

61738345314



A0024

OUR REF: Evan Sarinas:M11:4069501

YOUR REF:

REPLY TO: Brisbane

3 August 2000

Dr PG Lennox
Headmaster
Brisbane Grammar School
Gregory Terrace
BRISBANE QLD 4000

Dear Dr Lennox

As you are aware we have received instructions from a number of former students of the school claiming sexual abuse and abuse of a general nature perpetrated by Kevin Lynch.

We put you on notice that we are in the process of formulating a claim for compensation for these students and will in due course issue proceedings.

We believe the school holds or has access to a multitude of records relevant to the claims made by the students.

Such records will include but are not limited to:

1. all records relevant to Kevin Lynch including personnel records, resume details, application for employment forms, interview notes, period of employment details, diaries, job description documents and roll books;
2. complaints register for the period Kevin Lynch was employed at the school;
3. documents concerning any investigation into complaints against Kevin Lynch;
4. all student records for the period that Kevin Lynch was employed at the school;
5. all staff records for the period Kevin Lynch was employed at the school;
6. the register of enrolled students for the period Kevin Lynch was employed at the school;
7. all records relevant to counselling appointments as between Kevin Lynch and students at the school.

BRISBANE

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Steps should be taken by the school to ensure that such documents are located and appropriate measures put in place to ensure their security.

Please advise what steps are being taken in that regard.
We will require inspection of the documents and invite you to contact the writer so that appropriate arrangements can be made to inspect same.

Finally, we refer to our "without prejudice" letter dated 29 June 2000 noting that we have not been favoured with a reply from you.

Does the school intend responding so that the appropriate arrangements can be made to have the students counselled?

Yours faithfully

SHINE ROCHE McGOWAN

