

**Paul Arblaster**

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**From:** Evangelos\_Manollaras@agd.nsw.gov.au  
**Sent:** Monday, 13 February 2012 7:23 AM  
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**Subject:** Biles

**Follow Up Flag:** Follow up  
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Gentlemen (and lady)

WLS have served their list of objections. A copy will be provided later this morning by Marion or Jodie.

They object to certain parts of Peter Maxwell's affidavit dated 17 May 2011 (16 parts in all) on the basis of hearsay. They also object to the para 83, page 16 of the report of Dr Skinner on the basis of ultimate issue.

Turning to another issue, i had a call Friday afternoon, after I left from AIU [REDACTED]. Paul would know about him, but Michael and Steven may not. He is one of the other 60 odd kids at Bethcar who are not plaintiffs. He acts as the spokesman for the rest of the family, who deny that the incidents complained of by the plaintiffs ever happened. at least the sexual ones. As for the physical beatings, they say that they were only in the way of discipline and not the exaggerations of the plaintiffs. He, and a few others were called at the trial of Colin Gibson by the defendant, and their evidence was that certain allegations made by the plaintiffs could not have happened because the surrounding circumstances were not in existence. For example, I think Jodie Moore says that she went to the river to start the pump, and AIU [REDACTED] gave evidence that only boys were sent to start the pump, because it required an older boy's strength, that the girls were restricted to house chores, etc etc. He was seen in conference with Pat Saidi, when he was briefed in the matter and came across as a credible witness. He is not related by blood, but adopted the surname of AIU [REDACTED] because he was with the Gordons from age 2 and says he was treated by them as parents and child.

When asked the question, he said that all the kids that didn't go back to their natural parents have gone on and made something of their lives, and that those that did reverted to the bad ways that were the reasons that they had been taken away in the first place.

AIU [REDACTED] and his "siblings" are available witnesses who could give evidence, but I don't think they are the ones that the plaintiffs' lawyers have in mind.

Evangelos G Manollaras  
 Solicitor  
 for Crown Solicitor

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