

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

2000/06167

BETWEEN:

EMMA HAYES

Plaintiff

- and -

KENNETH JOHN SANDILANDS & ORS
(according to Schedule attached)

Defendant

SECOND DEFENDANT'S DEFENCE

Date of document: 4 December 2000
Filed on behalf of: Secondnamed Defendant

Prepared by:
Herbert Geer & Rundle
Lawyers
385 Bourke Street
MELBOURNE 3000

Solicitors Code: 174
DX 428 MELBOURNE
Tel No: 9641 8765
Ref: JXW:1056780 (John Wycherley)

As to the endorsements standing as the Statement of Claim of the Plaintiff, the Second Defendant says:

1. It does not admit the allegations contained in paragraph 1 thereof.
2. It admits the allegations contained in paragraph 2 thereof.
3. In respect of the allegations contained in paragraph 3 thereof, it admits that the First Defendant was employed by the Second Defendant as a teacher at the school. Otherwise it does not admit the allegations contained in paragraph 3 thereof.
4. It does not plead to the allegations contained in paragraph 4 thereof as they do not relate to the Second Defendant.
5. It does not plead to the allegations contained in paragraph 5 thereof as they do not relate to the Second Defendant.
6. It does not plead to the allegations contained in paragraph 6 thereof as they do not relate to the Second Defendant.
7. It admits the allegations contained in paragraph 7 (a) thereof.
It does not admit the allegations contained in paragraphs 7 (b) and 7 (c) thereof.

8. It does not admit the allegations contained in paragraph 8 thereof.
9. It denies the allegations contained in paragraph 9 thereof.
10. It admits the allegations contained in paragraph 10 thereof.
11. It does not plead to the allegations contained in paragraph 11 thereof as they do not relate to the Second Defendant.
12. It does not plead to the allegations contained in paragraph 12 thereof as they do not relate to the Second Defendant.
13. It does not plead to the allegations contained in paragraph 13 thereof as they do not relate to the Second Defendant.
14. It does not plead to the allegations contained in paragraph 14 thereof as they do not relate to the Second Defendant.
15. It does not plead to the allegations contained in paragraph 15 thereof as they do not relate to the Second Defendant.
16. In respect of the allegations contained in paragraph paragraph 16 thereof, it admits that the Third Defendant and Fourth Defendant were employed by the Second Defendant. Otherwise it does not admit the allegations contained in paragraph 16 thereof.
17. It admits the allegations contained in paragraph 17 thereof.
18. It does not plead to the allegations contained in paragraph 18 thereof as they do not relate to the Second Defendant.
19. It does not plead to the allegations contained in paragraph 19 thereof as they do not relate to the Second Defendant.
20. It does not plead to the allegations contained in paragraph 20 thereof as they do not relate to the Second Defendant.
21. It does not plead to the allegations contained in paragraph 21 thereof as they do not relate to the Second Defendant.
22. It does not plead to the allegations contained in paragraph 22 thereof as they do not relate to the Second Defendant.

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23. In respect of the allegations contained in paragraph 23 thereof, it admits that Tim Brown and Neil Rookes were employed by the Second Defendant. Otherwise it does not admit the allegations contained in paragraph 23 thereof.
24. It does not admit the allegations contained in paragraph 24 thereof.
25. Insofar as the allegations contained in paragraph 25 thereof relate to the Second Defendant, it does not admit the allegations contained therein. Otherwise it does not plead to the allegations contained in paragraph 25 thereof.
26. It does not admit the allegations contained in paragraph 26 thereof.

DATED the 4th day of December 2000

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HERBERT GEER & RUNDLE

This Defence is delivered by Herbert Geer & Rundle of 385 Bourke Street Melbourne Solicitors for the Second Defendant.

04-DEC-2000 13:06 FROM HERBERT GEER & RUNDLE TO 94676599#572 P.09/09

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SCHEDULE OF PARTIES

EMMA HAYES

Plaintiff

- and -

KENNETH JOHN SANDILANDS

Firstnamed Defendant

- and -

NORTHSIDE CHRISTIAN CENTRE INC.

Secondnamed Defendant

- and -

DENIS VERNON SMITH

Thirnamed Defendant

- and -

ANN ROSEMARY BROWN

Fourthnamed Defendant