



gadens
lawyers

Gadens Lawyers
Sydney Pty Limited
ABN 69 100 963 308

Skygarden Building
77 Castlereagh Street
Sydney NSW 2000
Australia

DX 364 Sydney

tel +61 2 9931 4999
fax +61 2 9931 4888

www.gadens.com.au

Our reference WCB: BAR: 29608018
Direct line 9931 4792
Email wblacker@nsw.gadens.com.au
Partner responsible Wendy Blacker
Your reference MTS: 103174

1 February 2011

Carroll & O'Dea Lawyers
DX 183
SYDNEY

WITHOUT PREJUDICE SAVE AS TO COSTS

Attention: Mr Martin Slattery

Knox Grammar School: Guy Lamond

Our client makes an offer to the claimant in compromise of his claim in this matter in the following terms.

Settlement for the claimant against our client in the sum of \$247,000.00, inclusive of legal costs.

This offer of compromise is made in accordance with the principle set out in *Calderbank v Calderbank* [1976] FAM 93. Consequently, should this matter proceed to hearing and our client achieves at hearing, a more favourable result than the terms of the offer, we will seek to rely upon the offer of compromise in support of an application for the claimant to pay our client's costs on an indemnity basis from the date of the offer.

The offer remains open for 14 days from the date of this letter.

Yours sincerely

Wendy Blacker
For **GADENS LAWYERS**

7357419.1 WCB WCB

sydney

melbourne

brisbane

perth

adelaide

port moresby