

NICOL ROBINSON HALLETTS
LAWYERS
ESTABLISHED 1890

Our ref: SJH:CLK:526432
Your ref: PJR:REB: 06-0030

9 February 2006

Mr Peter Roland
Foott, Law & Co
PO Box 18
GRAFTON NSW 2460
BY FACSIMILE: 02 6642 5070

ORIGINAL BY POST

Dear Sirs

North Coast Childrens Home

We write further to your letter dated 24 January 2006.

(1) Alleged abusers

To date the alleged abusers identified are those set out under the appropriate heading in our letter dated 5 January 2006 (page 2 paragraph 4 "The alleged abusers"). We therefore repeat our request that your client provide the "details" requested, if those details are available to it.

(2) Office bearers

We will advise as to what office bearers our clients will allege are culpable in due course.

In the interim we invite you to provide a comprehensive list of those who have held office on the Homes' Management Committee for the period 1949 to 1975. No doubt those matters of record could be readily provided at this stage.

(3) Appropriate entity

With respect, we do not understand the point you make regarding the Dioceses "*not [being] a separate legal entity*". Please clarify and advise as, "*separate*" from what?

(4) "Time elapsed"

As we previously advised we are still in the course of assessing each clients' limitation position this may or may not also be a matter for Psychiatric Medical advice.

Whilst it may be a simple matter of semantics ,the phrases "*[time lapsed]*" and "*the basis upon which liability would be alleged*" are of course two separate considerations, if we are misreading your letter please advise.

- 2 -

Mr Peter Roland
Foott, Law & Co

9 February 2006

(5) Inquiries

We would also request confirmation as to what, if any inquiries have taken place by the Diocese (or others at the request/instigation of the Diocese) after the conviction of Allan Kitchingham in 2002.

Would you also confirm whether other inquiries or investigations have taken place previously in relation to alleged abuses at the Home.

(6) Procedural issues

The writer is of the opinion that a without prejudice telephone conference between our respective Firms in the course of the next 2 weeks may be beneficial to discuss procedural and other issues that present at this stage.

We would suggest that this informal conference could take place at 3pm on any of the following dates: 20, 21 or 24 February 2006.

Perhaps you could advise whether these dates are acceptable, or in the alternative we await your own proposals.

Yours faithfully
NICOL ROBINSON HALLETTS

pct:


SIMON HARRISON

Partner

Direct Line: REDACTED

Email: REDACTED