

L A W Y E R S

22 May 2001

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Our reference

DJA/JPC/BRIS2923-7545873

Your reference

M2.4069502

WITHOUT PREJUDICE

Dear Sirs

BRISBANE GRAMMAR SCHOOL ats FORMER STUDENTS

Thank you for your letter of 11 May 2001.

In addition to any moral, social and/or legal responsibilities which the School may owe to former students, it has moral, social and legal obligations to all current stakeholders in the School which includes current and future students.

Commensurate with those obligations, it is incumbent upon the School to consider the legal merit of any claim against it when considering what action should be taken in response to that claim. For the Board to approach these claims in any other fashion would amount to an improper use of the Board's powers.

Our client has taken the allegations against Lynch seriously and has set up counselling for any former student who wishes to deal with any resulting issues. That counselling is confidential and independent of the School. Counselling decisions rest not with the School but with the independent psychiatrist, so that it cannot be suggested that the School plays any role in determining eligibility for counselling or the extent of treatment given.

The School's decision to fund this counselling process reflects its appreciation of its moral and social responsibilities.

Our client does not seek to avoid its legal responsibility, but rather to ascertain sufficient information on which to assess that responsibility. In particular, the position of each of your clients on the limitation issue is critical to an assessment of the merits of those claims. Without the information requested, we simply cannot do that.

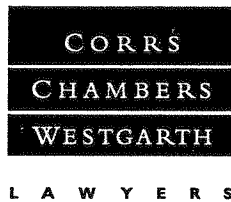


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BRISBANE GRAMMAR SCHOOL ats **FORMER STUDENTS**

We are currently engaged in discussions with the School's various insurers. We expect to have some clearer direction in that regard within the next two weeks. Once those discussions are concluded, we will revert to you.

Yours faithfully

CORR'S CHAMBERS WESTGARTH

David Abernethy

Partner

