

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: **Peter Meakin**  
Address: c/- 7PM Company Pty Ltd, Como Centre, Level 1, 620 Chapel Street, South  
Yarra VIC 3141  
Occupation: Editorial Consultant  
Date: 28 July 2023

I Peter Meakin of c/- 7PM Company Pty Ltd, Como Centre, Level 1, 620 Chapel Street, South  
Yarra VIC 3141 say on oath:

1. I am an Editorial Consultant to The Project.
2. The Project is a current affairs program broadcast by Network Ten Pty Ltd and its affiliates  
(**Network Ten**).
3. 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.

Filed on behalf of (name & role of party)	The First Respondent, being Network Ten Pty Limited	
Prepared by (name of person/lawyer)	Marlia Saunders	
Law firm (if applicable)	Thomson Geer	
Tel	+61 2 8248 5836	Fax
Email	msaunders@tglaw.com.au	
<b>Address for service</b> (include state and postcode)	Level 14, 60 Martin Place, Sydney NSW 2000	

[Version 3 form approved 02/05/2019]

4. 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.
5. 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.

**Work history**

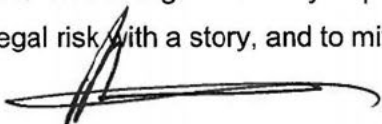
6. I am employed by 7PM Company Pty Ltd (**7PM**).
7. I understand 7PM and Network Ten have an agreement in place whereby 7PM produce The Project for Network Ten.
8. I have been a journalist for over 60 years.
9. Some of my more recent roles include:
  - (a) 1973-2003: various roles, including Director of News and Current Affairs, Channel Nine (which included being responsible for all of the network's lifestyle and factual programs such as Today, Sunday, RPA, Get Away, Our House and being Executive Producer (**EP**) of 60 Minutes and A Current Affair);
  - (b) 2003-2013: Director of News and Current Affairs, Channel Seven (which included being responsible for Seven News, Sunrise, Today Tonight and other factual programs such as Sunday Night);
  - (c) 2013-2021: Director of News and Current Affairs, Network Ten;
  - (d) 2021-2023: Editorial Consultant, The Project.
10. I have won a number of awards for my work. These include a Walkley Award for Journalism Leadership in 2002, recognising outstanding acts of leadership in journalism.
11. My work email address is: [REDACTED].
12. I have also used [REDACTED] and a Gmail account.
13. I used my Network Ten email account extensively during the production of the story which is the subject of these proceedings.
14. I communicated extensively using my email accounts during the period of January and February 2021 in relation to the broadcast of the story which is the subject of this proceeding.
15. I understand that from around 20 January 2021 to 15 February 2021, I sent, received and was copied to a large number of emails about the production of this story. Those emails were on a number of production-related topics, including:
  - (a) the commissioning of the story;



- (b) the development of the story; and
  - (c) the editing of the story.
16. My mobile telephone number is [REDACTED].
17. I communicated using my mobile phone 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.
18. From 20 January 2021 to 15 February 2021, I made and received a large number of telephone calls with other members of the production team including, Supervising Producer Laura Binnie and Producer Angus Llewellyn.
19. As a general rule, I tend to conduct my business and work over the telephone and via email. I do not tend to make handwritten notes.

#### **Roles and responsibilities**

20. As at January and February 2021, I was an Editorial Consultant engaged from time-to-time to help with the commissioning, development and editing of stories on The Project.
21. As an Editorial Consultant, my role is multi-faceted. For example, some of the things which I regularly do are:
- (a) suggest stories to the program;
  - (b) talk to producers and presenters about possible stories, including the angle and directions stories should take;
  - (c) talk to and work with producers and presenters prior to the filming of interviews to assist with developing the questioning, tone and angle of the interviews;
  - (d) work with producers, editors and presenters to compile interviews and field reports;
  - (e) assist producers and presenters with the scripting of segments and stories; and
  - (f) advise the EP on the content of the program.
22. I work mostly with Head of Features, Laura Binnie.
23. I also work closely with producers, such as Angus Llewellyn.
24. My role as a consultant is for producers such as Mr Llewellyn and Ms Binnie to contact me when they need to for assistance and guidance with the production of a story.
25. In producing any story, it is important to ascertain whether the story is factually correct and interesting. From my experience as a journalist, it is also important to identify any legal risk with a story, and to mitigate any such risk, and to act ethically in accordance with



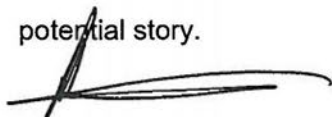
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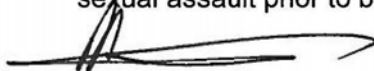

best journalistic practice. This includes engaging fairly with people for the purpose of conducting interviews.

### **Involvement with this story**

26. In January 2021, I was told that:
- (a) Lisa Wilkinson had been in contact with Brittany Higgins about Ms Higgins' allegation that she had been sexually assaulted in Australian Parliament House;
  - (b) Ms Higgins had also been in contact with print journalist Samantha Maiden; and
  - (c) Ms Maiden and Ms Wilkinson had been approached about preparing stories about Ms Higgins' allegations that she had been sexually assaulted in Australian Parliament House.
27. I do not recall how I first became aware of this or who told me, but I expect it was as a result of a telephone discussion with Ms Wilkinson.
28. Ms Wilkinson and I go back a long way and have a close relationship. We both worked together at Seven and Nine prior to working at The Project.
29. I cannot now recall specifically when I became involved with this story. Given the passage of time, I have relied on email and other documents that record my involvement in the story.
30. I was involved on an almost daily basis with the preparation of the story, including by having regular conversations about aspects of the production of the story as they arose with Mr Llewellyn and Ms Binnie.
31. On 20 January 2021 at 11.50am, I received an email from Ms Wilkinson titled "HIGHLY CONFIDENTIAL Canberra story" which set out and attached some material Ms Wilkinson had been provided with by Ms Higgins' partner, Mr Sharaz, including a "Timeline" document [FRD.001.00000925].
32. Although I cannot now recall looking at the "Timeline" document at the time I received Ms Wilkinson's email, I expect that I would have.
33. I was aware at this time that Mr Llewellyn had been allocated as the producer on the story because I had received an email from Craig Campbell (the co-EP for The Project) at 2.12pm on 20 January 2021 which said as much [FRD.001.00000001].
34. Although I cannot now recall having a conversation with Mr Llewellyn or Ms Wilkinson at this time, I expect that I would have done for the purposes of discussing her email and the potential story.



35. I spoke to Mr Llewellyn nearly every day from the time I was first told about the story to the time of broadcast. As described further below, Mr Llewellyn and possibly Ms Wilkinson consulted with me on aspects of the story as it was being produced for the purposes of obtaining my advice and guidance.
36. On 25 January 2021, I was copied into emails about logistical arrangements for a meeting that had been set up between Mr Llewellyn, Ms Wilkinson, Ms Higgins and Mr Sharaz [see, eg, **FRD.001.00000930**].
37. At 11.48am on 28 January 2021, I received an email from Mr Llewellyn about having a debrief of his meeting with Ms Wilkinson, Ms Higgins and Mr Sharaz [**FRD.001.00002437**]. A meeting was scheduled for the following day.
38. At 1.48pm, I received an email from Ms Wilkinson regarding a news story with comments from Michaelia Cash from 2019 [**FRD.001.00000940**]. Ms Wilkinson said:
- "This news story dates from 2019.*
- Michaelia Cash says here that these women who were assaulted by fellow liberal party staffers should report the assaults to the "appropriate authorities".*
- Turns out, if you're a woman whose been raped in Parliament House, there is no "appropriate authority".*
- 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. I read that email, and at 2.46pm, I responded: "Sad but true" [**FRD.001.00000077**].
40. At 4.25pm, I received an email from Mr Llewellyn [**FRD.001.00002439**]. I observe that in that email, Mr Llewellyn refers to discussions we had been having. Although I cannot now recall any specific discussion around this time with Mr Llewellyn, I expect that I would have spoken to him on that day.
41. On 29 January 2021, I attended a virtual "Field Debrief" via Teams [**FRD.001.00002641**]. This is ordinarily an internal meeting we hold after meeting with or filming talent. It is standard procedure, especially for big or key stories. Also in attendance at this meeting were Ms Wilkinson, Mr Llewellyn, Sarah Thornton (the Network EP), Mr Campbell and Ms Binnie. Two in-house lawyers from Network Ten, Tasha Smithies and Myles Farley were also in attendance. I do not now recall what was discussed.
42. I believe I learned Mr Lehrmann's name and that he was the alleged perpetrator of the sexual assault prior to broadcast. I do not now know how I learned his name.

43. I believe we appropriately mitigated our legal risk in this story and practised ethical journalism by not naming Mr Lehrmann. I do not recall when the decision was made not to name Mr Lehrmann but I expect I would have been involved in discussions about whether we should name him.
44. On 29 January 2021, I was copied into emails about logistical arrangements for the recording of the interview with Ms Higgins [see, eg, **FRD.001.00000014**].
45. On 1 February 2021 at 7.38am, Mr Llewellyn confirmed to me by email that a taped interview with Ms Higgins would take place the next day [**FRD.001.00002443**].
46. At 9.05am, I sent Mr Llewellyn an email asking him to provide an update to key members of the production team [**FRD.001.00002444**].
47. At 9.36am, I received an email from Mr Llewellyn to the production team providing an update on the story, including the timing of the recording of an interview with Ms Higgins and enquiries he had made [**FRD.001.00001620**]. I asked him a question and he responded [**FRD.001.00001623**, **FRD.001.00001624**].
48. At 9.59am, I received an email from Mr Llewellyn to the production team regarding, among other things, mental health care arrangements for Ms Higgins [**FRD.001.00001622**].
49. Later that morning, I was copied into emails about logistical and confidentiality arrangements for the recording of the interview with Ms Higgins [see, eg, **FRD.001.00001627**, **FRD.001.00001629**, **FRD.001.00002644**, **FRD.001.00002645**].
50. Before Ms Wilkinson interviewed Ms Higgins, Mr Llewellyn would probably have asked me for my views on:
- (a) the draft questions or topics that I thought he and Ms Wilkinson should cover with Ms Higgins during their interview;
  - (b) what questions to ask; and
  - (c) whether there were particular angles I thought we should pursue in the interview, beyond Ms Higgins' allegations of being sexually assaulted.
51. I do not recall what views, if any, I expressed to Mr Llewellyn on these topics.
52. On 2 February 2021 at 7.10pm, I was copied into an email from Mr Llewellyn with an update about the interview with Ms Higgins [**FRD.001.00002652**]. Mr Llewellyn and I exchanged further emails about the transcription of the interview [**FRD.001.00002653**].
53. On 3 February 2021 at 3.20pm, I received an email from Mr Campbell requesting a timeline for interviews and approaches for the remainder of the shoot and the proposed



- broadcast date. I sent an email to Mr Llewellyn at 3.44pm that we shouldn't be making any approaches without Ms Higgins' approval and it would not be until much closer to the transmission date [FRD.001.00000018]. At 4.10pm, Mr Llewellyn confirmed that the proposed broadcast date would be Monday 15 February 2021 [FRD.001.00000020].
54. Following the interview, Mr Llewellyn prepared the script or a first version of the story by editing down Ms Wilkinson's interview with Ms Higgins.
55. On 4 February 2021 at 4.56pm, Mr Llewellyn sent me an email with a link to a Google Doc containing an early draft version of the script for the segment [FRD.001.00002467].
56. I reviewed the draft script and made changes to finesse it [see, eg, FRD.001.00000943]. Mr Llewellyn or Ms Binnie also made edits to the draft script in the Google Doc which I could see.
57. At around that time, I would probably have spoken to Mr Llewellyn and Ms Binnie about the story generally, the interview with Ms Higgins and the draft script over the telephone.
58. The process of script refinement took a number of days, possibly up to a week.
59. On 5 February 2021, I was included in an email chain about having a catch up meeting to discuss the story the following week, including our plan for production and the proposed date for broadcast [FRD.001.00001680].
60. On 5 February 2021 at 4.53pm, I received a link to a Google Doc containing another part of the initial script prepared by Mr Llewellyn [FRD.001.00000945], which I reviewed.
61. On 6 February 2021 at 8.23am, I sent an email to Mr Llewellyn about the draft script which said:

*"Thanks Angus.*

*Excellent work.*

*I really think the best way to proceed from here is to edit the interview and have a close look at the result.*

*I don't see the point of marking deletions in the script until we see the actual conversation. Something that doesn't appear very strong on paper could be pretty powerful on air.*

*Plus let's get the lawyers' feedback ASAP. When do you plan to send Myles and Tasha the script?*

*It shouldn't be too hard to find a place to insert interviews with the police – if they are willing to speak.*

A handwritten signature in black ink, appearing to read 'J. Meitner', is written over a horizontal line that has been crossed out with a thick black stroke.

*Have a look at my suggested abbreviation of the opening sequence and let's discuss.*

*I did notice a small point about Linda Reynolds' reaction.*

*Brittany says her initial words were kind and supportive but a moment later we're told she was uncomfortable with her.*

*Is there any explanation of the change of heart?*

*Great stuff mate." [FRD.001.00000945]*

62. On 8 February 2021 at 7.31am, I sent an email to Editor, Darryl Brown about the rough cut, being the first edit of the video for the story [FRD.001.00002500].
63. At 8.12am, I sent an email containing a suggested promo of the story [FRD.001.00001725].
64. At 9.41am, I received an email from Mr Llewellyn about suggestions I had made to him for the opening of the segment. I believe I would have made these suggestions to Mr Llewellyn over the telephone or face-to-face. I responded at 9.48am by saying "As long as you think Brittany would be OK with that." [FRD.001.00000948]
65. During the day on 8 February 2021, I was included in an email chain between Mr Llewellyn, Ms Binnie, Mr Farley and Ms Smithies about the story, in which we shared some views about the story. I expressed disagreement about starting the story with a reference to the Prime Minister and Grace Tame [FRD.001.00001689].
66. At 4.37pm, I received an email from Mr Llewellyn about a conversation he had with Samantha Maiden, who was writing a story for news.com.au to correspond with The Project's broadcast. We then exchanged some emails regarding the timing of the broadcast [FRD.001.00001689, FRD.001.00001699, FRD.001.00001711].
67. Regarding the timing of this story, I took the view that if Ms Maiden was going to publish her article first, The Project's broadcast should not be too long after. I expect I made this view known to others during the production process.
68. At 7.28pm, I received an email from Mr Brown containing a link to the first work-in-progress (**WIP**) version of the story. I viewed the WIP video on my computer.
69. At 8.43pm, I sent an email to Mr Brown that said:

*"Thanks for that Darryl. Nice job. I can see a few trims along the way – not more than about 60 to 90 seconds though.*

*It is pretty compelling.*



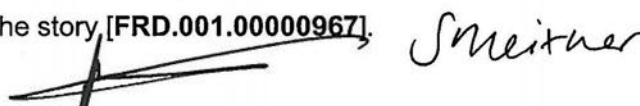
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*Angus, let's talk in the morning. When do we plan to send it to Tasha and Myles?"*

**[FRD.001.00002481]**

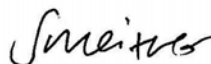
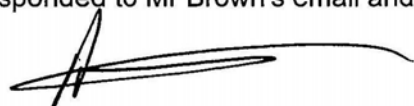
70. My main role after Mr Brown had produced the first WIP version of the story was cutting the segment back and, if necessary, rearranging it. Stories on The Project seldom run longer than 8 minutes. As the early version of this story lasted approximately 40 minutes, it was already an unusually long and detailed story for us to broadcast. I thought it was important to provide as much context and detail as possible and I believed the interview and story made good television. For those reasons, I anticipate that I would have recommended to Mr Campbell and other members of the production team that we should run the story long, that is a story longer than the usual segment length and, in this case, divided into three parts.
71. On the morning of 9 February 2021, Mr Llewellyn and I exchanged emails **[FRD.001.00002481]**. Mr Llewellyn said he would do some minor tweaks and trims then send the WIP video to the legal team later in the morning.
72. That morning, I also received some emails from Mr Campbell and Mr Llewellyn regarding confidentiality arrangements for the story **[FRD.001.00002686, FRD.001.00000956, FRD.001.00000026]**. Generally speaking, I was aware that the production of this story was treated differently to other stories because of the serious and sensitive nature of the subject matter of the story and concerns it might leak. Because of those concerns, certain measures were put in place to limit the chance of the story leaking. For example, the story was given the codename "ENVIRO".
73. On 9 February 2021 at 9.25am, I received an email from Mr Llewellyn with updated versions of Parts 1 and 2 of the script and WIP video for Part 1 **[FRD.001.00000958]**.
74. I viewed the script and WIP video and at 9.33am, I sent an email to Mr Llewellyn containing amendments (or "trims") to the script, which I had marked up in purple on the script for discussion **[FRD.001.00000959]**.
75. At 11.26am, I received an email from Mr Llewellyn with a new link to the WIP video for Part 1 **[FRD.001.00002483]**.
76. During the day on 9 February 2021, I attended a meeting on Teams with Mr Campbell, Chris Bendall (the other co-EP of The Project), Mr Llewellyn, Ms Thornton, Ms Binnie, Ms Smithies and Mr Farley **[FRD.001.00001712]**. I do not now recall what was discussed.
77. At 2.49pm, I recommended we use Professor George Williams as a constitutional law expert for the story **[FRD.001.00002217]**.
78. At 4.02pm on 9 February 2021, I received an email from Mr Brown with the WIP video for Part 2 of the story **[FRD.001.00000967]**.



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79. At 4.14pm, I received an email from Mr Llewellyn with the WIP video for Part 2 of the story [FRD.001.00000968, FRD.001.00000027].
80. I viewed the WIP video on my computer. After viewing it, I believe I had telephone discussions with Mr Llewellyn and Ms Binnie about the edit. My belief is based on the fact that we usually discussed edits to the WIP video by telephone and because Ms Binnie sent an email suggesting a call with me and Mr Llewellyn at 4.16pm that day [FRD.001.00000969].
81. At 10.43pm, I received an email from Mr Llewellyn with a link to a Google Doc containing draft requests for comment [FRD.001.00001738]. I read the draft requests for comment.
82. At 11.39pm, I received an email from Mr Brown with a "new and improved" WIP video for Part 1 [FRD.001.00000974].
83. On 10 February 2021 at 7.14am, I sent Mr Llewellyn an email about his draft requests for comment that said:
- "Hi Angus.*
- I think there are too many questions here. Happy to go through the list with you guys if you think that would help.*
- I reckon we should be asking Cash for an interview as well as Reynolds and the cops. And it would be great to speak to Ms Brown but I realise that is highly unlikely."* [FRD.001.00001744]
84. That day, I expect I had a number of discussions with Mr Llewellyn about the form of the requests for comment and who we should be seeking comment from. I expect this would have included Mr Llewellyn seeking comment from Mr Lehrmann even though he was not named in the story.
85. I watched the revised WIP for Part 1 on my computer that morning.
86. At 7.43am, I sent an email to Mr Llewellyn saying:
- "There are some grabs here that I thought we were going to lose.*
- I think we need to cut it back. Let's talk"* [FRD.001.00000976].
87. On the same day, I believe I had a call with Mr Llewellyn and Ms Binnie about some further trims [FRD.001.00000980].
88. I also exchanged emails with Mr Bendall regarding some proposed edits [FRD.004.00000100].
89. At 11.45pm that evening, I received an email from Mr Brown containing further WIP versions of the story [FRD.001.00000981].

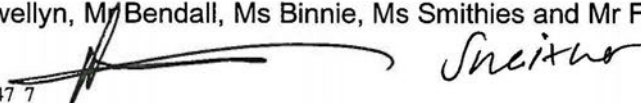
90. On 11 February 2021, I was included in an email chain with other members of the production team about the latest WIP versions, including the parts relating to Professor Williams [FRD.001.00000987, FRD.001.00000043, FRD.001.00001775].
91. At 1.37pm, I received an email from Mr Llewellyn with a draft "piece to camera" or "PTC" for Ms Wilkinson to read out [FRD.001.00000048]. I read the draft PTC. If I had any feedback on this, I would have provided it to Mr Llewellyn.
92. On 11 February 2021, I was included in an email chain with other members of the production team about the proposed requests for comment and the timing of them [FRD.001.00001797, FRD.001.00001798, FRD.001.00000050].
93. At 5.23pm, I received an updated WIP version of the story from Mr Brown [FRD.001.00001806].
94. At 6.04pm, I sent an email to Mr Llewellyn suggesting that the proposed PTC be run past the lawyers [FRD.001.00002509].
95. At 10.23pm, I received an email from Ms Wilkinson with some comments on the then-latest edit of the story [FRD.001.00000265].
96. On 12 February 2021, I discussed Ms Wilkinson's comments on the story with Ms Binnie and Mr Llewellyn. I cannot now recall what we discussed [see, eg, FRD.001.00001003, FRD.001.00001004, FRD.001.00001005]. As a result of those discussions, we amended the story to include two elements that Ms Wilkinson had suggested [FRD.001.00000267].
97. On 12 February 2021, I was included in an email chain regarding cross-promoting Ms Wilkinson's interview with Ms Higgins in Ms Maiden's article [FRD.001.00001013]. This would consist of a clip from Ms Wilkinson's interview that could be accessed via news.com.au in Ms Maiden's article. My email said:
- "If our talent is comfortable, I reckon it should be something about the assault itself – rather than the way ministers and others dealt with her.*
- How about "How many times did you tell him to stop?"*
98. During the evening of 12 February 2021, I exchanged emails with the production team in relation to suggested wording for a promo for the story [FRD.001.00001842].
99. On 13 February 2021 at 1.37am, I received an email from Mr Brown with an updated WIP version of the story [FRD.001.00001024].
100. I watched the updated WIP version of the story and at 9.14am on 13 February 2021, I responded to Mr Brown's email and said:





*"Really, really good. I love the sensitive way the interview is edited."*  
**[FRD.001.00000271]**

101. At 10.00am, I received an email from Ms Wilkinson with some comments on the then-latest edit of the story **[FRD.001.00000272]**.
102. On 13 February 2021, I was included in an email chain between Mr Llewellyn, Ms Binney, Ms Smithies, Mr Farley and Mr Brown about requests Ms Wilkinson had made in relation to the story **[FRD.001.00001027; FRD.001.00001029]**.
103. On 14 February 2021 at 9.09am, I received an email from Mr Llewellyn providing an update on the story **[FRD.001.00000078]**.
104. At 12.18pm, I was copied into an email from Mr Llewellyn to Mr Brown providing a script for a proposed promo **[FRD.001.00001872]**.
105. At 4.49pm, I sent an email providing my sign off on a proposed clip to provide to Ms Maiden **[FRD.001.00001882]**.
106. At 5.12pm, I received an email from Mr Llewellyn to the production team providing a link to the promo, which confirmed I had signed off on it **[FRD.001.00001567]**.
107. At 8.37pm, I received an email from Mr Llewellyn which forwarded a statement provided by ACT Policing **[FRD.001.00001898]**.
108. On 14 and 15 February 2021, I was included in an email chain with Mr Llewellyn, Ms Binnie, Ms Smithies and Mr Farley about the government's statement provided in response to a request for comment **[FRD.001.00001899, FRD.001.00001900, FRD.001.00002535, FRD.001.00000093]**.
109. On 15 February 2021 at 7.37am, I sent an email to Mr Llewellyn about the inclusion of the statement received from the government **[FRD.001.00000273]**.
110. At 8.22am, I received an email from Mr Llewellyn which provided a link to Ms Maiden's article **[FRD.001.00000275]**.
111. At 10.48am, I received an email from Mr Llewellyn which forwarded a statement provided by the office for Michaelia Cash **[FRD.001.00000299]**.
112. At 11.09am, I received an email from Mr Llewellyn regarding changes to the segment to incorporate a statement from Michaelia Cash **[FRD.001.00000089]**.
113. At 11.45am, I received an email from Mr Llewellyn which forwarded a revised statement provided by the government **[FRD.001.00000306]**.
114. At 12.05pm on 15 February 2021, I proposed some closing remarks to the segment to Mr Llewellyn, Mr Bendall, Ms Binnie, Ms Smithies and Mr Farley:



*"Naturally, we approached all the people named in our story and all our requests for interviews were declined. They remain open of course.*

*Full statements on behalf of Linda Reynolds, Michaelia Cash and the Australian Federal Police can be seen on our website.*

*And, despite repeated requests, no-one can tell us when or if Brittany Higgins will get access to that all-important CCTV footage." [FRD.001.00000308]*

115. At 12.28pm, I received an email chain with Mr Llewellyn forwarding a statement provided by the Presiding Officers at Parliament House [FRD.001.00000314]. I raised a query about who viewed the CCTV footage from Parliament House [FRD.001.00000316, FRD.001.00000319]. At 6.30pm, I received an email from Mr Llewellyn providing a response to that query [FRD.001.00000107].
116. At 3.43pm, I sent an email to Mr Llewellyn, Mr Bendall and Ms Binnie proposing a draft of the opening words for the segment to be spoken by Ms Wilkinson [FRD.001.00000343].
117. At 3.49pm, I received an email from Mr Llewellyn with a link to the WIP video for Part 3 [FRD.001.00000346]. I viewed the WIP video on my computer.
118. At 4.08pm, I sent an email to Mr Llewellyn with a proposed edit [FRD.001.00000349].
119. I believe I watched The Project live on television that evening.
120. At 8.17pm on 15 February 2021, I sent an email to key members of the production team commending everyone on their work [FRD.001.00000401].

### **Public Interest**

121. When I was first told about this story, I was initially sceptical about it. While I saw the potential significance of the story from the outset, I wanted to see what Ms Higgins said about the matter and what other evidence there was to support her claims. Seeing Ms Wilkinson's interview with Ms Higgins was a factor in changing my view. I saw Ms Higgins as a credible and impressive person. I considered that her version of events was consistent and believable.
122. In my view, if the segment had only focussed on Ms Higgins' rape allegations, it would have been overly salacious and lacking in important context and detail.
123. I felt that it was important to provide a broader context to viewers by focusing on:
- (a) the conduct having occurring in Parliament House;
  - (b) the conduct of individual ministers and government officials in how they had handled and treated Ms Higgins' allegations; and




- (c) the government's response to the conduct and how it fed more broadly into stories about the government's treatment of women.

124. I believed this was an important public interest story. It was a story which dealt with the security and livelihood of women working in Parliament House at the seat of our government. If we have a problem with harassment, the first place it shouldn't be happening is at the seat of power. This wasn't just a story about a woman alleging she was raped in Parliament House. It was a story also about how that allegation was dealt with.

**Legal advice**

125. I was aware that Ms Smithies and Mr Farley were involved with this story from very early on, and provided prepublication legal advice throughout the production process until the broadcast on 15 February 2021.

126. Given the nature of my role, it was common for me to suggest others seek or obtain legal advice.

Sworn by the deponent  
at Sydney  
in New South Wales  
on 28 July 2023  
Before me:



Signature of Sophie Meixner  
Level 14, 60 Martin Place, Sydney NSW 2000  
An Australian Legal Practitioner within the meaning of the Legal Profession Uniform Law

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Signature of deponent