

RULE 29.02(2)

FORM 29A

IN THE COUNTY COURT
OF VICTORIA
AT MELBOURNE
DAMAGES & COMPENSATION LIST
GENERAL DIVISION

No: CI-11-03121

BETWEEN
BIW

Plaintiff

and

First Defendant

GEELONG GRAMMAR SCHOOL

and

PHILIP TRUTMAN

Second Defendant

**NOTICE FOR DISCOVERY
(PURSUANT TO THE INITIAL ORDERS FILED 17 JULY 2012)**

Date of document: 24 July 2012

Filed on behalf of the Plaintiff

Prepared by:

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To: The First Defendant

You are required to give discovery of documents pursuant to the attached Schedule within 42 days after service of this notice on you.

Dated: 24 July 2012

ROBINSON GILL

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Robinson Gill
Solicitors for the Plaintiff

SCHEDULE

1. All documents in relation to the Plaintiff's enrolment for schooling and/or boarding with the First Defendant.
2. All documents in relation to the First Defendant's employment of the Second Defendant including terms and conditions, together with assessments of suitability for the position.
3. All documents in relation to the Plaintiff's complaint to the First Defendant of the sexual assaults referred to in paragraph 4 of the Statement of Claim.
4. All documents in relation to any prior or subsequent complaint by students and/or boarders of the First Defendant in relation to sexual misconduct by an adult whilst in their care.
5. All documents in relation to any internal, criminal, or civil investigations for allegations of sexual or other misconduct by an adult whilst in the First Defendant's care.
6. All documents in relation to the rules and/or guidelines for the supervision and care of students and/or boarders of the First Defendant.
7. All documents in relation to the Plaintiff being expelled from the First Defendant.
8. All documents in relation to the supervision of the Second Defendant by the First Defendant.