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PHB RLW 2/2439

Melbourne

23 February 2001

Mr R Matthews  
Slater & Gordon  
DX 81114  
FOOTSCRAY

Dear Sir

**Salvation Army ats David & RED Green**

We refer to your letter of 13 February 2001. The alleged assaults that you referred to apparently occurred many years ago and we would submit on behalf of the Salvation Army that any claim on behalf of your clients against the Army would be statute barred.

However, our client is prepared to deal with your clients' allegations in a caring and compassionate way provided your clients are prepared to:

1. Provide the names and addresses of all medical practitioners or psychologists who have examined and treated your clients for the injury sustained by your client.
2. Sign appropriate authorities permitting medical practitioners and/or psychologists to release all relevant records to our client and to provide a report if requested.

We also ask that your clients sign a "without prejudice" agreement prior to the negotiation process beginning. Such an agreement would provide that all discussions and negotiations are confidential and that in the event that the confidentiality undertaking is breached that all negotiations would cease.

Further, if settlement were reached with your clients we would require them to enter into a release which included a confidentiality undertaking.

We enclose copies of the proposed agreements and would be grateful if you could arrange for them to be executed by your clients to enable this matter to be progressed.

Yours faithfully

**Nevett *ford***

Philip Brewin

Encl