



Form 59
Rule 29.02(1)

Affidavit

No. NSD. 103/2023

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

Bruce Lehmann

Applicant

Network Ten Pty Limited (ACN 052 515 250) and Anor

Respondents

Affidavit of: **Kathleen Quinn**

Address: [REDACTED]

Occupation: Consultant

Date: 28 July 2023

I Kathleen Quinn, Consultant, of [REDACTED] make oath and say as follows:

1. I am a Partner of The Inner Circle Strategic Advisory, which specialises in government relations and strategic communications.
2. In 2010 I graduated from the Queensland University of Technology with a Bachelor of Journalism. From 2012-2015, I worked as an Electorate Officer for the Queensland Government. In June 2015, I started work as a Media Adviser to the Hon. Steven Ciobo, the then Minister for International Development and the Pacific. In June 2017, I was promoted to the role of Ministerial Adviser to Minister Ciobo, who was then the Minister for Trade, Tourism and Investment and later the Minister for Defence Industry. Following Minister Ciobo's retirement in March 2019, I worked for approximately 12 months as a Ministerial Adviser to the Hon. Melissa Price from July 2019, who was at that time the Minister for Defence Industry.
3. I first met Bruce Lehmann (the Applicant) in or about 2016 when we were both staffers at Australian Parliament House (APH). To the best of my recollection, the Applicant was working for the Hon. George Brandis, the then Attorney General, at the time. Since that

Two handwritten signatures in blue ink, one appearing to be 'Kathleen Quinn' and the other a less legible signature.

time, the Applicant and I were acquaintances, and interacted in both work and social settings over the years we both worked at APH.

4. I also knew Brittany Higgins as we had worked together for Minister Ciobo from about October 2018 until his resignation from politics in March 2019.

Broadcast sued upon

5. On the evening of 15 February 2021 I watched by television broadcast *'The Project'* television program which contained an interview with Ms Higgins conducted by Lisa Wilkinson (the broadcast). I watched the broadcast from my home on the Gold Coast. I am aware that the Applicant has instituted these proceedings for defamation in relation to the broadcast.
6. I noted that in the broadcast, Ms Higgins had alleged that she was sexually assaulted in Canberra by a former colleague. Whilst watching the broadcast, I took the reference to the former colleague accused by Ms Higgins as having sexually assaulted her as being the Applicant. I took the reference in the broadcast to the former colleague to be the Applicant by reason of the following:
- a. the broadcast stated that the former colleague was a senior male adviser to Minister (Senator) Reynolds, and I was aware that the Applicant was formerly an adviser to the Senator in Canberra. Although I did not consider the Applicant to be a senior adviser, I was aware that the Applicant was senior to Ms Higgins when she went to work in Minister Reynolds' office in March 2019;
 - b. the broadcast stated that the former colleague was previously an adviser to Senator Reynolds in her former portfolio of Home Affairs, and I was aware that the Applicant was formerly an adviser to the Senator whilst she held that position;
 - c. the broadcast stated that the former colleague ceased work in Parliament House in March 2019 and was subsequently working in a good job in Sydney, and I was aware that the Applicant had ceased working for Senator Reynolds in or about March 2019 and thereafter was working in Sydney at British American Tobacco.
7. [REDACTED]
8. I was in Canberra subsequent to the broadcast on 17-18 February 2021. The allegations made by Ms Higgins were, to my observation, the 'hot' topic of discussion amongst staffers at APH.

9. [Redacted]

10. [Redacted]

11. [Redacted]

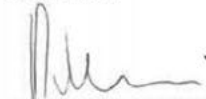
Applicant's reputation

12. Prior to publication of the broadcast on 15 February 2021, in the circle of people with whom I mix, including politicians and political staffers, the Applicant had a very good reputation. He was known to be politically savvy with excellent insight into government strategy. He had a reputation for being hard working, diligent, trustworthy and well-connected in political circles.

Sworn by the deponent
At Mermaid Beach
on 28 July 2023
Before me:

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Signed by deponent


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Signed by witness
Paul Svilans
Lawyer for the Applicant

This affidavit was signed in counterpart and witnessed over audio visual link in accordance with s14G of the Electronic Transactions Act 2000 (NSW)

NOTICE OF FILING**Details of Filing**

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& ANOR
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A handwritten signature in blue ink that reads "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.