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Our Ref: MOBL:657
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9 June 2023

Ms Marlia Saunders
Partner
Thomson Geer Lawyers
Level 14, 60 Martin Place
SYDNEY NSW 2000

By email: msaunders@tqlaw.com.au

Dear Ms Saunders

**Bruce Lehrmann v Network Ten Pty Limited & Anor
Federal Court of Australia Proceedings No. NSD103/2023**

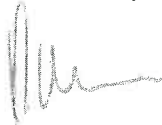
We refer to our letter to you of 16 May 2023.

In relation to the reference in that letter to the recording referred to therein being:

"... in the possession of Mr Whybrow SC and the Applicant"

we clarify that that possession was only in the legal sense, in that although Mr Whybrow SC (being Mr Lehrmann's Senior Counsel in the criminal proceedings) had physical possession of the recording, Mr Lehrmann did not. In that regard, we have confirmed with Mr Whybrow that at no stage did Mr Lehrmann have physical possession of the recording.

Yours faithfully



Paul Svilans

Principal

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