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**From:** Joanna Mitchell  
**Sent:** Wednesday, 14 November 2012 5:37 PM  
**To:** 'Benish\_Haider@agd.nsw.gov.au'  
**Subject:** State of NSW ats Biles

Dear Benish

Further to our discussion this afternoon, I have consulted with my instructing officers in Community Services.

You have instructions that, in the event that the State is unsuccessful in its argument on privilege, Counsel should seek a stay of the limitation hearing with a view to appealing the issue of privilege to the Court of Appeal.

I have also informed the TMF as a courtesy, however they have informed me that their approval is not required as this is a solvency fund matter.

Please contact me on my mobile (0405 258 024) if you require anything further. However, I will be unavailable between 9-9.30 tomorrow morning.

Kind regards

**Joanna Mitchell | Legal Officer, Child Law  
Legal Services**

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