

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: **Matthew John Higgins**

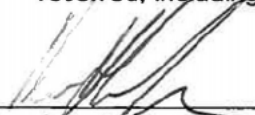
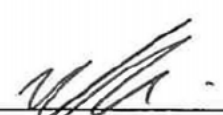
Address: [REDACTED]

Occupation: Building Manager

Date: 4 October 2023

I, Matthew John Higgins, of [REDACTED], Building Manager say on oath:

1. The matters set out in this affidavit are based on my own knowledge, except where I have stated or qualified otherwise. Where I have set out my recollection of conversations in this affidavit I have included the effect of the words spoken as I recall them.
2. Where I refer to a document in this affidavit, that document was produced to me at the time of swearing this affidavit and verified by me as a true copy of the relevant document.
3. Text messages reproduced in this affidavit reflect the actual messages sent and received, including any typographical errors.

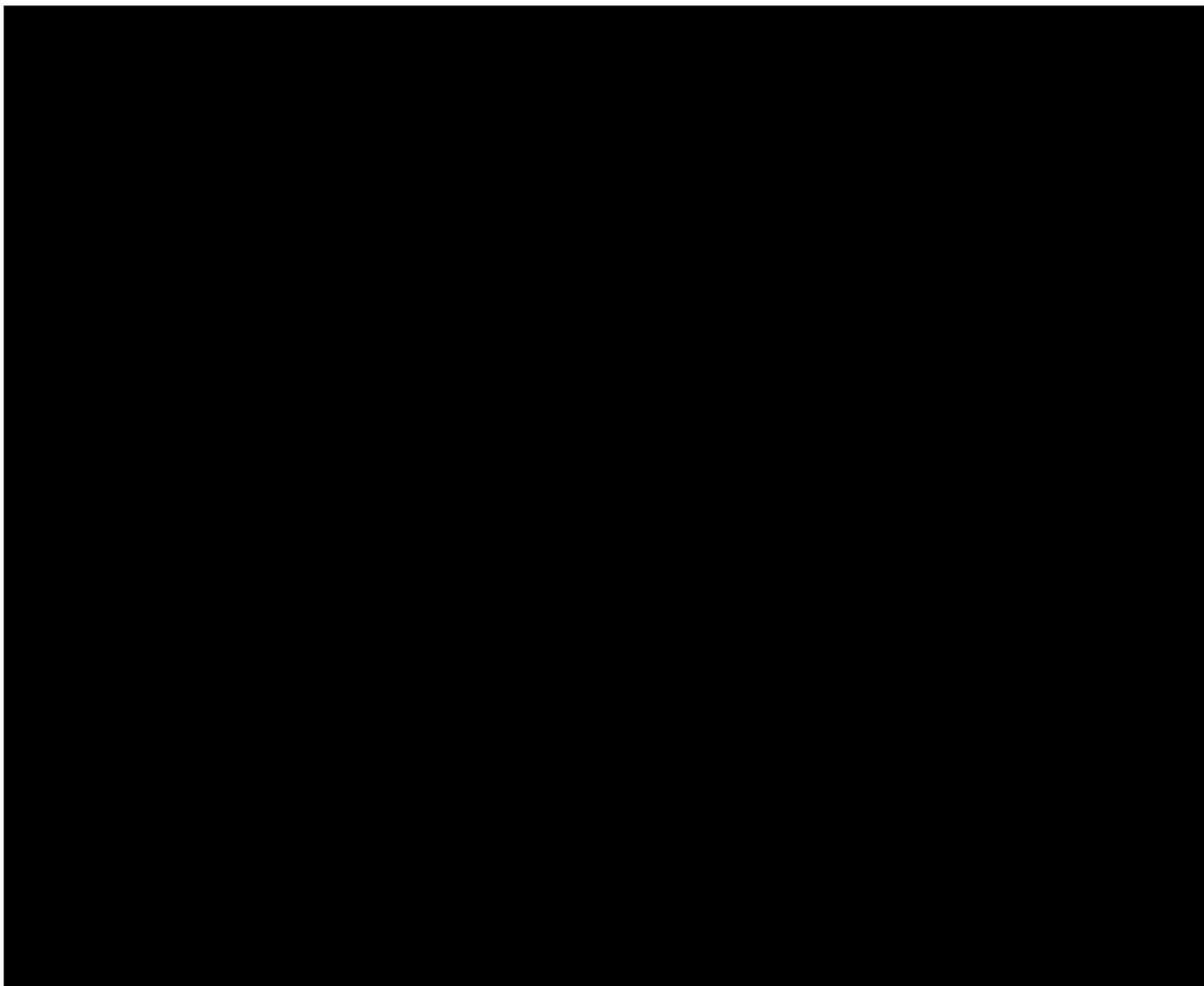



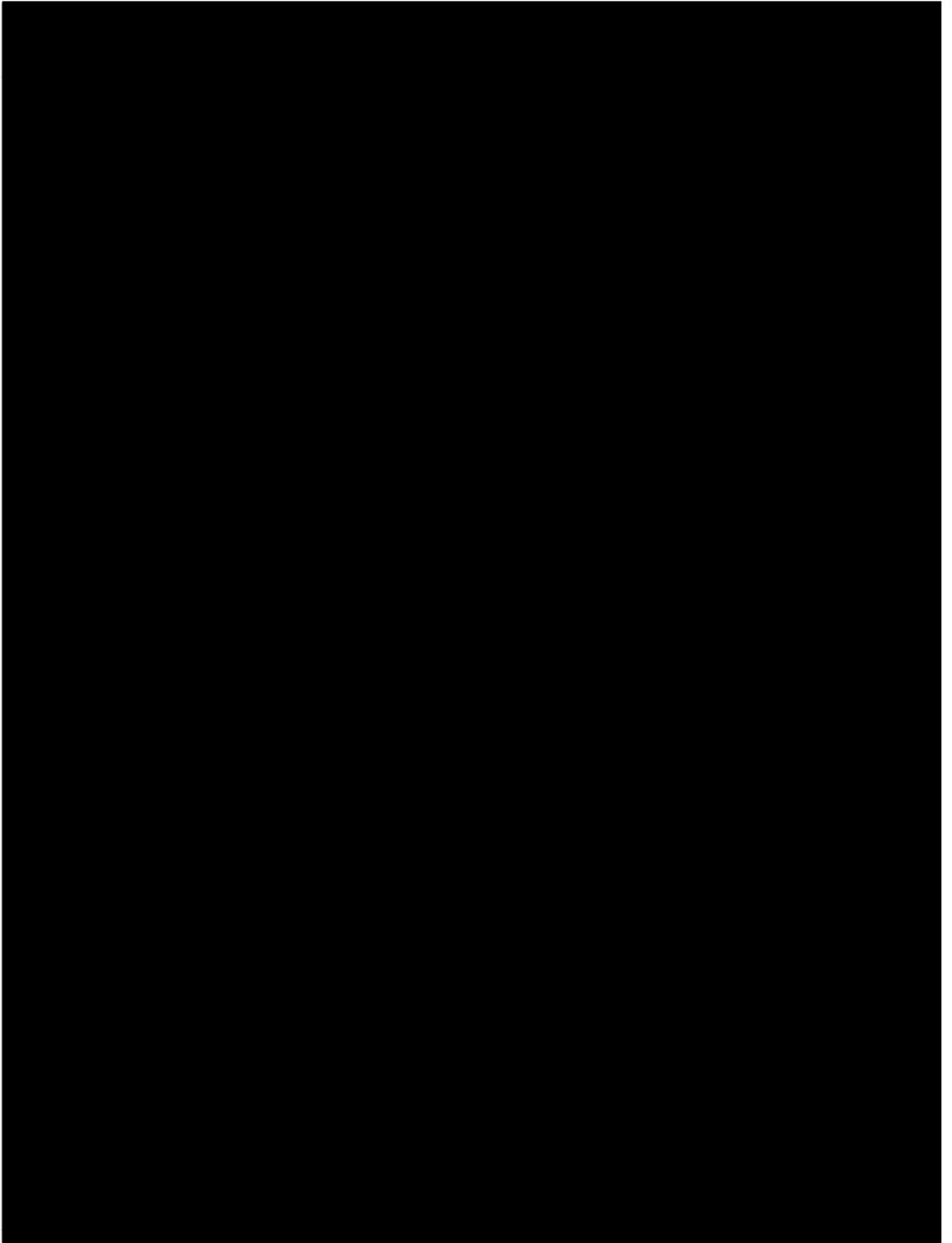
Filed on behalf of (name & role of party) First Respondent, being Network Ten Pty Limited  
 Prepared by (name of person/lawyer) Marlia Saunders  
 Law firm (if applicable) Thomson Geer  
 Tel 02 8248 5836 Fax \_\_\_\_\_  
 Email msaunders@tglaw.com.au  
**Address for service** Level 14, 60 Martin Place, Sydney NSW 2000  
 (include state and postcode)

[Version 3 form approved 02/05/2019]

**Background**

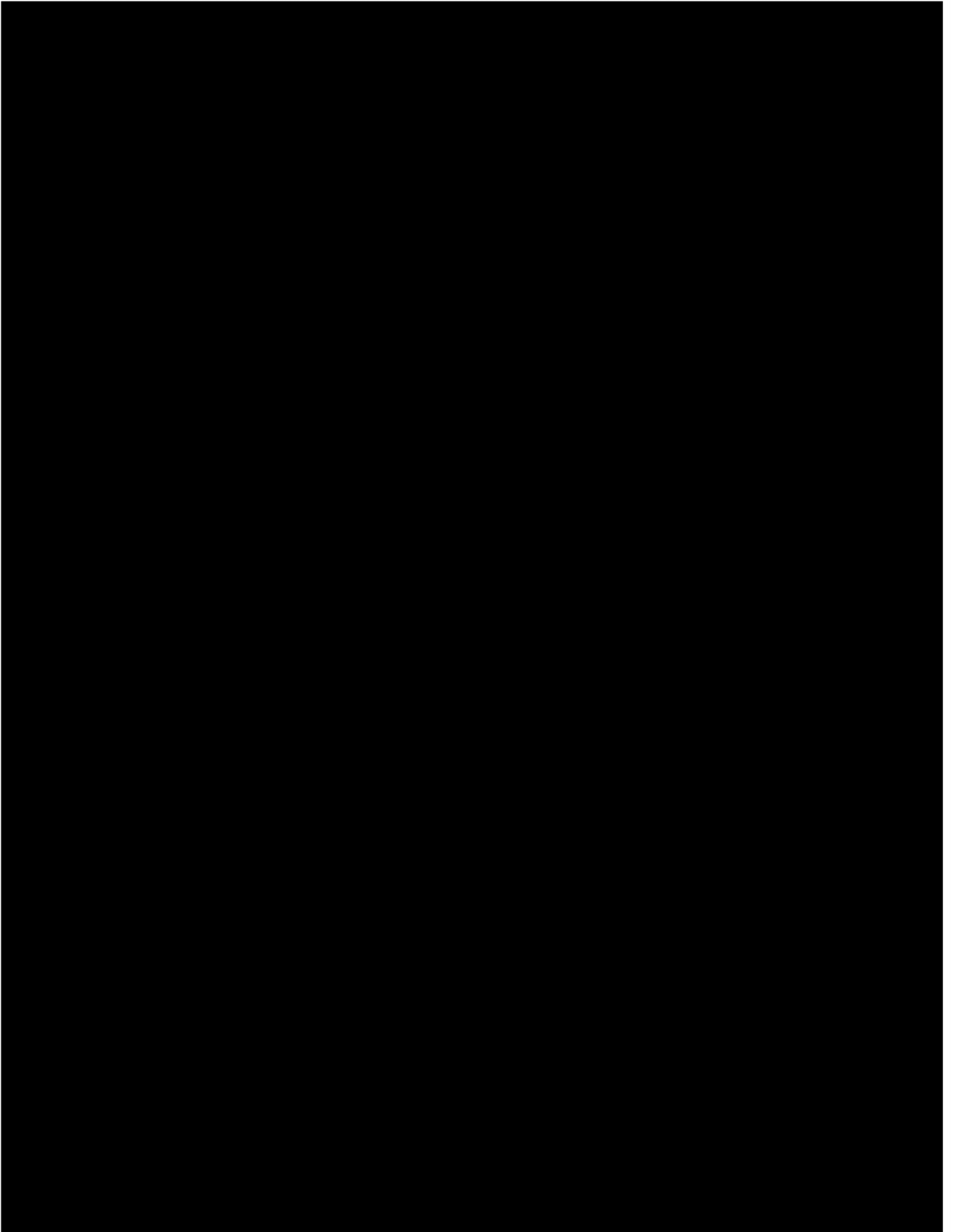
4. I am the father of Brittany Higgins (**Brittany**).
5. I live between my house at Gold Coast and my parents' house outside Byron Bay.
6. In around October 2018, Brittany left Queensland and moved to Canberra to work at Parliament House. She had hunted down her dream job. Brittany was really bubbly and happy and always talking about Parliament House. She would look at the good in everything. She was loving life. I was so proud Brittany had worked hard to get a good job.
7. While Brittany was working at Parliament House we would keep in touch regularly via text messages and phone calls. We were always talking and sharing our lives.
8. Between June 2018 and May 2021, Brittany and I exchanged a large volume of text messages, some of which I refer to specifically in this affidavit.





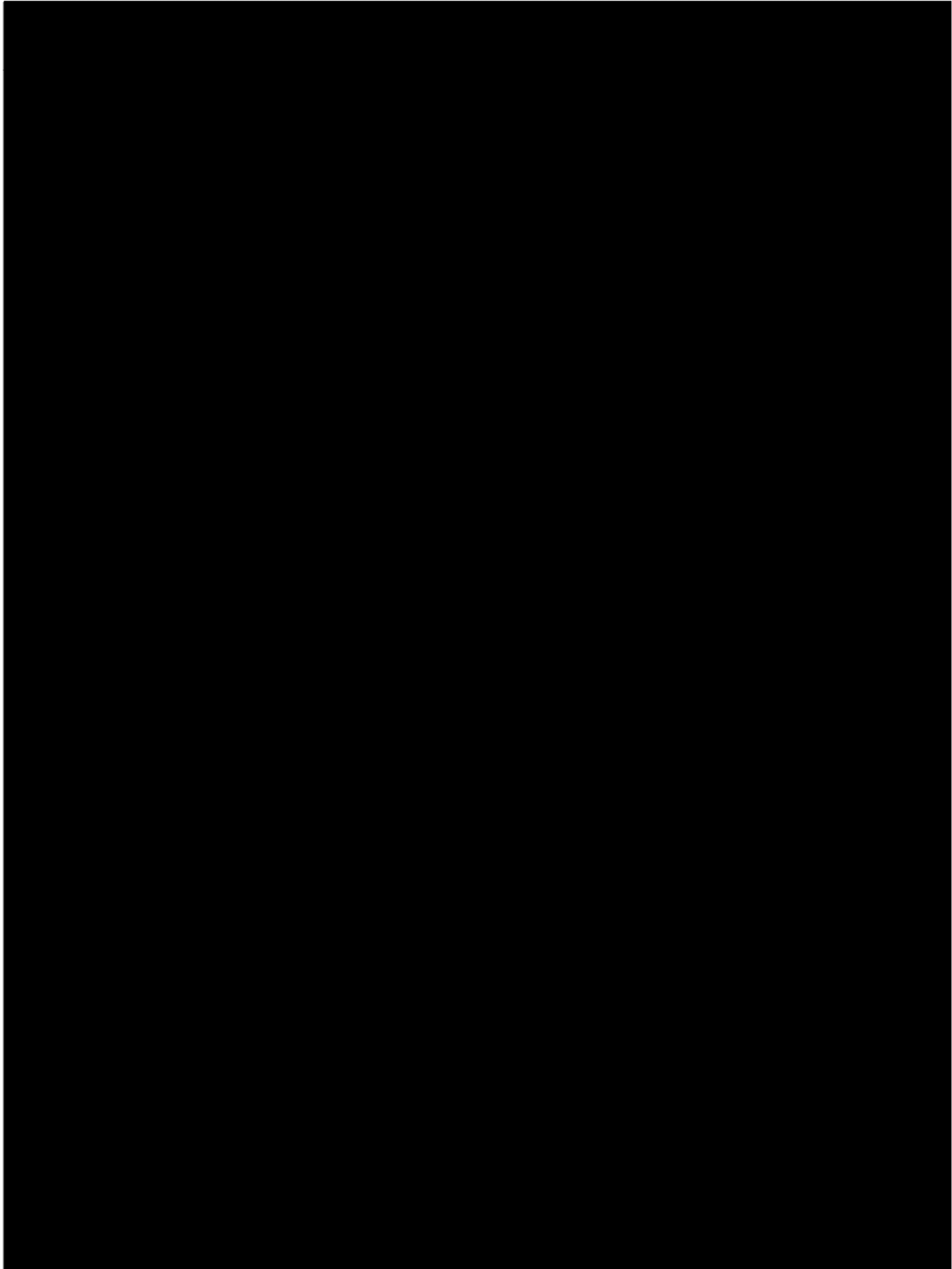
*[Handwritten signature]*

*[Handwritten signature]*



A handwritten signature or set of initials, possibly 'M. H.', written in black ink.

A handwritten signature or set of initials, possibly 'Y. C.', written in black ink.



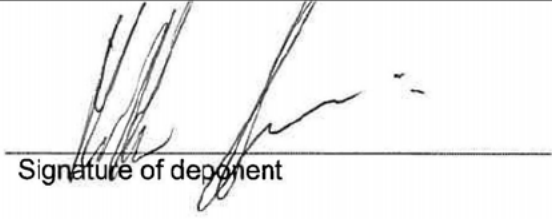
A handwritten signature or scribble in black ink, located at the bottom left of the page, partially overlapping the footer text.

A handwritten signature or scribble in black ink, located at the bottom right of the page.



Sworn by the deponent  
at Brisbane  
in Queensland  
on 4 October 2023  
Before me:

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)  
)  
)  
)

  
\_\_\_\_\_  
Signature of deponent  
\_\_\_\_\_  
Signature of witness

Michelle Fanning  
Solicitor  
Level 28, 1 Eagle Street, Brisbane Qld 4000  
An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law