

STATEMENT OF ROSS NUTTALL of **REDACTED** Brisbane, Queensland state as follows:

- 1 I am General Manager of AON Risk Services.
- 2 I have been employed by AON and its predecessors since 1971 when I commenced employment with Stenhouse Queensland Limited.
- 3 I was responsible for the Brisbane Grammar School account from about 1977 until about late 1980 or possibly early 1981. During my period of being responsible for placing insurance on behalf of Brisbane Grammar School I generally dealt with the School bursar, Mr Jim Brittane. Lyle Ackworth took over responsibility for the account from me.
- 4 My recollection is that we also acquired the Brisbane Girls Grammar School account in or about 1979. Brisbane Grammar School and Brisbane Girls Grammar School were the only two School accounts for which I was responsible.
- 5 I have no independent recollection of who were the insurers for the particular years when I was responsible for the Brisbane Grammar School account. However, I do recollect that the two insurers involved were Insurance Company of North American and American International Underwriters.
- 6 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.
- 7 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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