

Our ref: SJH:HM:526420  
Your ref:

2 November 2006

Mr Richard Campion

REDACTED

Dear Richard

**Church of England North Coast Childrens Home**

We write further to our letter dated 31 October 2006.

In that letter we advised you that if you wanted to try and settle these matters informally then we would need to make offers to the Church.

We would suggest proposing to the Church settlements possibly in the range of \$20,000.00 to \$100,000.00.

The lower end of the range of \$20,000.00 would be for those client's who have not suffered as badly as those at the \$100,000.00 end of the range (there may however be one or two exceptional cases that could, as an opening offer, exceed \$100,000.00).

This is not in any way to imply that the effect of the terrible traumas which clients at the \$20,000.00 end of the range suffered is not serious but rather it is simply that we have to categorise the claims if we are to offer a range of damages to the Church that would encourage them to settle.

Each assessment is not only based upon what we believe the Church in our experience would consider informally settling for but is also, in some part, based upon assessing the range of injuries sustained by the group of claimants and also the nature, duration and extent of the abuse each client was subjected to.

We would stress that the offers within the range are not based on what could or could not be obtained through formal Court proceedings but is simply a range of figures that we believe the Church could be persuaded to settle upon informally.

In situations where clients have indicated that they would continue with counselling and/or anti-depressant medication, we have added that consideration into the following estimate.

We would also state that we have estimated for 10 counselling sessions of \$200.00 per session, making a total of \$2,000.00. In addition, we have estimated anti-depressant medication at \$400.00 per year for the rest of your life. This is based upon the Australian Life

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Tables reduced by 30% for which is known as "vicissitudes of life" (or unforeseen eventualities that could shorten a person's life).

Again, you will appreciate that no medical advice has been provided in that regard and therefore these figures are based upon the indication that you have given that counselling and/or anti-depressant medication would be something that you may wish to commence/continue into the future.

The amounts would be as follows:

Initial Compensation offer for abuse suffered	\$95,000.00
Future counselling fees (as per Dr Curtis' report utilising the Australian Life Tables)	\$5,600.00
Future anti-depressant medication (as per Dr Curtis' report utilising the Australian Life Tables)	\$6,160.00
<b>Subtotal</b>	<b>\$106,760.00</b>
<b>Less</b>	
Health Insurance Commission repayment	\$332.55
Outlays i.e.	\$1,645.00
Our fees approximately	\$21,000.00
<b>Total</b>	<b><u>\$83,782.45</u></b>

This would be our opening offer to the Church. They may decide not to consider settling informally at all or may come back with revised figures in which case we shall of course contact you to also discuss.

We have yet to discuss with the Church lawyers what their position is in respect of any counselling fees that they may have already paid for you. (If applicable) at the present time we are proceeding on the basis that they will not be repaid and will be advising the Church that the offer which we set out above is on that basis.

We will be telephoning you in the course of the next several days to discuss matters.

Yours faithfully

NICOL ROBINSON HALLETTS

per:



**SIMON HARRISON**<sup>25</sup>

Partner

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\* *The Australian Life Tables are based upon a person's life expectancy, depending on what is known as their vicissitudes of life or what would otherwise be described as unforeseen eventualities that could shorten a person's life.*