



FEDERAL
COURT OF
AUSTRALIA

EXHIBIT / ~~FILE NO~~: EXHIBIT A65
RWH v NATIONWIDE
NEWS

FILE NO: NSD 2179 OF 2017

RETURN TO: A

ASSOCIATE: CA

DATE: 30/10/2018 WIGNEY J

Form 40
Rule 21.03(1)(a)(i)

Answers to interrogatories

No. NSD2179 of 2017

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

Geoffrey Roy Rush

Applicant

Nationwide News Pty Limited and another

Pursuant to an order made on 20 April 2018, the First Respondent provides the following answers to the Applicant's interrogatories:

EXTENT OF PUBLICATION

First matter complained of

Distribution

1. How many copies of the first matter complained of (or any poster to the same effect) were distributed in (please answer separately in relation to each):
 - (a) New South Wales;
 - (b) Victoria;
 - (c) Queensland;
 - (d) South Australia;
 - (e) Western Australia;
 - (f) Tasmania;
 - (g) Australian Capital Territory; and
 - (h) Northern Territory.

Please annex a document to the first respondent's answers that records the addresses to which each copy of the first matter complained of was distributed.

1A 4,242 copies of the first matter complained of were distributed in New South Wales and the Australian Capital Territory combined.

Second Matter Complained of

Sales

2. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 30 November 2017 in New South Wales?

2A 178,595

3. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 30 November 2017 in Victoria?

3A 52

4. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 30 November 2017 in Queensland?

4A 4,681

5. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 30 November 2017 in South Australia?

5A 0

6. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 30 November 2017 in Tasmania?

6A 0

7. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 30 November 2017 in Western Australia?

7A 0

8. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 30 November 2017 in the Australian Capital Territory?

8A 7,072

9. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 30 November 2017 in the Northern Territory?

9A 0

Readership

10. What was the readership (or estimated readership) of the editions of the DT published on about 30 November 2017 in New South Wales?

10A 909,000

11. What was the readership (or estimated readership) of the editions of the DT published on about 30 November 2017 in Victoria?

11A Unknown to the Respondents.

12. What was the readership (or estimated readership) of the editions of the DT published on about 30 November 2017 in Queensland?

12A Unknown to the Respondents.

13. What was the readership (or estimated readership) of the editions of the DT published on about 30 November 2017 in Tasmania?

13A 0

14. What was the readership (or estimated readership) of the editions of the DT published on about 30 November 2017 in Western Australia?

14A 0

15. What was the readership (or estimated readership) of the editions of the DT published on about 30 November 2017 in South Australia?

15A 0

16. What was the readership (or estimated readership) of the editions of the DT published on about 30 November 2017 in the Australia Capital Territory?

16A 24,000

17. What was the readership (or estimated readership) of the editions of the DT published on about 30 November 2017 in the Northern Territory?

17A 0

Third Matter Complained of

Sales

18. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 1 December 2017 in New South Wales?

18A 192,344

19. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 1 December 2017 in Victoria?

19A 78

20. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 1 December 2017 in Queensland?

20A 5,420

21. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 1 December 2017 in South Australia?

21A 0

22. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 1 December 2017 in Tasmania?

22A 0

23. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 1 December 2017 in Western Australia?

23A 0

24. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 1 December 2017 in the Australian Capital Territory?

24A 7,466

25. What was the number of sales (or estimated number of sales) of the edition of the DT published on about 1 December 2017 in the Northern Territory?

25A 0

Readership

26. What was the readership (or estimated readership) of the editions of the DT published on about 1 December 2017 in New South Wales?

26A 909,000

27. What was the readership (or estimated readership) of the editions of the DT published on about 1 December 2017 in Victoria?

27A Unknown to the Respondents.

28. What was the readership (or estimated readership) of the editions of the DT published on about 1 December 2017 in Queensland?

28A Unknown to the Respondents.

29. What was the readership (or estimated readership) of the editions of the DT published on about 1 December 2017 in Tasmania?

29A 0

30. What was the readership (or estimated readership) of the editions of the DT published on about 1 December 2017 in Western Australia?

30A 0

31. What was the readership (or estimated readership) of the editions of the DT published on about 1 December 2017 in South Australia?

31A 0

32. What was the readership (or estimated readership) of the editions of the DT published on about 1 December 2017 in the Australia Capital Territory?

32A 24,000

33. What was the readership (or estimated readership) of the editions of the DT published on about 1 December 2017 in the Northern Territory?

33A 0

REPUBLICATION

Second Matter Complained of

Hardcopy

34. Was the second matter complained of (or an any article to the same effect) published in any of the following newspapers (please answer separately in relation to each):
- (a) the Advertiser;
(a)A Yes.
 - (b) the Courier Mail;
(b)A Yes.
 - (c) the Gold Coast Bulletin?
(c)A Yes.
35. Is any of the following newspapers published by the first respondent or an entity related to the first respondent (please answer separately in relation to each):
- (a) the Advertiser;
(a)A Yes.
 - (b) the Courier Mail;
(b)A Yes.
 - (c) the Gold Coast Bulletin?
(c)A Yes.
36. If the answer to any of the preceding interrogatory is in the affirmative, in relation to each such newspaper, identify the entity that publishes that newspaper.
- 36A Advertiser Newspapers Pty Ltd; Queensland Newspapers Pty Ltd; and Gold Coast Publications Pty Ltd.**
37. Did the first respondent authorise the publication of the second matter complained of in any of the following newspapers (please answer separately in relation to each):
- (a) the Advertiser;
(a)A The first respondent implicitly authorised the publication of the second matter complained of by the Advertiser in that all Daily Telegraph content is placed on a centralised system which is available to other mastheads for publication at the discretion of those other mastheads.
 - (b) the Courier Mail;
(b)A The first respondent implicitly authorised the publication of the second matter complained of by the Courier Mail in that all Daily Telegraph content is placed on a centralised system which is available to other mastheads for publication at the discretion of those other mastheads.
 - (c) the Gold Coast Bulletin?

(c)A The first respondent implicitly authorised the publication of the second matter complained of by the Gold Coast Bulletin in that all Daily Telegraph content is placed on a centralised system which is available to other mastheads for publication at the discretion of those other mastheads.

38. If the answer to the preceding interrogatory is in the negative, in relation to any such newspaper, was the first respondent aware that such newspaper would be, or was likely to publish the second matter complained of, prior to its publication?

38A No.

39. What was the readership (or estimated readership) of the editions of the Advertiser published on about 30 November 2017?

39A 383,000

40. What was the readership (or estimated readership) of the editions of the Courier Mail published on about 30 November 2017?

40A 514,000

41. What was the readership (or estimated readership) of the editions of the Gold Coast Bulletin published on about 30 November 2017?

41A 87,000

Internet

42. Was the second matter complained of (or an any article to the same effect) made available for publication on any of the following websites (please answer separately in relation to each):

(a) DT website;

(a)A Yes.

(b) <http://www.adelaidenow.com.au> (the "**Advertiser website**");

(b)A Yes.

(c) <http://www.couriermail.com.au> (the "**Courier Mail website**");

(c)A Yes.

(d) <http://www.goldcoastbulletin.com.au> (the "**Gold Coast Bulletin website**");

(d)A Yes.

(e) <http://www.heraldsun.com.au> (the "**Herald Sun website**");

(e)A Yes.

(f) <http://www.news.com.au> (the "**News website**")?

(f)A No.

43. Is any of the following websites operated by the first respondent or an entity related to the first respondent (please answer separately in relation to each):

(a) DT website;

(a)A Yes

(b) Advertiser website;

(b)A Yes

(c) Courier Mail website;

(c)A Yes

(d) Gold Coast Bulletin website;

(d)A Yes

(e) Herald Sun website;

(e)A Yes

(f) News website?

(f)A Not applicable.

44. If the answer to any of the preceding interrogatory is in the affirmative, in relation to each such website, identify the entity that operates that website.

(a)A Nationwide News Pty Ltd.

(b)A Advertiser Newspapers Pty Ltd.

(c)A Queensland Newspapers Pty Ltd.

(d)A Gold Coast Publications Pty Ltd.

(e)A The Herald and Weekly Times Pty Ltd.

(f)A Not applicable.

45. Did the first respondent authorise the publication of the second matter complained of in any of the following websites (please answer separately in relation to each):

(a) DT website;

(a)A Yes.

(b) Advertiser website;

(b)A Yes.

(c) Courier Mail website;

(c)A Yes.

(d) Gold Coast Bulletin website;

(d)A Yes.

(e) Herald Sun website;

(e)A Yes.

(f) News website?

(f)A Not applicable.

46. If the answer to the preceding interrogatory is in the negative in relation to any such website, was the first respondent aware that such website would be, or was likely to publish the second matter complained of, prior to its publication?

46A Not applicable.

DT

47. Please state how many hits (or estimated number of hits) the second matter complained of received on the DT website on about 30 November 2017.

47A 670

48. Please state how many hits (or estimated number of hits) the second matter complained of received on the DT website after 30 November 2017.

48A 949

49. Please state what proportion (or estimated proportion) of the hits on the DT website on about 30 November 2017 originated from Australia.

49A 89%

50. Please state what proportion (or estimated proportion) of the hits on the second matter complained of on the DT website originated from Australia.

50A 91%

Advertiser

51. Please state how many hits (or estimated number of hits) the second matter complained of received on the Advertiser website on about 30 November 2017.

51A 0

52. Please state how many hits (or estimated number of hits) the second matter complained of received on the Advertiser website after 30 November 2017.

52A 0

The Courier Mail

53. Please state how many hits (or estimated number of hits) the second matter complained of received on the Courier Mail website on about 30 November 2017.

53A 5 hits from 29 November 2017 to present.

54. Please state how many hits (or estimated number of hits) the second matter complained of received on the Courier Mail website after 30 November 2017.

54A 5 hits from 29 November 2017 to present.

Gold Coast Bulletin

55. Please state how many hits (or estimated number of hits) the second matter complained of received on the Gold Coast Bulletin website on about 30 November 2017.

55A 0

56. Please state how many hits (or estimated number of hits) the second matter complained of received on the Gold Coast Bulletin website after 30 November 2017.

56A 0

Herald Sun

57. Please state how many hits (or estimated number of hits) the second matter complained of received on the Herald Sun website on about 30 November 2017.

57A 17 hits from 29 November 2017 to present.

58. Please state how many hits (or estimated number of hits) the second matter complained of received on the Herald Sun website after 30 November 2017.

58A 17 hits from 29 November 2017 to present.

News

59. Please state how many hits (or estimated number of hits) the second matter complained of received on the News website on about 30 November 2017.

59A Not applicable.

60. Please state how many hits (or estimated number of hits) the second matter complained of received on the News website after 30 November 2017.

60A Not applicable.

Third Matter Complained of

Hardcopy

61. Was the third matter complained of (or an any article to the same effect) published in any of the following newspapers (please answer separately in relation to each):

(a) the Advertiser;

(a)A Yes.

(b) the Australian;

(b)A No.

(c) the Courier Mail;

(c)A Yes.

(d) the Gold Coast Bulletin.

(d)A Yes.

(e) the Herald Sun?

(e)A No.

62. Is any of the following newspapers published by the first respondent or an entity related to the first respondent (please answer separately in relation to each):

(a) the Advertiser;

(a)A Yes.

(b) the Australian;

(b)A Not applicable.

(c) the Courier Mail;

(c)A Yes.

(d) the Gold Coast Bulletin.

(d)A Yes.

(e) the Herald Sun?

(e)A Not applicable.

63. If the answer to any of the preceding interrogatory is in the affirmative, in relation to each such newspaper, identify the entity that publishes that newspaper.

(a)A Advertiser Newspapers Pty Ltd.

(b)A Not applicable.

(c)A Queensland Newspapers Pty Ltd.

(d)A Gold Coast Publications Pty Ltd.

(e)A Not applicable.

64. Did the first respondent authorise the publication of the third matter complained of in any of the following newspapers (please answer separately in relation to each):

(a) the Advertiser;

(a)A The first respondent implicitly authorised the publication of the third matter complained of by the Advertiser in that all Daily Telegraph content is placed on a centralised system which is available to other mastheads for publication at the discretion of those other mastheads.

(b) the Australian;

(b)A Not applicable.

(c) the Courier Mail;

(c)A The first respondent implicitly authorised the publication of the third matter complained of by the Courier Mail in that all Daily Telegraph content is placed on a centralised system which is available to other mastheads for publication at the discretion of those other mastheads.

(d) the Gold Coast Bulletin.

(d)A The first respondent implicitly authorised the publication of the third matter complained of by the Gold Coast Bulletin in that all Daily Telegraph content is placed on a centralised system which is available to other mastheads for publication at the discretion of those other mastheads.

(e) the Herald Sun?

(e)A Not applicable.

65. If the answer to the preceding interrogatory is in the negative, in relation to any such newspaper, was the first respondent aware that such newspaper would be, or was likely to publish the third matter complained of, prior to its publication?

65A Not applicable.

66. What was the readership (or estimated readership) of the editions of the Advertiser published on about 1 December 2017?

66A 383,000

67. What was the readership (or estimated readership) of the editions of the Australian published on about 1 December 2017?

67A Not applicable.

68. What was the readership (or estimated readership) of the editions of the Courier Mail published on about 1 December 2017?

68A 514,000

69. What was the readership (or estimated readership) of the editions of the Gold Coast Bulletin published on about 1 December 2017?

69A 87,000

70. What was the readership (or estimated readership) of the editions of the Herald Sun published on about 1 December 2017?

70A Not applicable.

Internet

71. Was the third matter complained of (or an any article to the same effect) made available for publication on any of the following websites (please answer separately in relation to each):

(a) DT website;

(a)A Yes.

(b) Advertiser website;

(b)A Yes.

(c) <http://www.theaustralian.com.au/> (the "Australian website");

(c)A No.

(d) Courier Mail website;

(d)A Yes.

(e) Gold Coast Bulletin website;

(e)A Yes.

(f) Herald Sun website;

(f)A Yes.

(g) News website?

(g)A No.

72. Is any of the following websites operated by the first respondent or an entity related to the first respondent (please answer separately in relation to each):

(a) DT website;

(a)A Yes.

(b) Advertiser website;

(b)A Yes.

(c) Australian website;

(c)A Not applicable.

(d) Courier Mail website;

(d)A Yes.

(e) Gold Coast Bulletin website;

(e)A Yes.

(f) Herald Sun website;

(f)A Yes.

(g) News website?

(g)A Not applicable.

73. If the answer to any of the preceding interrogatory is in the affirmative, in relation to each such website, identify the entity that operates that website.

(a)A Nationwide News Pty Ltd.

(b)A Advertiser Newspapers Pty Ltd.

(c)A Not applicable.

(d)A Queensland Newspapers Pty Ltd.

(e)A Gold Coast Publications Pty Ltd.

(f)A The Herald and Weekly Times Pty Ltd.

(g)A Not applicable.

74. Did the third respondent authorise the publication of the third matter complained of in any of the following websites (please answer separately in relation to each):

(a) DT website;

(a)A Yes.

(b) Advertiser website;

(b)A Yes.

(c) Australian website;

(c)A Not applicable.

(d) Courier Mail website;

(d)A Yes.

(e) Gold Coast Bulletin website;

(e)A Yes.

(f) Herald Sun website;

(f)A Yes.

(g) News website?

(g)A Not applicable.

75. If the answer to the preceding interrogatory is in the negative, in relation to any such website, was the first respondent aware that such website would be, or was likely to publish the third matter complained of, prior to its publication?

75A Not applicable.

DT

76. Please state how many hits (or estimated number of hits) the third matter complained of received on the DT website on about 1 December 2017.

76A 10,157

77. Please state how many hits (or estimated number of hits) the third matter complained of received on the DT website after 1 December 2017.

77A 5,449

78. Please state what proportion (or estimated proportion) of the hits on the DT website on about 1 December 2017 originated from Australia.

78A 89%

79. Please state what proportion (or estimated proportion) of the hits on the third matter complained of on the DT website originated from Australia.

79A 89%

Advertiser

80. Please state how many hits (or estimated number of hits) the third matter complained of received on the Advertiser website on about 1 December 2017.

80A 5

81. Please state how many hits (or estimated number of hits) the third matter complained of received on the Advertiser website after 1 December 2017.

81A 5

Australian

82. Please state how many hits (or estimated number of hits) the third matter complained of received on the Australian website on about 1 December 2017.

82A Not applicable.

83. Please state how many hits (or estimated number of hits) the third matter complained of received on the Advertiser website after 1 December 2017.

83A Not applicable.

The Courier Mail

84. Please state how many hits (or estimated number of hits) the third matter complained of received on the Courier Mail website on about 1 December 2017.

84A 227

85. Please state how many hits (or estimated number of hits) the third matter complained of received on the Courier Mail website after 1 December 2017.

85A 227

The Gold Coast Bulletin

86. Please state how many hits (or estimated number of hits) the third matter complained of received on the Gold Coast Bulletin website on about 1 December 2017.

86A 1

87. Please state how many hits (or estimated number of hits) the third matter complained of received on the Gold Coast Bulletin website after 1 December 2017.

87A 1

Herald Sun

88. Please state how many hits (or estimated number of hits) the third matter complained of received on the Herald Sun website on about 1 December 2017.

88A 4

89. Please state how many hits (or estimated number of hits) the third matter complained of received on the Herald Sun website after 1 December 2017.

89A 4

News

90. Please state how many hits (or estimated number of hits) the third matter complained of received on the News website on about 1 December 2017.

90A Not applicable.

91. Please state how many hits (or estimated number of hits) the third matter complained of received on the News website after 1 December 2017.

91A Not applicable.

CONTINUED PUBLICATION

Second Matter Complained of

92. Is the second matter complained of, or any article to the same effect, still available for publication on the DT website?

92A Yes.

93. If the answer to the preceding interrogatory is in the negative, when was the second matter complained of removed from the DT website?

93A Not applicable.

94. Is the second matter complained of, or any article to the same effect, still available for publication on the Advertiser website?

94A Yes.

95. If the answer to the preceding interrogatory is in the negative, when was the second matter complained of removed from the Advertiser website?

95A Not applicable.

96. Is the second matter complained of, or any article to the same effect, still available for publication on the Courier Mail website?

96A Yes.

97. If the answer to the preceding interrogatory is in the negative, when was the second matter complained of removed from the Courier Mail website?

97A Not applicable.

98. Is the second matter complained of, or any article to the same effect, still available for publication on the Gold Coast Bulletin website?

98A Yes.

99. If the answer to the preceding interrogatory is in the negative, when was the second matter complained of removed from the Gold Coast Bulletin website?

99A Not applicable.

100. Is the second matter complained of, or any article to the same effect, still available for publication on the Herald Sun website?

100A Yes.

101. If the answer to the preceding interrogatory is in the negative, when was the second matter complained of removed from the Herald Sun website?

101A Not applicable.

102. Is the second matter complained of, or any article to the same effect, still available for publication on the News website?

102A Not applicable.

103. If the answer to the preceding interrogatory is in the negative, when was the second matter complained of removed from the News website?

103A Not applicable.

Third Matter Complained of

104. Is the third matter complained of, or any article to the same effect, still available for publication on the DT website?

104A Yes.

105. If the answer to the preceding interrogatory is in the negative, when was the third matter complained of removed from the DT website?

105A Not applicable.

106. Is the third matter complained of, or any article to the same effect, still available for publication on the Advertiser website?

106A Yes.

107. If the answer to the preceding interrogatory is in the negative, when was the third matter complained of removed from the Advertiser website?

107A Not applicable.

108. Is the second matter complained of, or any article to the same effect, still available for publication on the Australian website?

1048A Not applicable.

109. If the answer to the preceding interrogatory is in the negative, when was the second matter complained of removed from the Australian website?

109A Not applicable.

110. Is the third matter complained of, or any article to the same effect, still available for publication on the Courier Mail website?

110A Yes.

111. If the answer to the preceding interrogatory is in the negative, when was the third matter complained of removed from the Courier Mail website?

111A Not applicable.

112. Is the third matter complained of, or any article to the same effect, still available for publication on the Gold Coast Bulletin website?

112A Yes.

113. If the answer to the preceding interrogatory is in the negative, when was the third matter complained of removed from the Gold Coast Bulletin website?

113A Not applicable.

114. Is the third matter complained of, or any article to the same effect, still available for publication on the Herald Sun website?

114A Yes.

115. If the answer to the preceding interrogatory is in the negative, when was the third matter complained of removed from the Herald Sun website?

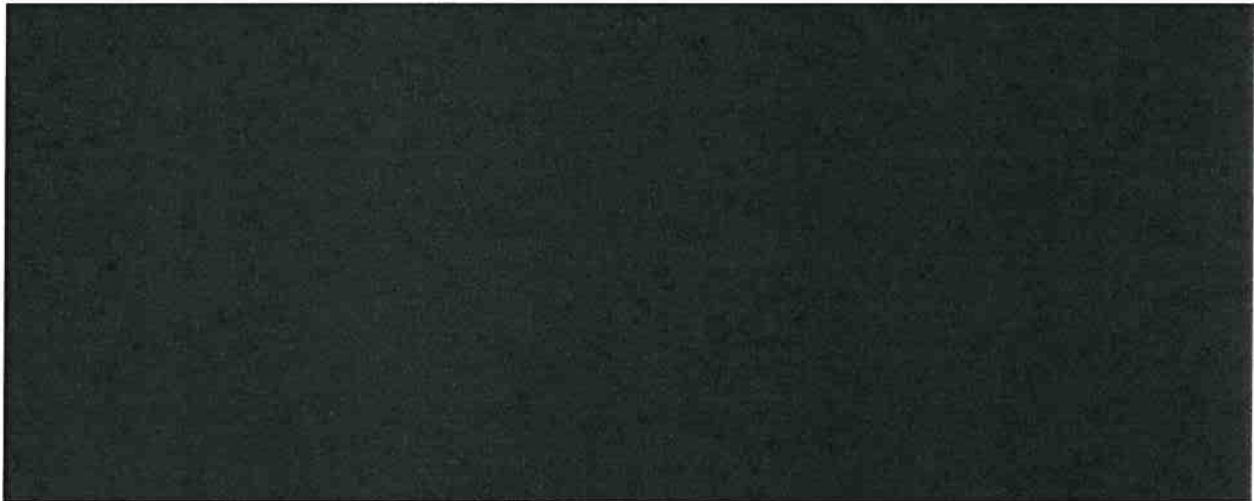
115A Not applicable.

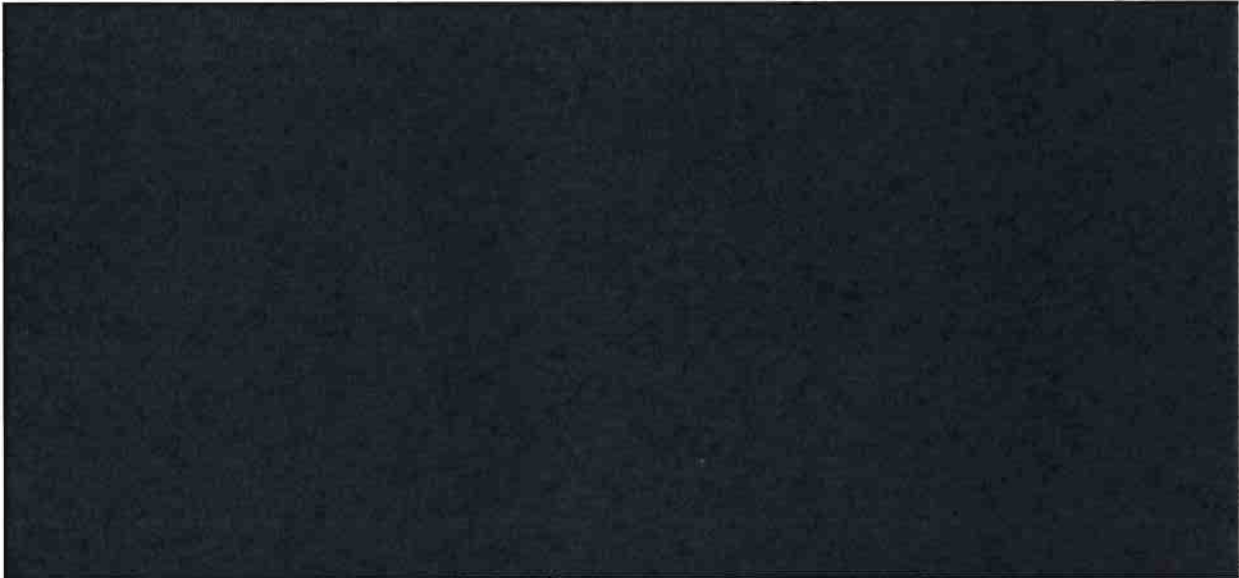
116. Is the third matter complained of, or any article to the same effect, still available for publication on the News website?

116A Not applicable.

117. If the answer to the preceding interrogatory is in the negative, when was the third matter complained of removed from the News website?

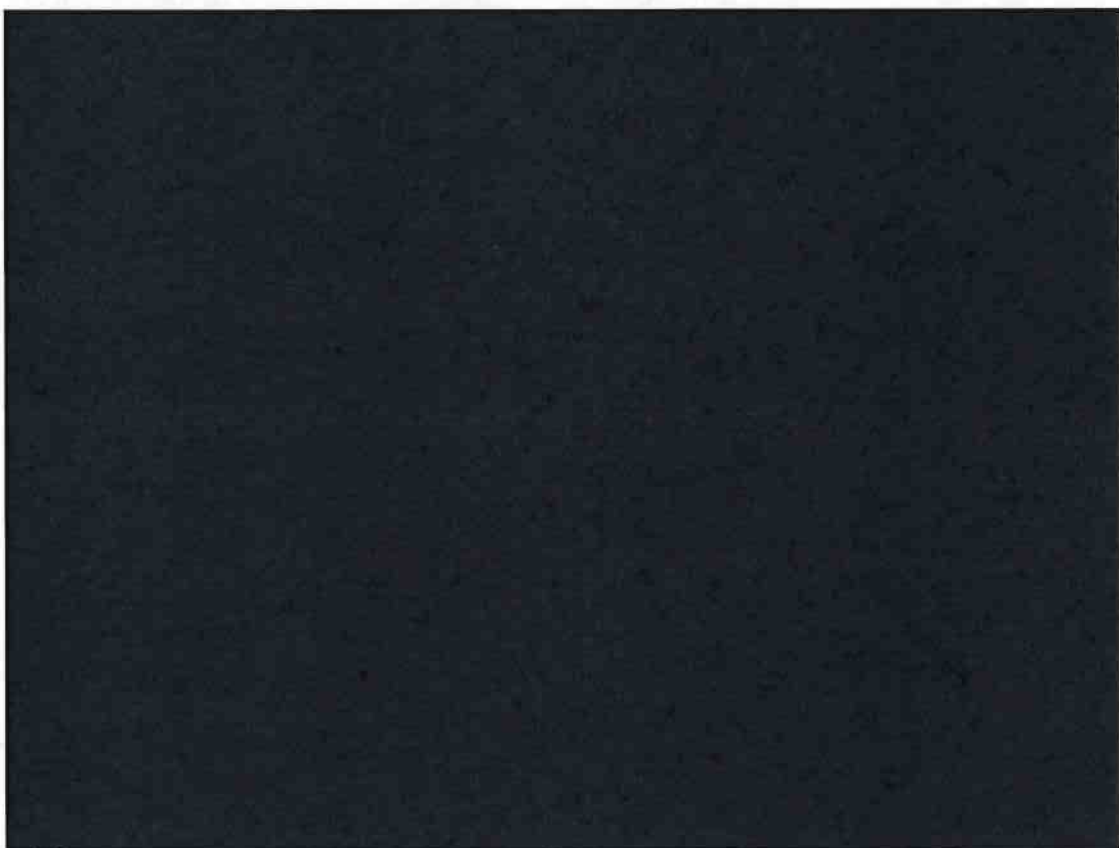
117A Not applicable.





Third matter complained of

137. At the time of the publication of the third matter complained of, did the first respondent intend to convey any of the following imputations (please answer separately in relation to each meaning) by the publication of the third matter complained of:



- (g) Geoffrey Rush had falsely denied that the Sydney Theatre Company had told him the identity of the person who had made a complaint against him.

(g)A Yes.



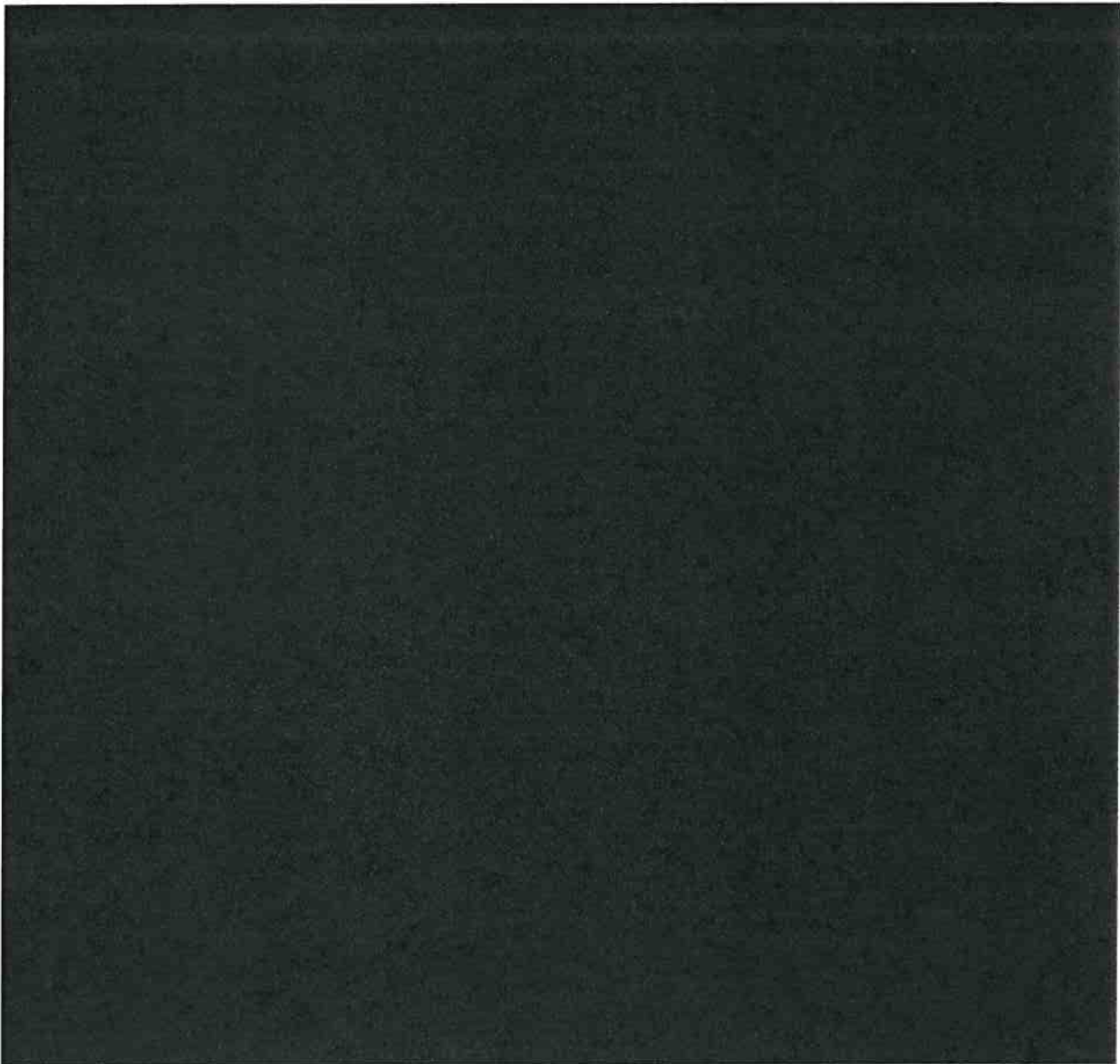
MALICE/AGGRAVATION

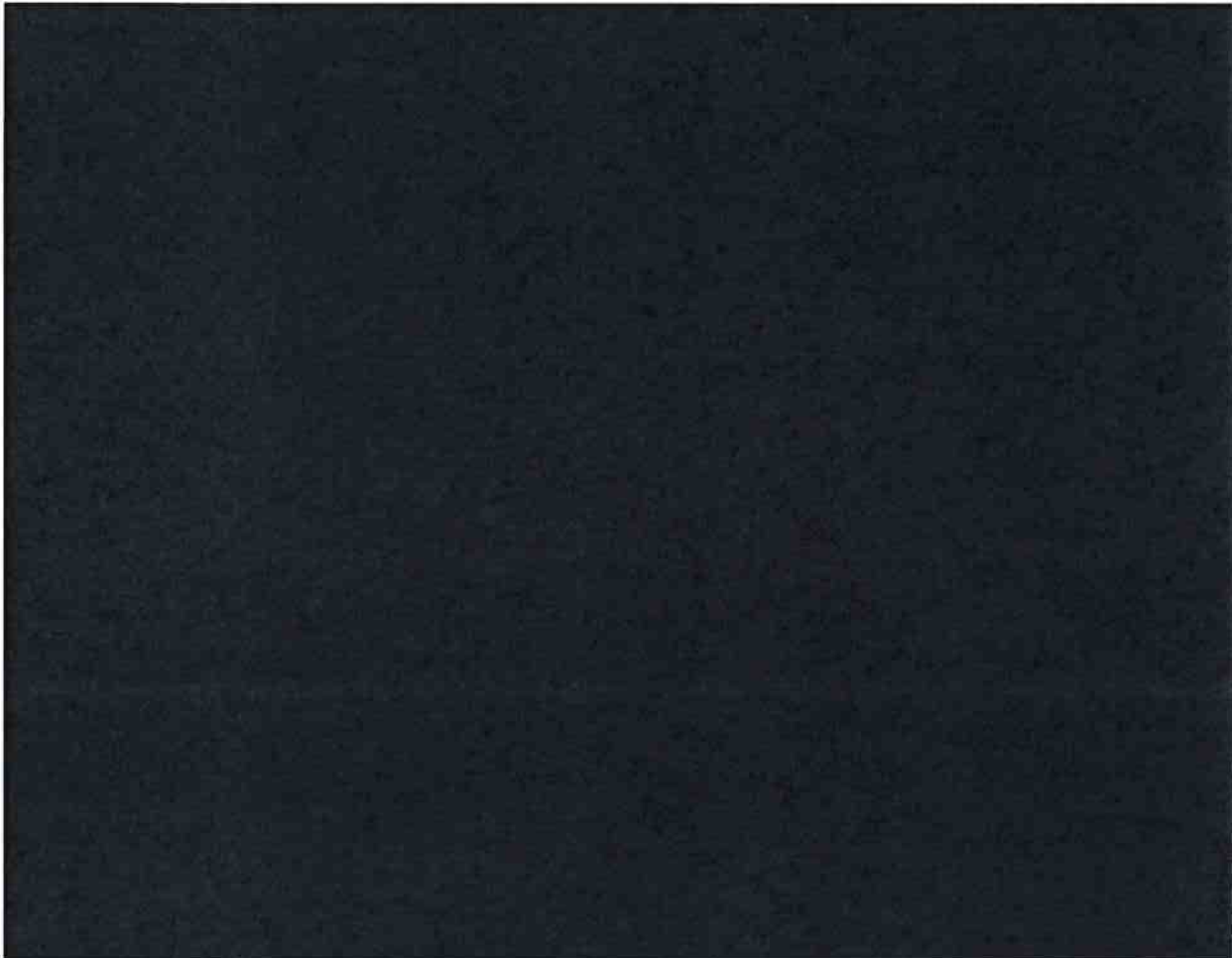
156. Did the first respondent "Tweet" the second matter complained of on Twitter? If so, please provide a print-out of that Tweet.

156A Yes.

157. Did the first respondent "Tweet" the third matter complained of on Twitter? If so, please provide a print-out of that Tweet.

157A Yes.





162. Has the first respondent ever apologised to Geoffrey Rush in relation to the content of any of the first or second or third matters complained of?

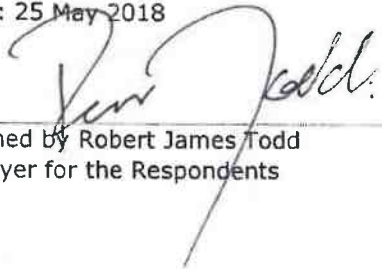
162A No.

163. If the answer to the preceding interrogatory is in the affirmative please state:

- (a) the date of the apology;
- (b) the substance of the apology; and
- (c) the form of the apology (whether it was oral or in writing).

163A Not applicable.

Date: 25 May 2018



Signed by Robert James Todd
Lawyer for the Respondents

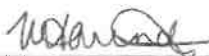
Affidavit

On 25 May 2018, I Marlia Ruth Saunders, solicitor, affirm:

1. I am the Senior Litigation Counsel of the First Respondent and I am authorised to make this affidavit on the First Respondent's behalf.
2. I verify that the above answers are true and complete answers to the Applicant's interrogatories.

Affirmed by the deponent
at Sydney
in New South Wales
on 25 May 2018
Before me:

)
)
)
)
)

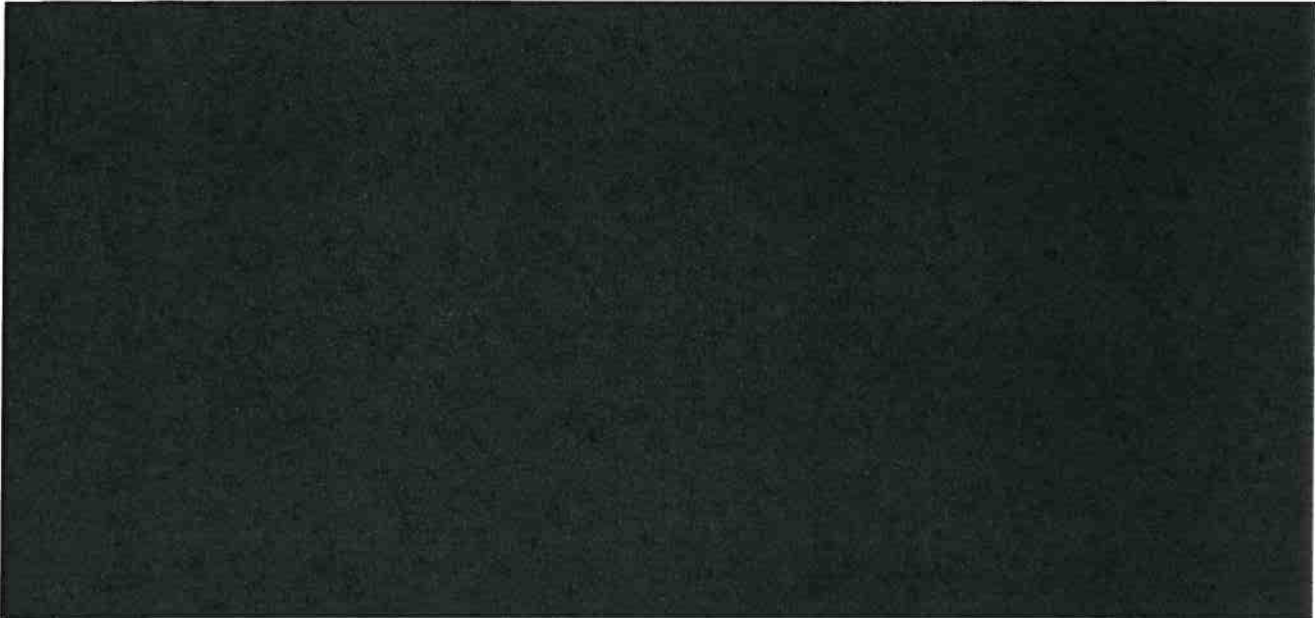


Signed by deponent

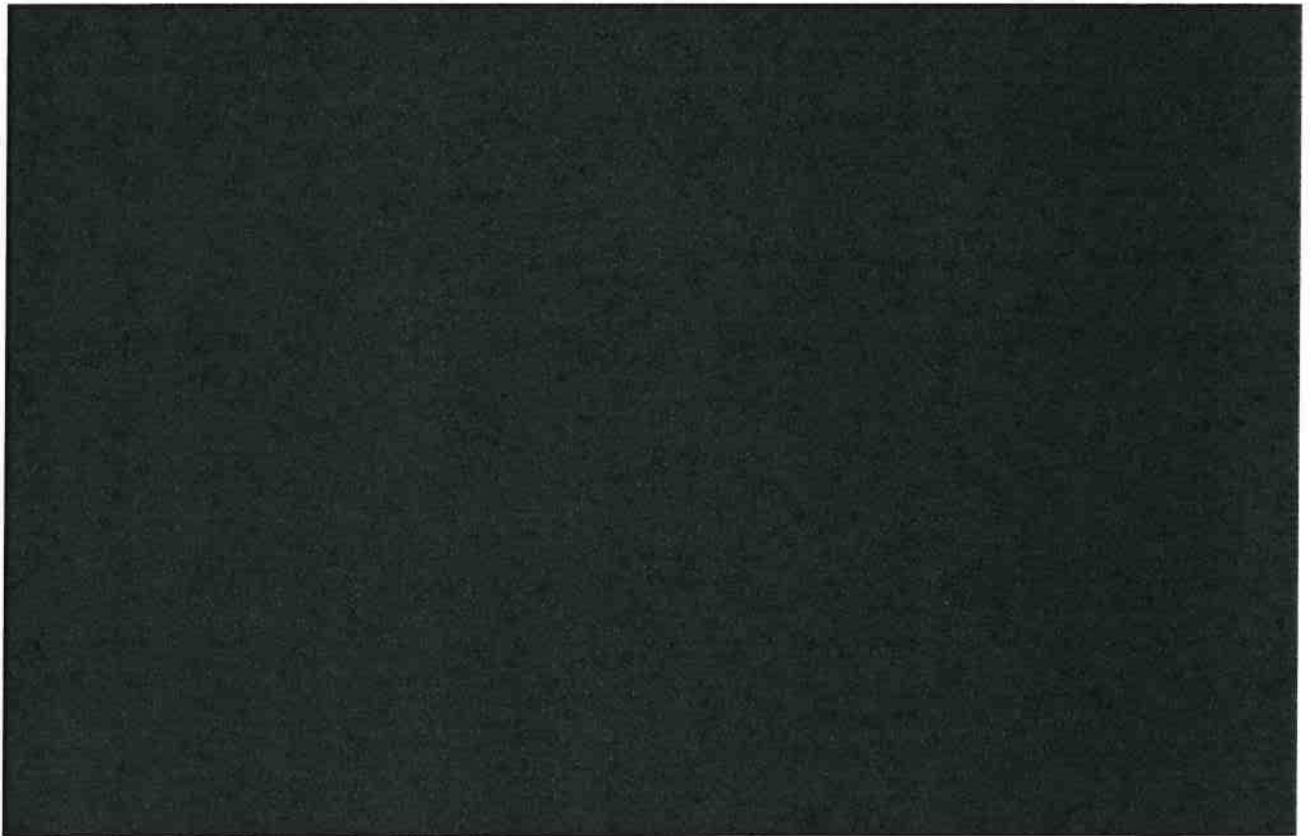


Signed by witness

Julie Anne Cheeseman
Solicitor
c/- 5 Martin Place
Sydney, New South Wales



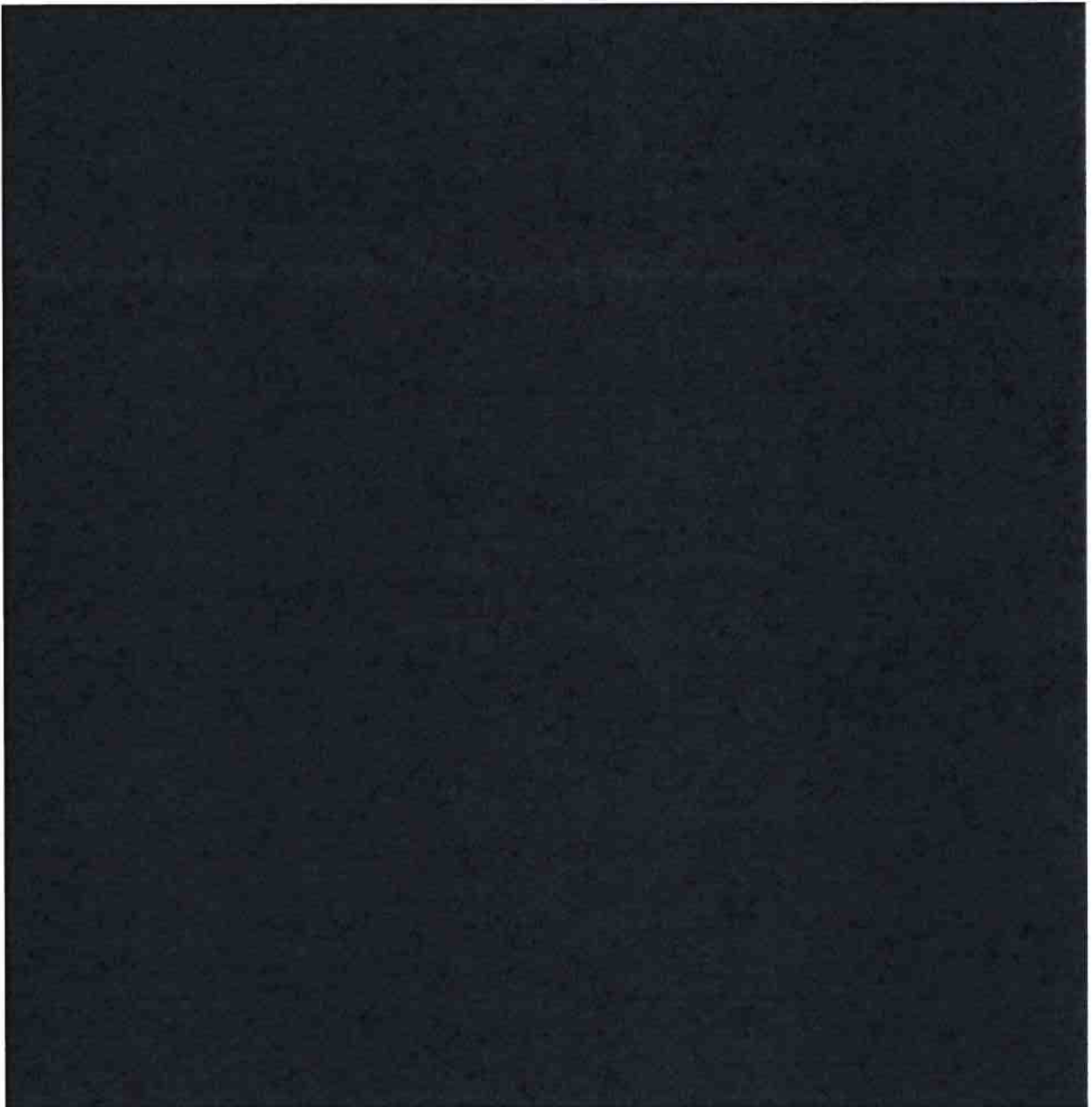
20. At the time of the publication of the third matter complained of, did you intend to convey any of the following imputations (please answer separately in relation to each meaning) by the publication of the third matter complained of:

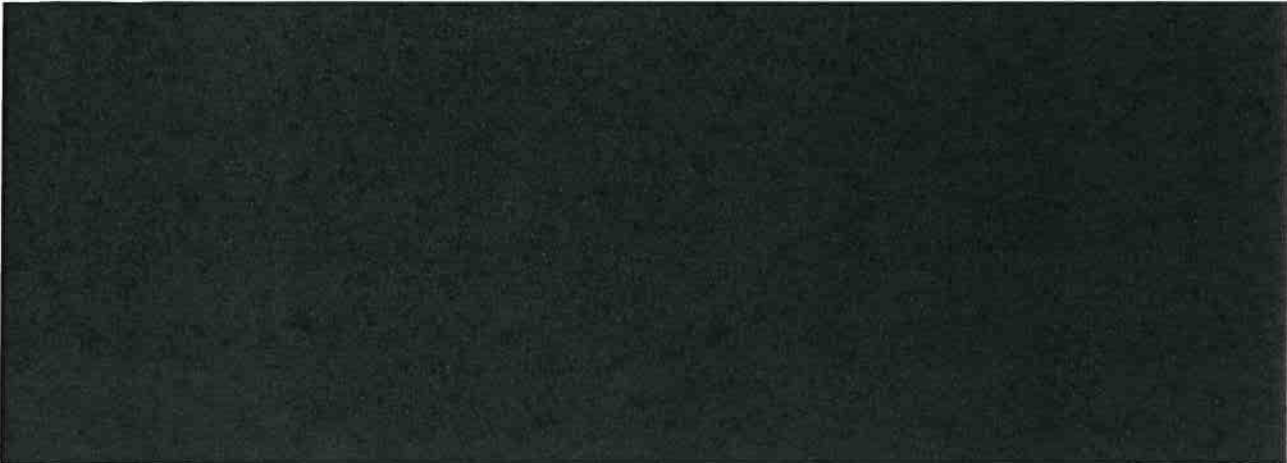




(g) Geoffrey Rush had falsely denied that the Sydney Theatre Company had told him the identity of the person who had made a complaint against him.

(g)A Yes.





MALICE/AGGRAVATION

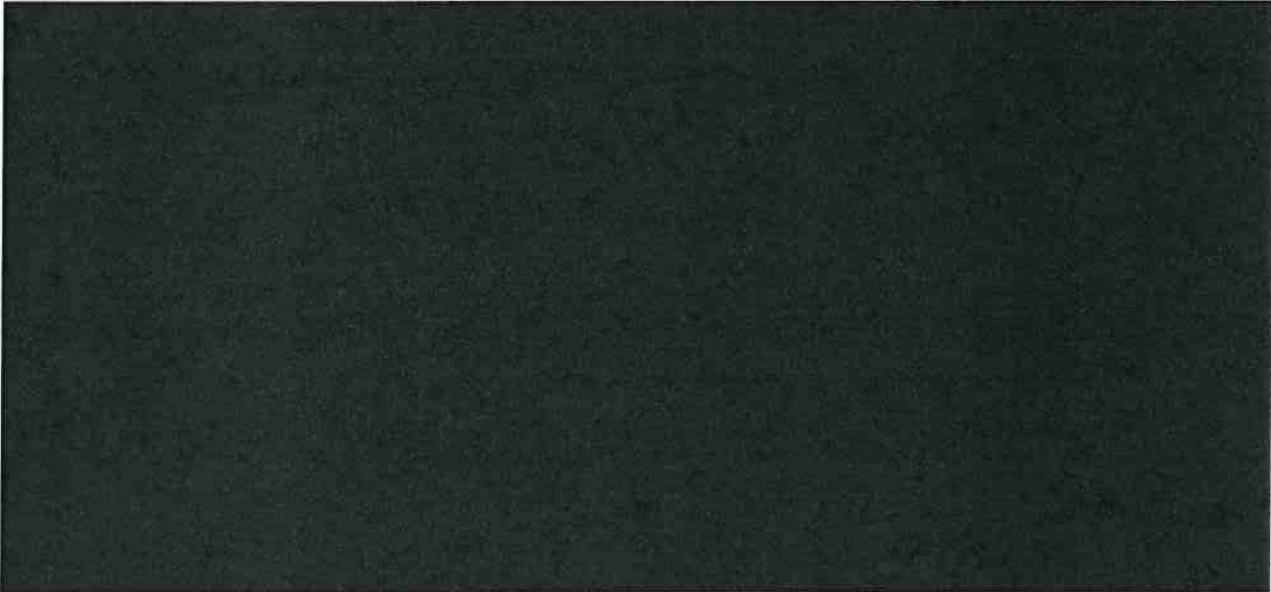
39. Did you "Tweet" the second matter complained of on Twitter? If so, please provide a printout of the Tweet.

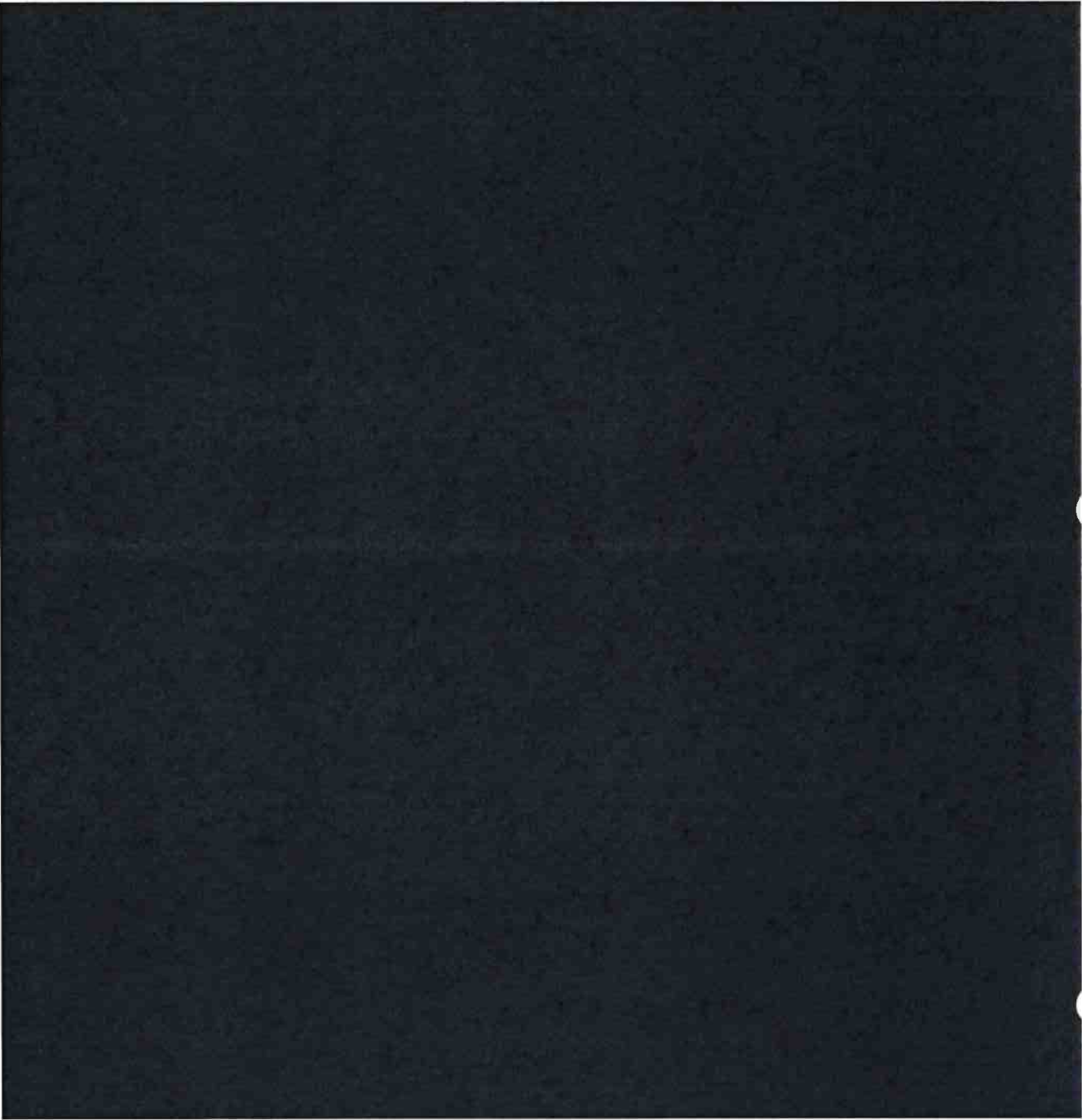
39A I tweeted an image of the first page of the second matter complained of.

40. Did you "Tweet" the third matter complained of on Twitter? If so, please provide a printout of the Tweet.

40A I tweeted a link to the third matter complained of.

41. Did you communicate with the Complainant about Mr Rush prior to the publication of the first and second matters complained of?





45. Have you ever apologised to Geoffrey Rush in relation to the content of any of the first or second or third matters complained of?


45A No.

46. If the answer to the preceding interrogatory is in the affirmative please state:

- (a) the date of the apology;
- (b) the substance of the apology; and
- (c) the form of the apology (whether it was oral or in writing).

46A Not applicable.

Date: 25 May 2018



Signed by Robert James Todd

Lawyer for the Respondents

Affidavit

On 25 May 2018, I, Jonathon William Moran, affirm:

1. I am the Second Respondent.
2. I verify that the above answers are true and complete answers to the Applicant's interrogatories.

Affirmed by the deponent
at Sydney
in New South Wales
on 25 May 2018
Before me:

)
)
)
)
)



Signed by deponent


Signed by witness

Julie Anne Cheeseman
Solicitor
c/- 5 Martin Place
Sydney, New South Wales