

Our reference
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Date 1 June 2006
Pages 1 (including this page)

To David Begg & Associates
Tel (02) 9232 5377
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Your ref ELL:114/04

From John Dalzell
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Our ref PRM/JD/CATH4300-9006837

Sydney
Melbourne
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Perth
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Gold Coast

Dear Sirs

John Andrew Ells v His Eminence Cardinal George Pell & Others

We refer to the above matter and to your facsimile dated 5 May 2006.

We have instructed Alyson Ashe, the legal costs consultant, to assess Cardinal Pell's costs of your client's Notice of Motion to extend the limitation period. It has been extremely difficult to furnish Ms Ashe with the documents she requires, principally because of the recent court appearances and correspondence caused by your client's attitude to the recent Notice to Admit Facts. We have now sent some of the necessary documentation to Ms Ashe and will forward your client an estimate of these costs as soon as we are in possession of Ms Ashe's report. As previously highlighted, we anticipate that these costs will be significant and indeed we expect that these costs will be in excess of \$100,000.

Our clients reject the proposition set out in the second paragraph of your facsimile dated 5 May 2006 and deny that there is any relationship whatsoever between the assessment of Cardinal Pell's costs and your client's cross-appeal.

Yours faithfully
Corrs Chambers Westgarth



John Dalzell
Senior Associate