



# Crown Solicitor's Office

**My Ref:** 201302119

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11 August 2014

Mr Tony Giugni  
Counsel – Case Studies  
Royal Commission into Institutional Responses to Child Sexual Abuse  
GPO Box 5283  
SYDNEY NSW 2001

**By hand**

Dear Mr Giugni

**Representation of State of NSW re Child Sexual Abuse Royal Commission  
Re: Summonses S-NSW-262 and S-NSW-269**

I refer to the above summonses addressed respectively to the Secretary of the Ministry of Health, and to Adj. Associate Professor Vicki Taylor of the Northern Sydney Local Health District ("NSLHD"), returnable at 10:00am today. I advise you as follows.

S-NSW-262

Please find **enclosed** a USB containing the document produced under this summons. The documents have been allocated the documents identifiers commencing NSW.2009.

S-NSW-269

The documents produced in response to this summons are also contained on the **enclosed** USB, and have been allocated the document identifiers commencing NSW.2010.

I note that whilst not produced as a Ringtail/Relativity export, the documents have been allocated document identifiers in consultation with Ms Rebecca Grant, Chief Information Officer at the Royal Commission.

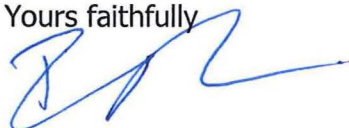
I also note that I am instructed that it is believed that given the time elapsed since the period in the summonses (1975-1985), some records would have been destroyed in accordance with government disposal guidelines issued by NSW State Records. Specifically I am instructed that the personnel records of John Rolleston, have been destroyed in accordance with such guidelines. I also note that any records held by the Healthcare Complaints Commission are not captured by either summons, as they are a separate entity from the Ministry of Health.

I confirm that the documents produced are produced under compulsion pursuant to s. 17 of the *Royal Commissions Act 1923*. The production of any document otherwise subject to legal

professional privilege is no intended to amount to a waiver of such privilege. I request that the Royal Commission notify me prior to any publication, or proposed disclosure to any third party, of any of the documents produced.

Please contact Ian Fraser of my Office on (02) 9224-5181 should you have any queries.

Yours faithfully



Ian Fraser  
A/Special Counsel  
**for Crown Solicitor**

Encl.