

L A W Y E R S

25 July 2002

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AON Risk Management

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**PRIVATE & CONFIDENTIAL**

Dear David

**BRISBANE GRAMMAR SCHOOL - PUBLIC LIABILITY INSURANCE**

Thank you for returning my telephone call this afternoon.

I confirm that we act for Brisbane Grammar School in relation to a number of claims which arose between 1975 and 1988. There are 64 claims in total and three weeks have been set aside in October in an endeavour to mediate a resolution of all of the claims.

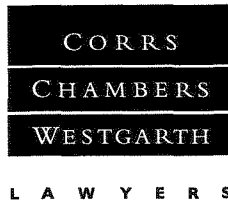
We have had considerable difficulty in putting together details of relevant underwriters throughout the period together with the amount of cover in each year. AON and its predecessor corporations have been the sole brokers to Brisbane Grammar School since at least the early 1970s.

Originally, when these claims started arising in 2000/2001 Ken Winks of your Brisbane office did alot of work endeavouring to locate relevant documents. I am currently dealing with Rick Edwards. I have also spoke to Ross Nuttall and Lyle Ackworth. As a result of the various enquiries and discussions we have been able to produce a schedule in relation to the various insurers for the period 1 September 1977 to 1 September 1988. I **attach** a copy of that schedule. While the solicitors for the various insurers involved have not yet formally confirmed indemnity I am reasonably confident that the insurers identified for the period 1 September 1978 to 1 September 1988 will accept that they are on cover for the periods identified. The concern is for the periods prior to 1 September 1978. Ken Winks thought that The Insurance Company of North America was also on risk during the 1977/78 year but we have absolutely no documents in support of that. We also need details for the 1975, 1976 and 1977 years.

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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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AON Risk Management

**BRISBANE GRAMMAR SCHOOL - PUBLIC LIABILITY INSURANCE**

The earliest dated document which we have in relation to the insurance cover for Brisbane Grammar School is a letter dated 15 May 1979 signed by yourself. I also **attach** a copy of that letter.

At this stage it appears that we have exhausted all avenues of investigation in the archives of both the School and AON.

I would welcome any comments you have as to who may have been the insurers on risk for the School's public liability insurance for the three year period prior to 1 September 1978.

I look forward to hearing from you.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'David Abernethy'.

**David Abernethy**  
Partner

**encl**