

CORRS

CHAMBERS

WESTGARTH

L A W Y E R S



H0042

19 March 2002

**BY FACSIMILE NO: 3229 1999**

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**Partner**

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**Our reference**

DJA/2923-7545873

**Your reference**

BDB/M11/4078901

**ATTENTION:** Mr Simon Morrison/Mr Roger  
Singh

**WITHOUT PREJUDICE**

Dear Sirs

**BRISBANE GRAMMAR SCHOOL - VARIOUS CLAIMS**

We refer to our meeting with Mr Singh yesterday when we confirmed that our clients are interested in setting up an ADR process to resolve all of these claims in which you are acting including the two claims of REDAC and REDAC which have been served and pursued.

Our proposal is that we appoint a mediator, provide some preliminary material to the mediator, and then convene an early meeting with the mediator to settle a framework to resolve all claims. In our view the framework should be flexible such that the claims could be resolved on a total pool basis, in groups/categories where appropriate or individually.

Within the framework there would need to be some agreement on such things as:

- The flow of information between the parties;
- Whether there should be a jointly appointed independent medical expert;
- Timeframes for completion of various steps;
- The funding of the mediation process.

In our meeting we put forward Mr Ian Hanger QC as the mediator and would welcome your views.



CCW.070.0517

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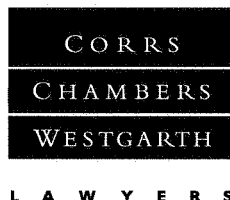
DX 135 BRISBANE

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.

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**BRISBANE GRAMMAR SCHOOL - VARIOUS CLAIMS**

You raised with us a possible concern in respect of unnecessary delays. Part of our client's motivation for suggesting mediation is to resolve these claims more quickly than would be the case through the Court process and to save costs. As far as we are aware there is no impediment to this proposal being implemented immediately.

Yours faithfully

**CORRS CHAMBERS WESTGARTH**

**David Abernethy**

Partner

