

STATEMENT OF LYLE ACWORTH

of **REDACTED** Brisbane, Queensland state as follows:

- 1 I am an insurance broker employed by Sawtell and Salisbury Pty Ltd.
- 2 From October 1974 to March 1982 I was employed by Reed Stenhouse Queensland. From the late 1970s until I finished with Reed Stenhouse I was involved as insurance broker to a number of educational institutions including Brisbane Boys Grammar School and Brisbane Girls Grammar School. I can also recollect being involved as broker to Ipswich Grammar School and Ipswich Girls Grammar School.
- 3 I do not have any independent recollection of who was the liability insurer for Brisbane Grammar School during any particular year when I was involved. Prior to looking at any of the relevant documents my recollection was that American International Underwriters were certainly involved in some years. During the late 1970s and early 1980s a more comprehensive liability product was introduced into the market by two United States based insurers, Insurance Company of North America and American International Underwriters, in the form of a broadform and umbrella liability policies. Those policies were offered to customers of Reed Stenhouse.
- 4 I have seen the Schedule of Insurers prepared by Corrs Chambers Westgarth and the documents referred to in the "Comments" column of that Schedule. Leaving aside the 1977/1978 and 1980/1981 years, where no directly relevant documents are available, the documents referred to in the comments column in my view support the conclusion reached as to the identity of the insurer and the amount of cover in place in the various other years referred to in the Schedule.
- 5 In respect of the 1980/1981 years as American International Underwriters were the insurers in the 1979/1980 and 1981/1982 years it is likely that they would have been the insurers in the 1980/1981 year.

DATED the day of June 2002.

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