

AIH and **ORS v STATE OF NEW SOUTH WALES**

SUBPOENA FOR PRODUCTION

TO THE NSW DEPARTMENT OF EDUCATION AND TRAINING
BREWARRINA CENTRAL SCHOOL

1. In relation to the people detailed in SCHEDULE 1 below:
 - (a) All school records including performance, behaviour and medical records.
 - (b) All records relating to concerns, complaints or investigations into health, safety and welfare.
 - (c) All records relating to communication with the Department of Community Services, the Department of Youth and Community Service, the Police and any other body in relation to matters of health, safety and welfare for the period prior to 1990.
 - (d) All records relating to communications with the Bethcar Children's Home at Brewarrina ("Bethcar") or foster care facilities at Anson Street, Orange ("Anson Street") in the State of New South Wales for the period prior to 1990.
 - (e) All records relating to communications with any person including Bert Gordon, Edith Gordon, Colin Gibson and **AIT** for the period prior to 1990.

SCHEDULE 1

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| (a) | AIH | DOB: | RE .1967 |
| (b) | AIE | DOB: | RED .1971 |

(c)	AIG [REDACTED]	(also known as REDA)	DOB: RE [REDACTED] 1973
(d)	All [REDACTED]	(also known as RED)	DOB: RE [REDACTED] 1967
(e)	Kathleen Biles		DOB: RE [REDACTED] 1971
(f)	Amy Denise Villaflor	(also known as REDA)	DOB: RED [REDACTED] 1969
(g)	Jodie Belinda Moore		DOB: RE [REDACTED] 1969
(h)	AIQ [REDACTED]		DOB: RE [REDACTED] 1972
(i)	AIL [REDACTED]		DOB: RE [REDACTED] 1970
(j)	AIS [REDACTED]		DOB: R [REDACTED] 1968
(k)	AIN [REDACTED]		DOB: R [REDACTED] 1960
(l)	Amelia Moore		DOB: RED [REDACTED] 1968
(m)	Douglas Bruce Biles		DOB: RE [REDACTED] 1973

2. Copies of all correspondence, notes, memoranda, drafts, files, statements, documents, writing and electronic, audio or visual records in relation to:

- (a) Communications with Bethcar, Anson Street, Bert Gordon, Edith Gordon, Colin Gibson and AIT [REDACTED] for the period prior to 1990.
- (b) Communication with the Department of Community Services, the Department of Youth and Community Services, the Police or any other body in relation to the operations of Bethcar or Anson Street in the period prior to 1990.
- (c) Communication with the Department of Community Services; the Department of Youth and Community Services, the Police or any other body in relation to Bert Gordon, Edith Gordon, Colin Gibson or AIT [REDACTED] in the period prior to 1990.