



PG: CBC:HS

Date:

To:

21 August 1996

Melbourne
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Confidential & Privileged

Mr Oliver Cosgrove

REDACTED

Dear Sir,

RE: Your claim against the Christian Brothers Order

We confirm your instructions to accept the Christian Brothers' offer and settle your claim.

Since speaking with you on the last occasion, we have had the opportunity to confer with other men who are part of this litigation who live in other states throughout Australia. A majority of these men have instructed us to accept the Christian Brothers offer, leading to group settlement of this litigation.

Enclosed herewith are copies of the following documents:-

1. Deed of Release signed by you accepting the Christian Brothers' offer;
2. Document titled "Instructions to Settle" - signed by you instructing Slater & Gordon to accept the offer on your behalf;
3. Charitable Trust Deed and Explanatory Memorandum - documents which outline the mechanisms of the Trust and how it is intended to work. (In order to protect the identity of other persons who are part of this litigation, we have deleted reference to names of individuals contained in Annexure "A" of the Charitable Trust Deed).

You are not required to sign any of these documents. This documentation is enclosed for your records only.

We will hand over this documentation to the Christian Brothers' lawyers on Wednesday 4 September 1996. If you have any problems or questions in relation to settlement of your claim, you should contact Hayden Stephens prior to 5.00pm Tuesday 3 September 1996.

Peter Gordon
 Stephen Planken
 Paul Henderson
 Nicholas Bryant-Browne
 Paul Mulvaney
 Tony Lang
 Jacinta Lurice
 Andrew Grech
 Robyn Wheeler

Litigation Outside Australia:

We confirm that nothing in the terms of settlement prevents you from commencing or continuing litigation outside Australia. For instance, you are not restricted from bringing an action against other parties not involved in this litigation, for example, those parties associated with the Child Migration Scheme, namely the British Government.

The Slater & Gordon
 National Legal Group

CONSULTANTS
 ASSOCIATES

Jonathan Birchfield Geoffrey Llewellyn Jones Jennifer Lush Irene Lawson Suzanne Sandford
 David Clarke Simon Weir Mark Walter Josh Bornstein Mark Carey Ross Sicilia John Tuck
 Bairie Woodlcock Kate Hawkins Amanda Roberts Paula Shelton Hayden Stephens

Hayden Stephens John Tuck

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Miscellaneous (photocopying, couriers, lettergrams, postage etc)	\$16,511.96
Perth administrative costs and agency fees:	\$190,307.91
<u>Total:</u>	<u>\$980,870.45</u>

The balance remaining, being \$519,129.55, will be received by Slater & Gordon as fees which go towards the cost of solicitors and support staff who have worked on this litigation for the past three years.

Should you have any queries in relation to these legal costs and expenses, please contact Hayden Stephens at our Melbourne office.

The Next Step in Your Case:

In approximately three weeks, we will write to you and inform you of how you can make application to the "W.A. Reconciliation Trust" for benefits that have previously been described to you under the terms of settlement.

The initial benefit that you shall receive under the Trust will be a payment of \$2000.00. We anticipate that this payment will be made to you prior to 30 September 1996.

Yours faithfully
SLATER & GORDON

Hayden Stephens

encls.

Hayden Stephens John Tuck