

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 named in the schedule
Respondents

Affidavit of: **Sarah Thornton**
Address: c/- Network Ten Pty Ltd, 1 Saunders Street, Pyrmont, NSW 2009
Occupation: Head of Popular Factual and Executive Producer
Date: 18/10/2023

I Sarah Thornton c/- Network Ten Pty Ltd, 1 Saunders Street, Pyrmont, NSW 2009 affirm:

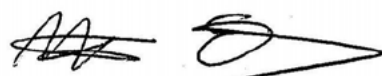
1. I am the Head of Popular Factual and Network Executive Producer (**Network EP**) at Network Ten Pty Ltd (**Network Ten**).
2. The matters set out in this affidavit are based on my own knowledge, except where I have stated or qualified otherwise. Where I have set out my recollection of conversations in this affidavit I have included the effect of the words spoken as I recall them.
3. 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.
4. Where I refer to the fact of provision of legal advice in this affidavit, I am not authorised to and do not waive privilege in respect of its content.

Filed on behalf of (name & role of party)	The First Respondent, being Network Ten Pty Limited	
Prepared by (name of person/lawyer)	Marlia Saunders	
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[Version 3 form approved 02/05/2019]

Work history

5. I am employed by Network Ten.
6. I have been a journalist and television producer for over 20 years.
7. I have worked in the following roles:
 - (a) 2000 – 2001: Researcher, Nine Network;
 - (b) 2001 – 2002: Producer, Nine Network;
 - (c) 2002 – 2007: UK-based TV Freelancer in various Roles, including Associate Producer, Producer and Showrunner for various production companies making content for: Channel 4, Channel 5, ITV, BBC;
 - (d) 2007 – 2008: Head of Production and In-House Programming, Star TV Network, based in Jakarta;
 - (e) 2008 – 2010: Freelance Showrunner, BBC;
 - (f) 2010: Director, Sky (UK);
 - (g) 2010 – 2017: Head of Production and Development, Vice-President Factual Entertainment, Discovery Networks International; and
 - (h) 2018 – present: Executive Producer, Head of Popular Factual, Network Ten and Paramount Australia and New Zealand.
8. The television shows I have worked on have won or been nominated for a number of awards, including:
 - (a) Hider in the House (BBC), Winner of the Rose D'Or Award, in or around 2008;
 - (b) Pineapple Dance Studios, Winner of the Royal Television Society Award, 2011;
 - (c) nominated for British Academy of Film and Television Arts awards for a number of programs including Undercover Dads in 2010 and Pineapple Dance Studios in 2011;
 - (d) nominee and recipient for a number of Logie Awards, including The Project winning Most Popular Panel or Current Affairs Program in 2019 and 2022; and
 - (e) The Living Room, nominated for an Australian Academy of Cinema and Television Arts Award, 2020.
9. My work email address is: [REDACTED].
10. I communicated using my work email account during the period of January and February 2021 in relation to the production and broadcast of the story which is the subject of this proceeding.

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11. From 20 January 2021 to 15 February 2021, I sent, received and was copied into emails about the production of this story. Those emails were on a number of production-related topics, including:
 - (a) the researching of the story; and
 - (b) the editing of the story.
12. My mobile telephone number is [REDACTED].
13. I communicated using my mobile phone during the period of January and February 2021 in relation to the broadcast of the story which is the subject of this proceeding. From 20 January 2021 to 15 February 2021, I made and received a number of telephone calls with other members of the production team, including the co-EP Mr Bendall [FRD.007.00000025].

Role and responsibilities

14. In January 2021, I was the Network EP responsible for The Project.
15. My job as Network EP for The Project is (as it was then) to be the conduit between the network and the production company.
16. My job as Network EP involves being across multiple productions at once. In addition to The Project, in or around January 2021, I was also:
 - (a) managing a senior production team making two in-house productions: The Living Room and The Dog House; and
 - (b) overseeing the production of a number of documentary series, including Territory Cops, Catching the Family Court Killer, The First Inventors, Ambulance Australia and Bondi Rescue.
17. The Project is produced by 7PM Company Pty Ltd (**7PM**) for Network Ten.
18. My job requires me to collaborate with 7PM and its Executive Producers (**EPs**) about the content of the episodes of The Project they are making for the network. I ensure the program is in line with Network Ten's expectations. My role links the production of The Project into Network Ten and its key stakeholders through the use of promotional material, publicity campaigns, marketing, programming, scheduling and advertisement sales.
19. There is someone else at Network Ten who manages the relationship with finance, studio facilities and crew and logistical departments. Many departments, such as Network Ten's in-house legal team, also work directly with 7PM.
20. Generally speaking, my role is one involving oversight. I provide Network Ten's views and input to The Project's production teams and EPs.



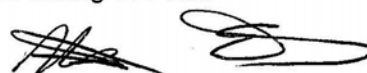
21. I am not involved in or across the detail for every story, but am generally across what is being broadcast on The Project. My most regular contact is with The Project's EPs, where we discuss the daily rundown, staffing, stories and talent. I am involved in various team calls including a bi-weekly guest booking and co-host forward planning call as well as ad-hoc story pitches from the features team.
22. Decisions to proceed with stories are made by The Project's EP together with the Head of Features, Laura Binnie, and Editorial Consultant Peter Meakin. I am not involved in the final decision on whether to proceed with a story idea as this can come down to any number of factors, including access, logistics, presentation and legal advice. Many stories are explored and dropped every day.
23. I do, however, have access to the final filed stories and liaise with the EP when I have queries. The production of the programs I am involved with, including The Project, is a collaborative process.
24. When a big or sensitive story is proposed or commissioned by The Project, it is common for me to be appraised of that story so that I can inform relevant stakeholders at Network Ten (including management, publicity and government and regulatory affairs) about the story and manage any issues arising from it from the network's perspective. This could be anything from an investigative piece through to a big celebrity interview.
25. It is not my job to sign off on each individual segment or story for The Project before it is broadcast. It is important to Network Ten that shows like The Project are given editorial independence to pursue and prepare the stories they want to. While Network Ten ultimately has the final say on whether or not a matter or item should be published, it is rare for Network Ten to step in and amend what is proposed to be broadcast.

The Project

26. A key part of my job as Network EP is to understand the brand of each of the programs which Network Ten broadcasts. As a program, The Project is a show that covers both light-hearted and serious content, including investigative content.

Involvement in the story

27. I was first told by Lisa Wilkinson about a story concerning an alleged sexual assault in Parliament House. I do not recall exactly when this was or how I was told this. To the best of my recollection, I believe I was told in a telephone call with Ms Wilkinson.
28. I do not recall exactly what words Ms Wilkinson used to describe the story, but I recall she said, in substance, that someone who she used to work with at the Today Show had gone to her with his partner who alleged that she was raped while working in Canberra. I do not believe Ms Wilkinson provided me with any specific details during this call.



29. I was also informed about this story by Craig Campbell, who was then EP of The Project. I believe I was told about the story in a telephone call with Mr Campbell.
30. As Mr Campbell was the EP of The Project, we used to speak on a very regular or daily basis. I believe I was told about the story in a telephone call that was about The Project generally. That is, I believe this story came up in our discussion about content for The Project. I do not recall the precise words used by Mr Campbell, but believe he said, in substance, that the story was going to require a lot of work before it could be broadcast. I do not recall if I was told on this telephone call with Mr Campbell that Mr Llewellyn would be the producer on the story.
31. At 11:50am on 20 January 2021, I received an email from Ms Wilkinson about the story which attached a 'Timeline' document which was provided to her by Brittany Higgins' partner, David Sharaz [FRD.001.00000925].
32. I received this email after I had been first told about the story.
33. The email was also sent to Mr Campbell, Mr Meakin, Ms Binnie and Mr Llewellyn. I do not recall reading the 'Timeline' attachment provided by Mr Sharaz. It is likely I planned to speak to the production team about it once I knew more about the story.
34. On 25 January 2021, I was added to a WhatsApp group with Ms Wilkinson and Mr Llewellyn titled "Story" [FRD.004.00000358].
35. On 25 January 2021, I spoke to Mr Llewellyn about booking accommodation and flights for Ms Higgins and Mr Sharaz so they could meet with Mr Llewellyn and Ms Wilkinson on 27 January 2021 and we exchanged some emails [FRD.004.00000075]. I was included in an email chain about those arrangements [FRD.001.00000930].
36. My assistant Rowena Barreira obtained information regarding the accommodation and flights and sent it to me. I passed it onto Mr Llewellyn and Mr Meakin, and recommended they book ASAP given there were limited flights.
37. On 25 January 2021, I was copied into an email from Mr Llewellyn, who advised me (and others in the production team) not to click on the alleged perpetrator's LinkedIn profile since he could get a notification [FRD.001.00000939]. I did not view the LinkedIn profile at that time. Although Bruce Lehrmann's name was referred to in the 'Timeline' document as being the alleged perpetrator, I do not recall knowing his name until well after the story was broadcast when it was in the public domain after he was charged. During the production of the story, I do not recall Mr Lehrmann being referred to by his name among the production team.



38. On 28 January 2021, I received an email from Ms Wilkinson which linked to a news story from 2019 with comments from Michaelia Cash [FRD.001.00000940]. Ms Wilkinson said:

"In fact, in the experience of Brittany, the way the policing and internal "security" works there, Parliament House may well be the safest place in Australia to commit sexual assault and get away with it."

39. On 29 January 2021, I attended a virtual "Field Debrief" on Microsoft Teams [FRD.004.00000078]. This is ordinarily an internal meeting we hold after meeting with or filming talent.
40. Having reviewed a diary entry for this meeting, I am aware that also in attendance were Ms Wilkinson, Mr Llewellyn, Mr Meakin, Mr Campbell and Ms Binnie. Two in-house lawyers from Network Ten, Tasha Smithies and Myles Farley were also in attendance. This was the first detailed briefing I received in relation to the story.
41. I cannot recall exactly what was said at this meeting, but I recall the substance of some of the matters that were discussed. During the meeting:
- (a) I noted to Mr Campbell that his co-EP Chris Bendall was not present on the call and requested his inclusion in this story. At the time, Mr Bendall was co-EP of The Project and the most senior, full-time journalist at 7PM.
 - (b) Ms Wilkinson and Mr Llewellyn provided a briefing about their meeting with Ms Higgins and Mr Sharaz.
 - (c) Upon being briefed by Ms Wilkinson and Mr Llewellyn, we all agreed the rape allegation itself was not the central feature of the story and our focus for the story should be on the failures of the government, as Ms Higgins' employer, in their handling of the rape allegation and the fact that there appeared to be no internal human resources department (HR) who could deal with and investigate issues like this.
 - (d) We agreed that the next steps were for Ms Wilkinson and Mr Llewellyn to set up an interview with Ms Higgins. It was agreed (either on this call or subsequently) that Ms Smithies would attend this interview so that she could provide preliminary legal advice in relation to the proposed story.
 - (e) The fact Ms Wilkinson was to conduct an interview with Ms Higgins did not mean the story would be broadcast.
 - (f) We discussed whether to name the alleged perpetrator in the story, and it was resolved that we would not name him.

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- (g) Some preliminary legal advice was given. For the avoidance of doubt, and as set out above, I do not waive privilege over the content of that advice.
- (h) I recall some discussions about when the story might be broadcast. I recall Ms Wilkinson had a preference for it to be broadcast on a Sunday night. I recall there being discussion about the fact that Ms Higgins had advised Ms Wilkinson that she wanted to do a television interview with her and a print interview with Samantha Maiden from News Corp and that the two stories were to be published at the same or similar times.
42. This meeting was the first time I had a clear outline of the story.
43. Throughout the production of the story in January and February 2021, I did not ask anyone else what the name of the alleged perpetrator was. I recall asking on a telephone call how Ms Higgins and the alleged perpetrator were connected. I do not recall who I asked this question of. I cannot recall the exact words used, but I was told in substance that he was a senior advisor with whom Ms Higgins had only recently started working, and who was more senior to her. This is all that I was interested in and I did not seek any further information about the man who Ms Higgins said had raped her.
44. Prior to the filmed interview with Ms Higgins, my main concerns were whether or not Ms Higgins was reliable, whether the actions taken by her employer were in breach of employment law as well as employer best practice, and whether there were systemic failings that had impacted Ms Higgins and would and could impact past and future employees at Parliament House.
45. I understand Ms Smithies attended the filmed interview between Ms Wilkinson and Ms Higgins to assist in the assessment of Ms Higgins' reliability.
46. In relation to the employment law issues, I contacted Mark Douglas, Network Ten's employment relations lead, to gain a greater appreciation of whether there were any legal failings in this case and what best practice would look like in a situation like that of Ms Higgins.
47. Given the passage of time I cannot recall exactly what words were used in my conversation with Mr Douglas, but I recall that:
- (a) I did not divulge any specific details about Ms Higgins' allegations. Instead, I asked questions in a hypothetical way about how an HR department should deal with an allegation from an employee that they had been raped on work premises and what support structures should (or could) be put around the complainant.
- (b) I was told that there should have been more checks and balances in place.



(c) I expect I passed this information on to Mr Campbell or Mr Bendall, or possibly both in the course of my regular telephone calls with one or both of them.

48. On 30 January 2021 I sent Mr Llewellyn a WhatsApp message checking in on how his investigation was progressing [FRD.004.00000358].

Fact checking

49. On 1 February 2021, I received emails from Mr Llewellyn containing updates on the development and production of the story.

50. Mr Llewellyn updated me on various steps he had taken ahead of Ms Higgins' filmed interview with Ms Wilkinson, which was scheduled for 2 February 202 (Interview), including steps taken to independently verify and fact check Ms Higgins' allegations [FRD.001.00002644, FRD.001.00001620, FRD.001.00001622].

51. I believe I spoke to Ms Smithies about the Interview over the telephone after it had finished.

52. I am aware from my contact with Mr Llewellyn at the time, that he took extensive steps throughout the production process to fact check Ms Higgins' story.

53. I was comforted by the involvement of multiple senior journalists behind the scenes on this story in terms of ensuring we got the facts right. Mr Llewellyn is a very experienced, and well-regarded producer; Mr Meakin is a very experienced producer, EP and advisor; and Mr Bendall is someone I regard very highly and who is also very experienced.

54. One step I understood that was taken during the investigation was to have Ms Higgins swear a statutory declaration saying that what she had said to Ms Wilkinson while being interviewed was true. I was not involved in the preparation of obtaining of this statutory declaration. Ms Smithies told me Ms Higgins had sworn a statutory declaration.

55. Further, Network Ten's lawyers were heavily involved in the story from the very start of the process. These matters satisfied me that we were producing and would be broadcasting an accurate and robust story.

Confidentiality

56. Throughout the production process, the story was treated as highly confidential and there was a very small number of people who were involved in its production. The production team exchanged emails about this.

57. A number of measures were put in place to try and preserve the confidentiality of the story, including, for example:



- (a) the story was given the codename "ENVIRO" to try and maintain confidentiality over the story [see, eg, **FRD.001.00000968**]; and
- (b) the various edits or draft versions of the story were not stored in Network Ten's central IT system, Ardome. Instead, they were circulated amongst the team as Vimeo links [see, eg, **FRD.001.00002644**].

Interactions with Samantha Maiden and News Corp

- 58. At the meeting on 29 January 2021, I was made aware that Ms Higgins had also been speaking to Samantha Maiden at news.com.au.
- 59. At various points, I was advised that Mr Llewellyn had been speaking to Ms Maiden about this.
- 60. I was copied into a number of emails about the proposed timing of the respective stories [**FRD.001.00001620**, **FRD.001.00000018**, **FRD.001.00001696**, **FRD.001.00001698**, **FRD.001.00001699**, **FRD.001.00001711**, **FRD.001.00002480**].
- 61. I understood that Ms Maiden would publish an article on the morning of 15 February 2021 and that we would follow up that article with a segment on The Project that evening.
- 62. I relied on other members of the production team to liaise with News Corp and did not get involved.

Briefing of stakeholders during production process

- 63. On 3 February 2021, I received some update emails from the production team about the story [see, eg, **FRD.001.00001646** and **FRD.001.00002676**].
- 64. On or about 3 February 2021, approximately a day or two after the Interview, I went to see Beverley McGarvey, the Executive Vice President and Chief Content Officer, ViacomCBS Australia and New Zealand, Network Ten's parent company [**FRD.004.00000079**].
- 65. I attended Ms McGarvey's office and we discussed the story very broadly. I also updated Ms McGarvey on legal advice that we had received. Given the possible fallout from the story, I sought and obtained Ms McGarvey's permission to proceed with investigating and preparing the story for broadcast.
- 66. I went to see Ms McGarvey because I wanted her to be across our plans for rigour around the preparation of the story because:
 - (a) Ms McGarvey is the person who can ultimately decide what goes to air and what does not; and
 - (b) given the high-profile nature of those involved, there was a possibility that Ms McGarvey could hear about our investigations via another source.



67. On or about 10 February 2021, I set up a call with Ms McGarvey, Ms Smithies, Mr Farley and James Boyce, the Head of Government & Regulatory Affairs at Network Ten, to provide Ms McGarvey with a further update about the story and answer any queries or concerns she may have.
68. I recall at that meeting we discussed the planned content and focus on the story, the timeline for seeking rights of reply and the decision not to name the alleged perpetrator in the story. Some legal advice was discussed. For the avoidance of doubt, I do not waive privilege over the content of that advice.
69. Ms McGarvey confirmed she was happy to proceed with the story. We also decided not to promote the story until after the news.com.au piece was published.
70. On 15 February 2021, I believe I watched a WIP video of the story in my office. After watching the WIP video I went to see Ms McGarvey in her office about the story. I do not recall the precise words that I used, but I recall telling Ms McGarvey, in substance, that I had just watched the latest version of the story. I believe I recounted the main parts of the story to Ms McGarvey. I recall inviting Ms McGarvey to watch the story in my office. I do not now recall if Ms McGarvey came to my office and watched the story.
71. During this meeting with Ms McGarvey, Ms McGarvey recommended I tell Ross Dagan, the Director of News at Network Ten, about the story on the morning of the broadcast to give him a heads up about it, which I did.

Script and WIP Video Reviews

72. I did not review or sign off on the script for the story. By the time I was provided with a draft copy of the story I believe it was well-advanced. I believe I reviewed the story at least two times in full before it was broadcast. I do not recall which versions of the draft story I watched. Regarding my involvement reviewing edits or versions of the story:
- (a) On 9 and 10 February 2021, I received emails from Mr Llewellyn with draft versions of the script and work-in-progress (WIP) videos [FRD.001.00000968; FRD.001.00002498; FRD.001.00001769; FRD.001.00001773]. I believe I clicked on some of the links contained in these emails from Mr Llewellyn and reviewed each script and WIP video at least once. At 3.54pm on 10 February 2021, I sent Mr Llewellyn and Ms Wilkinson a WhatsApp message about Part Two of the story [FRD.004.00000358].
- (b) At 5.23pm on 11 February 2021, I received an email from Mr Llewellyn containing revised WIP versions of the story [FRD.001.00001806].
- (c) After receiving these WIP versions, I received a number of further emails about these versions, including an email from Ms Wilkinson at 10.23pm on 11 February



2021 [FRD.001.00000265]. Ms Wilkinson mentioned that she had asked Ms Higgins on camera why she was speaking out now and asked that her answer be included.

- (d) As a result of this email and a further email from Mr Meakin [FRD.001.00000999], I sent Mr Meakin an email at 8.30am on 12 February 2021 that said "[f]or what it's worth I wondered whether we had asked the question." [FRD.001.00001001] I sent this email because I thought it was important to include Ms Higgins' motivation for going public with her allegations.
 - (e) At 11.08am on 12 February 2021, I sent Mr Llewellyn and Ms Wilkinson a WhatsApp message about the story, including a proposed minor edit [FRD.004.00000358]. I believe I had watched a draft version of the story or WIP video by the time I sent this email at 8.30am on 12 February 2021.
 - (f) At 1.37am on 13 February 2021, I received an email from Editor Darryl Brown containing revised WIP versions of the story [FRD.001.00001024].
 - (g) On 15 February 2021, I received emails from Mr Llewellyn containing further WIP videos for the story [FRD.001.00001960; FRD.001.00002557].
73. I was sent everything and given the option to provide feedback, but I do not believe I requested or recommended any major changes be made to the story. I recall suggesting a minor change to one of the voice overs used in the story, but do not now recall what it was. Apart from what is documented in the email and WhatsApp messages above, I believe any other feedback I had was provided over the telephone in conversations with Mr Bendall.
74. Given that changes were made to the story throughout 15 February 2021 right up to broadcast, I did not see the final cuts of the story prior to the broadcast. However, I do not think any of the last minute changes affected the substantive content of the story since the last version I viewed. I also understood legal advice had been sought about these edits.

Requests for comment

75. In early February 2021, I was copied into a number of emails regarding the timing of requests for comment [FRD.001.00000018; FRD.001.00000020; FRD.001.00001646].
76. On 11 February 2021, I received emails from Mr Llewellyn in which he said he would be approaching various people for comment in relation to issues raised in the story the following day [FRD.001.00001797, FRD.001.00000050]. I understood the requests for comment would be made by email.



77. On 11 February 2021, I informed Ms McGarvey that requests for comment would be going out. I advised her when the requests would be going out and to whom. I did this because I anticipated that some of the people who we were seeking comment from might call Ms McGarvey and ask her about the requests. Ms McGarvey agreed with the approach to send out these requests for comment on Friday 12 February 2021 ahead of the story being broadcast on Monday 15 February 2021.

Duty of care to and concern towards Ms Higgins

78. On 1 February 2021, I received an email from Mr Llewellyn confirming that Ms Higgins had been to the GP and had obtained a mental health plan and was also seeing a counsellor [FRD.001.00001622].
79. On 5 February 2021, I received an email from Mr Llewellyn that said that as a result of his dealings with Ms Higgins and Mr Sharaz, he understood Ms Higgins to be "quite fragile at the moment" [FRD.001.00001668].
80. On 10 February 2021, I received an email from Mr Llewellyn which referred to the duty of care owed to Ms Higgins and her desire to control the frenzy around her as much as possible [FRD.001.00001747].
81. I anticipated that the broadcast of the story could put pressure on Ms Higgins' mental health and wanted to ensure she was adequately prepared and supported. I recall that we did some mental health checks on Ms Higgins during the production process and arranged for her to get some professional assistance from a psychologist after the broadcast. We provided this assistance for the purpose of assisting with the potential fallout from the broadcast of the story. Assistance of this kind is not something that is commonly provided to talent on The Project, but I thought this story required it.
82. In the days after 15 February 2021, I sent and received a number of emails about Ms Higgins' mental health and wellbeing because I was concerned about how she would be impacted by the story, including emails exchanged with Mr Llewellyn, Ms Bunting, Mr Bendall and Mr Meakin about the "duty of care plan" that was implemented for Ms Higgins [FRD.001.00000415, FRD.001.00000419, FRD.001.00001173]. I updated Ms McGarvey about this by email on 16 February 2021 [FRD.001.00002023].

Legal advice

83. Throughout the production of the story, I was aware that the production team regularly sought and obtained legal advice from Network Ten's lawyers. The legal team were across the story and process in far more detail than I was – as I believe is appropriate.

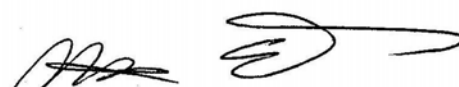
Promotion of the story



84. On 5 February 2021, I received a number of emails from the production team regarding the promotion of the story [see, eg, **FRD.001.00001679**].
85. On or about 9 February 2021, I attended a meeting via Teams with Mr Campbell, Mr Bendall, Mr Llewellyn, Mr Meakin, Ms Binnie, Ms Smithies and Mr Farley. Given the potentially high-profile and sensitive nature of the story, it was agreed during this meeting that the story would not be promoted prior to the news.com.au story being published (which occurred on 15 February 2021). As noted above, this was confirmed by Ms McGarvey on 10 February 2021.
86. On the evening of 14 February 2021, I received an email from Mr Llewellyn with a proposed 30 second promo for review, which was proposed to be published after the news.com.au story went live [**FRD.001.00001567**]. Mr Bendall responded and suggested we reassess the promo after seeing Ms Maiden's story [**FRD.001.00001896**]. I sent an email confirming my agreement to this suggestion [**FRD.001.00001897**].
87. On 15 February 2021, after the news.com.au story was live, we decided to limit promotion of The Project's story. We decided to promote The Project's story on television in the 5pm news as well as on social media.
88. That day, I was involved in preparing some of the promotional material for that night's broadcast. Much of my work was conducted face-to-face or over the telephone with Ms Wilkinson, Mikey Owen (Promo Producer at The Project) and other members of the production team.
89. During the day on 15 February 2021, Network Ten published a number of social media posts promoting The Project's story. Third party comments were disabled on all social media posts.
90. At 4.05pm on 15 February 2021, I received an email from David Sandy, Promotions Manager at Network Ten, which informed me that Ms McGarvey had asked to see the promos in advance of them being broadcast, and confirmed she was happy with them [**FRD.001.00000877**].


Impact of the story

91. I did not predict the scale of the impact and reach of the story. We were simply focussed on telling the best possible story with the best possible journalism, that the story was in the public interest, that Ms Higgins was supported, and that our journalism was sound.

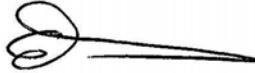
Two handwritten signatures in black ink, one appearing to be 'AA' and the other a more complex scribble.

Affirmed by the deponent
at Sydney
in New South Wales
on 18/10/2023
Before me:

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Signature of deponent



Signature of ELIYAHU YAACOV FISHER

An Australian legal practitioner within the meaning of the Legal Profession Uniform Law