

## NOTICE OF MOTION

### COURT DETAILS

Court	Supreme Court of NSW
Division	Common Law
List	Common Law General
Registry	Sydney
Case number	2018/00263841

### TITLE OF PROCEEDINGS

First Plaintiff	<b>Hunt Leather Pty Ltd ACN 000 745 960</b>
Number of Plaintiffs	<b>4</b>
Defendant	<b>Transport for New South Wales</b>

### FILING DETAILS

Person seeking orders	<b>Hunt Leather Pty Ltd ACN 000 745 960, Sophie Irene Hunt, Ancio Investments Pty Ltd as trustee for the Ancio Unit Trust and Nicholas Zisti, Plaintiffs</b>
Legal representative	Rick Mitry, Mitry Lawyers
Legal representative reference	RM: 13137
Contact name and telephone	Amanda Charchar (02) 9222 2833
Contact email	<a href="mailto:Amanda.charchar@mitry.com.au">Amanda.charchar@mitry.com.au</a>

### PERSON AFFECTED BY ORDERS SOUGHT

**Transport for New South Wales**, defendant

### HEARING DETAILS

This motion is listed for hearing on 19 June 2020.

[on separate page]

**ORDERS SOUGHT**

- 1 Pursuant to rule 21.2 of the Uniform Civil Procedure Rules 2005, the Defendant to give discovery of documents (as defined in the *Evidence Act 1995 (NSW)* and the *Evidence Act 1995 (Cth)* not already discovered and that are in Defendant's control in the categories annexed to this application and marked "A" (**Tranche 3 Categories**).
- 2 The Defendant to give discovery of unredacted copies of all documents discovered pursuant to order 2 made on 14 August 2019 (**Tranche 1 Categories**) and the agreed categories of discovery pursuant to order 3 made on 6 February 2020 (**Tranche 2 Categories**), and any other documents which the defendant is so ordered to discover, including the Tranche 3 Categories or otherwise, with such documents:
  - a. to be treated as confidential;
  - b. only to be used for purposes of the Proceedings;
  - c. not to be not to be disclosed to any person or entity except the Plaintiffs, the Defendants, those parties' legal advisors, the Plaintiffs' litigation funder, any lay and/or expert witnesses who may be called by a party to the Proceedings and to the document management provider of any party (**Restricted Authorised Persons**) (with any such permitted disclosures to be upon terms that none of those persons or entities disclose that material or any part thereof to any person or entity other than Restricted Authorised Persons).
- 3 The Defendant to give further and better discovery of categories 2(1), 7, 9, 12, 13, 15, 17 and 24(1) of the Tranche 1 Categories.
- 4 Costs.
- 5 Such further or other orders as the Court sees fit.

**SIGNATURE**

Signature of legal representative



Capacity

Solicitor in the employ of the solicitor on record

Date of signature

2 June 2020

**NOTICE TO PERSON AFFECTED BY ORDERS SOUGHT**

If you do not attend, the court may hear the motion and make orders, including orders for costs, in your absence.

**REGISTRY ADDRESS**

Street address	Law Courts Building, 184 Phillip Street, Sydney NSW 2000
Postal address	Supreme Court of New South Wales GPO Box 3, Sydney NSW 2001
Telephone	1300 679 272