

22 June 2020

The Sydney Morning Herald
1 Darling Island Road
Pyrmont NSW 2009

**SPEED AND
STRACEY
LAWYERS**

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Dear Ms McClymont and Ms Maley

We act for Mr Heydon.

We request publication of this response in full as part of any article you may choose to publish.

In respect of the confidential inquiry and its subsequent confidential report, any allegation of predatory behaviour or breaches of the law is categorically denied by our client.

The inquiry was an internal administrative inquiry and was conducted by a public servant and not by a lawyer, judge or a tribunal member. It was conducted without having statutory powers of investigation and of administering affirmations or oaths.

The inquiry did not afford any opportunity for representatives of the person complained of to confront those complaining or to cross-examine them.

Our client says that if any conduct of his has caused offence, that result was inadvertent and unintended, and he apologises for any offence caused. We have asked the High Court to convey that directly to the Associate complainants.

As to the balance of your claims our client denies emphatically any allegation of sexual harassment or any offence.

Yours faithfully
SPEED AND STRACEY



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