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This document was lodged electronically in the FEDERAL COURT OF AUSTRALIA (FCA) on 8/07/2021 9:55:48 AM 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: NSD616/2021
File Title: WESTPAC BANKING CORPORATION ABN 33 007 457 141 v FORUM
FINANCE PTY LIMITED & ORS
Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF
AUSTRALIA



Sia Lagos

Dated: 8/07/2021 9:55:51 AM 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. NSD 616 of 2021

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

Westpac Banking Corporation ABN 33 007 457 141
Applicant

Forum Finance Pty Limited ACN 153 301 172 and another
Respondents

Affidavit of: Caitlin Maria Murray
Address: Level 40, Governor Macquarie Tower, One Farrer Place, Sydney NSW 2000
Occupation: Solicitor
Date: 7 July 2021

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1.	Affidavit of Caitlin Maria Murray sworn on 7 July 2021	[1]	2
2.	Annexure 'A' being a copy of an email from Felicity Healy of Corrs Chambers Westgarth to Andrew Clarke dated 7.21pm on 6 July 2021	[5]	5
3.	Annexure 'B' being a copy of correspondence between MinterEllison and Paul Hunt exchanged between 6 and 7 July 2021	[10]	7
4.	Annexure 'C' being a copy of an email chain ending in an email from Felicity Healy to Andrew Clarke dated 8.34pm on 6 July 2021	[11]	12

Filed on behalf of (name & role of party) Westpac Banking Corporation, applicant
 Prepared by (name of person/lawyer) Caitlin Murray
 Law firm (if applicable) MinterEllison
 Tel (02) 9921 8888 Fax 02 9921 8123
 Email caitlin.murray@minterellison.com
Address for service Governor Macquarie Tower, 1 Farrer Place, SYDNEY NSW 2000
 (include state and postcode) Our reference: CMM:AGS:1353397

Version 3 form approved 02/05/2019

Document number	Details	Paragraph	Page
5.	Annexure 'D' being a proposed form of order in connection with access to the server held by Our Kloud Pty Ltd	[12]	15

I, Caitlin Maria Murray of Level 40, Governor Macquarie Tower, One Farrer Place, Sydney NSW 2000, Solicitor, say on oath:



1. I am a partner of the firm of solicitors, MinterEllison and the solicitor for the plaintiff (**Westpac**).
2. I have sworn four previous affidavits in these proceedings, as follows:
 - (a) my first affidavit and my second affidavits on 28 June 2021; and
 - (b) my third affidavit and my fourth affidavits on 2 July 2021.

Production of hard copy material collected during search of Sydney Premises

3. On 6 July 2021 at approximately 6:23pm, I was copied to an email sent by Andrew Clarke, a solicitor in my employ, to Felicity Healy, who I know to be a Partner of Corrs Chambers Westgarth and one of the Independent Solicitors listed in Schedule A to Annexure C to the Court's orders of 28 June 2021, in which Mr Clarke asked Ms Healy to confirm the date and time the hard copy documents collected during the Search of the first respondent's Sydney Premises were provided to the New South Wales Registry.
4. On 6 July 2021 at approximately 7:21pm, I was copied to an email sent by Ms Healy to Mr Clarke in which Ms Healy advised that she delivered two plastic containers of documents from the Searches to the Registry at 9:58am on 5 July 2021.
5. Annexed and marked 'A' is a copy of the emails referred to in paragraph 3 to 4 above.

Our Kloud Pty Ltd hosted servers containing information of the first respondent

6. On 6 July 2021 at approximately 12.03pm (AEST), I was copied to an email sent by Mr Clarke, to Paul Hunt, the solicitor for the first respondent, attaching a letter from MinterEllison dated 6 July 2021 addressed to Mr Hunt:
7. On 6 July 2021 at 12.30pm, I was copied to an email reply from Mr Hunt to Clarke.
8. On 6 July 2021 at 6.31pm, I was copied to an email reply from Mr Clarke to Mr Hunt.
9. On 7 July 2021 at 10.12am, I was copied to an email reply from Mr Hunt to Mr Clarke.

Signed:  Taken by: 

- 10. Annexed and marked 'B' is a copy of the correspondence referred to at paragraphs 6 to 9 above.
- 11. On 6 July 2021 at approximately 8:34pm (AEST), I was copied to an email sent by Ms Healy to Mr Clarke in which Ms Healy forwarded an email report of Yian Sun, the Court appointed Independent Computer Expert in relation to the Search Orders concerning the Sydney Premises. Annexed and marked 'C' is a copy of this email chain.
- 12. Annexed and marked 'D' is a copy of a proposed form of order in relation to access to the server held by Our Kloud Pty Ltd.

Sworn by the deponent
 at Sydney
 in New South Wales
 on 7 July 2021

)
)
)
)
)



Signature of deponent

Before me:



Signature of witness
 Andrew John Clarke
 Solicitor
 Level 40, Governor Macquarie Tower, One
 Farrer Place NSW 2000.

As a witness, I certify the following matters concerning the person who made this affidavit **(deponent)**:

- 1. This affidavit is witnessed over audio visual link in accordance with Part 2B of the *Electronic Transactions Act 2000* (NSW).
- 2. I saw the face of the deponent.
- 3. I observed the deponent signing a copy of this affidavit in real time.
- 4. I attest or otherwise confirm witnessing the deponent's signature by signing this affidavit.
- 5. I am reasonably satisfied this affidavit signed by me is a copy of the affidavit signed by the deponent.
- 6. I have known the deponent for over twelve months.

Signed: Taken by:

Schedule of Parties

No. NSD616 of 2021

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

Applicants

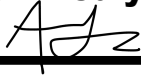
Applicant **Westpac Banking Corporation ABN 33 007 457 141**

Respondents

First Respondent **Forum Finance Pty Limited ACN 153 301 172**

Second Respondent: **Basile Papadimitriou**

Third Respondent **Vincenzo Frank Tesoriero**



Andrew Clarke

Andrew John Clarke, Solicitor

From: Felicity Healy <felicity.healy@corrs.com.au>
Sent: Tuesday 6 July 2021 07:21 PM
To: Andrew Clarke; Gowrie Varma
Cc: Caitlin Murray; Michael Hughes; Anthony Sommer
Subject: RE: Production of Search Order Hard Copy Material - Westpac Banking Corporation v Forum Finance Pty Ltd & Ors - NSD616/2021 [ME-ME.FID6264995]

Dear Andrew

I can confirm that at 9.58am on 5 July 2021, I delivered two plastic containers to the NSW Registry of the Federal Court of Australia, comprising hard copy documents which were obtained from 5/141 Walker Street, North Sydney pursuant to the Search orders made by Justice Lee on 28 June 2021. One of the items is the subject of a claim of Legal Professional Privilege.

Feel free to reach out if you have any other queries.

Kind regards

Felicity Healy | Partner
Corrs Chambers Westgarth
t +61 2 9210 6830 m +61 416 545 914 e felicity.healy@corrs.com.au
corrs.com.au

From: Andrew Clarke [mailto:Andrew.Clarke@minterellison.com]
Sent: Tuesday, 6 July 2021 6:23 PM
To: Felicity Healy <felicity.healy@corrs.com.au>; Gowrie Varma <gowrie.varma@corrs.com.au>
Cc: Caitlin Murray <Caitlin.Murray@minterellison.com>; Michael Hughes <Michael.Hughes@minterellison.com>; Anthony Sommer <Anthony.Sommer@minterellison.com>
Subject: Production of Search Order Hard Copy Material - Westpac Banking Corporation v Forum Finance Pty Ltd & Ors - NSD616/2021 [ME-ME.FID6264995]

Dear Felicity and Gowrie

Westpac Banking Corporation v Forum Finance Pty Ltd & Ors - NSD616/2021 (Proceedings)

We refer to your appointment as Independent Solicitors in connection with the Search Order for the Sydney Premises made in the Proceedings.

We would be grateful if you could confirm the date and time that the copies of the hard copy documents collected during the search were produced to the NSW Registry of the Federal Court of Australia.

Regards
Andrew

Andrew Clarke
Associate
T +61 2 9921 8514
andrew.clarke@minterellison.com
MinterEllison Governor Macquarie Tower 1 Farrer Place Sydney NSW 2000
minterellison.com Follow us on [LinkedIn](#) and [Twitter](#)



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Andrew Clarke

From: Paul Hunt <p.hunt@huntslaw.com.au>
Sent: Wednesday 7 July 2021 10:12 AM
To: Andrew Clarke
Cc: Caitlin Murray; Michael Hughes; Anthony Sommer
Subject: RE: Westpac Banking Corporation v Forum Finance Pty Ltd & Ors - Federal Court of Australia Proceeding No. NSD616/2021 [ME-ME.FID6264995]


Dear Mr Clarke, I am yet to receive instructions on the below matter and will respond when I have.

Regards

Paul Hunt
Hunts.Law

Email: p.hunt@huntslaw.com.au
Web: www.huntslaw.com.au
Ph: +61 2 9119 3621 | **Fax:** +61 2 8569 1050
Office: Suite 202, 272 Pacific Highway, Crows Nest NSW 2065

This is the Annexure marked 'B' referred to in the Affidavit of Caitlin Maria Murray sworn on 7 July 2021 before me:


Andrew John Clarke, Solicitor

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From: Andrew Clarke [mailto:Andrew.Clarke@minterellison.com]
Sent: Tuesday, 6 July 2021 6:31 PM
To: Paul Hunt <p.hunt@huntslaw.com.au>
Cc: Caitlin Murray <Caitlin.Murray@minterellison.com>; Michael Hughes <Michael.Hughes@minterellison.com>; Anthony Sommer <Anthony.Sommer@minterellison.com>
Subject: RE: Westpac Banking Corporation v Forum Finance Pty Ltd & Ors - Federal Court of Australia Proceeding No. NSD616/2021 [ME-ME.FID6264995]

Dear Mr Hunt

We refer to your email below and our letter attached to my email of 12.03pm today below (**Our Letter**).

We note that Our Letter requested a response by **5pm today** and as at the time of this email we are yet to receive a response.

We request you to provide a response to Our Letter by no later than **9am tomorrow** (7 July 2021).

All of our client's rights remain reserved.

Regards

Andrew Clarke

Associate

T +61 2 9921 8514

andrew.clarke@minterellison.com

MinterEllison Governor Macquarie Tower 1 Farrer Place Sydney NSW 2000

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From: Paul Hunt <p.hunt@huntslaw.com.au>

Sent: Tuesday 6 July 2021 12:30 PM

To: Andrew Clarke <Andrew.Clarke@minterellison.com>

Cc: Caitlin Murray <Caitlin.Murray@minterellison.com>; Michael Hughes <Michael.Hughes@minterellison.com>; Anthony Sommer <Anthony.Sommer@minterellison.com>

Subject: RE: Westpac Banking Corporation v Forum Finance Pty Ltd & Ors - Federal Court of Australia Proceeding No. NSD616/2021 [ME-ME.FID6264995]

Importance: High

Dear Mr Clarke, I refer to your email below and will respond in due course.

I note your firm has not responded to my email at 9:49pm last night requesting a response by mid day. If your client has not agreed to the proposed orders by 1:30pm today then I will request the matter be relisted at the earliest time.

Regards

Paul Hunt
Hunts.Law

Email: p.hunt@huntslaw.com.au

Web: www.huntslaw.com.au

Ph: +61 2 9119 3621 | **Fax:** +61 2 8569 1050

Office: Suite 202, 272 Pacific Highway, Crows Nest NSW 2065

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From: Andrew Clarke [<mailto:Andrew.Clarke@minterellison.com>]

Sent: Tuesday, 6 July 2021 12:03 PM

To: Paul Hunt <p.hunt@huntslaw.com.au>

Cc: Caitlin Murray <Caitlin.Murray@minterellison.com>; Michael Hughes <Michael.Hughes@minterellison.com>; Anthony Sommer <Anthony.Sommer@minterellison.com>

Subject: Westpac Banking Corporation v Forum Finance Pty Ltd & Ors - Federal Court of Australia Proceeding No. NSD616/2021 [ME-ME.FID6264995]

Dear Mr Hunt

Please find our correspondence of today's date **attached** for your immediate attention.

Regards

Andrew Clarke

Associate

T +61 2 9921 8514

andrew.clarke@minterellison.com

MinterEllison Governor Macquarie Tower 1 Farrer Place Sydney NSW 2000

minterellison.com **Follow us on LinkedIn and Twitter**



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Sensitive: Legal

MinterEllison

6 July 2021

BY EMAIL: p.hunt@huntslaw.com.au

Paul Hunt
Hunts Law
Suite 202, 272 Pacific Highway
Crows Nest NSW 2065

Dear Mr Hunt

**Westpac Banking Corporation v Forum Finance Pty Ltd & Ors - Federal Court of Australia
Proceedings No. NSD616/2021 (Proceedings)**

1. As you are aware, we act for Westpac Banking Corporation.
2. We refer to:
 - (a) Annexure C – Search Orders of the Court's orders made on 28 June 2021 (**28 June Orders**) being the Search Order made against Forum Finance Pty Ltd;
 - (b) Order 1 of the Court's orders made on 29 June 2021 permitting the search party named in Annexure C in respect of the Sydney Premises to re-enter the premises for the purposes of conducting the search until such time as the search has been completed; and
 - (c) the Court's orders made on 2 July 2021 (**2 July 2021 Orders**).
3. We understand from the conduct of the Search Order at the Sydney Premises that:
 - (a) the Independent Computer Expert in respect of the Sydney Premises, Yian Sun of CYTER, was provided with global administrator access to the Forum Group's Microsoft office 365 online systems (**Server**) which contains files which relate to your client; and
 - (b) the Server is hosted on behalf of your client by a third party named OurKloud (**Third Party Provider**) in a warehouse located in Alexandria, New South Wales.
4. We are advised by the Independent Solicitor appointed by the Court in relation to the Sydney Premises, Felicity Healy, that Mr Sun has been unable to extract any data from the Server. We understand from Mr Sun that the extraction of server data may take several weeks to download via the internet connection at the Sydney Premises and he will need a backup copy of the servers from the Third Party Provider.
5. We request that your client make urgent arrangements, including with the Third Party Provider, to provide Mr Sun a backup copy of the Servers from the host site in Alexandria. Please confirm no later than **5pm on 6 July 2021** the arrangements that have been made.
6. In the event that your client does not assist in relation to the request at paragraph 5 above, our client reserves its rights to approach the Court to obtain further orders to secure access to the Server from the Third Party Provider on an urgent basis.



All of our client's rights are expressly reserved.

Yours faithfully
MinterEllison

A handwritten signature in blue ink that reads "MinterEllison". The signature is written in a cursive, flowing style.

Contact: Andrew Clarke T: +61 2 9921 8514
andrew.clarke@minterellison.com
Partner: Caitlin Murray T: +61 2 9921 4279
OUR REF: AGS:CMM 1353397

Andrew Clarke

From: Felicity Healy <felicity.healy@corrs.com.au>
Sent: Tuesday 6 July 2021 08:34 PM
To: Andrew Clarke
Cc: Caitlin Murray; Michael Hughes; Gowrie Varma
Subject: FW: Westpac Banking Corporation v Forum Finance Pty Ltd & Ors – FCA Proceedings NSD616/2021


Andrew John Clarke, Solicitor

Dear Andrew

Further to our telephone discussion today please see report from Yian Sun regarding the Office 365 environment and virtual servers of the Forum Group.

I also note that while attending the offices of Forum Finance on 29 June 2021, I was informed by Mr Rollinson that Our Kloud is controlled by a relative of Mr Papas.

Please feel free to reach out if you have any further queries.

Regards

Felicity Healy | Partner
Corrs Chambers Westgarth
t +61 2 9210 6830 m +61 416 545 914 e felicity.healy@corrs.com.au
corrs.com.au

From: Yian Sun [mailto:ysun@cyter.com]
Sent: Tuesday, 6 July 2021 7:54 PM
To: Felicity Healy <felicity.healy@corrs.com.au>
Cc: Anna Ross <Anna.Ross@corrs.com.au>; Rod McKemmish <rmckemmish@cyter.com>; Gowrie Varma <gowrie.varma@corrs.com.au>
Subject: Westpac Banking Corporation v Forum Finance Pty Ltd & Ors – FCA Proceedings NSD616/2021

Hi Felicity,

Find below a requested summary of the Office 365 environment and the virtual servers for the Forum Group.

Microsoft Office 365 Environment

1. The emails for Forum Financial are stored within the Microsoft Office 365 environment.
2. The documents for Forum Financial are stored in both OneDrive and Sharepoint within the Microsoft Office 365 environment.
3. There is approximately 5.6TB of data stored on the Microsoft Office 365 environment.
4. Approximately 3.2TB has been downloaded from Office 365 as at 7pm on 6th July 2021.
5. Data was migrated from the virtual servers in 2020. The IT manager was unable to provide an exact time of the migration.

Virtual Servers in Alexandria data centre

6. Previously, documents and emails for Forum Financial were stored on the virtual servers mail16-01.fg.internal and fg-file01 at a datacentre in Alexandria, NSW.
7. Although the data on the two servers mail16-01.fg.internal and fg-file01 were migrated to Office 365, it is unclear whether all data on the two servers were migrated in its entirety.
8. The accounting system used by Forum Financial is BMS and is hosted in a virtual server at a datacentre in Alexandria, NSW.

9. Filebound is a software solution used by Forum Financial to scrape data from invoices. The system is also stored in a virtual server at a datacentre in Alexandria, NSW.
10. There are also various number of servers which are hosted at a datacentre in Alexandria, NSW.

Internal IP	Hostname	Purpose
172.31.151.10	dc4.fg.internal	AD Domain Controller (FG / fg.internal)
172.31.151.11	ok-fg-spm	
172.31.151.12	fg-dc2	AD Domain Controller (FG / fg.internal)
172.31.151.13		
172.31.151.14	netsvc1	Network Services server (RADIUS,VPN, etc)
172.31.151.15		
172.31.151.16	mail16-01.fg.internal	Exchange server for internal mailboxes
172.31.151.17	fg-file01	Windows File Server, backing store for ShareFile
172.31.151.18	fg-domino	Lotus Notes server for SODB sales Orders system
172.31.151.19	fg-myob	Shared MYOB desktop
172.31.151.20	bms-forum	Linux accounts server
172.31.151.21	fg-fiscal	Linux fiscal projections server
172.31.151.22	fg-nsws290	Shared Adobe products desktop
172.31.151.23	fg-print01	Windows print server
172.31.151.24	fg-psicap01.fg.internal	PSICapture server
172.31.151.25	fg-thehive	Intranet web server
172.31.151.26	fg-reporting	Crystal Reports server (internal use)
172.31.151.27	fg-cirrato01	Solns pre-sales demo server
172.31.151.28	fg-uipath	Unipath server
172.31.151.29	fg-jitterbit	Jitterbit Server
172.31.151.32	fg-dm01	Solns Filebound customer web server
172.31.151.33	fg-dm02	Solns Filebound customer web server
172.31.151.34	fg-dm04	Solns Filebound internal SQL server
172.31.151.35	fg-dm03	Solns Filebound internal web server
172.31.151.37	fg-fb-esm	Solns Filebound Enterprise Service server
172.31.151.38	fg-soln-demo	Solns pre-sales demo server
172.31.151.39	fg-testsrv	Solns Pre-sales test server

11. The servers at the data centre is managed and operated by a third party IT service party called Our Kloud.
12. Collection of data on the virtual servers can be performed using one of the below methods:
 - a. Obtain a copy/backup of the Virtual Servers from the 3rd party IT service provider “Our Kloud” – this is the cleanest and most efficient way to obtain a copy of the servers and allows for the servers to be started and replicated in alternate environments. The ability to replicate the servers and have them in an operable state is extremely important when dealing with servers at a later stage which hosts accounting and financial systems. If backups were in place, a snapshot or copy of the servers at a specific point in time can also be obtained.
 - b. Access the virtual servers from the Forum Group Sydney office and copy the servers to a storage device in the Forum Group Sydney office – this method requires an uninterrupted and stable internet connection to the data centre from the office. It could take weeks for the copying of the servers to complete based on the estimated data size of the Office 365 environment. This method usually does not allow a server to be operable in an alternate environment.

Telephone call with Our Kloud

13. On 30th June 2021 at 1310 Hrs, I was contacted by Mr Paula Salibe (“Mr Salibe”) of Our Kloud. During the whole duration of the call, I was in the presence of the independent solicitor.
14. I asked Mr Salibe to prepare a list of all Forum Group servers along with their corresponding storage size.
15. I also asked Mr Salibe provide a backup of all Forum Group servers.
16. Mr Salibe indicated he will come back to me with the requests and the likely timing of providing a copy of the Forum Group Servers.

Follow up with Our Kloud regarding Forum Group Servers

17. On 1st July 2021, I made to phone calls to Mr Salide regarding the requests made with him on 30th June 2021. Both calls were not answered by Mr Salibe.
18. Subsequent phone calls were made on the 2nd and 5th July 2021 with a voice message left on the 5th July 2021.
19. As at 1730 Hrs on 6th July 2021, there has been no response by Mr Salibe.

Let me know if you require any further questions or queries.

Cheers,

Yian

Yian Sun
Senior Forensic Specialist


m: +61-402951403 | e: ysun@cyter.com | w: cyter.com



Forensic | Analytics | Cyber | Technology

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This is the Annexure marked 'D' referred to in the Affidavit of Caitlin Maria Murray sworn on 7 July 2021 before me:



Andrew John Clarke, Solicitor

Federal Court of Australia
District Registry: Sydney
Division: General

Short Minutes of Order

No. NSD626/2021

Westpac Banking Corporation ABN 33 007 457 141

Applicant

Forum Finance Pty Limited ACN 153 301 172 and other named in the schedule

Respondents

Judge: JUSTICE LEE
Date of order: 7 July 2021
Where made: Sydney

THE COURT ORDERS THAT:

1. The First Respondent is to immediately take all steps necessary to permit or allow Yian Sun and Rodney McKemmish of CYTER, Suite 2, 301A Castlereagh Street, Sydney NSW 2000 (the **Independent Computer Experts**) to have access to the servers hosted by Our Kloud Pty Ltd (ACN 603 675 529) (**Our Kloud**) at Our Kloud's Alexandria, New South Wales premises (**Our Kloud Servers**) for the purposes of taking a forensic image or copy of the data on the Our Kloud Servers held for or on behalf of the First Respondent on the Our Kloud Servers (**Our Kloud Servers Forensic Image**).
2. In obtaining the Our Kloud Forensic Image, the Independent Computer Experts are to take all reasonable steps to ensure that no damage is done to any computer or data associated with the Our Kloud Servers.

Filed on behalf of (name & role of party)	Westpac Banking Corporation, Applicant
Prepared by (name of person/lawyer)	Caitlin Murray
Law firm (if applicable)	MinterEllison
Tel	(02) 9921 4279
Fax	(02) 9921 8123
Email	caitlin.murray@minterellison.com
Address for service	Level 40, Governor Macquarie Tower, 1 Farrer Place, Sydney NSW 2000
(include state and postcode)	Our reference: 1353397

3. Once the Our Kloud Servers Forensic Image has been obtained, the Independent Computer Experts are to:
 - (a) inform the solicitors for the parties that the Our Kloud Servers Forensic Image has been successfully obtained;
 - (b) produce a complete copy of the Our Kloud Servers Forensic Image to the Court (with no access by the parties to that copy until further order of the Court);
 - (c) retain a complete copy of the Our Kloud Servers Forensic Image until further order of the Court.

4. If the Independent Computer Experts have not obtained the Our Kloud Servers Forensic Image by 5pm on 8 July 2021, then the Independent Computer Experts are to inform the solicitors for the parties:
 - (a) the reasons why they have not obtained the Our Kloud Servers Forensic Image;
 - (b) what further steps they consider need to occur in order to successfully obtain the Our Kloud Servers Forensic Image.

Schedule

No. NSD616/2021

Federal Court of Australia

District Registry: New South Wales

Division: General

Applicant

Westpac Banking Corporation ABN 33 007 457 141

First Respondent

Forum Finance Pty Limited ACN 153 301 172

Second Respondent

Basile Papadimitriou

Third Respondent

Vincenzo Frank Tesoriero