

Keogh & Co

BARRISTERS & SOLICITORS

1 COLLINS STREET
MELBOURNE VIC 3000
AUSTRALIA

TEL: (0131) 9650 1760
FAX: (0131) 9650 1751

RECEIVED

10 JUL 1997

SGS ADMINISTRATION

cc LWH

The Business Manager,
Geelong Grammar School,
GEELONG 3220.

7th July, 1997.

Dear Sir,

Re: BKK

We act for BKK, who instructs us that he was a boarding student at your Glamorgan campus at Toorak between the years of 1970 and 1975, and at Geelong during 1976 and 1977.

During his time at Glamorgan we are instructed that our client (among others) was repeatedly sexually abused by one REDACTED who was employed by you as a REDACTED teacher.

It is clear that you bear a very strict onus to ensure that staff employed to teach and supervise children are worthy of their position of power and trust, and further that adequate supervision, and systems for the prevention and early detection of offences, should be in place.

It is clear from our instructions that none of these obligations was met satisfactorily, or at all.

As a result of the trauma caused by his years of abuse, our client has suffered enormously, both psychologically and financially. His economic loss, caused by inability to undertake studies because of severe psychological disturbance, is calculated at approximately \$550,000 to date. In addition, he is now undergoing treatment, and will continue to do so, and is entitled to recover the cost thereof from you, together with damages.

In view of the trauma which litigation will cause to both parties, our client has instructed us to seek a meeting with you in an endeavour to reach a settlement with you by conciliation. The meeting can be in the presence of lawyers for the parties, or simply between the parties. It is suggested that to encourage an open exchange it could be agreed to be a totally confidential and "without prejudice" discussion. We will make our meeting room available, and we seek your advices as to appointing a suitable time, and as to your preferred format.



we seek your response within seven days, failing which we will
draw an application to the supreme court of victoria for leave
to proceed. That would involve very substantial costs, and would
bring the matter into the public arena, both of which are to be
avoided if at all possible in the interests of both parties.

Yours faithfully,

Keogh & Co.

KEOGH & CO.,
(Ref.:JMK:MJK)