

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: **Taylor Auerbach**

Address: c/- Giles George, Level 7, 135 King Street, Sydney NSW 2000

Occupation: Producer and journalist

Date: 3 April 2024

I, Taylor Auerbach, c/- Giles George, Level 7, 135 King Street, Sydney, producer and journalist, say on oath:

1. I have sworn the affidavits in these proceedings on the following dates:

(a) 30 March 2024 (**First Affidavit**);

(b) 31 March 2024 (**Second Affidavit**); and

(c) 1 April 2024 (**Third Affidavit**).

2. I refer to paragraph 21 of my First Affidavit. I became aware of a subpoena to Seven when I read or saw media reports in or around early December 2023. At this time I was concerned that I was in possession of material in relation to the Spotlight episodes concerning the applicant which may have been caught by the subpoena. I contacted my lawyer in relation to those concerns and do not waive privilege over any advice I received.

*taylor auerbach* 

Filed on behalf of (name & role of party)	Taylor Auerbach
Prepared by (name of person/lawyer)	Rebekah Giles
Law firm (if applicable)	Giles George
Tel	1300 163 662
Fax	
Email	rebekah.giles@gilesgeorge.com.au
<b>Address for service</b> (include state and postcode)	Level 7, 135 King Street, Sydney NSW 2000

[Version 3 form approved 02/05/2019]

3. Annexed hereto and marked **Annexure K** is a copy of screenshots of my Instagram messages with the applicant. My messages to the applicant on 6 June 2023 refer to a Dillaway audio and police interview. This is a reference to an audio file of Ben Dillaway's police interview that I listened to in the Seven studios at Everleigh on multiple occasions prior to the broadcast of the first episode regarding the applicant on 4 June. The file was located in a folder on an external hard drive located in Nick Brenner's edit suite and the transcript of the interview (that was hyperlinked by time stamps to the audio file) was located on Seven's rev account, being an online transcription service.
4. I have prepared this affidavit at the request of Network Ten for use only in these proceedings and only to the extent the Court considers this evidence relevant.

Sworn by the deponent  
By AVL  
On 3 April 2024  
Before me:

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)  
)

*taylor auerbach*

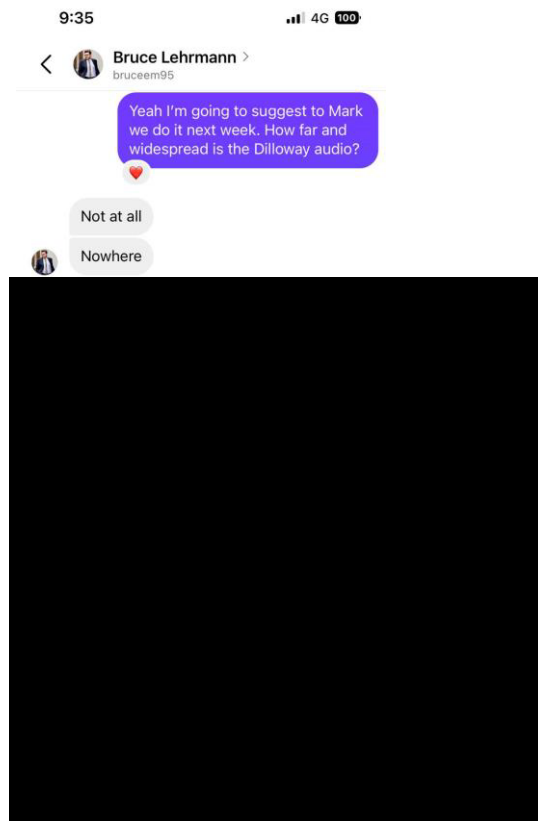
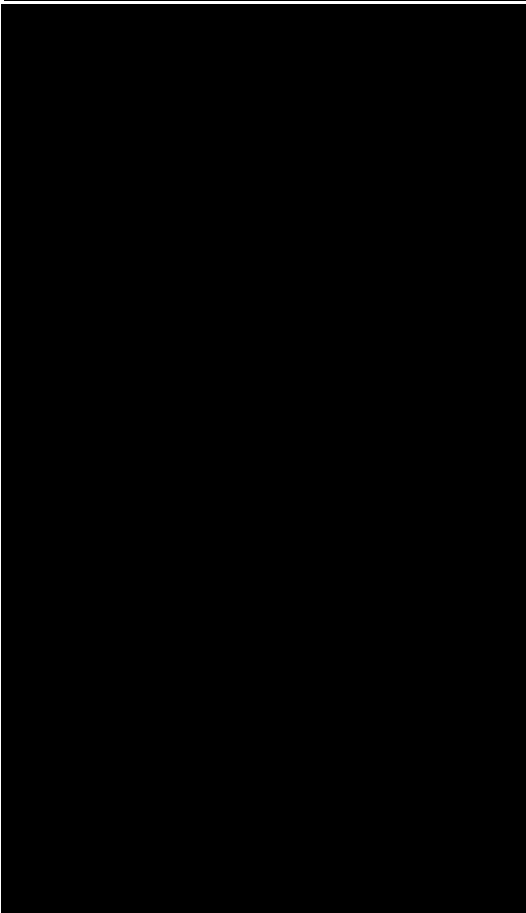
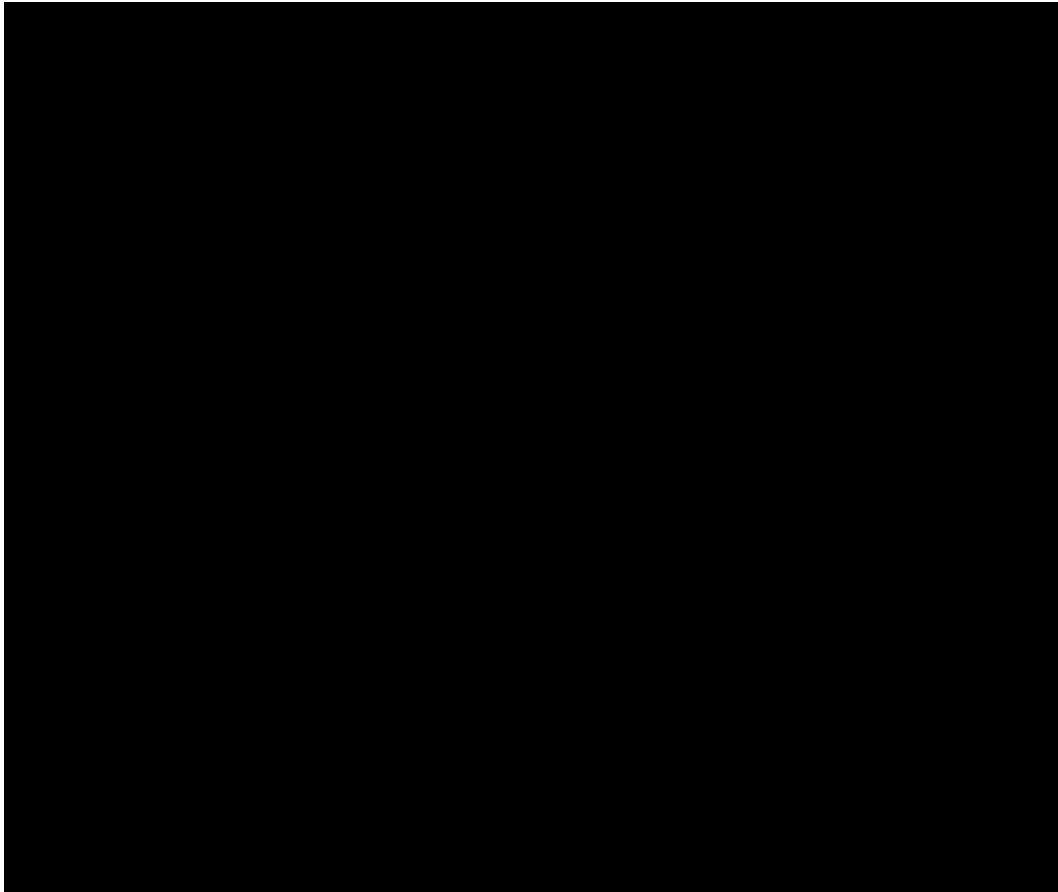
Signature of deponent



Signature of witness  
Rebekah Ruth Giles, legal practitioner

This document was signed in counterpart and witnessed over audio visual link in accordance with s 18A of the Oaths and Affirmations Act 2018 (Vic).

ANNEXURE K



This and the following 3 pages in Annexure K referred to in the affidavit of Taylor Auerbach sworn 3 April 2024 before me

Rebekah Ruth Giles, Legal Practitioner

