

Form 59
Rule 29.02(1)

Affidavit

No. NSD103 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
Respondents

Affidavit of: **Alex Katrina Humphreys**

Address: 

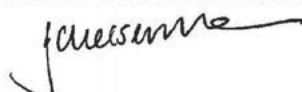
Occupation: Public Servant

Date: 27 July 2023

I Alex Katrina Humphreys, Public Servant, affirm:

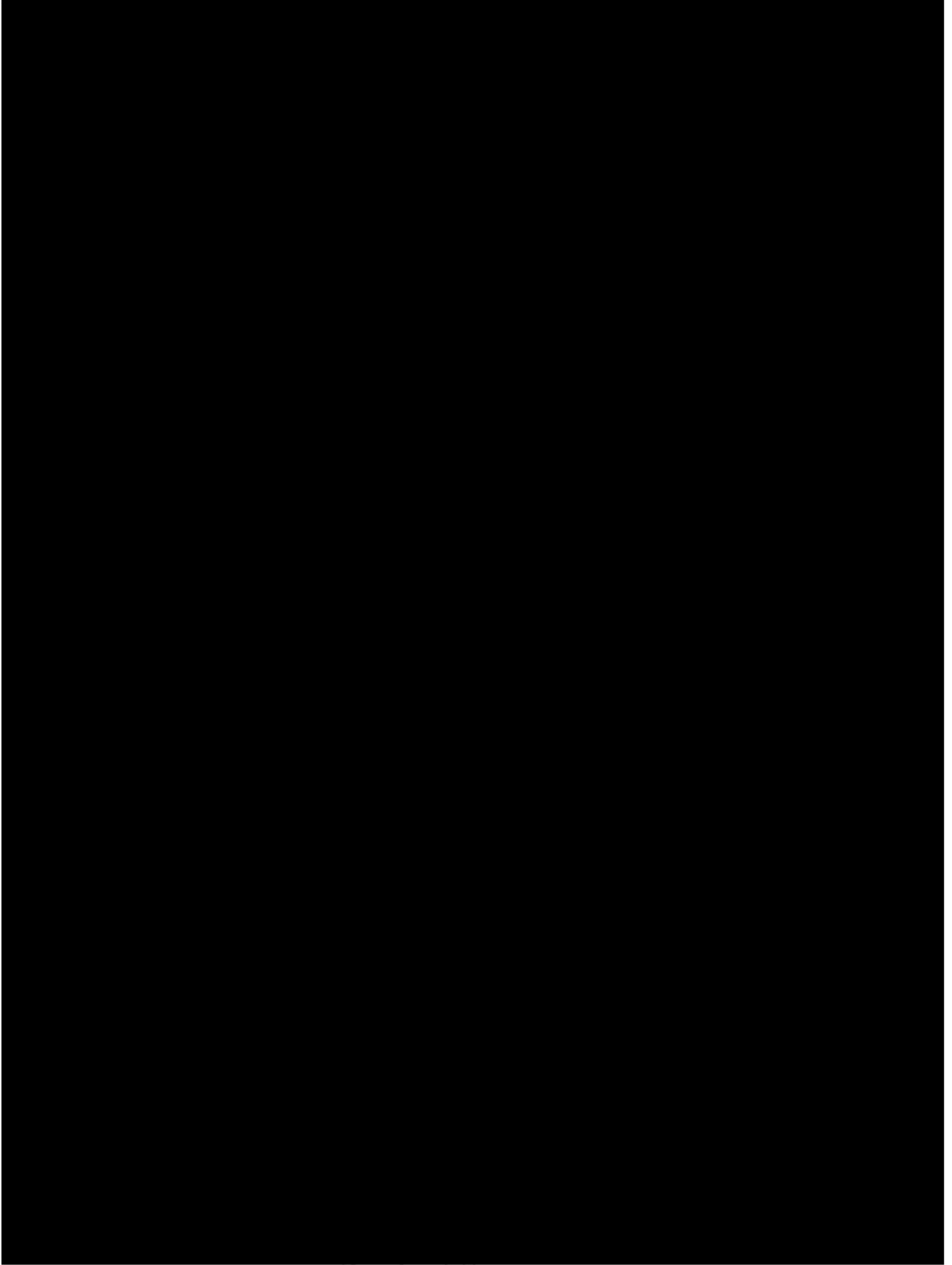
1. The matters set out in this affidavit are based on my own knowledge, except where I have stated or qualified otherwise.
2. Where I refer to a document in this affidavit, that document was produced to me at the time of affirming this affidavit and verified by me as a true copy of the relevant document.

Filed on behalf of (name & role of party) First Respondent, being Network Ten Pty Limited
Prepared by (name of person/lawyer) Alex Humphreys (represented by Julie Cheeseman)
Law firm (if applicable) Bird & Bird
Tel 02 9226 9888 Fax _____
Email julie.cheeseman@twobirds.com
Address for service Level 22, 25 Martin Place, Sydney NSW 2000
(include state and postcode)



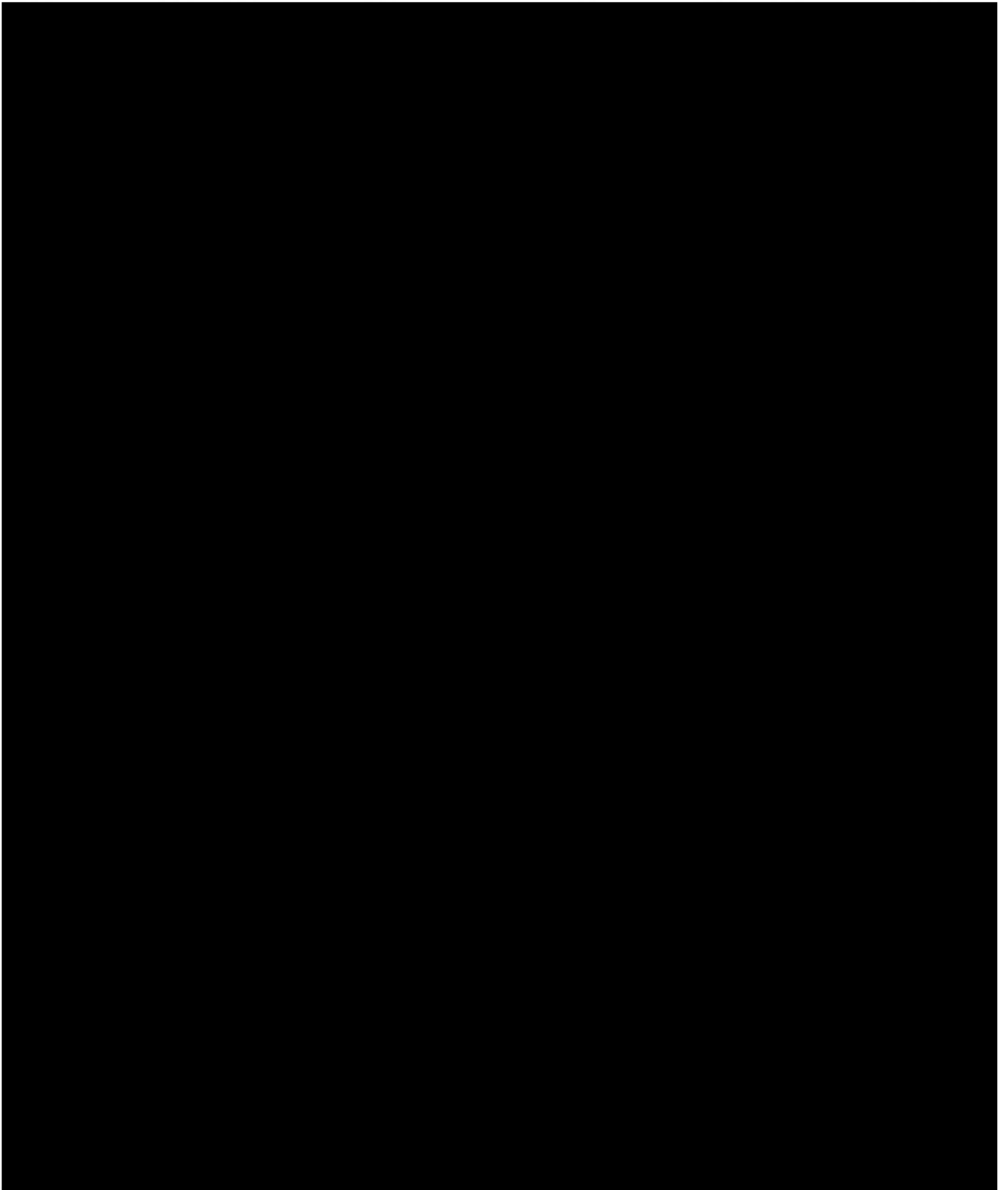
[Version 3 form approved 02/05/2019]





Jerusalem

Atyp



14. I first met Brittany Higgins when she moved in to live with me and my housemate at our share house in Woden, Canberra in early 2019. Ms Higgins had relocated from Queensland to Canberra and was new to the city. As with previous housemates, after Ms Higgins moved into the share house, I added her to a group chat on Facebook

Jane Senne

Brittany Higgins

Messenger which included my wider group of friends. After Ms Higgins moved in, I organised, and I also attended, occasional dinners and social gatherings after work and on weekends, sometimes individually with Ms Higgins and sometimes with Ms Higgins and a group of my friends. We quickly became friends.

15. When I first met Ms Higgins at the start of 2019, my impression of her was that she was friendly, open and enthusiastic about her new job at Parliament House as a media advisor.
16. In or around May 2019, Ms Higgins travelled to Western Australia to work on an election campaign. I independently travelled to Western Australia at around the same time to visit friends. When preparing this affidavit, I conducted a Google search to ascertain the approximate timing of the Western Australia election to refresh my memory as to the approximate timing of this travel to Western Australia.
17. Prior to Ms Higgins leaving to go to Western Australia, I recall standing near Ms Higgins in our share house in the common area near the living room and kitchen when a telephone call came into Ms Higgins' mobile phone and interrupted our conversation. I no longer recall whether Ms Higgins picked up the call but immediately afterwards I do recall Ms Higgins saying to me words to the effect that the call was from the police in relation to something that had occurred at work. This struck me as odd at the time.
[REDACTED]
18. Prior to my travel, I also recall making plans to catch up with Ms Higgins while we would both be in Perth. However, those plans did not eventuate because Ms Higgins cancelled them once we were there.
19. When Ms Higgins returned to our share house in Canberra following her trip to Western Australia, I observed a change in her behaviour. I noticed that she stayed in her bedroom a lot rather than spending time with me and our housemate in the common area. I noticed that she was becoming quite messy in her bedroom and in the kitchen whereas she had not previously been that way. Although I continued to invite Ms Higgins to occasional social events with me and my friends, I don't recall her attending any events with me in the period between when she returned from Western Australia and when she moved out in late 2019. During this period, I recall thinking to myself that something was amiss with Ms Higgins but I personally attributed the changes which I had observed in Ms Higgins' behaviour to work-related stress associated with the election. As at the date of affirming this affidavit, I do not recall Ms Higgins' state of mind just prior to her trip to Western Australia, [REDACTED]
[REDACTED]

J. [Signature]

[Signature]

- [REDACTED]
- [REDACTED]
20. In late 2019 Ms Higgins moved out of the share house and around the same time, she left the group chat which I had added her to when she moved in. When Ms Higgins moved out, I recall observing that she had lost weight and that she had left her bedroom in a very messy state.
21. After Ms Higgins moved out, I sporadically attended one on one catch ups with her. These catch ups were not as frequent as I had planned (or wanted) them to be because Ms Higgins would often flake (cancel our plans).
22. I recall only two occasions in the period after Ms Higgins moved out where she attended a social event which I had organised with a wider group of people: in around April or May 2020, she attended a pizza night at my place; and in February 2021, she attended my birthday dinner at a restaurant with three or four of my other friends.
23. In the evening of 16 January 2021, I attended Ms Higgins' apartment to visit her. I have refreshed my memory of the exact date of my visit from the Note. I believe this is an accurate date because I checked my personal records to confirm this date when I wrote the Note. The reason I went to visit Ms Higgins that night was because she had cancelled her attendance at a prearranged social event that I was also meant to attend. When Ms Higgins cancelled, I also cancelled and opted to go and visit Ms Higgins instead because I had not been seeing her on a regular basis and I was concerned about her. While I was at Ms Higgins' apartment, I recall sitting on the couch with her and having a conversation over a take-away meal. During this conversation, Ms Higgins told me she had been raped and it had happened at Parliament. We both cried during this conversation. [REDACTED]
- [REDACTED]
- [REDACTED]

J. [Signature]

[Signature]

Phone calls from Angus Llewellyn

24. Shortly prior to Ms Higgins' interview on *The Project*, I received a phone call from a man who identified himself as Angus Llewellyn, a producer who worked on the television program, *The Project*. I do not recall all of my conversation with Mr Llewellyn but I do recall that he asked me what I knew about Ms Higgins' rape and whether I felt comfortable appearing and being interviewed on the program in relation to a story *The Project* was going to run about Ms Higgins. I recall saying that I wouldn't feel comfortable doing so, but I do not recall whether it was on this occasion or whether I called him back around that time to say this.
25. I spoke with Mr Llewellyn on two occasions. As at the date of affirming this affidavit, I do not recall whether the second phone call was initiated by me (as stated in paragraph 24 above) or whether I received another phone call from Mr Llewellyn.
26. As at the date of affirming this affidavit, Mr Llewellyn has not contacted me again.

Affirmed by the deponent
 at L22, 25 Martin Place, Sydney
 in New South Wales
 on 27 July 2023
 Before me:

)
)
)
)
)

Signature of deponent

Signature of witness

Julie Anne Cheeseman
 Legal Practitioner