

L A W Y E R S

1 May 2001

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Our reference

DJA/BRIS2923-7545873

Your reference

M11/4069501

WITHOUT PREJUDICE

Dear Sirs

BRISBANE GRAMMAR SCHOOL - CLAIMS BY FORMER STUDENTS

Thank you for your letter of 18 April enclosing the Submission.

We understand from the Saturday Courier Mail report that proceedings have now been issued on behalf of each of your clients and we understand why it may have been necessary for you to take that step.

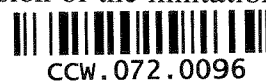
We assume that the issue of proceedings does not bring the dialogue which we have commenced to an end.

The quantum and nature of the claims you have foreshadowed necessarily means it is impossible for our clients to take the matters further on the basis of the information which has been provided to date.

You will appreciate the claims arise over a period of time during which there were a number of different insurance underwriters to the School. Without details identifying the claimants and the years during which such claimants allege incidents took place we are not able to properly notify relevant insurers. The relevant insurance policies are occurrence based rather than claims made.

At a more basic level, without the claimants being identified, we are not even in a position to confirm that the claimants were, in fact, students at the School.

Further, your general submission with respect to the limitation period issue is insufficient to allow any reasonable assessment to be made as to whether or not your clients are likely to be successful in obtaining an extension of the limitation

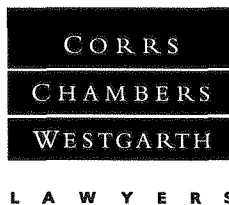


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period. That is an issue which is critical to assessing the prospects of each claim. We do not think that this issue can be dealt with in a global sense or in three separate categories because we expect each claimant's circumstances will be different. As identified in your submission the various claimants' reactions to the alleged abuse vary widely, as will their conduct since the alleged abuse.

If you are in a position to provide the further information to us in relation to identity of claimants, periods of claims and the types of allegations in each case together with information in respect of each case on the limitation period issue we will consider the matter further.

Yours faithfully

CORRS CHAMBERS WESTGARTH

David Abernethy
Partner

