

American Home Assurance Company
 ABN 67 007 483 267
 Incorporated with Limited Liability in the USA
 A Member of American International Group, Inc.



January 22, 2001

Corrs Chambers Westgarth
 GPO Box 9925
BRISBANE QLD 4001



Attention: Julie Cameron

Dear Julie

re: **BRISBANE GRAMMAR SCHOOL** – BQA & ORS.
OUR REFERENCE – 8000181360

I refer to the above matter and our telephone conversation of 15 January 2000.

As advised, our archived computer records indicate that we had a General Products & Public Liability policy wording for the period 1 September 1981 to 1 September 1982. Unfortunately, our computer archives do not go back any further and I am unable to tell whether or not there are earlier policies in existence. I do however also have a copy of a letter provided by Aon dated 29 October 1979, by which we are asked to quote for the Brisbane Girls Grammar School for limits of \$2 and \$5M. respectively. There is reference in paragraph 2 that the “the ammendments which have been agreed to your standard Policy wording in respect of the exercise carried out for the Brisbane Boys Grammar school, would also be incorporated into this cover.” I am not convinced that this is concrete evidence that cover was in place, although investigations in this regard are still continuing.

In the interim, I note your advices that you are waiting to see insurers reactions prior to progressing the matter. As we are unable to confirm indemnity at this stage, I ask that the insured act as a prudent uninsured. I would assume that the third party (based on the common state of knowledge) would have problems in extending the limitation period, and indeed, in proving liability. Accordingly, I would not have any objection to the insured inviting the third party’s comments on these issues, and perhaps inviting their expectations of settlement.

I know in the statement of Howell that he makes mention of REDACTED and BQP BQP I note your advices that they too may have been allegedly assaulted in the period we are talking about. Can you please provide me further information on these two matters?

Further, can you please provide me with any other documentation evidencing what other children may have allegedly been assaulted, and particularly those which may have been assaulted during our period. I note your advice that a number of people called in after the newspaper article alleging that they had been assaulted. Please provide me with details of all these complaints.



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Can you please also confirm how many people availed themselves of the counselling? If the insured is aware of their names, please provide these to me. In addition, please advise if we are aware of what dates we are concerned with for these students.

In the newspaper article previously provided to us, there was reference to a statement made by Allan Bromiley which may have been of some concern. Have you obtained a statement from this person? Do we know anything more about the other teacher referred to in the article? If so, again have we obtained a statement from him or her.

I thank you for your assistance. Of course, if I can be of any help, please feel free to contact me.

I ask that you keep me advised of all developments.

Yours sincerely

GEORGE KARALIS
MELBOURNE
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GK:LR jan15u

cc Ken Winks, Consultant, AON Corporate Risk Services, GPO Box 65 QLD 4001



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