

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

Exhibit No: R15
Assoc: Alice O'Connell

MFI No: _____

Applicant's Answers to Interrogatories

No. NSD 1485 of 2018

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

Ben Roberts-Smith VC MG

Applicant

Fairfax Media Publications Pty Limited ACN 003 357 720 and others

Respondents

Filed on behalf of	Ben Roberts Smith VC MG, Applicant	
Prepared by	Paul Svilans	
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16A. Please look at paragraph 161 of your Outline of Evidence dated 12 July 2019 and answer the following questions:

- (a) Who informed you that Person 12 had been stood down and replaced as Commander of the NDS soldiers?
- (b) What in substance was said in this regard?
- (c) Where was the command group meeting held?
- (d) Who attended the command group meeting?
- (e) State the name of the person who replaced Person 12 as Commander of the NDS soldiers.

16B.

- (a) To the best of the Applicant's recollection it was Person 31.
- (b) The Applicant does not recall the specific details of what was said to the command group. However, to the best of the Applicant's recollection, Person 31 informed the command group, in substance, that there had been an incident on a mission involving Person 12 attempting to shoot a stray dog and, in the process, wounding Person 57. Person 31 noted that Person 12 had been stood down as Commander of the NDS as a result of the incident.
- (c) In the Officer Commanding Force Element Alpha's office, Camp Russell, Tarin Kowt.
- (d) Person 58, Person 54, Person 26, Person 7, Person 55, Person 31, Person 35 and the Applicant.
- (e) To the best of the Applicant's recollection, the soldier who replaced Person 12 was Commander **Person 59**

Date: 23 October 2019



Signed by Paul Svilans
Lawyer for the Applicant

Affidavit

On 23 October 2019, I Ben Roberts-Smith VC MG, General Manager, say on oath:

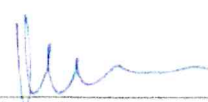
1. I am the Applicant.
2. I verify that the above answers are true and complete answers to the Respondents' interrogatories.

Sworn by the deponent
at Sydney
in New South Wales
on 23 October 2019
Before me:

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)
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Signed by deponent



Signed by witness
Paul Svilans
Lawyer for the Applicant