



**Royal Commission**  
into Institutional Responses  
to Child Sexual Abuse

4 September 2014

Mr Ian V. Knight  
Crown Solicitor  
NSW Crown Solicitor's Office  
Level 5, 60-70 Elizabeth Street  
SYDNEY NSW 2000

C/- Mr Ian Fraser  
A/Special Counsel  
NSW Crown Solicitor's Office  
Level 5, 60-70 Elizabeth Street  
SYDNEY NSW 2000

Dear Mr Knight

**Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission)**

The Royal Commission intends to hold a public hearing in Sydney commencing on 22 October 2014 in relation to institutional responses to child sexual abuse at Bethcar Children's Home in Brewarrina and subsequent civil litigation involving the alleged victims of the abuse and the state of New South Wales.

It is proposed that the scope and purpose of the public hearing will include, and focus primarily on, an exploration of the civil proceedings *Kathleen Monica Biles & 14 Ors v State of New South Wales* (proceeding No 2008/316976) in the District Court at Sydney (Bethcar civil litigation).

The Royal Commission requests that you prepare a statement addressing the matters set out in Annexure A.

The Royal Commission requires the statement by **26 September 2014** at which time the Royal Commission intends to require its production under summons. The Royal Commission may summon you to give evidence at the public hearing in respect of the statement produced to the Royal Commission.

Please do not hesitate to contact me if you would like to discuss any aspect of this matter.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tony Giugni', with a wavy line underneath.

Tony Giugni  
Solicitor Assisting  
Telephone: 02 8284 2431  
Email: [tony.giugni@childabuseroyalcommission.gov.au](mailto:tony.giugni@childabuseroyalcommission.gov.au)