John Dalzell ext-6160

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cc: "Michael Casey" <mcasey@ado.syd.catholic.org.au>, Annie Phillips/Sydney/CORRS/AU, Paul McCann/Sydney/CORRS/AU

Subject: Ellis - Private and Confidential

Dear Fr John

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Also (and sorry to ask) we want to put on a short affidavit in the matter of Ellis. The latest evidence that has been put on in this matter is from someone called SA SA says that he too was abused by Duggan and that he complained to Fr Mick McGloin. At the material time, Fr McGloin was the Dean of St Mary's Cathedral. We want to put on evidence to show:

- 1. McGloin was not a Trustee, nor was he a servant or agent of the Trustees;
- 2. McGloin had no legal relationship with the then Archbishop;
- 3. McGloin had no ecclesiastical relationship with the Archbishop or the Archdiocese;
- 4. McGloin was not an employed priest (ie there was no contract of employment between the Archdiocese and McGloin); and
- 5. At the time of the alleged complaint (1983), McGloin was not acting as an agent or servant of the Archbishop or the Archdiocese.

Sorry to ask this of you, but with the reluctance of Mgr Rayner to testify, we are in a difficult position.

Annie Phillips will arrange a time that is convenient to you to come to the Polding Centre to talk to you.

Finally, I will call you this afternoon to ask you one or two other questions that I have been asked to identify in the Ellis matter before Friday.

Thank you for your help

Kind regards

John Dalzell