

66-12-08 16:47 FROM-

T-054 P001/001 F-070



WOMEN'S LEGAL SERVICES NSW

Indigenous Women's Program

22 December 2008

Your reference: 200802073
TS Richard Kelly

Mr Evangelos Manolagas
Solicitor
Crown Solicitor's Office
GPO Box 23
Sydney NSW 2001

Also by Facsimile: (02) 9221 5011 (1 page)

Dear Mr Manolagas

Kathleen Biles and Ors v State of New South Wales (Bethcar)
Proceedings No. 3199/08

We refer to the above matter and note that to date you have not filed a Defence. In order that we can isolate the issues and formulate a mutually acceptable approach for the further conduct of the proceedings we ask that you provide that Defence as soon as possible.

In any event, at this stage, having now had the opportunity to inspect the substantial amount of material which has been produced we ask that, for now, you advise:

- (a) Whether, in the circumstances, you intend to raise any limitation defence against the claim by the Plaintiffs.
- (b) Which of the allegations in the Statement of Claim are you prepared to admit at this point.

We note that this matter is listed for call-over on 23 February 2009 and we look forward to your response as soon as possible.

Yours faithfully,

WOMEN'S LEGAL SERVICES NSW
Natalie Neumann
Solicitor

Crown Solicitor NEW SOUTH WALES
23 DEC 2008
D2



Indigenous Women's Program PO Box 208 Lismore NSW 1525 Administration: (02) 9749 7700
Fax: (02) 9749 4631 Indigenous Women's Legal Contact Line: 1800 626 724
Website: www.womenslegalnsw.nsw.gov.au info@womenslegalnsw.nsw.gov.au
Women's Legal Resources Limited ACN: 002 347 499 ABN: 61 002 347 499