

**CROWN SOLICITOR'S OFFICE**

NEW SOUTH WALES

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2 October 2009 [This field is a date creation field. The date will change if you save the document as a new document.]

Ms Robyn Young
Legal Officer, Legal Services
Department of Community Services
Locked Mail Bag 21
ASHFIELD NSW 2131

By facsimile: (02) 9716-2988

Dear Ms Young

State of New South Wales ats AIL

Copies of the following are enclosed:

- 1) Letter from Women's Legal Services dated 23 September 2009;
- 2) Letter from Women's Legal Services dated 24 September 2009 enclosing an Affidavit by Dianne Hamey dated 23 September 2009; and
- 3) A copy of the letter I have sent to the plaintiff's solicitors in response to their correspondence.

These are self explanatory.

At present, Judge Knox has allowed the 15 claims to be consolidated. This puts the defendant at a significant disadvantage. At the time the decision was made, both Counsel and I recommended that the decision be appealed. The instructions I received, however, were not to appeal.

As you are aware, Mr Manollaras had a conference with Mr Saidi and Mr Arblaster on 30 September 2009 at which time you were telephoned in your office in relation to an aspect of the claim that arose in discussion.

It was not clear in those discussions whether I am instructed to defend the claim or attempt to resolve the claim. Could you please clarify this matter or let me know if further advice is required.

During the discussion, Counsel indicated that on preliminary investigation of the allegations suggests that at least some of the plaintiffs would appear to have very little, if any, prospects of successfully obtaining a verdict in their favour. In relation to some of the other plaintiffs, further investigation may clarify that aspect.

The plaintiffs are refusing to provide particulars of their claim on the basis of his Honour's decision. The motion which was originally listed for consideration by Judge Knox in February this year is now listed for hearing on 16 October 2009, seeking orders that the particulars be provided and should the plaintiff's fail to do so, the proceedings be dismissed.

Yours faithfully

Evangelos G Manollaras
Solicitor
for Crown Solicitor