

DEPARTMENT: Mass Claims Law  
 DEPT MANAGER: Evan Sarinas  
 CONTACT: Bruce Brown  
 OUR REF: Bruce Brown:M11:4069501  
 YOUR REF: DJA/JPC/29233-7545873  
 REPLY TO: Brisbane



U0086

BRISBANE  
 'Quay Central'  
 Level 2, 95 North Quay  
 PO Box 12011  
 Elizabeth Street Qld 4002  
 DX 928 Quay Central  
 Tel: (07) 3006 6000  
 Fax: (07) 3229 1999

13 March 2001

**Attention: David Abernethy**  
 Corrs Chambers Westgarth  
 Lawyers  
 DX 135  
 BRISBANE

**SHINE  
 ROCHE  
 McGOWAN**  
 SOLICITORS



Your Voice

"WITHOUT PREJUDICE"

Dear Colleagues

**OUR CLIENT: EX STUDENTS OF THE BRISBANE GRAMMAR  
 SCHOOL**

**YOUR CLIENT: BRISBANE GRAMMAR SCHOOL**

TOOWOOMBA  
 'Kensington'  
 126 Russell Street  
 PO Box 668  
 Toowoomba Qld 4350  
 DX 41077  
 Tel: (07) 4699 4699  
 Fax: (07) 4638 5481

We refer to previous correspondence in this matter.

We act for 35 ex students of the Brisbane Grammar School, in relation to injuries suffered while they were students at the Brisbane Grammar School between 1977 and 1990.

These injuries sustained by the claimants are a result of sexual abuse perpetrated by Kevin John Lynch who was a counsellor employed at the Brisbane Grammar School between 1977 and 1987 inclusive. We advise that we are now in a position to issue proceedings to protect our clients interests at common law and in equity.

GOLD COAST - NORTH  
 'Excalibur House'  
 Level 4, 52 Davenport Street  
 PO Box 217  
 Southport BC Qld 4215  
 DX 41552 Southport  
 Tel: (07) 5558 5558  
 Fax: (07) 5558 5559

Prior to issuing these proceedings, we invite you to consider early settlement of this matter. We feel that it would be in the best interests of all parties concerned to attempt resolution through settlement, rather than through more time consuming, costly and public litigation.

GOLD COAST - SOUTH  
 'Professional Centre'  
 First Floor  
 1150 Gold Coast Highway  
 Palm Beach Qld 4221  
 Tel: 13 11 99  
 Fax: (07) 3229 1999

Our firm, in the past, has acted for ex Wards of the State in relation to abuse suffered while they were resident at various institutions throughout Queensland. A number of these institutions have been the subject of much publicity. These claims were able to be resolved in an expedient and commercially sensible way for all parties involved. We believe this claim is capable of similar expeditious resolution.

SUNSHINE COAST  
 'Central Coast Serviced Offices'  
 First Floor, Suite 9  
 Cnr First Avenue & Memorial Avenue  
 Maroochydore Qld 4558  
 Tel: 13 11 99  
 Fax: (07) 3229 1999

Please advise us with seven days as to whether you are prepared to enter into negotiations with a view to resolving this matter. If you are amenable to such a resolution, we would be happy to forward to you a model of settlement as a means of resolving these claims.

Alternatively, we will arrange for the filing of the Claims and Statements of Claim and commence litigation.

We look forward to hearing from you.

Email: law@shine.com.au  
 Website: www.shine.com.au

Yours faithfully

**SHINE ROCHE McGOWAN**



CCW.072.0338