

## NOTICE OF FILING

### Details of Filing

Document Lodged: Affidavit - Form 59 - Rule 29.02(1)  
Court of Filing: FEDERAL COURT OF AUSTRALIA (FCA)  
Date of Lodgment: 22/07/2024 3:39:14 PM AEST  
Date Accepted for Filing: 22/07/2024 3:39:18 PM AEST  
File Number: VID1023/2023  
File Title: MOIRA DEEMING v JOHN PESUTTO  
Registry: VICTORIA 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 of Helen Papadimitriou

VIC 1023 of 2023

Federal Court of Australia  
District Registry: Victoria  
Division: General

**Moira Deeming**

Applicant

**John Pesutto**

Respondent

Affidavit of: **Helen Papadimitriou**

Address: [Redacted]

Occupation: Project Officer

Date: 22 July 2024

I, Helen Papadimitriou, of [Redacted], affirm:

1. I am a Project Officer at The Victorian Legal Services Board. I work in their grants program which funds projects in the legal sector. I have been in this role for about 2 years. Before that, I was an Event Coordinator at the Victoria Law Foundation.

**Let Women Speak Rally**

2. I saw on social media that Kellie-Jay Keen was scheduled to host a Let Women Speak Rally outside Parliament House on 18 March 2023 (**LWS Rally**).

3. I was drawn to the LWS Rally because my child is caught up in gender ideology and this has caused difficulties for our family. There has not been any forum in which parents like myself are able to openly discuss the impacts of gender ideology on their families. I was very optimistic about the LWS Rally and wanted to share a space with other people with whom I could openly discuss issues relating to gender ideology.

Filed on behalf of (name & role of party)	Moira Deeming, Applicant
Prepared by (name of person/lawyer)	Patrick George, Solicitor
Law firm (if applicable)	Giles George
Tel	1300 163 662
Fax	
Email	patrick.george@gilesgeorge.com.au   jeremy.marel@gilesgeorge.com.au   petar.strkali@gilesgeorge.com.au
Address for service (include state and postcode)	Level 7, 135 King Street Sydney NSW 2000

*corrected by callan 8/7/24 Jpw*

*HP*

4. I attended the LWS Rally with a small group of parents I know who have had similar experiences to me.
5. The LWS Rally was held on a warm, sunny day and it was exciting.
6. I recall there were different groups gathered outside Parliament House at the same time:
  - (a) There were people who were attending the LWS Rally. My recollection is that the LWS Rally was predominantly composed of women, though there were some men. There were mothers and grandmothers. There were lesbians. There were people from various different backgrounds. For example, I recall having a discussion with a woman who wore a hijab.
  - (b) There were pro-trans activists who had gathered opposite the LWS Rally, near Bourke Street, and were protesting against the LWS Rally.
  - (c) There was a group of "Freedom Protesters", who I understand regularly hold protests every Saturday near Parliament House. They were mostly older looking men. I recall they were carrying Australian flags and a banner, but I do not recall what the banner said.
  - (d) There was a small group of younger men who were wearing black t-shirts and black shorts (**the Men**).
7. My perception and observation at the time was that these were all separate groups.
8. I did not pay much attention to any of the groups other than the LWS Rally. I was there for the LWS Rally and wanted to listen to the women who were speaking as part of that rally. However, I do recall at some point (I do not recall precisely when) I climbed the first few steps of Parliament House and looked towards the north end of Spring Street where I saw the Men for the first and only time. They were further down Spring Street. I could see them from my vantage point on the steps but hadn't been able to see them from where I had been on ground level with the rest of the LWS group. I recall seeing that the Men were carrying a banner, but I could not see what it said from where I was. It was clear to me at the time that they were a totally distinct group from the LWS group.
9. I had no idea who the Men were. All I could see was that they were wearing generic black clothes and were carrying a banner. I did not even contemplate at the time that they were Nazis. It was only after the LWS Rally when I started to see footage of the LWS Rally that I first saw that the Men had performed a Nazi salute.
10. I do not recall anyone at the LWS Rally saying anything about the Men and did not see anyone from the LWS Rally interacting with them.

11. Throughout the LWS Rally, I listened to the speakers and spoke with other women who were there. I recall at times I was struggling to hear the LWS Rally speakers because there was a lot of noise coming from all the other groups, and the LWS Rally speaker equipment was not very loud.
12. I left early, as one of the women I was with was 78 years old and she wanted to find a place where she could sit and rest.

#### **After the LWS Rally**

13. On 21 March 2023, I sent an email to Maree Edwards (the Speaker of the Victorian Legislative Assembly), copying Daniel Andrews, John Pesutto and Moira Deeming. A copy of that email is annexed and marked **HP-1**.
14. I sent the email because I could not believe that Mr Andrews and Mr Pesutto, despite disagreeing on seemingly everything, could all agree that it was appropriate to label Moira and the other women who attended the LWS Rally as Nazis. Based on my experiences at the LWS Rally, I was of the view that Mr Pesutto was misrepresenting what had occurred at the LWS Rally. I understood he was suggesting Moira was a Nazi, or had some link to the Men (who by that time were being called 'Nazis'). For this reason, I wrote:

*It is absurd to suggest that the Victorian women at the event, including Moira Deeming, are somehow linked to the Nazi group. The women who peacefully attended come from a diverse range of backgrounds. Many were lesbians and parents of gender dysphoric young people.*

...

*I am a lifelong Labour[sic]/Greens supporter who supports Moira Deeming. On Saturday Moira spoke eloquently and with dignity about a muslim, migrant woman's experience of living in Australia. Moira has done nothing wrong. Using her as a scapegoat for the angry violent behaviour of random men is unjust and unfair. Do not blame this woman and sacrifice her career and livelihood.*

*I am happy to speak with you about the issue - I am a witness to the event and the women who spoke there. I am a woman who cares about the erosion of women's rights and our voice in public life. I hope you do too.*

15. I never received a response to this email.
16. Since 19 March 2023, I have seen that when Moira posts a tweet on X she receives comments in reply calling her a Nazi. The people who post these comments never respond to the substance of her tweet, but consistently defer to calling her a Nazi or a Nazi sympathiser. Prior to 19 March 2023, I had never seen such comments about Moira.

*clt*

*HP*

Affirmed by the deponent

At Melbourne

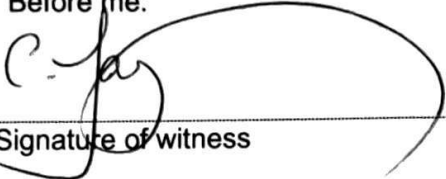
in Victoria

on 22 July 2024

Before me:

)  
)  
)  
)  
)

Helen Papadimitriou  
Signature of deponent

  
Signature of witness

**CATHERINE ELIZABETH TAYLOR**

Name and qualification of witness  
An Australian legal practitioner  
within the meaning of the  
*Legal Profession Uniform Law (Victoria)*

cat .

#P