

NOTICE OF FILING

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& ANOR
Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



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.



Form 59
Rule 29.02(1)

Affidavit

No. NSD 103 of 2023

Federal Court of Australia
District Registry: New South Wales
Division: General

Bruce Lehrmann
Applicant

Network Ten Pty Limited
First Respondent
Lisa Wilkinson
Second Respondent

Affidavit of: **Anthony James Jefferies**
Address: Level 40, 161 Castlereagh Street, Sydney in the State of New South Wales
Occupation: Solicitor
Date: 10 March 2023

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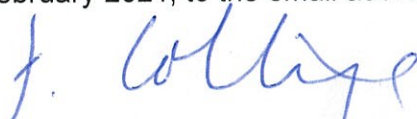
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1	Affidavit of Anthony James Jefferies sworn 10 March 2023	1-19	1 - 5
2	Exhibit AJJ-1, comprising:		
	(a) Email communication from Angus Llewellyn to b.lehrmann@hotmail.com	6	2 - 3
	(b) Part of transcript of interview between the applicant and Australian Federal Police of 19 April 2021	7	4-5
	(c) Transcript of execution of search warrant by Australian Federal Police on 19 April 2021	8	6-20

Filed on behalf of	Lisa Wilkinson, Second Respondent
Prepared by	Anthony James Jefferies
Law firm	Gillis Delaney Lawyers
Tel	(02) 9394 1144
Email	aji@gdlaw.com.au ; dec@gdlaw.com.au
Address for service	Level 40, 161 Castlereagh Street, Sydney NSW 2000

Document number	Details	Paragraph	Page
	(d) Email correspondence between the applicant and Emma Frizzell	9	22–23
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	(f) Article published in the Daily Mail on 8 March 2023	12	25–26
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I, Anthony James Jefferies, make oath and say:

1. I am the solicitor for the Second Respondent (**Ms Wilkinson**), and am authorised to swear this affidavit on her behalf.
2. Except where otherwise indicated, I make this affidavit from my own knowledge, information and belief.
3. I am not authorised to waive any client legal privilege. I do not, by anything in this affidavit, intend to waive any privilege, and nothing in this affidavit may be construed as involving any waiver of privilege.
4. Exhibited to this affidavit and marked "**Exhibit AJJ-1**" is a bundle of documents referred to in this affidavit. Where I refer to page numbers in this affidavit, I am referring to the pages of Exhibit AJJ-1.
5. I depose this affidavit in opposition to the Applicant's application for an order pursuant to s56A of the *Limitation Act 1969* (NSW).
6. Exhibited at **pages 2 to 3** is a copy of an email communication from Angus Llewellyn, who I am informed by Ms Wilkinson and verily believe was a co-worker of Ms Wilkinson at the first respondent in February 2021, to the email address b.lehrmann@hotmail.com.




7. Exhibited at **pages 4 to 5** is a copy of a part of a transcript of an interview between the applicant and officers of the Australian Federal Police of 19 April 2021. I note that the applicant, in answer to question 809 states that his personal email address is “ ... *b dot Lehrmann at Hotmail dot com* ...”, which I interpret to be b.lehrmann@hotmail.com, which is the same address as that to which the email of 12 February 2021 (referred to in paragraph 6 above) was sent.
8. Exhibited at **pages 6 to 20** is a copy of a transcript of the execution of a search warrant carried out by Australian Federal Police in relation to the applicant on 19 April 2021. From question 95, the transcript records the applicant writing down, *inter alia*, his personal Hotmail email address and various passwords on a sheet of paper, a copy of which was produced by the applicant to the Court in answer to a Notice to Produce and is exhibited at **page 21**. I note that the email address written by the applicant is the same address as that to which the email of 12 February 2021 (referred to in paragraph 6 above).
9. Exhibited **pages 22 to 23** are copies of email correspondence between the applicant and Emma Frizzell (who I understand to be an officer of the Australian Federal Police), copies of which were produced by the applicant to the Court in answer to a Notice to Produce. The emails from the applicant are from the email address b.lehrmann@hotmail.com which is the same address as that to which the email of 12 February 201 (referred to in paragraph 6 above).
10. Exhibited at **page 24** is a communication from the solicitor for the applicant to the Court requesting that a redacted version of the Defence filed for the first respondent be uploaded to the Court’s on-line file because the unredacted version “... *contains the Applicant’s current personal email address*”. I note that the email address set out in the unredacted version of the first respondent’s Defence is b.lehrmann@hotmail.com which is the same address as that to which the email of 12 February 201 (referred to in paragraph 6 above) was sent.
11. I am informed by Ms Wilkinson and verily believe that:
 - a. Ms Wilkinson has never received a concerns notice or any other letter of demand or notice from the applicant or anyone on his behalf;
 - b. Ms Wilkinson was informed of the letter received by the first respondent from the applicant’s lawyers on 16 December 2022 (**Concerns Notice**), but was specifically told that it was not directed to her and did not directly concern her;



- c. the first respondent did not seek instructions from Ms Wilkinson in relation to the Concerns Notice or any response to it;
 - d. Ms Wilkinson was not aware of nor given a copy of the first respondent's letter dated 20 January 2023 in response to the Concerns Notice, until after the commencement of these proceedings;
 - e. Ms Wilkinson did not have any notice of any defamation complaint against her by the applicant until 12:50 pm on the day after these proceedings were commenced;
 - f. Ms Wilkinson otherwise had no knowledge of any foreshadowed defamation complaint against her until reading media reports on the morning of 8 February 2023 after these proceedings had been commenced;
 - g. Ms Wilkinson is no longer the host of the Project program broadcast by the first respondent, and has not otherwise appeared on air since 20 November 2022.
12. Exhibited at **pages 25 to 26** is the text of an article published in the Daily Mail on 8 March 2023 about Mr Lehrmann's attendance to give evidence in this application.
 13. Exhibited at **pages 27 to 28** is the text of an article published in the Daily Mail on 10 March 2023 about Mr Lehrmann's receipt of the email from Mr Llewelyn sent on 12 February 2021, referred to above.
 14. On 8 March 2023 the applicant produced to the Court documents responsive to some paragraphs of the notices to produce issued by the respondents in these proceedings.
 15. Exhibited at **page 29** is a partial document produced by the applicant with text messages.
 16. At 9:38 am on 10 March 2023 I sent an email to the applicant's lawyers about the redactions to that document. Exhibited at **page 30** is a copy of that email.
 17. After reviewing those messages, it became apparent to me that some replies to messages included were missing. I also noted a message from the applicant which referred to a second lawyer from whom he was obtaining advice on 15 February 2021.
 18. At 1:57 pm on 10 March 2023 I caused to be issued a further notice to produce to the applicant. Exhibited at **pages 31 to 34** is a copy of that notice to produce.
 19. I have not, at the time of swearing this affidavit received any response to my communications of 10 March 2023, referred to above.



Sworn by the deponent
at Sydney
in New South Wales
on 10 March 2023
Before me:

)
)
)
)
)



Signature of deponent



Signature of witness

DAVID ERIC COLLINGE, SOLICITOR

Name and qualification of witness

Exhibit Certificate

AJJ-1

No. **NSD 103 of 2023**

Federal Court of Australia
District Registry: New South Wales
Division: General

Bruce Lehrmann

Applicant

Network Ten Pty Limited

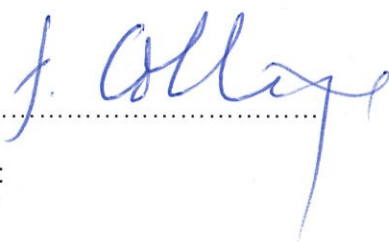
First Respondent

Lisa Wilkinson

Second Respondent

This is the Exhibit marked "**AJJ-1**" referred to in the Affidavit of Anthony James Jefferies sworn on 10 March 2023.

Before me:


.....

Witness:
Solicitor

Filed on behalf of	Lisa Wilkinson, Second Respondent
Prepared by	Anthony James Jefferies
Law firm	Gillis Delaney Lawyers
Tel	(02) 9394 1144
Email	aji@gdlaw.com.au ; dec@gdlaw.com.au
Address for service	Level 40, 161 Castlereagh Street, Sydney NSW 2000

From: Angus Llewellyn <allewellyn@networkten.com.au>
Sent: Friday, 12 February 2021 2:46 PM
To: b.lehrmann@hotmail.com
Subject: The Project, Network Ten request

Follow Up Flag: Flag for follow up
Flag Status: Flagged

PRIVATE AND CONFIDENTIAL NOT FOR PUBLICATION

Dear Bruce Lehrmann,

I'm producing a story for Network Ten's The Project. The Project has been informed of an alleged rape of Brittany Higgins perpetrated by you within a minister's office in Australian Parliament House on the evening of 22 March 2019/morning of 23rd March 2019. Could you please answer the specific queries below by no later than 10am Monday 15 February 2021:

- Did you attend a drinks function with Ms Higgins and colleagues on 22nd March 2019?
- Did you buy Ms Higgins drinks?
- Did you become intoxicated at the drinks?
- Did Ms Higgins become intoxicated at the drinks?
- Did you share a taxi with Ms Higgins after the drinks?
- Did you take Ms Higgins to Australian Parliament House after the drinks?
- Did you use your pass to enter Parliament House?
- Did you use your pass to enter the Ministerial Wing?
- Did you rape Brittany Higgins as alleged?
- Did you leave Parliament House without Ms Higgins after the alleged rape?
- Were you sacked or given an opportunity to resign over the alleged rape?
- Have you ever had contact with the AFP Sexual Assault and Child Abuse Team (SACAT)?
- Have you ever been interviewed by the AFP or the AFP SACAT?
- Have you ever been interviewed by the APH police regarding events on the evening of 22nd March 2019 and the morning of 23rd March 2019?
- Have you seen the CCTV footage showing you and Ms Higgins in Parliament House on the evening of 22nd March 2019 and/or the morning of 23rd March 2019?
- Are you available for an interview with The Project?

Yours faithfully

Angus

Angus Llewellyn
Producer



7PM Company Pty Ltd
Network Ten
1 Saunders St, Pyrmont,
NSW, 2009

M: (+61) 400 780 099
E: allewellyn@networkten.com.au

AFP RECORD OF INTERVIEW

Phone (02) 6131 3000

**RECORD OF INTERVIEW BETWEEN MARCUS BOORMAN AND
BRUCE LEHRMANN CONDUCTED AT AFP SYDNEY OFFICE, GOULBURN
STREET, SYDNEY, NEW SOUTH WALES ON MONDAY, NINETEEN APRIL,
TWO THOUSAND AND TWENTY-ONE**

**PERSONS PRESENT: DETECTIVE INSPECTOR MARCUS BOORMAN
SENIOR CONSTABLE EMMA FRIZZELL
BRUCE LEHRMANN**

TIME COMMENCED: THREE THIRTY-SIX PM

BOORMAN:

**Q1. This is a taped video and audio recorded interview between myself,
Detective Inspector Marcus BOORMAN and Mr Bruce LEHRMANN, is
that the correct pronunciation?**

A Correct, yes.

**Q2. Being conducted at AFP Sydney office, Goulburn Street in Sydney.
The time is now three thirty-six pm in the afternoon on the nineteenth
of April, twenty twenty-one.**

A Yes.

**For the benefit of the recording I will get all persons present to state their name
starting with yourself, Emma.**

FRIZZELL: Senior Constable Emma FRIZZELL, badge one two eight nine six.

BOORMAN:

Q3. And yourself, Bruce?

A Ah, Bruce LEHRMANN, no badge number.

**Q4. As I've just explained there, as I said before, the interview is audio
and video recorded. And if a transcript is made of this record of
interview, a copy of the transcript will be made available within seven
days of it being made. Okay. So, when I receive it within a week, I'll
make sure you get a copy as well.**

A Thank you.

**Q5. And at the completion of the interview you will be given a copy of the
audio disk of the interview.**

A Mm-hmm.

Q6. Do you understand that?

A Yes.

ROI BETWEEN BOORMAN/LEHRMANN ... CONTINUED ... PAGE 73

Q798. Yep.

A - - - I've certainly got a lot of views about it all coming out in the media.

Q799. Yes, yes, yes.

A It's not relevant to give indistinct

[REDACTED]

Q801. Yep.

A That on reflection since this has come out, appear to have a connection.

Q802. Mm-hmm.

A Um - - -

Q803. And what – what were those things that happened in January?

A They were, ah, two emails from a domain name, not owned by me.

Q804. Mm-hmm.

A bruce dot lehrmann one at outlook dot com

Q805. Mm-hmm.

A I only have one of them but I have a record of the other one just on the content of it.

Q806. Right.

A Um - - -

Q807. Can you just explain that to us again, bruce?

A bruce dot lehrmann one at outlook dot com. So, they were in early January. Um, ah, fifteenth of January was one of them.

Q808. So, you've received emails from this - - - ?

A That same address, yeah, which is not mine.

Q809. Through – through which - - - ?

A My b dot lehrmann at Hotmail dot com, which is my personal - - -

Q810. b dot - - -

A lehrmann at hotmail.

Q811. Yeah. And this was in January this year?

A Correct.

FRIZZELL:

Q812. Who has access to your personal emails?

A Ah, well, if people who know me, like I knew a lot of people.

AFP RECORD OF CONVERSATION

Phone (02) 6131 3000

RECORD OF CONVERSATION BETWEEN DETECTIVE INSPECTOR MARCUS BOORMAN AND BRUCE EMERY LEHRMANN REGARDING A SEARCH WARRANT CONDUCTED AT AFP SYDNEY HEADQUARTERS, GOULBURN STREET, SYDNEY, NEW SOUTH WALES ON MONEY, NINETEEN APRIL, TWO THOUSAND AND TWENTY-ONE

**PERSONS PRESENT: DETECTIVE INSPECTOR MARCUS BOORMAN
SENIOR CONSTABLE EMMA FRIZZELL
ACTING SERGEANT JAMES BROWN
BRUCE EMERY LEHRMANN**

TIME COMMENCED: THREE ELEVEN PM

BOORMAN:

Q1. All right. This is a record of conversation for the execution of a 3E Crimes Act search warrant of a person in relation to your telephone. Now, it's being recorded on Monday the nineteenth of April, two thousand and twenty-one, inside – inside the AFP Sydney Headquarters in Goulburn Street in Sydney. Persons present is myself, Detective Inspector Marcus BOORMAN and Bruce – now how do I pronounce your surname again?

A LEHRMANN.

Q2. LEHRMANN.

A Yeah.

Q3. Of currently residing at forty-nine Kara View Court in Rangeville, but has a Sydney residence of two O four/four Karrabee Avenue, Huntleys Cove. Is that correct?

A Correct, yeah.

All right. Now, also present are two other colleagues of mine. Can you introduce yourself for the purpose of the tape?

FRIZZELL: Senior Constable Emma FRIZZELL, badge one two eight nine six.

BROWN: Acting Sergeant James BROWN, AFP two one double eight three.

BOORMAN:

Q4. All right. When I refer to the time in relation to the recording, I'll refer to my watch and at the moment it is about – what eleven minutes past three in the afternoon pm. Is that correct, Bruce?

A Yep, yep, yep.

On 26 July 2021, I listened to the audio recording of this conversation whilst reading this transcript. I found this transcript to be a true and accurate record of the audio recording. – Senior Constable Emma Frizzell 12896

ROC BETWEEN BOORMAN/LEHRMANN ... CONTINUED ... PAGE 2

- Q5. All right. Can you state your full name please?
A Bruce Emery LEHRMANN.
- Q6. And Bruce are you known by any other names or anything like that?
A No, no.
- Q7. All right. Now, I have a – now, just before you attended at the headquarters here in company with your legal representative, Mr John KORN. Would that be correct?
A Correct.
- Q8. All right. And, um, you know, I spoke to you just briefly down there and Mr KORN and we discussed in relation to we would like to analyse and – and look at your phone. And, um, and I informed Mr KORN that we will be doing it under warrant, a section 3E warrant. So, I have a warrant for you, which is Search Warrant for a Person, it's in relation to your phone.
A Mm-hmm.
- Q9. All right. Now, you can have a read of that. It authorises myself and other police present, obviously to conduct a personal search and get the phone, but we don't need to do that because you've got your phone right in front of you. Is that – is that right?
A That's right.
- Q10. All right. So, I'll give you a copy of the warrant to read. So, for the purpose of the tape, Bruce, can you just read the – just the first few paragraphs out aloud to me?
A Ah, just starting here?
- Q11. Yeah, yeah, that'll do.
A Oh, yeah. Yep. "Marcus BOORMAN, a constable within the meaning of the Crimes Act nineteen fourteen, who is the executing officer in relation to this warrant. And to any other constable whose name may be written on this warrant in accordance with section 3(C)(1) of the Crimes Act nineteen fourteen, in which event that constable shall be the executing officer in relation to this warrant. Whereas I, J - ." Who's that?
- Q12. That's the registrar at the court, that's – that's all right, that's all I need.
A Oh, oh, sorry.
- Q13. You can read the rest to yourself, but it's just for the benefit of the recording to show that you are reading it.
A Yep. Oh, got you. Yep. Sorry. Yep. Okay. Ah, so, it will cover social media as well?
- Q14. Yeah, your data on your phone.
A That's yeah, and that's good. Okay. Because I haven't been able – I've got evidence of making the reports to Twitter, but you might be able to get some of these out.

ROC BETWEEN BOORMAN/LEHRMANN ... CONTINUED ... PAGE 3

Q15. Yep.
A Okay. Oh, okay, maybe not. It's only in relation to that I'm assuming.

Q16. Yeah, in relation to the second condition.
A Brilliant, yeah.

FRIZZELL: And then - - -

BOORMAN:

Q17. And then all the - - -
A Oh, sorry.

FRIZZELL:

Q18. - - - if you can finish reading - - -
A I'm sorry, just keep reading, okay.

No, that's okay.

BOORMAN:

Q19. All the - all of the stuff around it. Read it and then if you have any questions.
A Oh, so, do you need to frisk me as well?

Q20. No, no, no, I don't need to do that because I can see your phone is - is right in front of you.
A No, all right. You've got - oh, good, oh, right, sorry. Sorry.

Q21. That's okay.
A Do I get to keep this copy?

Q22. Yeah.
A Oh, good. Because that is the first time I'm seeing those times, so. All right, that's fine, thank you.

Q23. Now, do you have any questions in relation to that - that warrant at the moment, like without going into specifics?
A Not - not at the moment, no.

Q24. All right.
A No, but I haven't gone through it with - with my counsel, but if I do I'll - - -

Q25. Yeah, yeah, that's all right. All right. So, you've read the whole warrant?
A Yes.

Q26. Do you understand the warrant?

On 26 July 2021, I listened to the audio recording of this conversation whilst reading this transcript. I found this transcript to be a true and accurate record of the audio recording. - Senior Constable Emma Frizzell 12896

ROC BETWEEN BOORMAN/LEHRMANN ... CONTINUED ... PAGE 4

- A Yes.
- Q27. All right. Now, I'll now give you the copy of the Rights of the Occupier, it normally relates to – in relation where we're executing a search warrant at a premises.
- A Mm-hmm.
- Q28. But also in relation to they're – they're your rights, ah, in relation to the Rights of a Person Searched. So, you can have a copy of that.
- A Mm-hmm.
- Q29. Just a lot of legal definitions.
- A Yeah. I have seen this before.
- Q30. Have you?
- A In the course of my work in Parliament.
- Q31. Mm-hmm.
- A Okay. That's all good.
- Q32. Okay. Now, do you agree that I've provided you with a copy of the search warrant and the Rights of a Person Searched documentation?
- A Yep.
- Q33. All right. Bruce, now I'm going to ask you some questions in relation to this warrant, but before continuing, I must give you a caution and inform you of your rights. Okay. I must caution you that you do not have to say or do anything, but anything you say or do may be used in evidence. Do you understand that?
- A Yes.
- Q34. Can you tell me what that means to you, what I've just told you?
- A Ah, well, if the matter proceeds further that you can use this in a brief of evidence or not moving forward, yep.
- Q35. Yeah. So, I'm just making it clear that, you know, anything you say
-
- A Yes.
- Q36. --- could be used as evidence.
- A Yeah, yes.
- Q37. At a future time in relation to this matter.
- A Yes, yes.
- Q38. Are you clear on that?
- A Yes, yeah.
- Q39. All right. Are you Aboriginal or Torres Strait Islander?
- A No.
- Q40. Are you an Australian citizen?

On 26 July 2021, I listened to the audio recording of this conversation whilst reading this transcript. I found this transcript to be a true and accurate record of the audio recording. – Senior Constable Emma Frizzell 12896

ROC BETWEEN BOORMAN/LEHRMANN ... CONTINUED ... PAGE 5

- A Yes. I'm also a dual citizen.
- Q41. A dual citizen.
A Mm-hmm.
- Q42. All right. What – what country are you a dual citizen of?
A The other nationality is the USA.
- Q43. Sorry?
A USA.
- Q44. USA?
A Yeah.
- Q45. And you're an Australian citizen as well?
A As well, yep, yep.
- Q46. All right. Do you want to communicate with your consular of the USA in relation to this matter?
A No.
- Q47. I have to ask these questions.
A No, no, I have not been back since we returned, so, that's all good.
- Q48. Because you may communicate or attempt to communicate with the consular office of your country.
A No.
- Q49. Do you understand that?
A Yeah, I do understand it, no, thank you.
- Q50. All right. Now, you also may communicate or attempt to communicate with a friend or relative to inform that person of your whereabouts. Do you understand that?
A I do, yes.
- Q51. So, does anyone know that you're here, family or anything like that?
A Um, ah, my mum does and my counsel.
- Q52. Yes.
A But I suppose upon taking my phone I'd like to get a couple of numbers of - - -
- Q53. Absolutely, we can facilitate that.
A - - - I've only got a very few amount of people that still talk to me of course, but yeah.
- Q54. We – we will facilitate all that, I understand the, um, - the – ah, inconvenience. But it's part of the investigative procedure.
A Oh, no, I understand that. Yeah, I understand.

ROC BETWEEN BOORMAN/LEHRMANN ... CONTINUED ... PAGE 6

Q55. All right. And you may communicate with or attempt to communicate with a legal practitioner of your choice and/or attempt to arrange for a legal practitioner of your choice to be present. Do you understand that?

A Yes.

Q56. Now, do you wish to communicate with your legal practitioner at this point?

A No. But I can during breaks.

Q57. Absolutely. You can contact your legal practitioner at any time you feel like it.

A Yes, okay.

Q58. And just to be – just to clarify, that you attended at the Sydney Office here with your legal representative, Mr John KORN, just before. Is that right directly?

A I did, yep, yes, that's right.

Q59. You're over eighteen years of age?

A I am.

Q60. Okay. Have you recently consumed any alcohol, medication or drugs?

A No.

Q61. Have you been interviewed by an investigating official or police officer in the last forty-eight hours?

A No.

Q62. At the completion of this interview, in relation to the execution of this warrant. A transcript will be made available to you as soon as practicable. Do you understand?

A Okay. Yes.

Q63. But we will have to get that transcribed.

A Yep, yep.

Q64. But we will get that to you as soon as practicable.

A Sure.

Q65. Now, obviously the allegation that – I'm investigating here at the moment. It's written in the warrant.

A Mm-hmm.

Q66. As you – as you can see.

A Mm-hmm.

FRIZZELL:

Q67. Turn it over.

A Just there, yeah.

On 26 July 2021, I listened to the audio recording of this conversation whilst reading this transcript. I found this transcript to be a true and accurate record of the audio recording. – Senior Constable Emma Frizzell 12896

BOORMAN:

Q68. No worries, I'll just follow that in. And it's, um, the allegation is that between eleven forty-eight - - -

A One forty-eight.

Q69. One forty-eight am, thank you. And two thirty-three am on Saturday, the twenty-third of March, two thousand and nineteen, that you engaged in sexual intercourse with a Miss Brittany HIGGINS at the Australian Parliament House in the Australian Capital Territory without her consent contrary to section fifty-four of the Crimes Act. That's what this is all about, as I believe you're aware, that – that's why we've asked you to come here.

A Ah, oh, yes, yes.

Q70. Yeah, yeah.

A Oh, yep.

Q71. All right. I just wanted to be clear on that. So, right at this point in time, so that I can get my colleague here to start looking through your phone. I'm going to suspend the tape for the purposes of, you know, viewing your phone.

A Mm-hmm.

FRIZZELL:

Q72. I might just – before we do suspend, just have a look back at the warrant to the second condition and we had a discussion earlier about whether there would be anything relevant to the warrant on your mobile device.

A Mm-hmm.

Q73. Is there anything relevant to the warrant on your phone?

A Not – not to my knowledge.

BOORMAN:

Q74. Mm-hmm.

A I've – I've, of course, discussed, um, the media inquiries.

Q75. Mm-hmm.

A Um, because that's all I've ever had.

Q76. Mm-hmm.

A Um, with (coughs) um, you know, very few people, my mum included.

Q77. Mm-hmm.

A Um, ah, that's all I can think of in terms of emails, no. There would be emails between myself and my counsel.

ROC BETWEEN BOORMAN/LEHRMANN ... CONTINUED ... PAGE 8

Q78. Mm-hmm.
A Um, yeah, not to my knowledge.

FRIZZELL: Okay.

BOORMAN: All right.

FRIZZELL:

Q79. So, is there any say discussions, correspondence about the allegation at all on your phone?
A Oh, there – there is, yes.

Q80. Okay.
A Yeah.

Q81. So, that would be relevant?
A Oh, sorry, okay, okay, yeah. Sorry, I didn't, yeah.

BOORMAN:

Q82. That's all right.
A Count it as directly, but yeah, they're just based on from when a journalist would enquire and then I would try and, you know, think back and recall and whatever.

Q83. So, is there communications on your phone with journalists?
A I haven't responded back, but there is them reaching out to me, yes.

Q84. Mm-hmm.
A I can probably name them off if you want them.

Q85. Mm-hmm.
A There was – there was – there hasn't been a flurry, they've just been consistently – there's been a consistent of one, um, that has - - -

Q86. But there's no communication between you and them backwards or forwards it's just been - - -
A No, no, no. No, oh, the only one I had a very brief phone call with Sean NICHOLLS, who did the Four Corners report.

Q87. Mm-hmm.
A That was a very short phone call because the number kept ringing me.

Q88. Mm-hmm.
A And it was – it was during a quiet period where I thought journalists would no longer contact me.

Q89. So, that was a voice conversation was it that you had with him?
A Yes, yes, yes.

All right. No, that's okay.

FRIZZELL:

Q90. What about do you have any – is there any correspondence, um, with Brittany HIGGINS herself?

A Not to my knowledge, nothing, no, not to my knowledge at all. Um, and I have thought about that and the only – the only correspondence I would have had with her ever, would have been in professional context – context briefly on my ministerial phone about work matters.

BOORMAN:

Q91. Mm-hmm, mm-hmm.

A But for a very brief period, I didn't work with her for very long, so.

Q92. So, we'll suspend the tape so that we can have a look at the phone. Bruce, is there – you know, for like emails or like passwords and everything like that, are you prepared to give those to us?

A Oh, yeah.

Q93. So, that we can access obviously, yeah.

A Yeah, yeah, absolutely. I can – what do you need, I suppose I can jot them down on the - - -

Q94. All right. I'll let you write it down on here.

A Ah, so, I've got, um, well, the phone is, um, nine five one four is the PIN code.

Q95. Mm-hmm.

A Um, ah, Hotmail email is just my personal which – ah, because that's through Outlook, so I think and don't diss me for my passwords, but this was back when I worked for George BRANDIS, I think it's attorney-nine-five or attorney-one-nine, no, yeah, nineteen ninety-five.

Q96. Mm-hmm.

A That or it could be cricketeighteen.

Q97. Mm-hmm.

A Um, and now what else do you want? Um, Facebook I suppose.

Q98. Yep.

A Um, I've suspended all of them because once all this started I - - -

Q99. Yep, yep.

A - - - I – so, Facebook is probably also is my email address and then I think, but feel free to come back and ask me, like I don't - - -

Yeah, I appreciate your co-operation.

ROC BETWEEN BOORMAN/LEHRMANN ... CONTINUED ... PAGE 10

BROWN:

Q100. And what is your email?

A Oh, um, bdotlehrmann at Hotmail. I do have a Gmail but that's – it's not used for anything, it's like where crap goes to. Like when I sign up to newsletters and things, so.

Okay.

BOORMAN:

Q101. Mm-hmm.

A Um, now, Twitter I suspended my Twitter account way back in January when I was – this – whoever this was impersonating my account. So, I don't know what – how to get that, um, because I understand Twitter gets rid of it after thirty days or something, I'm not sure.

Yeah.

BROWN:

Q102. That's all right.

A But I did have Twitter.

BOORMAN:

Q103. Mm-hmm.

A Um, Instagram, ah, there won't be anything on Instagram but I'll give it to you anyway. Ah, I think it's lehrmannb and then password, I think it's cricketeighteen. What else did you need?

BROWN: Um, let me think.

FRIZZELL:

Q104. Do you have any WhatsApp, Signal or anything like that?

A Oh, yes, I've got all of that. Um, um, so, signal – are they – but they're not pass – they're already like unlocked.

BROWN:

Q105. Yep.

A So, feel free to go through them.

Q106. Do you have any secure folders or anything like that?

A No, the only thing I've got in my files of what – like my bank accounts, which I've saved on there, which I'm going to give you anyway.

BOORMAN:

On 26 July 2021, I listened to the audio recording of this conversation whilst reading this transcript. I found this transcript to be a true and accurate record of the audio recording. – Senior Constable Emma Frizzell 12896

ROC BETWEEN BOORMAN/LEHRMANN ... CONTINUED ... PAGE 11

Q107. Sure. Yeah.
A You know, I've taken like screenshots of media of – over the course of it coming out, when I've – I've saved a media article or whatever.

Mm-hmm.

BROWN:

Q108. And what type of phone do you have?
A iPhone XS or something, yeah.

Q109. Okay. And how long have you had that for?
A Oh, two years, yeah.

Q110. Okay. You've had that phone at the time of the allegation?
A No.

Q111. Okay.
A No. That – no, this no. But I've had the number the whole time, so yeah.

BOORMAN:

Q112. When you changed phones - - -
A Mm-hmm.

Q113. - - - did you mirror your other phone to that phone?
A Yeah, yeah, I have always, yeah.

Q114. Yeah.
A Because an iPhone, yeah, I just do that.

BROWN:

Q115. Oh, good.
A All right. I'll give you that and that's the phone, so, I'll just put that there as well.

Q116. No problem. If I have any questions on finding anything, I'll pop back in, but, um, that should do.
A Yeah, please, yeah. Sorry.

BOORMAN:

Q117. That's all right. Thank you. All right. So, do you agree the – I'll suspend the tape now for the purposes of obviously going through and having a look at your phone.
A Mm-hmm.

Q118. And that's for us to determine whether there's any evidentiary value from an investigation point of view. Do you understand?
A Mm-hmm. Yes, yep.

On 26 July 2021, I listened to the audio recording of this conversation whilst reading this transcript. I found this transcript to be a true and accurate record of the audio recording. – Senior Constable Emma Frizzell 12696

ROC BETWEEN BOORMAN/LEHRMANN ... CONTINUED ... PAGE 12

Q119. All right. Do you agree the time is now by my watch – is about three thirty pm?

A Yes. Mm-hmm.

All right. Interview suspended.

ROC SUSPENDED AT THREE THIRTY PM

ROC RESUMED AT SEVEN ZERO NINE PM

BOORMAN:

Q120. All right. This is a recommencement of taped record of conversation between Detective Inspector Marcus BOORMAN and Bruce LINDEMAN.

A LEHRMANN.

Q121. LEHRMANN.

A You did that once too.

Q122. I'll get it right once before. Bruce, do you agree the time is now nine minutes past seven pm in the evening, by my watch?

A Yep, yep.

Q123. All right. And the interview recommencement is obviously in the AFP Sydney Office, Goulburn Street in Sydney. And it's in relation to the execution of a 3E, section 3E Crimes Act search warrant for a Person on yourself, Bruce. And we've initially taken your phone.

A Mm-hmm.

Q124. All right. Now, I'll remind you that the caution I gave you before, this still applies. You do not have to say or do anything, but anything you say or do, may be used in evidence. Do you understand that?

A Yep.

Q125. All right. Now, we've, um, my colleague here has done a brief analysis of that and looked through your phone.

A Mm-hmm.

Q126. And I have also had a look. And basically I've viewed – viewed a number of images on the phone of handwritten notes relating to a Miss Brittany HIGGINS.

A Yep.

Q127. I have reasonable grounds to believe there is evidential material on the phone, being those – those photographs.

A Okay. Yep.

On 26 July 2021, I listened to the audio recording of this conversation whilst reading this transcript. I found this transcript to be a true and accurate record of the audio recording. – Senior Constable Emma Frizzell 12896

Q128. So, therefore I will be seizing the phone.

A Yep.

Q129. To conduct further analysis and examination under section 3F of the Crimes Act in accordance with this warrant. Do you understand that?

A Yep. I do.

All right. Basically now I've got a Property Seizure Record. Um, so the warrant is now complete, I've got the – I've got the – I've got the phone. Um, - - -

BROWN: So, I'll go through this part if you like?

BOORMAN: Yeah, I'll get James to do that while I sign the Property Seizure Record.

BROWN:

Q130. So, for the purpose of the audio, Acting Sergeant James BROWN, AFP two one double eight three. Every search warrant, there's certain roles that we are allocated.

A Mm-hmm.

Q131. In this case, um, I'm managing the property that has been seized and it's just one mobile phone.

A Mm-hmm.

Q132. Again, there's a little bit of a proforma that I will go through, but effectively do you agree that during the search warrant police have seized one item?

A Correct.

Q133. Being your mobile phone. For the audio, the phone is in front of us at the moment, it is bagged, taped and sealed. Do you agree?

A Yes.

Q134. I'll go through what's called a Property Seizure Record, it's basically a receipt for the item that we're taking. You'll get a copy as well.

A Mm-hmm.

BROWN: Perfect.

Q135. So, for the audio, we've got Property Seizure Record number M four eight four five four one. Do you agree?

A Yep.

Q136. So, listed on here, we've got obviously the date, today's date.

A Mm-hmm.

ROC BETWEEN BOORMAN/LEHRMANN ... CONTINUED ... PAGE 14

- Q137. Our location which is the AFP Office, a hundred and ten Goulburn Street, Sydney.
A Mm-hmm.
- Q138. We've got your details up here. Can I just confirm the date of birth is correct, fourteenth of June, ninety-five?
A Yeah, yep.
- Q139. And just one item listed, being item number zero zero one.
A Mm-hmm.
- Q140. Being one Apple iPhone XS Max in a brown case.
A Yep.
- Q141. Which was located on you earlier today. It was seized at seven ten pm by Detective Inspector BOORMAN. Do you agree that this is the only item listed on the Property Seizure Record?
A Correct, yep.
- Q142. So, I've ruled off here just to solidify that fact and we can't add any other items.
A Yep, mm-hmm.
- Q143. I've got the warrant holder details being Detective Inspector BOORMAN. My details acting as the Property Officer for today.
A Mm-hmm.
- Q144. What I'll get you to do is to just fill out the owner section there for me.
A Right, yep.
- Q145. One thing I neglected to mention, you can see over on this side of the Property Seizure Record a seal number, so, we've got one one four one zero seven zero and the seal on the bag one one four one zero seven zero. Do you agree that both of those numbers match?
A Yes. I do, yep.
- Q146. Okay. As I said you get a copy of the Property Seizure Record, this green one here.
A Oh, okay.
- BOORMAN: All right.
- BROWN: That's all.
- BOORMAN:
- Q147. All right. Now, we'll just wind this up, Bruce. Detective Inspector Marcus BOORMAN. Have the answers you have provided during this conversation been made of your own free will?
A Yes.

ROC BETWEEN BOORMAN/LEHRMANN ... CONTINUED ... PAGE 15

Q148. Has any threat, promise, inducement been held out to you to provide the answers you have given?

A No.

Q149. Before we complete is there anything else that you – further you wish to say in relation to the phone?

A No.

Q150. All right. Do you have any complaints regarding the way the execution of this Person search warrant was conducted?

A No.

Q151. Do you agree the time is now seven fifteen pm by my watch?

A I do, yep.

All right. Record of conversation complete.

ROC CONCLUDED AT SEVEN FIFTEEN PM

b.lehrmann@hotmail.com

9514 phone
hotmail: Attorney 95
~~729.1995~~
Cricket 18
FB: Attorney 95

Instagram: @lehrmannb
Cricket 18

From: [Bruce Lehrmann](#)
To: [Frizzell, Emma](#)
Subject: 1 of 2 emails - FW: Coming for you
Date: Wednesday, 21 April 2021 8:23:40 AM

Good morning Senior Constable,

I am forwarding through as requested the two emails I received. One from the below address which I do not own or have ever set up and the second from what appears to be an online system of sending an email message.

I will follow this email with the second email I have that doesn't have any content as I unsubscribed my address, but it does contain the subject line of the initial message.

Best Regards,
Bruce Lehrmann

From: Bruce Lehrmann <BruceLehrmann1@outlook.com>
Sent: Monday, 25 January 2021 11:11 PM
To: b.lehrmann@hotmail.com
Subject: Coming for you

Bruce,

A woman spoke about what happened to her tonight, and she's Australian of the Year.

I want you to have a think about what you did, and what might be around the corner for you.

It's inspiring when justice is delivered and the truth comes out. You know what they said: The truth will set you free.

How many people know what you did, and how many did you tell. How many cameras are in Parliament House and how many people tracked down the vision.

Think about it. Two former staffers from Aussies, now security guards.

It's going to be a magical 2021.

From: Bruce Lehrmann
To: Frizzell, Emma
Subject: 2 of 2 emails - FW: unsubscribe
Date: Wednesday, 21 April 2021 8:24:40 AM

2 of 2 emails.

This shows me unsubscribing from the system where my address (b.lehrmann@hotmail.com) was submitted to receive this particular message.

Regards,
Bruce Lehrmann

-----Original Message-----

From: Bruce Lehrmann <b.lehrmann@hotmail.com>
Sent: Friday, 15 January 2021 4:49 PM
To: contact@anonymousemail.me
Subject: unsubscribe

Apple Mail sent this email to unsubscribe from the message "Truth will come out".

From: Monica Allen <Monica.Allen@markobrienlegal.com.au>
Sent: Wednesday, 8 March 2023 11:05 AM
To: Associate.LeeJ@fedcourt.gov.au
Cc: Anthony Jefferies; Nicola Sanchez; David Collinge; Saunders, Marlia; O'Beirne, Conor; Paul Svilans
Subject: NSD103 of 2023 - Lehrmann v Network Ten Pty Limited and Anor
Attachments: NSD103_2023-Defence-Network-Ten_Redacted.pdf

Dear Associate

We refer to the Defence filed on behalf of the First Respondent on 7 March 2023.

The Defence contains the Applicant's current personal email address (see paragraphs 22(b) and 22(e) on page 33). In circumstances where the Defence is publicly available on the Federal Court website, the Applicant respectfully requests that his Honour give consideration to substituting the Defence presently online with the **attached** redacted version.

The legal representatives for the Respondents are copied to this correspondence.

Yours faithfully

Monica Allen

Special Counsel | Mark O'Brien Legal

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How Lisa Wilkinson's lawyer is homing in on a possible flaw in Bruce Lehrmann's defamation case - as his defence team says he WILL give evidence

- Bruce Lehrmann could give evidence in court
- He's suing media for coverage of Brittany Higgins' allegations
- His lawyer said he is available on March 16

By [LAUREN FERRI FOR NCA NEWSWIRE](#)

PUBLISHED: 19:20 AEDT, 8 March 2023 | UPDATED: 21:28 AEDT, 8 March 2023

Lawyers for [Bruce Lehrmann](#) have told the Federal Court he is available to give evidence in a court for the first time if required, as his defamation proceedings get underway.

Mr Lehrmann launched legal action in February against [Lisa Wilkinson and Network 10](#), and journalist [Samantha Maiden and News Corp Australia's News Life Media](#) over coverage of Ms Higgins' allegations in February, 2021.

The media companies say the lawsuit is not maintainable as it was filed beyond the one-year limitation period, given the article involving Ms Higgins - published on February 15, 2021 - is now more than two years old.

All parties in the proceedings faced the Federal Court for the first time on Wednesday afternoon, where Mr Lehrmann's lawyer Steven Whybrow told the court his client would be available to give evidence at another hearing on March 16 if required.

Bruce Lehrmann (above) said he is available to give evidence in Federal Court in his case against Lisa Wilkinson, Network 10, journalist Samantha Maiden and News Corp Australia's News Life Media

Mr Lehrmann is suing two media companies, including Lisa Wilkinson (above) and Network Ten, over their coverage of Brittany Higgins' rape allegations against him

After questions were raised about why Mr Lehrmann didn't lodge proceedings for two years the court was told he was given advice from a solicitor not to in February 2021, around the time the article and broadcasts were published.

The court heard he also didn't want to lodge proceedings while facing existing criminal proceedings.

Mr Whybrow told the court his client was also struggling with mental health issues due to the alleged defamatory claims.

Representing Lisa Wilkinson, Sue Chrysanthou SC told the court Mr Lehrmann had plenty of time to file the defamation claims.

'He apparently seeks to rely on his medical condition from time-to-time ... from a factual perspective we wish to challenge those,' she told the court.

Justice Lee queried whether it would be problematic for Mr Lehrmann to be potentially cross examined on multiple occasions, including in relation to the extension of time application to be heard next week and again during the trial.

Mr Whybrow told the court he was worried his client may come under 'stress and anxiety' if he is called to give evidence multiple times.

Brittan Higgins first alleged to Lisa Wilkinson (pictured left, with Ms Higgins) that she was raped by 'a male colleague' in Parliament House in 2019

Mr Lehrmann had pleaded not guilty to the charge and stood trial in the ACT Supreme Court before it was aborted due to juror misconduct.

The charges were subsequently dropped by the Director of Public Prosecutions and he has continually denied any allegation he sexually assaulted Ms Higgins at Parliament House in March 2019.

He claims the coverage conveyed four false and defamatory meanings he 'raped Brittany Higgins in Defence Minister Linda Reynolds' office in 2019', despite not being named.

Both media companies filed their defences with the Federal Court on Tuesday, as well as Ms Wilkinson, who retained her own legal team Ms Chrysanthou.

Network Ten, News Life Media and both journalists are relying on the defences of truth and qualified privilege and will seek to prove Mr Lehrmann lied to police and did rape Ms Higgins.

[Bruce Lehrmann claims The Project botched efforts to contact him before Lisa Wilkinson interview | Daily Mail Online](#)

Bruce Lehrmann claims The Project botched efforts to contact him by using an old email address and calling a wrong number before airing Lisa Wilkinson interview with Brittany Higgins about rape allegation

- Channel Ten tried to contact Bruce Lehrmann five times
- He was accused of raping Brittany Higgins, which he denies
- One email address was defunct, another was old and disused
- News.com.au didn't contact him because he didn't reply to Ten

By [CHARLOTTE KARP FOR DAILY MAIL AUSTRALIA](#)

PUBLISHED: 01:20 AEDT, 10 March 2023 | UPDATED: 01:20 AEDT, 10 March 2023

[Bruce Lehrmann](#) alleges [Channel Ten](#) failed to get in contact with him about [Brittany Higgins'](#) rape allegations because it tried a wrong number and unused and discarded email addresses.

Mr Lehrmann launched a defamation case last month against the network over a Lisa Wilkinson interview with Brittany Higgins - aired on The Project in February 2021 - in which she first alleged she was raped in Parliament House in 2019.

He is also suing Ms Wilkinson, along with news.com.au journalist Samantha Maiden and its parent company News Life Media, owned by News Corp, for an article featuring the same allegations.

The former parliamentary staffer strenuously denies having any sexual contact with Ms Higgins.

One of his claims in the defamation suit is that both Ten and News failed to contact him for comment prior to broadcasting and publishing the rape allegations.

According to defence documents filed in the Federal Court on Wednesday, The Project's producer Angus Llewellyn made five 'reasonable attempts' to contact Mr Lehrmann - via a phone call, text, and emails to two different addresses, between February 12 and 15, 2021.

However, Daily Mail Australia understands Mr Lehrmann will claim the contact details - which were supplied by Ms Higgins fiancé David Sharaz - were either incorrect or long obsolete.

Bruce Lehrmann is suing news.com.au and Channel Ten for airing and publishing rape allegations against him in 2021

Ten has argued in its defence that staff made 'reasonable attempts' to get Mr Lehrmann's side of the story before it broadcast Lisa Wilkinson's (pictured) interview with Ms Higgins

Mr Lehrmann will claim the mobile number Mr Llewellyn tried to call and text had not belonged to him for two years.

It was attached to an old work phone he was given when he started his job at Parliament House. He left that job in March 2019, and subsequently had to surrender the phone and the number.

Ten also tried to contact Mr Lehrmann using a work email address owned by public affairs agency Parker and Partners.

Mr Lehrmann never worked for the agency, and would therefore have never have received that email. He was formerly employed by the Ogilvy Network, which is a partner of Parker and Partners, but a different company.

In any case, Mr Lehrmann was employed by British American Tobacco by the time The Project sent the email. He had left his job at Ogilvy six months prior.

The personal email address Ten used to try and reach Mr Lehrmann was so old it contains an obsolete domain. He created the address more than a decade ago and at the time was not using it.

In his interview with Australian Federal Police over the allegations in 2021, Mr Lehrmann did cite that same personal email address as the one he was actively using.

It is understood Mr Lehrmann will argue he only logged back into that account after the allegations against him aired and found the email from the network in his junk folder.

Channel Ten declined to make a statement when contacted by Daily Mail Australia.

94732	Instant Messages	Incoming		15/02/2021 5:37:07 PM(UTC+10)	[REDACTED]	[REDACTED]	
94733	Instant Messages	Outgoing		15/02/2021 5:37:20 PM(UTC+10)	[REDACTED]	[REDACTED]	
94734	Instant Messages	Outgoing		15/02/2021 5:37:32 PM(UTC+10)	[REDACTED]	[REDACTED]	
94735	Instant Messages	Outgoing		15/02/2021 5:37:44 PM(UTC+10)	From: +61428168898 (owner) To: +61424386895 Greta Sinclair, To: b.lehmann@hotmail.com Bruce Lehmann (owner) To: +61424386895 Greta Sinclair, To: b.lehmann@hotmail.com Bruce Lehmann (owner)	Warwick doesn't think I will be named Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70D85C9 (Table: message, handle, chat, Size: 161562624 bytes)	
94736	Instant Messages	Incoming		15/02/2021 5:37:53 PM(UTC+10)	[REDACTED]	[REDACTED]	
94737	Instant Messages	Outgoing		15/02/2021 5:38:19 PM(UTC+10)	From: +61428168898 (owner) To: +61424386895 Greta Sinclair, To: b.lehmann@hotmail.com Bruce Lehmann (owner) To: +61424386895 Greta Sinclair, To: b.lehmann@hotmail.com Bruce Lehmann (owner)	If I am then he channel 10 as well as the government/department of finance are up for a lot of money Source: Native Messages Source file: Bruce's iPhone/mobile/Library/SMS/sms.db : 0x70DAF49 (Table: message, handle, chat, Size: 161562624 bytes)	
94738	Instant Messages	Incoming		15/02/2021 5:38:31 PM(UTC+10)	[REDACTED]	[REDACTED]	
94739	Instant Messages	Incoming		15/02/2021 5:40:33 PM(UTC+10)	[REDACTED]	[REDACTED]	

Our Ref: AJJ/220244
Your Ref: MOBL:657

10 March 2023

Mr Paul Svilans
Principal
Mark O'Brien Legal

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Via email: paul.svilans@markobrienlegal.com.au

Dear Colleagues

Lisa Wilkinson & Anor ats Bruce Lehrmann
Federal Court of Australia - Proceedings No: NSD103/2023

We refer to the documents produced by the applicant in answer to notices to produce served on him in these proceedings.

Some of those documents are redacted, in particular the text message compilation.

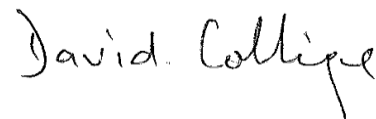
A party is not entitled to unilaterally redact documents produced in answer to a compulsive process of the Court.

Please urgently supply us with unredacted copies. If the redactions are by reason of claims of privilege, please provide us with a schedule of such claims in accordance with the practice note.

Yours faithfully,
GILLIS DELANEY LAWYERS



Anthony Jefferies
Partner
Direct Line: (02) 9394 1132



David Collinge
Special Counsel
Direct Line: (02) 9394 1114

cc. Thomson Geer
Marlia Saunders
msaunders@tqlaw.com.au

Notice to produce

No. NSD 103 of 2023

Federal Court of Australia
District Registry: NSW
Division: General Division

Bruce Lehrmann

Applicant

Network Ten Pty Limited ACN 052 515 250 and another

Respondents

To the Applicant

The Second Respondent requires you to produce the following documents or things to the Registrar at 9:30am on 15 March 2023:

1. All documents recording or constituting communications taking place between 12 February 2021 and 12 December 2022 between the applicant and any person or persons being described as *“And another who’s says I’m up for a bit of money”* in the text message sent from the Applicant’s mobile phone at 10:37 pm on 15 February 2021 (**the Civil Lawyer**), a copy of which is attached to this Notice.
2. All documents comprising notes, audio recordings and other communications (including text messages, emails, WhatsApp messages, letters, retainers) recording or referring any legal advice given to the applicant by the Civil Lawyer between 12 February 2021 and 12 December 2022 in relation to potential defamation proceedings.
3. The documents comprising the *“Cellebrite report”* identified in the letter from the lawyer for the applicant to the lawyer for the second respondent of 7 March 2023.

Date: 10 March 2023

Filed on behalf of	Lisa Wilkinson, Second Respondent
Prepared by	Anthony James Jefferies
Law firm	Gillis Delaney Lawyers
Tel 61 2 9394 1144	Tel 61 2 9394 1144
Email	ajj@gdlaw.com.au; dec@gdlaw.com.au
Address for service	Level 40, 161 Castlereagh St, Sydney, New South Wales, 2000



Signed by Anthony James Jefferies
Lawyer for the Second Respondent

Note

If this notice specifies a date for production, and is served 5 days or more before that date, you must produce the documents or things described in the notice, without the need for a subpoena for production.

If you fail to produce the documents or things, the party serving the notice may lead secondary evidence of the contents or nature of the document or thing and you may be liable to pay any costs incurred because of the failure.

94965	Instant Messages	Outgoing	15/02/2021 10:35:03 PM(UTC+10)	From [REDACTED]	[REDACTED]
94966	Instant Messages	Outgoing	15/02/2021 10:35:05 PM(UTC+10)	[REDACTED]	[REDACTED]
94967	Instant Messages	Outgoing	15/02/2021 10:35:13 PM(UTC+10)	[REDACTED]	[REDACTED]
94968	Instant Messages	Incoming	15/02/2021 10:35:30 PM(UTC+10)	[REDACTED]	[REDACTED]
94969	Instant Messages	Incoming	15/02/2021 10:36:08 PM(UTC+10)	[REDACTED]	[REDACTED]
94970	Instant Messages	Outgoing	15/02/2021 10:36:59 PM(UTC+10)	[REDACTED]	[REDACTED]
94971	Instant Messages	Outgoing	15/02/2021 10:37:08 PM(UTC+10)	From: +61420168898 (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehmann@hotmail.com Bruce Lehmann (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehmann@hotmail.com Bruce Lehmann (owner)	I've got two lawyers now Source: Native Messages Source file: Bruce's iPhone/mobile/.brary/SMS/ems db : 0x70FC4FE (Table: message, handle, chat, Size: 161562624 bytes)
94972	Instant Messages	Outgoing	15/02/2021 10:37:14 PM(UTC+10)	From: +61420168898 (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehmann@hotmail.com Bruce Lehmann (owner) To: +61438259671 Tahlia Work Mobile , To: b.lehmann@hotmail.com Bruce Lehmann (owner)	Criminal Source: Native Messages Source file: Bruce's iPhone/mobile/.brary/SMS/ems db : 0x70FC27F (Table: message, handle, chat, Size: 161562624 bytes)

94973	Instant Messages	Outgoing	15/02/2021 10:37:27 PM(UTC+10)	From: +61420160098 (owner) To: +61438259671 Tahlia Work Mobile, To: b.lehmann@hotmail.com Bruce Lehmann (owner) To: +61438259671 Tahlia Work Mobile, To: b.lehmann@hotmail.com Bruce Lehmann (owner)	Who says it's joy his realm yet Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms.db : 0x70FD749 (Table: message, handle, chat, Size: 161562624 bytes)
94974	Instant Messages	Outgoing	15/02/2021 10:37:47 PM(UTC+10)	From: +61420160098 (owner) To: +61438259671 Tahlia Work Mobile, To: b.lehmann@hotmail.com Bruce Lehmann (owner) To: +61438259671 Tahlia Work Mobile, To: b.lehmann@hotmail.com Bruce Lehmann (owner)	And another who's says I'm up for a 'bit' of money Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms.db : 0x70FD7BC (Table: message, handle, chat, Size: 161562624 bytes)
94975	Instant Messages	Outgoing	15/02/2021 10:37:56 PM(UTC+10)	From: +61420160098 (owner) To: +61438259671 Tahlia Work Mobile, To: b.lehmann@hotmail.com Bruce Lehmann (owner) To: +61438259671 Tahlia Work Mobile, To: b.lehmann@hotmail.com Bruce Lehmann (owner)	'not his Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms.db : 0x70FD9FC (Table: message, handle, chat, Size: 161562624 bytes)
94976	Instant Messages	Outgoing	15/02/2021 10:38:34 PM(UTC+10)	[REDACTED]	[REDACTED]
94977	Instant Messages	Outgoing	15/02/2021 10:38:40 PM(UTC+10)	[REDACTED]	[REDACTED]
94978	Instant Messages	Incoming	15/02/2021 10:38:49 PM(UTC+10)	From: +61438259671 Tahlia Work Mobile To: +61420160098 (owner), To: b.lehmann@hotmail.com Bruce Lehmann (owner) To: +61420160098 (owner), To: b.lehmann@hotmail.com Bruce Lehmann (owner)	Clear your name mate that's all that matters - you only have your name and one name. Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms.db : 0x70FD797 (Table: message, handle, chat, Size: 161562624 bytes)
94979	Instant Messages	Outgoing	15/02/2021 10:40:17 PM(UTC+10)	From: +61420160098 (owner) To: +61438259671 Tahlia Work Mobile, To: b.lehmann@hotmail.com Bruce Lehmann (owner) To: +61438259671 Tahlia Work Mobile, To: b.lehmann@hotmail.com Bruce Lehmann (owner)	Yeah exactly Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms.db : 0x70FD4D0 (Table: message, handle, chat, Size: 161562624 bytes)
94980	Instant Messages	Outgoing	15/02/2021 10:40:33 PM(UTC+10)	From: +61420160098 (owner) To: +61438259671 Tahlia Work Mobile, To: b.lehmann@hotmail.com Bruce Lehmann (owner) To: +61438259671 Tahlia Work Mobile, To: b.lehmann@hotmail.com Bruce Lehmann (owner)	He said I'm clear from criminal completely Source: Native Messages Source file: Bruce's iPhone/mobile/L brary/SMS/sms.db : 0x70FD26D (Table: message, handle, chat, Size: 161562624 bytes)