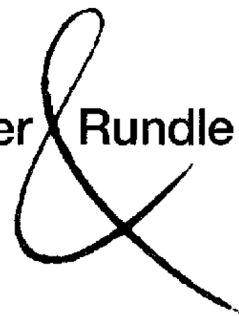


Your Ref:
 Our Ref: JXW:1049542
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Herbert | Geer & Rundle Lawyers



24 August 2001

BY FACSIMILE TRANSMISSION: 9898 0333

Moore's Legal
 DX 12808
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CONFIRMATION
 OF FAX

Attention: Tim Adams

Dear Sir

Northside Christian Centre Inc. and Kenneth John Sandilands ats AGH

We refer to our recent telephone conversation.

So far as is relevant for these claims, EIG Ansvar was on risk through the early 1980's to 31 August 1987. AGH, AGD and AGE complain of transgressions by Sandilands in this period. We should add that there are no proceedings at this point in relation to AGE

In respect of Hayes and AGL, they complain of transgressions occurring in 1986, 1987 and 1988.

In respect of AGN, the relevant period is 1987, 1988 and 1989.

AGC falls outside the relevant period.

Consequently, the burden of Hayes, AGL and AGN needs to be shared by EIG Ansvar and Northside in fair proportions. On the basis that there are 11 months in the school year between February and December, it follows that in the case of Hayes and AGL, there are 33 months which span the relevant period. By our calculation, EIG Ansvar was on risk for 18 of these with Northside responsible for the remainder, 15 months.

With regard to AGN, EIG Ansvar was on risk for 7 of 33 months.

These calculations are, we suggest, the most logical (simple) way of dealing with the split. We are yet to convert the fractions to percentages. We would be pleased to have your thoughts as soon as possible noting that matters will start to come to a head quite rapidly from now on.

Yours faithfully
 HERBERT, GEER & RUNDLE

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