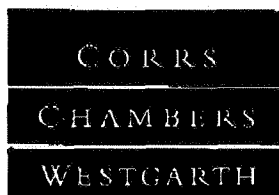


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CORRS CHAMBERS WESTGATE

NO. 0347 P. 6



L A W Y E R S



A0059

9 April 2002

**BY FACSIMILE NO: 3229 1999**

Shine Roche McGowan  
Solicitors  
DX 1057  
NORTHPOINT

**Partner**  
Julie Cameron (07) 3228 9461  
Email: Julie\_Cameron@corrs.com.au

**Our reference**  
JPC/BRIS2923-7545873

**Your reference**  
rs:m11:4078301

Dear Sirs

**BRISBANE GRAMMAR SCHOOL - PROPOSED MEDIATION**

Attached is a copy of the mediation agreement proposed by you, incorporating the changes required by our client.

Your covering facsimile of 5 April stated that you "will expect there to be a settlement of "all" claims at mediation ("all or none"). For the reasons discussed in conference with Mr Hanger, our client will not agree to any such term, which we note is not a term of the mediation agreement in any event.

We understood Mr Hanger's position is that he will not mediate on that basis.

We appreciate that your clients are entitled to reach such an agreement as between themselves without our client being a party to the agreement. However, our client is entitled to know if such an agreement is struck since our client is offering to bear the cost of the mediations, and will not do so if that is the basis on which the mediations are proceeding.

If you do not provide written confirmation that this condition on settlement is withdrawn, our client will not mediate the claims in a bulk group. The claims can simply proceed in the normal litigation framework, including an inevitable requirement for mediation in each matter on a case by case basis as each reaches the appropriate stage.

Also, in light of the media ban, confidentiality and other issues in the agreement, performance of which rests with the parties individually as well as with their representatives, we believe each of the plaintiffs should sign a copy of the

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GPO BOX 9025 QLD 4001  
TELEPHONE (07) 3228 9333 INT +617 3228 9333 FAX (07) 3228 9444  
DX 133 BRISBANE

SYDNEY MELBOURNE BRISBANE PERTH CANBERRA GOLD COAST  
OUR LIABILITY IS LIMITED BY THE SOLICITORS SCHEME, APPROVED UNDER THE PROFESSIONAL STANDARDS ACT 1994 (NSW)  
THIS LIMITATION OF LIABILITY APPLIES TO CLAIMS THE PROPER LAW OF WHICH IS THE LAW OF NEW SOUTH WALES.  
B/S4486/1

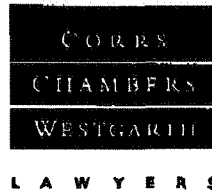


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Shine Roche McGowan

**BRISBANE GRAMMAR SCHOOL - PROPOSED MEDIATION**

agreement. If you require it, a representative of the defendant would also sign the agreement.

Yours faithfully

**CORRS CHAMBERS WESTGARTH**

**Julie Cameron**  
Partner