

Our reference
PRM/JD/CATH4300-9006837

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**CORRS
CHAMBERS
WESTGARTH**
lawyers

18 December 2007

By fax: 9232 5388

FAXED
18-12-07

Sydney
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David Begg
David Begg & Associates
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Contact
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Partner
Paul McCann

Dear Sirs

**Ellis v The Trustees of the Roman Catholic Church for the
Archdiocese of Sydney
HCA No. S325 of 2007**

This matter is now concluded and there only remains the outstanding issue of the orders for costs which have been made in favour of Cardinal Pell and the Trustees of the Roman Catholic Church for the Archdiocese of Sydney (**Trustees**).

Cardinal Pell's costs at first instance have been assessed by Alyson Ashe and Associates, however, our clients have not yet had the total party/party costs for the Cardinal and the Trustees assessed.

The solicitor/client costs for Cardinal Pell and the Trustees, including GST and disbursements, currently amount to \$755,940. Based on an estimated recovery of 70% for party/party costs, we anticipate that our client will recover in excess of \$500,000.00.

Before our clients incur further costs by commencing the process of formal assessment and enforcement, we are instructed to invite your client to make an offer to settle the costs orders. By settling the issue of costs in this manner, it is hoped that we can obviate the need for a formal assessment and further hearings in this matter.

In the event that your client claims that his financial position is such that he is unable to meet his costs obligations we invite him to set out details of his:

- (a) assets and liabilities;
- (b) annual income and expenditure; and
- (c) directorships and/or shareholdings of private companies.

We would further request that your client provides documentary proof supporting his financial position. We note that your client is now employed by your firm.

If your client does not accept our clients' invitation to settle this matter by 5pm on **Friday 18 January 2007**, we have instructions to commence to have the costs formally assessed and to issue an examination notice to UCPR rule 38.1.

18 December 2007

David Begg & Associates

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We look forward to your response.

Yours faithfully

Corrs Chambers Westgarth

A handwritten signature in black ink, appearing to read 'John Dalzell', with a stylized flourish at the end.

John Dalzell
Senior Associate