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**Mr Michael Cashion SC  
6 Wentworth Chambers  
DX 398 SYDNEY**

cc: Mr Paul Arblaster  
9 Selborne Chambers  
DX 376 SYDNEY

**By facsimile (02) 9221-5604** *[delete options not required]*

Dear Mr Cashion

AIL

**& D B v State of NSW**

I refer to the directions hearing before her Honour Judge Truss on 9 June 2011.

As Senior Counsel will recall, her Honour directed the parties to confer with a view to agreeing on a practical and expeditious program for the resolution of the proceedings.

Would Senior Counsel please advise whether the defendant should be attempting to seek agreement on a program prior to the next directions on 5 August 2011. If so, does Senior Counsel have views on the way the proceedings should be conducted?

It may be that it will be necessary to refer an advice from Senior Counsel to the client for approval. However, I would suggest that we at least consult first with the plaintiffs' lawyers to see whether any common ground can be reached.

Yours faithfully

Evangelos G Manollaras  
Solicitor  
**for Crown Solicitor**