



Royal Commission
into Institutional Responses
to Child Sexual Abuse

7 November 2014

Your ref: MBG/MKS//3136527

Mr Michael Greene
Partner
Henry Davis York Lawyers
44 Martin Place
SYDNEY NSW 2000

cc: Stuart Wells (wells@selbornechambers.com.au)

Dear Mr Greene

Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission)
Re: Bethcar Summons S-NSW-231 and S-NSW-280

I refer to the email that Ms Rachel Deane sent to Henry Davis York on Wednesday 5 November 2014.

As that email details, Mr Wells, who is the legal representative for Mr Arblaster (one of the witnesses summoned to appear at the public hearing) has requested access to a number of documents of the Crown Solicitor's Office.

As you know, not all of that material was sought by, or produced to, the Royal Commission under Summons by the CSO. The position in relation to each request is as follows:

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| 1. Mr Arblaster's brief | Not sought by or produced to the Royal Commission. Held by the CSO and any access to be determined by CSO/ HDY. |
| 2. The file maintained by the CSO in relation to the District Court litigation | Only specific parts of the CSO file were sought and produced to the Royal Commission, as set out in Summons S-NSW-231 and Summons S-NSW-280. Those Summonses are enclosed . |
| 3. Mr Cashion's brief | Not sought by or produced to the Royal Commission. Held by the CSO and any access to be determined by CSO/ HDY. |
| 4. Mr Woods' brief | Not sought by or produced to the Royal Commission. Held by the CSO and any access to be determined by CSO/ HDY. |

In relation to the request for the CSO file, we are considering whether we may provide any material held by the Royal Commission to the legal representatives for Mr Arblaster in response to his request. To that end, could you please advise **by close of business Monday 10 November 2014** whether the CSO would have any objection to either of the following courses:

1. the Royal Commission providing the legal representatives for Mr Arblaster with an index to the materials that were produced by the CSO to the Royal Commission;
2. the Royal Commission providing the legal representatives for Mr Arblaster with a copy of any document produced by the CSO to the Royal Commission but not tendered to date.

Please do not hesitate to contact me if you would like to discuss any aspect of this matter.

Yours sincerely,



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