

List of documents

No. NSD426 of 2021

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

Joanne Elizabeth Dyer

Applicant

Sue Chrysanthou SC

First Respondent

Charles Christian Porter

Second Respondent

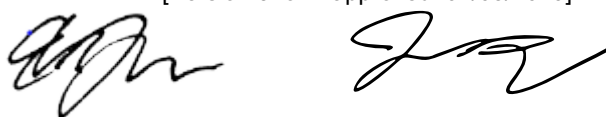
Pursuant to the order for discovery made on 24 May 2021, the Applicant makes this list of documents and affidavit.

Affidavit

On 24 May 2021, I, Joanne Elizabeth Dyer, Freelance Producer and Festival Director, affirm:

1. I am the Applicant.
2. I have made reasonable enquiries as to the existence and location of the documents specified in the order.
3. To the best of my knowledge, there are no documents specified in the order that are or have been in my control, other than the documents specified in this list of documents.
4. The documents set out in part 1 are in my control and I do not claim privilege from production for any of these documents.
5. The documents set out in part 2 are in my control but I claim privilege from production of each of these documents on the grounds that disclosure be prohibited other than to the solicitors and counsel for the first respondent and other than any solicitor or counsel of

Filed on behalf of (name & role of party) Joanne Elizabeth Dyer, Applicant
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the second respondent that is not acting for the second respondent in proceedings NSD 206 of 2021.

- 6. The documents set out in part 3 have been but are no longer in my control (**Signal Messages**) and are unlikely to be responsive to the categories of documents specified in the order. I recall that there were messages sent using the Messaging service "Signal," however, I no longer have access to these messages. On Signal:
 - a. messages can be sent using the 'disappearing' function, resulting in the messages disappearing are 1 day or 1 week; or
 - b. messages can be deleted by the users.
- 7. To the best of my recollection, the Signal Messages between Louise Milligan and I were in respect of logistical matters, such as organising a meeting or a phone call. I have been unable to review these messages.

Sworn / Affirmed by the deponent
 at Sydney
 in New South Wales
 on 24 May 2021
 Before me:

 Signed by witness

Emma Johnsen, Solicitor

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 Signed by deponent 

Part 1 - Documents in the control of Applicant

No.	Description of document(s) / category	Number of documents in category (if applicable)	Date/period
1	Text message between Applicant and Annabel Crabb	1	1 July 2020 – 16 November 2020
2	Whats App messages between Louise Milligan and the Applicant	1	June 2020
3	Signal messages between Peter Cronau and the Applicant	1	21 July 2020 – 31 July 2020

Part 2 – Documents in the control of for which privilege from production is claimed as per paragraph 5 above.

No.	Description of document(s) / category	Number of documents in category (if applicable)	Date/period
1	No production.		

Part 3 – Documents that have been but are no longer in the control of Applicant

No.	Description of document	Date of document	What became of document
1	Signal message between Louise Milligan and the Applicant	26 June 2020 – November 2020	Messages have been deleted