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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 ACN 052 515 250 and another named in the schedule

Respondents

**Lisa Wilkinson**

Cross-claimant

Network Ten Pty Limited ACN 052 515 250

Cross-respondent

Affidavit of: **Lisa Wilkinson AM**

Address: c/- Gillis Delaney Lawyers, Level 40, 161 Castlereagh Street, Sydney in the State of New South Wales

Occupation: Journalist

Date: 2 February 2024

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I, Lisa Wilkinson AM, c/- Gillis Delaney Lawyers, Level 40, 161 Castlereagh Street, Sydney in the State of New South Wales, journalist, affirm:

1. I am the cross-claimant.
2. I have affirmed two affidavits in this proceeding to which I refer in this affidavit, being affidavits affirmed on:
  - a. 5 December 2023 (my December Affidavit), and
  - b. 16 January 2024 (my January Affidavit)

I use terms as defined in those affidavits



3. I have reviewed:

- a. Affidavit of Tasha Smithies sworn on 25 January 2024 (**Smithies Affidavit**) and its Exhibit TTS-1; and
- b. Affidavit of Marlia Ruth Saunders affirmed on 25 January 2024 (**Saunders Affidavit**) and its Exhibit MRS-1.

4. Exhibited to this affidavit and marked "LW-2" is a bundle of documents to which I refer in this affidavit. If I refer to page numbers in this affidavit, unless otherwise specified, those references are to page numbers in Exhibit LW-2.

Reply to Smithies Affidavit

5. In reply to paragraphs 34 to 36 of the Smithies Affidavit:

- a. No further changes were made to the Logies speech following my meeting with Ms Smithies. The only change to the speech requested by Ms Smithies was the removal of a date, and that change was made in front of Ms Smithies during that meeting. The version of the speech reviewed and approved by Ms Smithies in that meeting was the final version of the speech.
- b. On the afternoon of 19 June 2019, the day of the Logies, despite Ms Smithies' prior approval of the speech, I requested that Ms Thornton show Ms Smithies once again a copy of the speech Ms Smithies had already reviewed and approved. I did this to reassure myself that, with the trial pending, the contents of the speech were legally appropriate and were approved by Ms Smithies in her role as legal counsel on behalf of Network Ten. I received that reassurance when Ms Thornton sent me a text message at 4:37pm on the same afternoon stating, "*Tasha says speech all good x*"; page 6 of Exhibit LW-1.
- c. I otherwise repeat paragraphs 8 to 10 of my January Affidavit.

6. In reply to paragraph 39 of the Smithies Affidavit:

- a. Ms Smithies was sitting near me during the Logie Awards ceremony, including at the point that nominees for the Logie for Most Outstanding News Coverage or Public Affairs Report (2021/2022) were announced and video clips to introduce the finalists were played. We conversed during the course of the evening.
- b. If Ms Smithies, after seeing the video footage used to introduce the nomination of *The Project* for the Logie Award, had told me not to give the Logies speech, I would have followed her legal advice and not given the speech.

7. In reply to paragraphs 56 to 59 of the Smithies Affidavit:

- a. I was not told of, or asked to approve, TEN's intention to engage Dr Collins prior to him being engaged.
- b. I was not informed, prior to Dr Collins' engagement, that Dr Collins had asked that I consider the matter of his interview on *Sunrise* prior to instructing him, and only became aware that Dr Collins had made that request when I reviewed the Smithies Affidavit.
- c. I was not asked if I was agreeable to Dr Collins acting as my legal representative, and did not have the opportunity, prior to his engagement by TEN, to communicate any objection to the engagement of Dr Collins. When I was informed that Dr Collins had been engaged, I communicated to Ms Smithies in the conversation described in paragraph 31 of my previous affidavit that I was not comfortable with his engagement in light of his public criticism of me.
- d. I otherwise repeat paragraphs 30 to 33 of my January affidavit.

8. In reply to paragraphs 60 to 64 and 66 to 67 of the Smithies Affidavit:

- a. I repeat paragraphs 30 to 33 of my January affidavit, in which I set out how I communicated to Ms Smithies the concerns I had in respect of briefing Dr Collins. I did not feel it appropriate to raise those concerns again in front of Dr Collins during a professional conference with him and others, especially when I was meeting Dr Collins for the first time.
- b. At the time of the call, I was on the front page of multiple newspapers and news sites across Australia and being reported on in a very negative light. The media were also already ridiculing me over the announcement by TEN of the appointment of Dr Collins.
- c. During that call, and due to the events which had just happened, I felt a combination of shell-shock, uncertainty, and a desire for Dr Collins to understand the position I was in, including as a result of TEN's legal advice in relation to the Logies speech.





d. Dr Collins was courteous throughout the call, and I was grateful for the empathy he showed, and I acted accordingly. I remained, however, concerned about his capacity to effectively advocate for me in any future proceedings in light of his public criticism of me that morning, as well as how the media would continue to report on his engagement by TEN on my behalf given that criticism.

e. During that conference call, Mr Fitzsimons, Mr Fordham and I each repeatedly made requests of TEN to make clear on the public record that it had approved the Logies speech. Those requests were refused. When I made those requests and subsequently, it was never my desire to talk publicly about the trial or the substance of the allegations against Mr Lehrmann – all I was seeking was that a public statement be made that the Logies speech I gave had been approved by TEN's management and TEN's legal department, and that I had not been warned by the DPP not to give it.

f. Although I agreed with Dr Collins' advice that a letter be sent to Mr Drumgold, I did not consider that this addressed the heart of the problem of many in the media misreporting facts relating to the content of the Logies speech, and what had been said in Court. A letter to the DPP would not result in a correction of the public record in relation to those issues or make it clear to the public that the speech had been approved by TEN and that I had not been warned by Mr Drumgold not to give it.

g. I otherwise repeat paragraph 36 of my January affidavit.

9. In reply to paragraphs 73 and 74 of the Smithies Affidavit:

a. One of the reasons that I initiated that call with Ms Smithies was to express my ongoing concerns regarding Dr Collins' advice that I not be represented at court the next day. I asked my brother-in-law, a lawyer, to participate in that call because I wanted his assistance in articulating my misgivings about the decision TEN had made for no one to appear for either TEN or me before the Court.

b. I agree that I raised concerns about the engagement of Dr Collins. I do not agree that I was "comfortable" with that decision, but I accepted that it had been made and felt that ultimately I was in TEN's (my employer's) hands as to the choice of lawyer and his advice.

10. In reply to paragraphs 76 to 81 of the Smithies Affidavit:

a. During the period described, Mr Fitzsimons and I repeatedly made requests of TEN to make clear on the public record that it had approved the Logies speech, and to correct factual inaccuracies in widespread reporting on that issue.

b. TEN ultimately made a public statement that:

*"Recent reporting on Lisa Wilkinson by some media organisations has been inaccurate and unfair. There are significant facts that cannot be disclosed until after the trial has concluded.*

*"This reporting is now causing significant harm, and we ask these organisations to cease this harassment to allow Lisa the best opportunity to give her evidence in court and to enable the trial to go ahead in a fair and timely manner.*

*"We are closely monitoring all coverage of this issue and Lisa and Network 10 reserve their rights in respect of any future defamation claims.*

*"Network 10 continues to fully support Lisa in her ongoing and full commitment to doing the right thing as a witness in the trial."*

A copy of an email sent to me by Ms Thornton setting out the final wording of that statement and asking that it be distributed is at **pages 2 to 3**. I subsequently saw that statement issued on a TEN letterhead signed by Ms McGarvey.

c. I did not consider that statement to be adequate in correcting the public record nor did it address my repeated requests for TEN to publicly acknowledge that it had approved the Logies speech. However, I considered it to be better than nothing. I was worried that if I disagreed too strongly with TEN's approach and advice, TEN might not make any statement. I also remained hopeful that TEN would follow through with its promises to engage an external crisis comms team to deal, behind the scenes, with the widespread inaccurate reporting in the media.

11. In reply to paragraphs 82 to 84 of the Smithies Affidavit:

a. I did not believe Ms Smithies' advice – that there was a "contempt risk" – to be appropriate, given that my actual request was for factual inaccuracies or defamatory statements about me to be addressed behind the scenes, to attempt to limit the media frenzy that remained ongoing.



b. I did not feel there was anything I could do given Ms Smithies' position and her advice, which to my mind was to the ultimate effect that I just had to "wear" the situation.

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12. In reply to paragraph 106 of the Smithies Affidavit, as I have explained above and in my January Affidavit, I had remained concerned at correcting the public record at all times since the inaccurate reporting emerged concerning what had (or had not) been said to me at the Drumgold meeting. However, I felt I had to go along with Ms Smithies' advice given her position.

13. In reply to paragraph 109 of the Smithies Affidavit:

a. Mr Fordham and I raised the issue of the "crisis comms" team at this meeting. At that time, we had no idea who this team was, had not seen any evidence of their work or been offered the opportunity to communicate with that team. At the end of the meeting, Mr Fordham asked Ms Donovan for details of who the external "crisis comms team" were, so that he could communicate with them directly. Ms Donovan said that she would speak with him after the conference. Mr Fordham later told me that his attempts to speak to Ms Donovan after the conference were frustrating and fruitless, and that he had not been able to obtain any further information about the "crisis comms" team.

b. To the best of my knowledge, TEN did not write to the media about any factual inaccuracies or defamation issues relating to media reporting about me or the Logies speech.

14. In reply to paragraph 121 to 122 of the Smithies Affidavit:

a. I am not aware of any instances of TEN taking steps to "correct inaccuracies".

b. At no time did I receive any communication raising with me any articles which had been identified by a "media monitoring system", apart from in response to communications from me like the email at page 189 of Exhibit TS-1.

15. In reply to paragraphs 123 to 124 of the Smithies Affidavit, I repeat paragraphs 44 to 55 of my January affidavit.

16. In reply to paragraphs 136 to 137 of the Smithies Affidavit, I was not "comfortable with the steady approach". I was increasingly frustrated by the lack of meaningful action by TEN. However, I still considered that I was required to effectively be in the hands of TEN and Ms Smithies. I did not feel I could act in a way that Ms Smithies might consider to be contrary to her advice. I also remained concerned, especially in light of the loss of my on-air role on *The Project*, that TEN might abandon me entirely.

17. In reply to paragraph 145 of the Smithies Affidavit, on many occasions since June 2022 Mr Fordham and I had both requested TEN provide us with an introduction to the external "crisis communications" team or company, which had been promised by TEN, evidence of any work done by it, or evidence of its existence. The request described at paragraph 145 – made on this occasion to the CEO of TEN – was one of those requests, but not the first.

18. In reply to paragraph 159 of the Smithies Affidavit:

a. A complete copy of the email quoted in part in that paragraph is at pages 4 to 6, dated 16 to 18 January 2023.

b. In the first email in that chain, Ms Smithies sent to me:

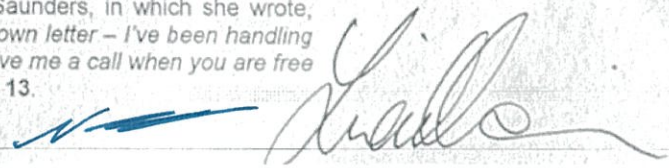
i. A letter dated 22 December 2022 from legal representatives of Fiona Brown to Justin Quill of Thomson Geer, who, it appeared, had received it on my behalf; and

ii. A letter dated 16 January 2023 from Ms Saunders to Ms Brown's solicitors.

Copies of those two letters are at pages 7 to 12. The email I received from Ms Smithies was the first I was informed of the letter from Ms Brown's solicitors or Ms Saunders' reply to that letter.

c. I tried to call Ms Saunders, but she was unavailable. I observed that the letter from Ms Brown's solicitor had been sent to Mr Quill, so I called Mr Quill. I do not waive privilege about the legal matters discussed in our call. In that call, Mr Quill did not disclose any conflict of interest that would prevent him or Thomson Geer from acting on my behalf.

d. On 19 January 2023, I received an email from Ms Saunders, in which she wrote, "Justin told me you had a query about the Fiona Brown letter – I've been handling this, so he's not across the recent developments. Give me a call when you are free and we can discuss." A copy of that email is at page 13.





e. After receiving that email, I called Ms Saunders. Ms Saunders said to me words to the effect, "Don't ever call Justin again." I perceived her to be annoyed with me. I was unsure at the time of the reason for her strong reaction to me having any contact with Mr Quill.

f. I was not aware until the conference described in paragraphs 88 to 92 of my January Affidavit that Thomson Geer acted for *The Australian*. In that conference, Ms Chrysanthou SC asked me if I was sure that Ms Saunders did not act for *The Australian*, because Thomson Geer and Mr Quill did. I told Ms Chrysanthou of the call with Ms Saunders described in the preceding sub-paragraph.

19. In reply to paragraphs 162 to 174 of the Smithies Affidavit:

a. A draft of the proposed letter to the DPP is at pages 389 to 392 of Exhibit TS-1. In drafting the proposed letter to the DPP, I was conscious of the respect I held for the Court and the presiding judge. I did not at the time (and do not now) consider that any of my proposed words could be construed other than as showing that respect.

b. I did not consider Ms Saunders' advice about "*scandalising the court*" to be correct. I harboured a belief that other factors relating to whatever course TEN wanted to take were influencing that advice.

c. Increasingly, at this time, and having read Ms Saunders' advice to me, I began to believe that Ms McGarvey's public statement promising that "*significant facts*" would be disclosed after the conclusion of the trial in *R v Lehmann* may well not come to fruition.

d. After reading Ms Saunders' advice, I felt that the interests of TEN were informing the advice that was being given to me by Ms Saunders.

e. I otherwise repeat paragraph 63 of my January Affidavit.

20. In reply to paragraphs 175 to 177 of the Smithies Affidavit:

a. I did not perceive myself to be "*supported*" by TEN in circumstances where TEN had determined not to make a submission to the Board of Inquiry. I believed that, if TEN's really wanted to support me, it would treat the Board of Inquiry as an opportunity to finally correct the record on what happened in the Drumgold meeting, as ultimately occurred as a direct result of the work of my legal team. I did not consider that a submission to the Board of Inquiry needed to be, or should be, purely a "*personal*" complaint by me given that Ms Smithies was present in the Drumgold meeting, I was in the employ of TEN and I gave the Logies speech at the request of TEN and with the express approval of TEN, including of Ms Smithies.

b. I did not perceive Ms Saunders to be able to act solely for me, as I perceived a tension between Ms Smithies' advice that I would have "*direct recourse to Marlia's advice without network involvement*" but that Ms Saunders would "*then communicate with [Ms Smithies] for network input on proposed courses of actions*".

c. I otherwise repeat paragraph 64 of my January Affidavit.

21. In reply to paragraphs 178 and 179 of the Smithies Affidavit, the reason that I was "*shocked*" was that when the opportunity came for TEN to make a submission to an independent inquiry that had powers to compel a response from Mr Drumgold, they refused. I believed at the time that Ms Smithies' decision on this matter was motivated by a personal desire to avoid her involvement in the approval of the Logies speech becoming a matter of public record, and, in so doing, protect her own professional reputation and avoid personal embarrassment. These matters, including repeated threats of "*contempt issues*" which by now did not seem to be particularly real, led me to have a growing distrust about relying on any advice given to me by Ms Smithies, or that any directions given to me by Ms Smithies on legal matters would have regard to my separate legal interests distinct from TEN's or hers.

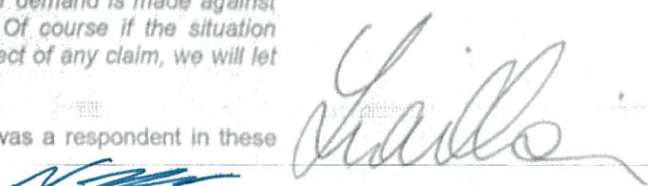
22. In reply to paragraph 182 of the Smithies Affidavit:

a. I was not contacted by Ms Smithies on 7 February 2023 to notify me that defamation proceedings had been commenced against me.

b. In the email of 11 January 2023 at page 365 of Exhibit TS-1, Ms Smithies wrote to Mr Fordham (copying me):

*In relation to the defamation letter, no claim or demand is made against Lisa, it is limited to Ten as the publisher... Of course if the situation changes and Lisa is named or she is the subject of any claim, we will let you know.*

However, this did not occur. I only found out that I was a respondent in these





proceedings when reading an article accompanied by a large photo of me titled "Recklessly Indifferent to Truth: Lehmann Sues Lisa for Damages" on the front page of *The Australian* newspaper the following morning, in the circumstances set out in paragraph 75 of my January Affidavit.

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23. In reply to paragraph 186 of the Smithies affidavit, the first time I became aware of that email chain, or that a "press query" had already been received by TEN early on the evening of 7 February 2023 was as part of Exhibit TS-1.

Reply to Saunders Affidavit

24. In reply to paragraph 7 of the Saunders Affidavit, I was not aware until the conference of 12 February 2023 described in paragraphs 88 to 92 of my January Affidavit that the "Media team" at Thomson Geer of which Ms Saunders was a partner acted for *The Australian* newspaper, including during a period in which *The Australian* newspaper published articles which I considered misrepresented facts concerning me in regards to the Logies speech, the *R v Lehmann* trial and my contractual arrangements with TEN.
25. In reply to paragraphs 8 and 9 of the Saunders Affidavit, Ms Saunders and Thomson Geer were also instructed by Ms Smithies to act for me in relation to the Board of Inquiry.
26. In reply to paragraph 13 of the Saunders Affidavit, I recall that on or about 23 June 2022, I was told that Mr Drumgold had said to Ms Saunders that he was not considering any contempt of court charges against TEN or me. I remembered this when Ms Saunders subsequently advised me on multiple occasions that if TEN took specific actions to correct the public record concerning the Drumgold meeting and the Logies speech, I would be at a risk of "contempt" charges. I was concerned at avoiding such an outcome or otherwise putting the *R v Lehmann* trial at risk, but was also confused at how this advice was consistent with what I had been told Mr Drumgold had said to Ms Saunders.
27. In reply to paragraph 15 of the Saunders Affidavit:
- a. I repeat paragraph 7 above.
  - b. I repeat paragraphs 30 to 33 of my January Affidavit.
  - c. I deny that I indicated to Ms Smithies that I was happy to proceed to retain Dr Collins.
28. In reply to paragraphs 17 to 19 of the Saunders Affidavit:
- a. I was not advised whether, in circumstances where an adverse finding had been made against me, I would be entitled to be heard in respect of that finding despite not being a party to the proceedings.
  - b. I repeat paragraph 36 of my January Affidavit and paragraph 8 above.
29. In reply to paragraph 22 of the Saunders Affidavit:
- a. Mr Drumgold did not tender the letter in open court.
  - b. As no lawyer appeared on my behalf before the hearing in *R v Lehmann* of 22 June 2022, I was unable to instruct a lawyer to tender the letter to the Court when Mr Drumgold did not do so.
  - c. Following the hearing in *R v Lehmann* of 22 June 2022, in which TEN and I did not appear, the media commentary continued and escalated, to which I have referred in my earlier affidavits.
30. In reply to paragraph 30 of the Saunders Affidavit, to the best of my recollection, this is the same meeting that was described in paragraphs 109 and 113 of the Smithies Affidavit, and I repeat what I have said above and in my earlier affidavit in respect of that meeting.
31. In reply to paragraph 31 of the Saunders Affidavit, the "Janet Albrechtsen" referred to is a journalist employed by *The Australian* newspaper.
32. In reply to paragraph 33 of the Saunders Affidavit, I noted Ms Saunders' advice that Mr Drumgold had said "that his view is that there has never been a suggestion that a contempt of court was committed by Lisa". This contributed to my growing confusion at advice from Ms Saunders that I subsequently received on the issue of contempt.
33. In reply to paragraph 53 of the Saunders Affidavit, I repeat paragraph 16 above.
34. In reply to paragraph 66 of the Saunders Affidavit, given that the subsequently announced Board of Inquiry provided an appropriate forum to correct the record, and given that Ms Saunders did not consider that Mr Drumgold would do so voluntarily, I did not understand Ms Saunders' advice following the announcement of the Board of Inquiry (as set out at page 117 of Exhibit LW-1) that it was not in my interests to make a submission to the Board of Inquiry. At the time, it was clear to me that the Board of Inquiry presented a "step" that could be taken.



35. In reply to paragraph 69 of the Saunders Affidavit, to my observation, the process undertaken by the DPP in preparing the file note was revealed to the Board of Inquiry by reason of the submission made on my behalf and the cross-examination undertaken by Ms Chrysanthou during the course of the Board of Inquiry. If not for those steps, taken by my independent legal team on my instructions, it seemed to me in light of the lack of submissions from anyone else on these issues that the misrepresentations made to the Court in *R v Lehmann* regarding the preparation of that file note would never have been revealed.

36. In reply to paragraph 75 of the Saunders Affidavit:

- a. I disagreed with Ms Smithies' advice in her email of 11 January 2023 that *there are no further steps we can take during the course of the inquiry*. At the time, my view was that making a submission to the Board of Inquiry was a further step that ought to be taken to reveal the truth of what had occurred at the Drumgold meeting.
- b. Subsequent to that email, in which Ms Smithies wrote, *"Of course if the situation [regarding the defamation proceedings foreshadowed by Mr Lehmann] changes and Lisa is named or she is the subject of any claim we will let you know."* Ms Saunders was a recipient of the email of 7 February 2022 in which Mr Svilians advised that Mr Lehmann had *"instituted Federal Court defamation proceedings as against Network Ten Pty Limited and Ms Lisa Wilkinson"*, a copy of which is at pages 265 to 267 of Exhibit MS-1. Upon receiving that email, Ms Saunders did not inform me that I was a respondent in those proceedings, and I found out myself the following morning when it was reported in *The Australian* as set out in paragraph 22.b above and in paragraph 75 of my January Affidavit.

37. In reply to paragraphs 78 to 91 of the Saunders Affidavit, I repeat paragraph 63 of my January Affidavit.

38. In reply to paragraph 93 of the Saunders Affidavit, in the email described in that paragraph, Ms Saunders wrote to me that Mr Lehmann had made a complaint to the ACT Bar Council which referred specifically to the Drumgold meeting, which suggested *"that Drumgold's conduct in allegedly failing to properly instruct and manage witnesses will be a matter dealt with by the Inquiry, and it's likely the issues you encountered will be raised during the Inquiry's processes."* If this was the case, I did not understand why Ms Saunders was advising me against making a submission to the Board of Inquiry. I did not understand how it would be in my interests to allow the issue of what occurred at the Drumgold meeting to be considered by the Board of Inquiry without my or TEN's input, especially as I was sure that, if I did not participate in the Board of Inquiry, this would still result in further, misinformed, negative media reporting about me. I considered that her recommended course of action (or inaction) would risk leaving me further legally and reputationally exposed.

39. In reply to paragraph 94 of the Saunders Affidavit, the terms of reference for the Board of Inquiry were extended after I made my submission to it to include that the Board inquire into whether Mr Drumgold failed to act in accordance with his duties or acted in breach of his duties in *"his conduct of the preparation of the proceedings for hearings"*.

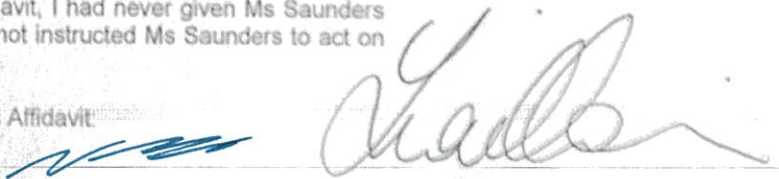
40. In reply to paragraph 95 of the Saunders Affidavit, in the email quoted in that paragraph, Ms Smithies wrote, *"it is our view that it is not appropriate for the network to make any submissions to the board of inquiry, for several reasons including that any complaint is properly a personal complaint by Lisa."* Ms Saunders did not advise me about steps that she could take as my lawyer to advocate to TEN on my behalf requesting that TEN, or Ms Smithies as a witness to the Drumgold meeting, make a submission or provide a statement to the Board of Inquiry.

41. In reply to paragraph 99 of the Saunders Affidavit:

- a. I repeat paragraph 65 of my January Affidavit. My contemporaneous note setting out my recollection of that call is at pages 110 to 115 of Exhibit LW-1.
- b. I deny that I said that I was *"very pleased"* with the approach taken by TEN generally. I expressed that I was pleased that TEN was finally in communication with at least one of the journalists who had, on a number of occasions, published articles which misstated what had occurred in the period surrounding the Logies speech and since.
- c. I deny that I said that I *"could not be more grateful for the effort"* Ms Saunders had gone to with Mr Drumgold. I was polite to Ms Saunders, but I was frustrated by TEN's decision not to make a submission to the Board of Inquiry, and at Ms Saunders for not advocating for me in relation to that issue, as explained above.

42. In reply to subparagraph 104(e) of the Saunders Affidavit, I had never given Ms Saunders instructions to accept service on my behalf. I had not instructed Ms Saunders to act on my behalf in relation to these proceedings.

43. In reply to subparagraph 104(k) and (l) of the Saunders Affidavit:





a. At the time of that call, I was in the process of obtaining independent legal advice, and did not consider that Ms Saunders was acting for my separate legal interests.

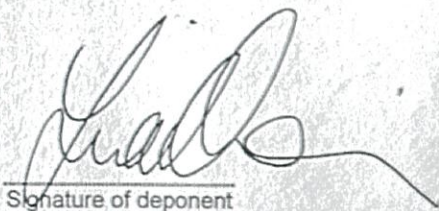
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b. I recall Ms Saunders advised that she intended to file an address for service the following week, while I intended to pursue independent legal advice and representation prior to that time. I did not want to alert Ms Saunders to my intention until I was satisfied with the independent legal advice that I had received, as I was concerned that, if I told Ms Saunders, that information would be shared with TEN.

44. In reply to paragraph 116 of the Saunders Affidavit, Ms Saunders did not advise me:

- a. That Thomson Geer – including Justin Quill – had acted, and continued to act, for *The Australian*, including giving pre-publication advice in relation to articles that referred to me;
- b. Of any such proposed articles that she, or others at Thomson Geer, became aware of prior to their publication;
- c. The nature and extent of any conflict between my interests and those of *The Australian*, and the impact of that conflict on her capacity to advise me concerning any defamatory or potentially defamatory articles concerning me or take steps to respond to such articles;
- d. Of what steps, if any, Thomson Geer had taken to mitigate any such conflict of interest.

Affirmed by the deponent )  
at Sydney )  
in New South Wales )  
on 2 February 2024 )  
Before me:



Signature of deponent



Signature of witness

Nicola Rebecca Sanchez  
Name and qualification of witness

Filed on behalf of Lisa Wilkinson, Second Respondent/Cross-claimant  
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