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3rd December, 2009

Mr I V Knight
Crown Solicitor
DX 19 SYDNEY

Dear Evangelos,

Re: State of New South Wales ats. Kathleen Biles & Ors.

Att: Mr. Evangelos Manollaras

Thank you for your letter dated 30th November last.

Quite frankly, the information provided by way of particulars is inadequate. This is probably a reflection of the fact that the Plaintiffs' legal advisors have not really worked out for themselves the basis upon which the cause of action can be proven as against the Defendant on behalf of each of the Plaintiffs.

In fact, one is at a loss to determine precisely where one goes from this point onwards.

Perhaps at an appropriate time, we can discuss the answers provided by the Plaintiffs and agree on the appropriate course of action which should be taken in order to meet what is obviously a very deficient situation.

Yours faithfully,


Patrick Saidi

