

NOTICE OF FILING

Details of Filing

Document Lodged:	List of Documents - Form 38 - Rule 20.17(1)
Court of Filing	FEDERAL COURT OF AUSTRALIA (FCA)
Date of Lodgment:	8/08/2024 3:39:18 PM AEST
Date Accepted for Filing:	8/08/2024 3:39:25 PM AEST
File Number:	VID1023/2023
File Title:	MOIRA DEEMING v JOHN PESUTTO
Registry:	VICTORIA REGISTRY - FEDERAL COURT OF AUSTRALIA



A handwritten signature in blue ink, reading "Sia Lagos".

Registrar

Important Information

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 of the filing of the document is determined pursuant to the Court's Rules.



Applicant's Supplementary List of Documents

VID 1023 of 2023

Federal Court of Australia
District Registry: Victoria
Division: General

MOIRA DEEMING

Applicant

JOHN PESUTTO

Respondent

Pursuant to order 3 made on 2 February 2024 (**the order**) (the timeframe for which was extended by order 3 made on 28 March 2024, order 2 made on 27 May 2024, and order 1 made on 24 June 2024), the Applicant makes this affidavit and Supplementary List of Documents.

Affidavit

On 8 August 2024, I, Moira Deeming, say on oath:

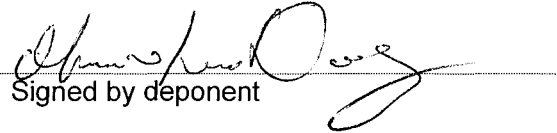
1. I am the Applicant.
2. On 28 June 2024, I swore an affidavit and provided a List of Documents pursuant to the order (**Original List**).
3. I now provide this Supplementary List of Documents (**Supplementary List**) pursuant to the order, of additional documents which were not included in my Original List.
4. To the best of my knowledge, there are no documents required to be produced in response to the order that are or have been in my control over than those specified in my Original List or Supplementary List.
5. The documents set out in Part 1 of this Supplementary List are in my control and I do not claim privilege from production for any of these documents.
6. The documents set out in Part 2 of this Supplementary List are in my control but I claim privilege from production of each of these documents on the grounds set out in Part 2.

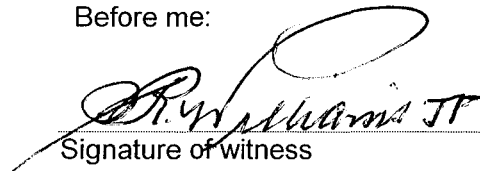
Filed on behalf of (name & role of party)	Moira Deeming, the Applicant
Prepared by (name of person/lawyer)	Patrick George
Law firm (if applicable)	Giles George
Tel	1300 204 602
Fax	
Email	patrick.george@gilesgeorge.com.au jeremy.marel@gilesgeorge.com.au petar.strkali@gilesgeorge.com.au
Address for service (include state and postcode)	135 King Street Sydney NSW 2000

7. There are no documents other than those set out in my Original List which have been but are no longer in my control, and therefore there are no documents in Part 3 of this Supplementary List.

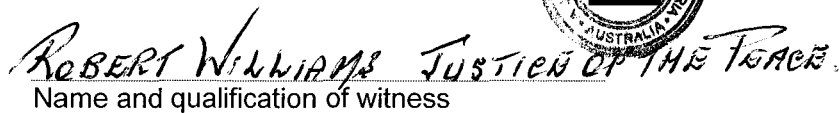
Sworn by the deponent
at Melbourne
in Victoria
on 8 August 2024
Before me:

)
)
)
)
)


Signed by deponent


Signature of witness




Name and qualification of witness

Inspection of documents

The documents set out in Part 1 of the Supplementary List of Documents will be sent electronically to the Respondent's solicitors.

Date: 8 August 2024



Signed by Patrick George
Lawyer for the Applicant

Part 1 - Documents in the control of the Applicant

No.	Description of document(s) / category	Number of documents in category (if applicable)	Date/period
1	Copy of messages between Kellie-Jay Keen and Moira Deeming on X	1	17 January 2023 – 26 January 2023
2	Copy of email from 'AV Equipment By RED PULSE' to Moira Deeming entitled 'Quote 00000102; Your Quote from REDPULSE AV'(with 1 attachment)	1	15 February 2023, 4.49pm
3	Copy of email from Moira Deeming to Standing For Women entitled 'Fw: table of sex/gender anti-discrimination provisions' (with 1 attachment)	1	16 February 2023, 6.39pm
4	Copy of email from Moira Deeming to Standing For Women entitled 'FW: table for sex/gender anti-discrimination provisions' (with 1 attachment)	1	18 February 2023, 11.02am
5	Copy of text message from Beverley McArthur to Moira Deeming	1	21 February 2023
6	Copy of text message from Chris Crewther to Moira Deeming	1	21 February 2023
7	Copy of text message from Matt Bach to Moira Deeming	1	21 February 2023
8	Copy of text message from Nick McGowan to Moira Deeming	1	22 February 2023
9	Copy of audio recording of meeting between Moira Deeming, Georgie Crozier and John Pesutto	1	23 February 2023
10	Copy of email from Moira Deeming to John Moncrieff	1	24 February 2023, 2.13pm
11	Copy of email from John Moncrieff to Moira Deeming entitled 'Re: 18 th march Security'	1	24 February 2023, 2.34pm
12	Copy of email from Moira Deeming to John Moncrieff	1	26 February 2023, 7.48am
13	Copy of email from John Moncrieff to Moira Deeming	1	26 February 2023, 9.26am

WD

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No.	Description of document(s) / category	Number of documents in category (if applicable)	Date/period
14	Copy of email from Tina Guthrie to John Moncrieff (copying Moira Deeming) entitled 'Re: 18 th march Security'	1	26 February 2023, 12.31pm
15	Copy of email from Moira Deeming to Tina Guthrie	1	27 February 2023, 3.03am
16	Copy of email from Tina Guthrie to Moira Deeming entitled 'Re: 18 th march Security'	1	27 February 2023, 8.08am
17	Copy of Standing for Women media release (being the document which Angie Jones sent to Mrs Deeming on 13 March 2023 at 5.36pm via Facebook)	1	2 March 2023
18	Copy of email from Moira Deeming to Tina Guthrie entitled 'Change from 4 to 2 Security Guards'	1	2 March 2023, 1.52pm
19	Copy of tweet published by Magnificat Days (@ItBeganInThe90s), accessible at URL: https://x.com/ItBeganInThe90s/status/1631852584465219584	1	4 March 2023, 2.02pm
20	Copy of Facebook post published by Community Action for Rainbow Rights, accessible at URL: https://www.facebook.com/sydneyCAAH/posts/pfbid02p2GPAEkfdnxRP6tRyMpeDFa3gf9QLqU7ssLAI2DMUCBBCScqxghWBo5pive3Tf74I	1	5 March 2023, 2.23pm
21	Copy of Facebook post published by Lily Rosebell, accessible at URL: https://www.facebook.com/lilyrcampbell/posts/pfbid0223nv38nUQTQEWkrpyzLA5VuKYAauvFCBpmib38Po83xtCDZUZ1yGVx2t7B6EwUJI	1	6 March 2023, 3.03pm
22	Copy of tweet published by METATRON LEVENDI (@Warcrimereport), accessible at the following URL: https://x.com/Warcrimereport/status/1632281466213216256	1	5 March 2023, 6.26pm
23	Copy of Facebook post published by Community Action for Rainbow Rights, accessible at URL: https://www.facebook.com/sydneyCAAH/posts/pfbid02BSCotCVtVBqJfPUBTkJ5RobBTv8jzYsXY1tNvuoYxW1vkF87cAHC6ZJ8s7wFQLyvl	1	5 March 2023, 9.53pm
24	Copy of email from Tina Guthrie to Moira Deeming entitled 'RE: Change from 4 to 2 Security Guards'	1	6 March 2023, 12.22pm
25	Copy of email from Moira Deeming to Standing For Women entitled 'FW: Change from 4 to 2 Security Guards'	1	6 March 2023, 2.03pm

No.	Description of document(s) / category	Number of documents in category (if applicable)	Date/period
26	Copy of email from Claire Webb to Moira Deeming entitled 'Let Women Speak – Melbourne'	1	10 March 2023, 5.00pm
27	Copy of email from Claire Wells to Angie Jones and Moira Deeming entitled 'FW: Let Women Speak – Melbourne'	1	11 March 2023, 4.04am
28	Copy of email from Moira Deeming to Claire Wells entitled 'RE: Let Women Speak – Melbourne'	1	11 March 2023, 3.44pm
29	Copy of email from Moira Deeming to Claire Wells entitled 'RE: Let Women Speak – Melbourne'	1	11 March 2023, 3.47pm
30	Copy of Facebook post published by Bec Freedom on the 'F.R.A. (freedom rally Australia)' Facebook page accessible at the following URL: https://www.facebook.com/groups/511178425723458/posts/2230306383810645/	1	12 March 2023, 3.07am
31	Copy of Facebook post published by Bec Freedom on the 'Worldwide Freedom Movement' Facebook page, accessible at the following URL: https://www.facebook.com/groups/1044777159457813/?multi_permaLinks=1276526699616190	1	12 March 2023, 7.45am
32	Copy of Facebook post published by Bec Freedom on the 'Melbourne Freedom Rally' Facebook page, accessible at the following URL: https://www.facebook.com/groups/992940847955282/?multi_permaLinks=1308261323089898	1	12 March 2023, 7.46am
33	Copy of email from Moira Deeming to Claire Wells entitled 'RE: Let Women Speak – Melbourne'	1	12 March 2023, 2.34am
34	Copy of email from Moira Deeming to Claire Wells entitled 'RE: Let Women Speak – Melbourne'	1	12 March 2023, 1.34pm
35	Copy of email from Claire Wells to Moira Deeming entitled 'Re: Let Women Speak – Melbourne'	1	12 March 2023, 1.38pm
36	Copy of email from Moira Deeming to Claire Wells entitled 'RE: Let Women Speak – Melbourne'	1	12 March 2023, 1.49pm
37	Copy of email from Claire Wells to Moira Deeming entitled 'Security Arrangements for LWS Melbourne'	1	13 March 2023, 6.00am
38	Copy of email from Moira Deeming to Claire Wells entitled 'Security Arrangements for LWS Melbourne'	1	13 March 2023, 8.38am

WD

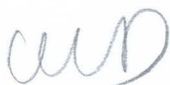
PP

No.	Description of document(s) / category	Number of documents in category (if applicable)	Date/period
39	Copy of Facebook post published by Bec Freedom on the 'Millions March against Mandatory Covid Vaccination' Facebook group, accessible at the following URL: https://www.facebook.com/groups/346969350143724/?multi_permaLinks=744112027096119	1	13 March 2023, 10.39am
40	Copy of Facebook post published by Bec Freedom on the 'FFS <> < Faith-filled soldiers' Facebook page accessible at the following URL: https://www.facebook.com/groups/5338163556248580/posts/6219788328086094/	1	13 March 2023, 10.25pm
41	Copy of Facebook post published by Seragee Vinikeulent, accessible at the following URL: https://www.facebook.com/permalink.php?story_fbid=pfbid0atREVMYLHCtvmhJavteNMEswr5UE5uwpczWEjVxBQupEbQvmQq9rhCBmsydFRPckl&id=100087149764180	1	14 March 2023, 7.31pm
42	Copy of Facebook post published by Jay Lawrence, accessible at the following URL: https://www.facebook.com/jay.lawrence.5011/posts/pfbid0mHhH6thNbTvaHWtrt9f5AUvZk2DNdjBJEFMdMyjd9pjmzDivTTuwg2b6hqbUpfiZl	1	14 March 2023, 9.51pm
43	Copy of Facebook post published by Jeffery Vino, accessible at the following URL: https://www.facebook.com/permalink.php?story_fbid=pfbid0oMVt3De91vK2YHu17cjQbWE1kJjRcS3dWdUepMSNjA95s554QD3kacR3rey2AyuHI&id=100078408528759	1	14 March 2023, 9.53pm
44	Copy of Facebook post published by Peter Miranda, accessible at the following URL: https://www.facebook.com/peter.miranda.921/posts/pfbid02Fu2vsTnA5dgeqs8nXPHFWrtGP RocFqVfeMEQ8CVvH2mMjvJBif9X68tNhNxSVMedl	1	15 March 2023, 12.57am
45	Copy of article published by the Star Observer on 16 March 2023 entitled 'Christian Far-Right Groups To Rally In Sydney This Weekend, LGBT Activists Organise Counter Protest??' accessible at the following URL: https://www.starobserver.com.au/news/national-news/christian-far-right-groups-to-rally-in-sydney-this-weekend-lgbt-activists-to-counter-protest/222544	1	16 March 2023
46	Copy of Facebook post published by Bec Freedom, accessible at the following URL: https://www.facebook.com/bec.freedom89/posts/pfbid02KWW2GMZPtjLzgUbZh3LRg8xWFOtc6B2FvPsFmLpsg91imjrWu5otPUsVcvepeDgPI	1	17 March 2023, 2.28am

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No.	Description of document(s) / category	Number of documents in category (if applicable)	Date/period
47	Copy of Facebook post published by Dan Tilders, accessible at the following URL: https://www.facebook.com/dtilders1/posts/pfbid0hEZmvYkbpE9mX1hEfKyAEhc5VYVSyQyEu0VcH8Shvxe3Lnn5muXBCqn5smYWG4Sml	1	17 March 2023, 2.48am
48	Copy of Facebook post published by Bec Freedom on the 'F.R.A. (freedom rally Australia)' Facebook page, accessible at URL: https://www.facebook.com/groups/511178425723458/posts/2230306383810645/	1	17 March 2023, 3.07am
49	Copy of Facebook post published by George Fuimaono, accessible at URL: https://www.facebook.com/george.fuimaono/posts/pfbid0AgQw9rfjAN3tij4bQLQTGx8NoKJhZdDfLvbMx4stpTWKpo7iMRaDwTwihuBomdzwI	1	17 March 2023, 4.57am
50	Copy of Facebook post published by Aurora R Robinson, accessible at URL: https://www.facebook.com/groups/1339997533158747/posts/1542218459603319/	1	17 March 2023, 5.05am
51	Copy of Facebook post published by Debby Blanchfield, accessible at URL: https://www.facebook.com/debby.blanchfield/posts/pfbid0VaLVbdS7MCLngxWmJvEQRM7T7qTxDEuv29AfVhHUBrLjbJGEefgdCoSYxPsdB2gl	1	17 March 2023, 5.16am
52	Copy of Facebook post published by David Snipe, accessible at URL: https://www.facebook.com/david.b.snipe/posts/pfbid0XFKFXbdyk5h88jVqtm1eke1m6EeyT5uU7L6MvtNUJNxd7s9UQXVCK4vNMpBiNHwI	1	17 March 2023, 5.28am
53	Copy of Facebook post published by Joanne Harrison, accessible at URL: https://www.facebook.com/permalink.php?story_fbid=pfbid034K4bZzMcZ2Bc4BAnK4TVskNBpw6vTN9CrrKWGRS4sj7WicdypejHRA26eEE8ucRpl&id=100016348446356	1	17 March 2023, 6.27am
54	Copy of Facebook post published by Grant Allen, accessible at URL: https://www.facebook.com/grant.allen.56679/posts/pfbid0mmDVZxtaYSiyAcQnTcfQM2x9b6piUuEYHZG9QZFzjoW661a9KgGKGtydUVtM2uc7I	1	17 March 2023, 7.00am
55	Copy of Facebook post published by Timeto Openyoureyes, accessible at URL: https://www.facebook.com/permalink.php?story_fbid=pfbid0hfajaxazQpuw6rvmjqiWsCMjAmhw5C9Tjfb8GY85cQF9b8u5zvzUbbPoh7ujQqvrl&id=100084445842847	1	17 March 2023, 7.22am




No.	Description of document(s) / category	Number of documents in category (if applicable)	Date/period
56	Copy of Facebook post published by Rebecca Cumming, accessible at URL: https://www.facebook.com/permalink.php?story_fbid=pfbid02a3VTXLX8wYAhNDJGkkweiBYyh9PBfiMPsWpYoH97kEGLEQbU8kmyA4t2PskQCSUEI&id=100080833200081	1	17 March 2023, 9.00am
57	Copy of Facebook post published by Matt MisterMagnetic, accessible at URL: https://www.facebook.com/permalink.php?story_fbid=pfbid02zTqX7jqGxzB3xaHbCcBCfvjgsZdfLvH2ap7D4SpTj8KuUR438RQMJPZQ6q2j7S9dI&id=100083055190244	1	17 March 2023, 9.37am
58	Copy of Facebook post published by Joel Jammal, accessible at URL: https://www.facebook.com/realjoeljammal/posts/pfbid0UanaLhogpHHQhAYyaWbfgp1BzZXDc3Cqm8C24QeecYfHhqTnhQHctw747f6pVUDNI	1	17 March 2023, 12.29pm
59	Copy of Facebook post published by Bec Freedom on 'FFS <> < Faith-filled Soldiers' Facebook page, accessible at URL: https://www.facebook.com/groups/5338163556248580/posts/6219788328086094/	1	17 March 2023, 2.00pm
60	Copy of Facebook post published by Rev Hon Fred Nile MLC, accessible at URL: https://www.facebook.com/fnileindp/posts/pfbid02EmjEZgHXxHs2Gx2CPza3QGUmPFUmgzM sBCQ2zxP2XdJXDnheV6g1MiXqE74WqrXvI	1	17 March 2023, 4.04pm
61	Copy of Facebook post published by Kathleen Murphy, accessible at URL: https://www.facebook.com/musicforlife19/posts/pfbid0CT54zN7sq72EoUbW3WuqsPhWqbEea yZimGWYekPJUYd6iUAgD4aandZHWS2z8DDI	1	17 March 2023, 6.39pm
62	Copy of Facebook post published by Mick Maher, accessible at URL: https://www.facebook.com/anthony.reham.7/posts/pfbid0ie9QswYFJn7GaiYQPER9qumZRzfqi tLYkiXx1iVKBRpFz4j5tDeKZyXdfre9fmi6I	1	17 March 2023, 11.36pm
63	Copy of text messages between Angie Jones and Moira Deeming	1	17-18 March 2023
64	Copy of text messages between Moira Deeming and Neil Angus	1	18 March 2023 -17 May 2023
65	Copy of Facebook post published by Con Tangas, accessible at the following URL: https://www.facebook.com/con.tangas/posts/pfbid0UbDjpsM5euAZzfr8PgflbXx78UcJ8SrmC Szbj3Uk2GhkSjt3MrZJxnfQ3faLXcSCI	1	18 March 2023, 1.31am

No.	Description of document(s) / category	Number of documents in category (if applicable)	Date/period
66	Copy of text messages between Kellie-Jay Keen and Moira Deeming	1	18 March 2023
67	Copy of historical version of Wikipedia page for Kellie-Jay Keen as it appeared at 6.50am UTC (5.50pm AEDT) on 18 March 2023, accessible at the following URL: https://en.wikipedia.org/w/index.php?title=Kellie-Jay_Keen-Minshull&oldid=1145278854 , preserved on 23 July 2024	1	18 March 2023, 6.50am UTC (5.50pm AEDT)
68	Copy of historical version of Wikipedia page for Kellie-Jay Keen as it appeared at 6.57am UTC (5.47pm AEDT) on 18 March 2023, accessible at the following URL: https://en.wikipedia.org/w/index.php?title=Kellie-Jay_Keen-Minshull&oldid=1145279379 , preserved on 23 July 2024	1	18 March 2023, 6.57am UTC (5.47pm AEDT)
69	Copy of tweet posted by Angie Jones (@angijones) published at 7.13am on 19 March 2023, accessible at the following URL: http://x.com/angijones/status/1637185554285723648?s=20	1	19 March 2023, 7.13am
70	Copy of historical version of Wikipedia page for Kellie-Jay Keen as it appeared at 4.33am UTC (3.33pm AEDT) on 19 March 2023, accessible at the following URL: https://en.wikipedia.org/w/index.php?title=Kellie-Jay_Keen-Minshull&oldid=1145438395 , preserved on 23 July 2024	1	19 March 2023, 4.33am UTC (3.33pm AEDT)
71	Copy of historical version of Wikipedia page for Kellie-Jay Keen as it appeared at 4.39am UTC (3.39pm AEDT) on 19 March 2023, accessible at the following URL: https://en.wikipedia.org/w/index.php?title=Kellie-Jay_Keen-Minshull&oldid=1145439111 , preserved on 23 July 2024	1	19 March 2023, 4.39am UTC (3.39pm AEDT)
72	Copy of historical version of Wikipedia page for Kellie-Jay Keen as it appeared at 5.07pm UTC (4.07pm AEDT) on 19 March 2023, accessible at the following URL: https://en.wikipedia.org/w/index.php?title=Kellie-Jay_Keen-Minshull&oldid=1145442378 , preserved on 23 July 2024	1	19 March 2023, 5.07am UTC (4.07pm AEDT)
73	Copy of historical version of Wikipedia page for Kellie-Jay Keen as it appeared at 5.43am UTC (4.43pm) on 19 March 2023, accessible at the following URL: https://en.wikipedia.org/w/index.php?title=Kellie-Jay_Keen-Minshull&oldid=1145446040 , preserved on 23 July 2024	1	19 March 2023, 5.43am UTC (4.43pm AEDT)

No.	Description of document(s) / category	Number of documents in category (if applicable)	Date/period
74	Copy of messages between Anne-Marie Hermans and Moira Deeming	1	20 March 2023 to 15 June 2023
75	Copy of Facebook post published by Mandi L Woffenden, accessible at the following URL: https://www.facebook.com/mandi.lalonde.9/posts/pfbid07xVhcoKcijkEAR4vfnDhaA9SyQ4YKfxFurNYymBXJnaMwnEKAnpeBYLVC8VtLbtmI	1	20 March 2023, 10.16am
76	Copy of Facebook post published by Nabiac Stand in the Park, accessible at the following URL: https://www.facebook.com/permalink.php?story_fbid=pfbid02LgRmCEoi9AfWyatKHqFdDf9RjuW2wz7ZrkNdDJmjhVdxePrZGzyg8DEbzQRuu9ZEI&id=100079165017844	1	20 March 2023, 4.49pm
77	Copy of email from Kellie-Jay Keen to Moira Deeming entitled 'Statement' (with 1 attachment)	1	20 March 2023, 4.07pm
78	Copy of text messages between Moira Deeming and Adam Boyd	1	21 March 2023
79	Copy of draft letter to Victorian Parliamentary Liberal Team (being the document which Mrs Deeming sent to Neil Angus at 5.17pm on 25 March 2023)	1	25 March 2023
80	Copy of text messages between Renee Heath and Moira Deeming	1	26 March 2023-1 April 2023
81	Copy of text messages between John Pesutto and Renee Heath (which Renee Heath sent to Mrs Deeming on 27 March 2023)	1	27 March 2023
82	Copy of text messages between Moira Deeming and Lee Tarlamis	1	17 May 2023
83	Copy of Wikipedia page for Kellie-Jay Keen-Minshull, accessible at the following URL: https://en.wikipedia.org/wiki/Kellie-Jay_Keen-Minshull), preserved on 23 July 2024	1	23 July 2024
84	Copy of Wikipedia page for <i>The National</i> , (accessible at the following URL: https://en.wikipedia.org/wiki/The_National_(Scotland)), preserved on 23 July 2024 (The National Wikipedia Page)	1	23 July 2024

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[Signature]

No.	Description of document(s) / category	Number of documents in category (if applicable)	Date/period
85	<p>Copy of data published by the Audit Bureau of Circulations (UK) showing the circulation figures for <i>The National</i> in the period January to December 2023, preserved on 23 July 2024, which is accessible:</p> <ul style="list-style-type: none"> at the following URL: http://www.abc.org.uk/product/18179; and by clicking the hyperlink in the first footnote in The National Wikipedia Page 	1	23 July 2024

Part 2 – Documents in the control of Applicant for which privilege from production is claimed

No.	Description of document	Date of document	State grounds of privilege
1	Confidential communications between the Applicant and a third party.	20 March 2023	Privileged under common law, as being confidential communications between the Applicant and a third party for the dominant purpose of the Applicant's legal representatives giving legal advice and providing legal services to the Applicant in connection with anticipated legal proceedings.

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

N/A

up

B. H. H.