



# Applicant's Supplementary Outline of Closing Submissions

WAD 37 of 2022

Federal Court of Australia

District Registry: Western Australia

Division: General

**YINDJIBARNDI NGURRA ABORIGINAL CORPORATION RNTBC**

Applicant

**STATE OF WESTERN AUSTRALIA & ORS**

Respondents

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- 1 CB Vol J includes financial documents and correspondence which are subject to confidentiality orders made in this proceeding on 7 June 2024 (***Sandy* confidentiality orders**).
- 2 Order 4 of the *Sandy* confidentiality orders limits inspection of documents subject to those orders to persons who meet certain criteria, which relevantly include the criterion that they are “persons who are not involved in the conduct of Supreme Court proceeding *John Sandy & Paul Aubrey v Yindjibarndi Aboriginal Corporation RNTBC & Ors* (CIV 2883 of 2017) for the Yindjibarndi Aboriginal Corporation RNTBC”. This criterion disqualifies two of the Applicant’s counsel in this proceeding, Tina Jowett SC and Justin Edwards SC, from inspecting the documents. That is why I have prepared this supplement to the *Applicant’s Outline of Closing Submissions* (principal submissions).
- 3 The principal submissions state the following at [430]:

“Corser & Corser acted for the plaintiffs in [CIV 2072 of 2011] *Sandy* (No. 4) from June 2011 to around January 2012. Integra Legal then acted for them from around January 2012 until around September 2016. Finally, Bennett acted for them from around 2016 until the finalisation of the matter in 2023. There are numerous invoices from these firms for their representation of the plaintiffs in evidence. These together with other documents establish that FMG funded this proceeding against YAC.”

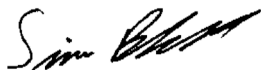
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4 [REDACTED]  
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5 [REDACTED]  
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Dated: 13 November 2024



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Simon Charles Blackshield  
Solicitor for the Applicant

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<sup>1</sup> See the principal submissions at [439].

## NOTICE OF FILING

### Details of Filing

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*Sia Lagos*

Registrar

### Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date of the filing of the document is determined pursuant to the Court's Rules.