

From: mcashion <mcashion@sixthfloor.com.au>
To: Jodie_Vella <jodie_vella@agd.nsw.gov.au>
Sent: Monday, 23/05/2011 09:19 AM
Subject: RE: Biles - Peter Maxwell's affidavit

CSO REFERENCE: 200801481 - D2011/242898

Jodie

Subject to cost being sensible (which appears likely), it seems as though it may be a worthwhile exercise.

Regards

Michael

From: Jodie_Vella@agd.nsw.gov.au [Jodie_Vella@agd.nsw.gov.au]
Sent: Friday, 20 May 2011 11:30 AM
To: mcashion@sixthfloor.com.au
Cc: Evangelos_Manollaras@agd.nsw.gov.au
Subject: Biles - Peter Maxwell's affidavit

Dear Mr Cashion,

Angelo asked me to direct a question from Peter Maxwell to you.

Peter Maxwell's investigations re the limitation motion are continuing and he would appreciate Counsel's view on whether he should be applying for the death certificates of the plaintiffs' parents and including them in any supplementary affidavit as to prejudice.

Peter Maxwell notes:

"Noting the allegations in the statement of claim, the contact that may have occurred between the plt parents and Bethcar i.e. visits speaking with the plt's/Gordons conversations lack of complaint, should we be applying for the parent death certificates. If so, I have a list of their names that could be applied for."

and further on this from Peter Maxwell,

"It would be expected that the parents would have some knowledge as to how the children came to be in the care of the Gordons. Additionally, they may have visited/spoken with the children/met them in town etc."

I will forward your advice on to Peter Maxwell.

Kind regards,
Jodie Vella
Paralegal
for Crown Solicitor

NSW Crown Solicitor's Office | Level 5, 60-70 Elizabeth Street, Sydney NSW 2000
GPO Box 25 SYDNEY 2001 | DX 19 SYDNEY | www.cso.nsw.gov.au
Email: jodie_vella@agd.nsw.gov.au | Tel: (02) 9224 5266 | Fax: (02) 9224 5122

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