

## NOTICE OF FILING

This document was lodged electronically in the FEDERAL COURT OF AUSTRALIA (FCA) on 13/05/2021 9:26:06 PM AEST and has been accepted for filing under the Court's Rules. Details of filing follow and important additional information about these are set out below.

### Details of Filing

Document Lodged: Affidavit - Form 59 - Rule 29.02(1)  
File Number: NSD426/2021  
File Title: JOANNE ELIZABETH DYER v SUE CHRYSANTHOU & ANOR  
Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



A handwritten signature in blue ink that reads 'Sia Lagos'.

Dated: 13/05/2021 9:26:23 PM AEST

Registrar

### Important Information

As required by the Court's Rules, this Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

The date and time of lodgment also shown above are the date and time that the document was received by the Court. Under the Court's Rules the date of filing of the document is the day it was lodged (if that is a business day for the Registry which accepts it and the document was received by 4.30 pm local time at that Registry) or otherwise the next working day for that Registry.



Form 59  
Rule 29.02(1)

**Affidavit**

No. NSD426 of 2021

Federal Court of Australia  
District Registry: Sydney  
Division: General

**Joanne Elizabeth Dyer**  
Applicant

**Sue Chrysanthou SC**  
Respondent

Affidavit of: **Joanne Elizabeth Dyer**  
Address: [REDACTED]  
Occupation: Freelance Producer and Festival Director  
Date: 10 May 2021

**Contents**

Document number	Details	Paragraph	Page
1	Affidavit of Joanne Elizabeth Dyer affirmed on 10 May 2021		
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I affirm:

- 1 I am the Applicant in these proceedings.
- 2 I make this affidavit in support of my Summons, seeking an injunction to restrain Ms Sue Chrysanthou SC (**Ms Chrysanthou**) from continuing to act for Mr Christian Porter

Filed on behalf of (name & role of party) Joanne Elizabeth Dyer, Applicant  
 Prepared by (name of person/lawyer) Nathan Mattock  
 Law firm (if applicable) Marque Lawyers  
 Tel (02) 8216 3000 Tel (02) 8216 3000  
 Email nathanm@marquelawyers.com.au  
**Address for service** Level 4, 343 George Street, Sydney NSW 2000  
 (include state and postcode)

(Mr Porter) in defamation proceedings against the Australian Broadcasting Corporation (ABC) and Ms Louise Milligan (Ms Milligan) commenced in the Federal Court of Australia (the ABC Proceedings).

3 I first met Ms Chrysanthou in November 2020 about [REDACTED]  
[REDACTED]

4 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

5 Nothing in this affidavit is intended to waive the confidentiality or claims for legal professional privilege in respect of communications with my lawyers.

**Background**

6 In this affidavit I refer to a friend of mine as “Kate” without providing her surname. [REDACTED]  
[REDACTED]  
[REDACTED]

7 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]


8 After Kate told me of the allegation, I supported Kate in her decision to report her allegations to the NSW Police. [REDACTED]  
[REDACTED]

9 Kate took her own life on 24 June 2020. [REDACTED]  
[REDACTED]

10 [REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

11 [REDACTED]  
[REDACTED]



12

[REDACTED]

13

[REDACTED]

14

On 9 November 2020, I watched the broadcast of the Four Corners episode, entitled 'Inside the Canberra Bubble'. Because of work commitments, I did not watch the episode live but watched the episode later that evening.

[REDACTED]

15

[REDACTED]

16

[REDACTED]

17

[REDACTED]

18

The next day, 17 November 2020, Mr Hooke and I met with Mr Michael Bradley (**Mr Bradley**) of Marque Lawyers at his office to discuss [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

19 After meeting with Mr Bradley, I had a conversation with Mr Hooke in words to the following effect:

Mr Hooke:

[REDACTED]

Me:

20 Mr Hooke and I met with Mr Matthew Richardson (**Mr Richardson**) on 18 November 2020.

**Conference on 20 November 2020**

21 On the morning of 20 November 2020, Mr Hooke, Mr Bradley and I met with Ms Chrysanthou in her chambers. Mr Richardson was also present at the conference, but he arrived approximately ten to fifteen minutes after the conference had started.

22 I understood that the purpose of the conference was to hear Ms Chrysanthou's opinion on [REDACTED]  
[REDACTED]  
[REDACTED]

23 [REDACTED]  
[REDACTED] Before attending the conference with Ms Chrysanthou, I thought it would be likely those matters would be discussed at the conference.

24 As explained at paragraph 5 above, I do not intend to waive the legal professional privilege attached to my communications with my legal advisors on 20 November 2020. To preserve the privileged nature of those discussions, I explain only the topics that were discussed and not the content of those discussions.

25 I recall that the following topics were discussed during the conference:

[REDACTED]  
[REDACTED]



[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

*[Handwritten signature]*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

26 On the afternoon following the conference on 20 November 2020, several emails were exchanged between Mr Richardson, Mr Bradley, Mr Hooke, Ms Chrysanthou and myself in relation to [REDACTED]  
[REDACTED]

27 Further emails were exchanged between 23 November 2020 and 26 November 2020 discussing [REDACTED]

28 On 26 November 2020, I received an email from Mr Bradley [REDACTED]  
[REDACTED]

29 On 1 December 2020, I separately emailed the same group, including Ms Chrysanthou, Mr Bradley, Mr Richardson, and Mr Hooke, in respect of [REDACTED]  
[REDACTED]

30 On 13 January 2021, I received an email from Mr Bradley attaching a [REDACTED]  
[REDACTED]  
[REDACTED]

31 On 27 January 2021, Ms Chrysanthou sent an email, in response to Mr Bradley's email attaching [REDACTED]  
[REDACTED]

32 On the same day, I had a telephone call with Ms Chrysanthou, Mr Richardson, Mr Bradley and Mr Hooke.



33 Following that telephone call, I believed that [REDACTED]  
[REDACTED]  
[REDACTED]

34 On 29 January 2021, I received an email from Ms Chrysanthou (which was also sent to Mr Hooke, Mr Bradley and Mr Richardson) saying that [REDACTED]

**Ms Chrysanthou’s involvement in the ABC Proceedings**

35 On 15 March 2021, I became aware that Mr Porter had commenced defamation proceedings against the ABC and Ms Milligan in the Federal Court of Australia. On the same day I also became that Ms Chrysanthou was acting for Mr Porter in the proceedings.

36 As at today’s date, I have not spoken with Ms Chrysanthou in relation to her involvement in the proceedings against the ABC and Ms Milligan. Ms Chrysanthou has not requested, nor have I provided, my permission for Ms Chrysanthou to act for Mr Porter in those proceedings.

Affirmed by the deponent )  
at Sydney )  
in New South Wales )  
on 10 May 2021 )  
Before me: )



  
Signature of deponent

Signature of witness

Solicitor  
**Emma Johnsen**



Rule 29.02(8)

**Certificate identifying annexure**

No. NSD of 2021

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

**Joanne Elizabeth Dyer**  
Applicant

**Sue Chrysanthou SC**  
Respondent

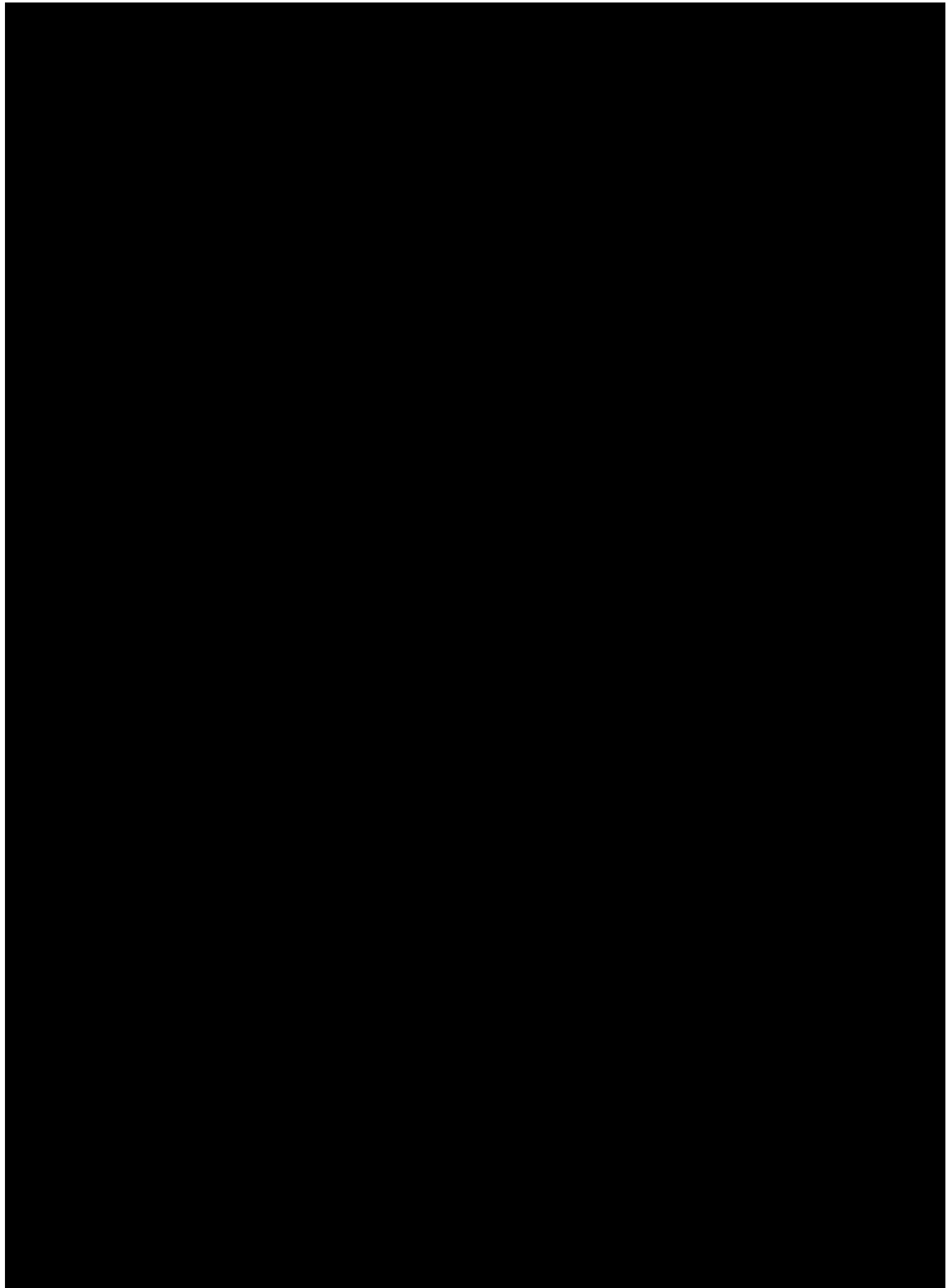
**Annexure "JED-1"**

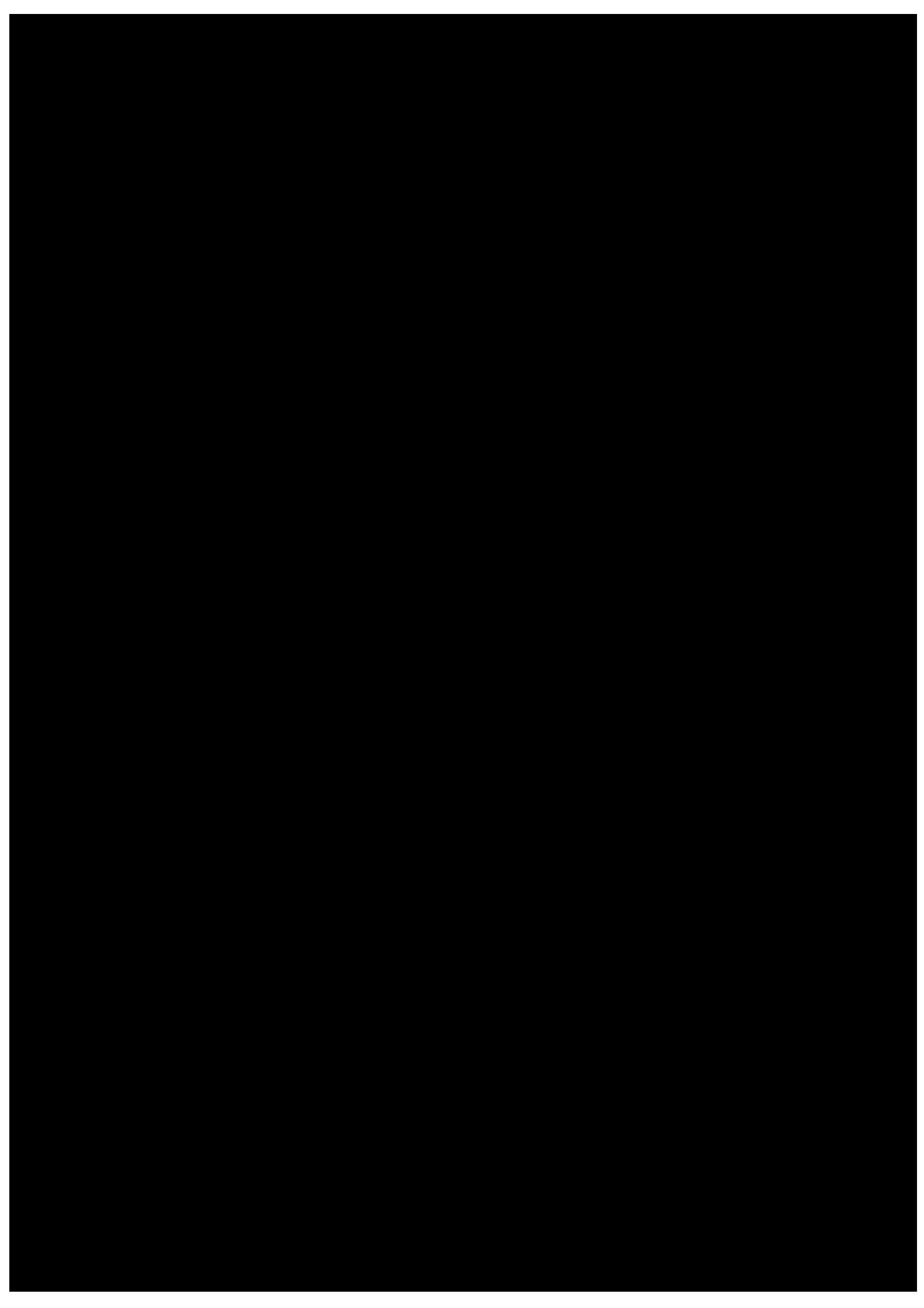
This is the annexure marked "JED-1" to the affidavit of Joanne Elizabeth Dyer affirmed before me on 10 May 2021.

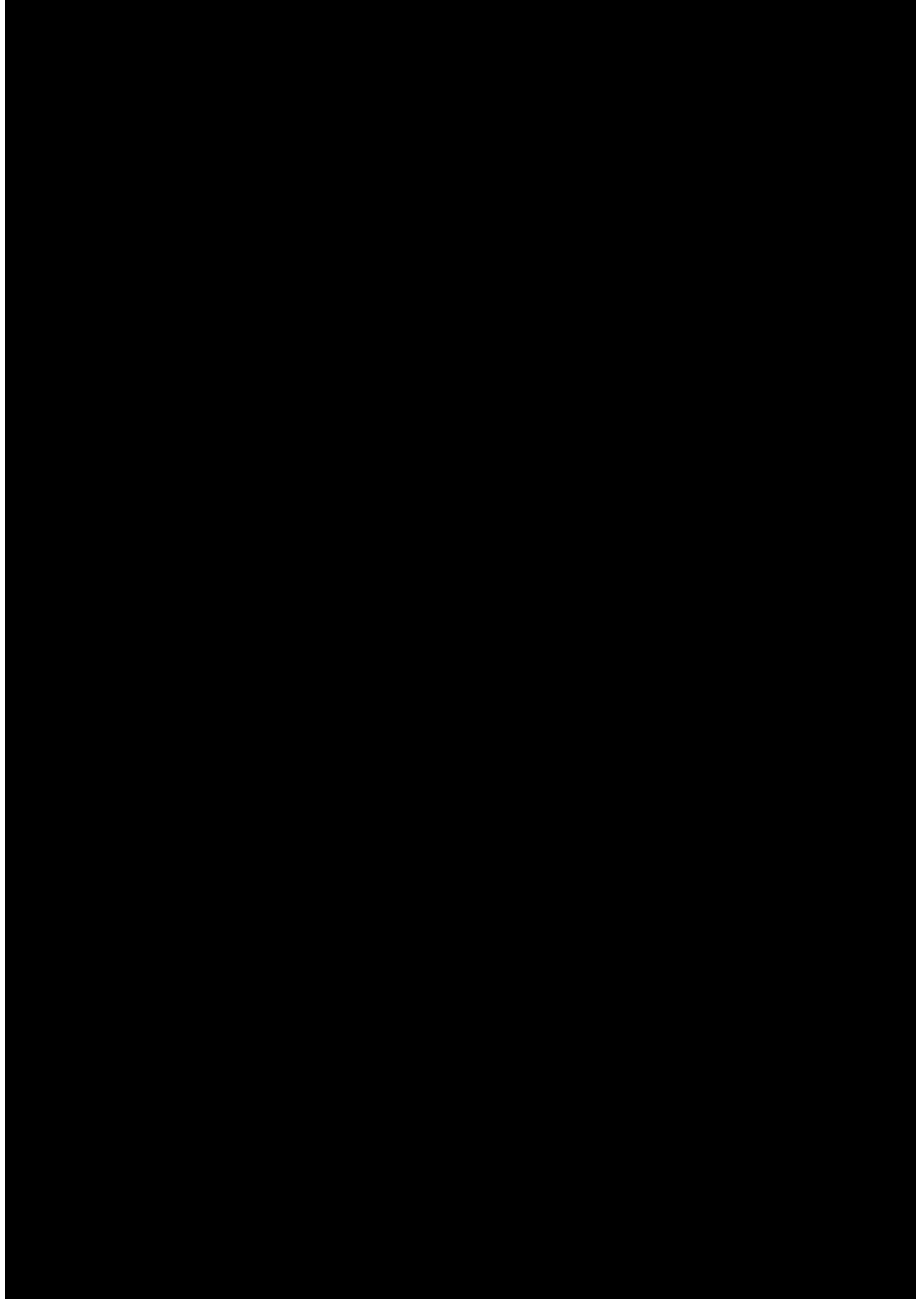


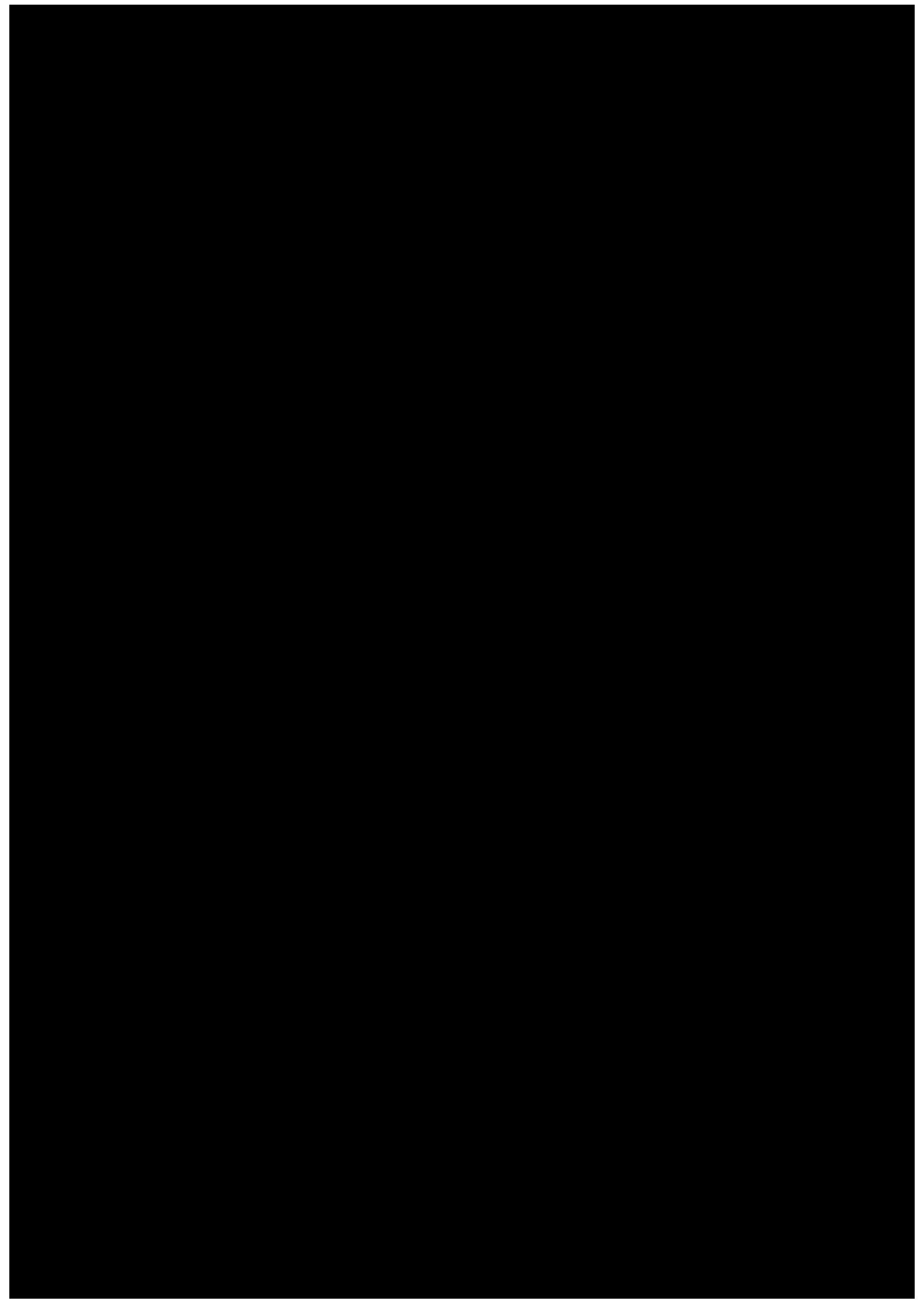
.....  
Signature of Witness

Emma Johnsen, solicitor.









The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry, no matter how small, should be recorded to ensure the integrity of the financial data. This includes not only sales and purchases but also expenses and income. The document provides a detailed list of items that should be tracked, such as inventory levels, accounts payable, and accounts receivable. It also outlines the procedures for recording these transactions, including the use of double-entry bookkeeping to ensure that the books balance.

The second part of the document focuses on the analysis of the financial data. It explains how to calculate key financial ratios and metrics, such as the gross profit margin, operating profit margin, and return on investment. These calculations are essential for understanding the company's financial performance and identifying areas for improvement. The document also discusses the importance of comparing the company's performance to industry benchmarks and providing a clear explanation of any significant variances.

The final part of the document covers the preparation of financial statements. It provides a step-by-step guide to creating the income statement, balance sheet, and cash flow statement. It also discusses the importance of auditing the financial statements to ensure their accuracy and reliability. The document concludes with a summary of the key findings and recommendations for the future, emphasizing the need for continued monitoring and reporting of financial performance.