

## NOTICE OF FILING

### Details of Filing

Document Lodged: Affidavit - Form 59 - Rule 29.02(1)  
Court of Filing: FEDERAL COURT OF AUSTRALIA (FCA)  
Date of Lodgment: 24/12/2025 6:47:21 AM AEDT  
Date Accepted for Filing: 24/12/2025 6:47:27 AM AEDT  
File Number: NSD1727/2025  
File Title: CHARLOTTE MACINNES v REBEL WILSON  
Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



*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.

Form 59  
Rule 29.02(1)

## Affidavit

No. 1727 of 2025

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

### Charlotte MacInnes

Applicant

### Rebel Wilson

Respondent

Affidavit of: **Rebel Melanie Elizabeth Wilson**

Address: [REDACTED]

Occupation: Actress and Director

Date: 24 December 2025

### Contents

Document number	Details	Paragraph	Page
1	Affidavit of Rebel Wilson relevant to the issues on which she bears the onus of proof.	1 - 245	1
2	Annexure "RW-1", being a copy all of the documents referred to throughout the affidavit.	9	64

I affirm:

1. My name is Rebel Melanie Elizabeth Wilson. I am an actress, director, writer, comedian and producer and the respondent in this proceeding.
2. I graduated from the University of New South Wales in 2009 with a Bachelor of Arts (Theatre and Performance Studies) and a Bachelor of Laws.

Filed on behalf of (name & role of party) Rebel Wilson, the Respondent  
 Prepared by (name of person/lawyer) Richard Leder; Georgie Austin  
 Law firm (if applicable) Wotton Kearney  
 Tel (03) 9604 7940 Fax \_\_\_\_\_  
 Email [Richard.Leder@wottonkearney.com](mailto:Richard.Leder@wottonkearney.com); [Georgie.Austin@wottonkearney.com](mailto:Georgie.Austin@wottonkearney.com)  
**Address for service** Level 30, 500 Bourke Street, Melbourne VIC 3000  
 (include state and postcode)

[Version 3 form approved 02/05/2019]

3. I have also studied at The Australian Theatre for Young People (**ATYP**) and the internationally renowned comedy school, The Second City.
4. In November 2009, after I graduated from UNSW, I moved to Los Angeles, California to pursue my career in film and comedy. I have principally lived in Los Angeles ever since.
5. I have now worked in the entertainment business for 25 years and with over 25,000 people on various projects including stage productions, concerts, television both scripted and non-scripted, stand-up and improvisational comedy, commercials, books and more recently feature films. I have worked primarily in the USA for the last 15 years but have also worked extensively in the United Kingdom and Australia. I have filmed and performed in many other countries including Japan, Italy, South Africa and Canada.
6. I am a proud member of the Academy of Motion Picture Arts and Sciences, SAG-AFTRA (the US actors union), Writer's Guild of America West and the Producers Guild of America. I am the current Ambassador to The Australian Theatre for Young People, and the Rebel Theatre in Sydney is named after me. I am also an Ambassador for the School of St Jude in Tanzania and have done extensive charity work in Africa being a former Rotary International Youth Ambassador. I am a current Ambassador for US based health and wellness company NOOM.
7. In my 25-year professional career, I have never had a professional complaint levelled against me for misconduct of any kind. I am known as a hard-working, professional, multi-hyphenate who has worked with all major Hollywood film studios and as one of Australia's biggest comedy exports.
8. Where I use quotation marks in this affidavit indicating direct speech, I have a recollection of those words being used. Otherwise, where I depose to conversations which I was a party to, I recall what was discussed to the best of my recollection.
9. Now produced and shown to me is a bundle exhibit marked "**RW-1**". This exhibit contains all of the documents referred to throughout my affidavit. To the extent the exhibit contains copies of documents, I believe them to be true copies of what is described.
10. Generative artificial intelligence was not used to generate this affidavit or any exhibit to this affidavit prepared or created to my knowledge.

### **The Deb: from stage production to feature film**

11. I have spent the past five years co-writing, producing, directing, acting in and promoting *The Deb*, an uplifting original Australian feature film about two young women from different backgrounds who are searching for self-acceptance and a date to a debutante ball.
12. *The Deb* is scheduled for release in Australia on 15 January 2026. It is my directorial debut, and I am so proud of it. It had its world premiere at the prestigious Toronto Film Festival in September 2024.
13. I first learned about *The Deb* through a three page pitch document submitted to my scholarship program at The Australian Theatre for Young People by Hannah Reilly.
14. ATYP is a not-for-profit organisation which is very important to me and which I hold very dear. It is Australia's flagship youth theatre company. ATYP gives young Australians the chance to create and perform and when I was younger, I trained there, worked there and performed in eight of their productions. From my experiences at ATYP, I started my own theatre company at age 21 which led to me producing, writing and starring in theatre productions, which then resulted in me getting an agent and hired in television. Nicole Kidman, through ATYP generously gave me a scholarship in 2003 which allowed me to travel to New York and train at Second City. ATYP provided me with early opportunities that have allowed me to have the career that I have. It encouraged my uniqueness and fostered my talents.
15. As a way of giving back to ATYP, in 2015 I set up the Rebel Wilson Theatremaker Scholarship which later became the Rebel Wilson Comedy Commission. This scholarship gave the emerging artist \$20,000 to develop a project which they submitted a brief description of. They were also entitled to help and support from ATYP including office space, dramaturgical support, and development resources. I mentored the emerging artist giving them support for their project and in the industry in general. The inaugural winner Yve Blake's project "Fangirls" went on to huge success and recently had a successful season on the West End. One emerging artist was awarded the scholarship each year. Most winners had their work professionally produced on stage.
16. Over the last decade, I have donated significantly to ATYP, donating \$1,000,000 towards the building of a new theatre at the Wharf in Walsh Bay. In recognition of this, ATYP named their main theatre, "The Rebel Theatre".
17. In 2019, I revisited and updated my commitment to ATYP. My scholarship was re-named the Rebel Wilson Comedy Commission. This commission was also worth \$20,000 and in addition to financial support:

- a. I provide winners with script development support and mentoring; and
  - b. my company, Camp Sugar Pty Ltd (**Camp Sugar**), and I obtain the first rights of refusal to produce the resulting work into a stage play and any subsequent screen adaptation.
18. In 2019, Hannah Reilly was awarded the Rebel Wilson Comedy Commission for her pitch idea called 'The Deb' which ultimately became the feature film at the centre of these proceedings.
19. In 2022, after significant work over three years done by Hannah Reilly, Megan Washington (the composer) and me, we agreed to put on a staged workshop production at ATYP which was to be the inaugural production at The Rebel Theatre. The stage play debuted on 8 April 2022. It was a co-production between Camp Sugar and ATYP. The script for the stage play was written by Hannah Reilly and the music was written by Megan Washington. I took no writing credits in this production due to my mentoring role but substantially contributed to the show's script, plot, characters, comedy and songs. Ms Washington, the composer, also contributed significantly to the script, plot and characters but after lengthy negotiations over a 9-month period between representatives for Ms Reilly and Ms Washington an agreement was made as to credits, which was not indicative of actual contributions but allowed the staged workshop production to happen. There was a dispute between Ms Reilly and Ms Washington and to my knowledge they have not spoken since late 2021 over this credit dispute issue. I believed that Ms Reilly and Ms Washington should share 50/50 in all credits because in writing a musical there is a cross over between the script and the music as one plays into the other. Ms Reilly would not agree to give Ms Washington a 50/50 credit.
20. Between 2019 and 2022, I helped Ms Reilly and Ms Washington write and develop the script and music for The Deb. I attended many creative sessions (both in-person and over Zoom due to the COVID-19 pandemic) and attended workshops with both Ms Reilly and Ms Washington. Ms Reilly and Ms Washington did a great job in bringing The Deb to the stage. It is very difficult to create an original musical. The ATYP workshop production was designed to be a development step for a contemplated film version.
21. During this development time, I formed a view that The Deb would make an excellent film. The stage play was a natural development step for the film, for example that was how Baz Luhrmann's 'Strictly Ballroom' was developed. I worked very hard to complete negotiations between Ms Reilly and Ms Washington, which was difficult because of the credits dispute. Nevertheless, I thought The Deb had an appeal much like classic Australian comedy movies 'Muriel's Wedding' or 'Prescilla Queen of the Desert.' The Deb therefore became a passion

project for me. I really wanted it to get made into a film. I have loved those classic films from when I was a teenager and wanted to make something equally special.

22. In late 2020 and early 2021, I caused Camp Sugar to execute agreements with Ms Reilly and Ms Washington in relation to turning The Deb into a film.
23. Shortly before the ATYP staged workshop production, I began speaking to my Australian based agent Kevin Whyte and my UK-based agent Angharad Wood of Tavistock Wood, about what it would take to turn The Deb into a feature film. We discussed a number of things, including what kind of budget the film would need, potential producers, financiers, the timeframe and what my role would be. Mr Whyte (a credited executive producer on the film) thought the film would need a budget of approximately US\$15m and assisted in the original deals.
24. Ms Wood put me in touch with a woman named Amanda Ghost. Ms Wood told me that Ms Ghost was financially backed by billionaire, Sir Len Blavatnik, and that she was interested in making music-based films. Ms Wood also told me that Ms Ghost was influential at Warner Music, which is owned by Sir Blavatnik. Ms Wood had told me that she had been flown on Sir Blavatnik's private jet to the Cannes Film Festival, had seen many projects funded by Sir Blavatnik over the prior years and that a number of her clients had been in projects produced by Danny Cohen, another producer financially backed by Sir Blavatnik. Ms Wood told me that as this project was music based, Ms Ghost was the person to speak to.
25. I thought this sounded like a great opportunity and Ms Wood arranged for the meeting with Ms Ghost to be set up to discuss two music-based projects I had: 'Girl Group' and The Deb. This first meeting occurred around 16 March 2022 in London at the Corinthia Hotel. During this meeting we chatted for approximately 90 minutes over tea and exchanged details.
26. We discussed The Deb officially for the first time on 30 March 2022 at the Bel Air Hotel in Los Angeles after Ghost stated she was not interested in 'Girl Group' (this was financed by another music company Live Nation earlier this year and is set for release in 2026).
27. During this meeting we spoke about the project generally and what an arrangement might look like. Ms Ghost told me all about her impressive experience in the music business and that she basically ran all entertainment ventures out of Warner Music. I remember thinking that Ms Ghost's experience in the music industry, together with Sir Blavatnik's ownership of Warner Music and obvious ability to fund a \$15 million USD project, would make them great partners for an Australian musical with enormous potential.
28. Ms Ghost was the first person to whom I officially pitched The Deb and provided the full song selections to. She was so enthusiastic about it and we got on so well that I believed

that I had found my ideal partners to make this movie. I did Google her but there was not much information publicly available about her at that time apart from some songwriting credits. All I knew was that she was associated with the music business and made grand claims about her success in it and her relationships with major stars. And I understood she had access to Sir Blavatnik's wealth because she mentioned it repeatedly. She told me she and Sir Blavatnik have a very deep bond and that he will fund whatever she tells him to fund.

29. I left the meeting thinking that I had found the people who would finance, co-produce and ultimately help and support me in turning my passion project of The Deb becoming a feature film, into a reality. After the promises made to me by Ms Ghost, I believed her and did not pitch the project to any other financiers. Unfortunately, what started as a dream has turned out to be a nightmare.
30. From 8 April 2022 to 4 June 2022, The Deb stage play was performed in The Rebel Theatre by ATYP. It was well reviewed for an ATYP show but was far from being suitable for a \$15 million USD investment.
31. I flew to Australia to watch the stage play a number of times in April 2022. Ms MacInnes played the role of Maeve Brennan and I thought she was well cast as 'Maeve'. The cast and crew all performed their roles very well, particularly Tara Morice who was the lead in Mr Luhrmann's 'Strictly Ballroom.' I had approved the casting of all lead roles prior to the production by watching audition tapes for the young lead actresses.
32. My mother Sue Bownds took multiple parties to see the show over various nights of the ATYP production. While some parts were rough and some songs clearly weren't as strong as others, there was definite enthusiasm for the material and the themes in the show. This confirmed my view that I should stop pursuing some other Hollywood projects I was working on and work hard to adapt this material into a feature film. Around this time, I caused Camp Sugar to exercise its right of first refusal to adapt The Deb into a feature film. My mother Sue is also a company director of Camp Sugar.
33. In late April 2022, I asked Ms Reilly to transcribe the staged workshop script into a feature film format. This then became the first draft of the script of the film. Ms Reilly provided a first draft on 18 May 2022. From then, from my home in Los Angeles, I worked almost every day on refining and adapting the materials. This included initially getting rid of half of the music and working with Ms Washington and others to create new music, making the project cinematic as it felt too stage-y, adding a significant amount of comedy to the script and refining characters and character arcs.

34. Throughout March to May 2022, I had a number of Zoom and phone meetings with Ms Ghost to discuss the project. As a result of these meetings I sent some materials, including Reilly's first draft of the script and existing demos of the music to Ms Ghost via Soundcloud. On a number of occasions, Ms Ghost told me that she was impressed by the music demos that I provided and my ideas to improve the project. I felt like Ms Ghost and I were working really well together and that we had a very professional working relationship. The idea was that I would do all of the creative work the film needed and she would bring the financing. Ms Ghost was very complimentary of my career and my work.
35. On or around 14 May 2022, I had another meeting with Ms Ghost at the Bel Air Hotel. This time, we spent more time discussing what the details of financing and producing The Deb would look like. When I arrived at the meeting, Ms Ghost had brought with her the UK-based rapper, singer, dancer and actor FKA Twigs. Ms Ghost told me that she and FKA Twigs were staying at the hotel together.
36. FKA Twigs was present for this meeting at which Ms Ghost and I discussed that:
- a. Ms Ghost's company, Unigram, which is part of Sir Blavatnik's Access Industries group of companies, would provide the millions of dollars in financing to turn The Deb into a feature film as per Mr Whyte's estimate;
  - b. I would need to carry out all further writing responsibilities to turn Ms Reilly's script into a script for an internationally appealing feature film. Ms Ghost said this was because Ms Reilly was an up-and-coming writer who she didn't care about and that in order for the film to be a success, it needed someone with more of a name and reputation to have written it;
  - c. I would direct, produce and play a role in the film; and
  - d. I would be given my own music label, called Rebellionaire, with Warner Music which would allow me to retain the intellectual property in the film's music, sign artists to the label (such as cast members of the film) and ultimately release the soundtrack to the film.
37. I left this meeting believing that I had obtained Ms Ghost's and Unigram's support to turn The Deb into a feature film.
38. As a result of this support, I continued writing and editing the draft script. I worked on this almost every day from my home in Los Angeles. I wanted to make sure the script was as good as it could be. I ended up writing the second, third and fourth drafts of the scripts, all pre-production and production drafts including what is referred to as the 'shooting script'.

39. On 2 June 2022, I spoke with Ms Ghost and her husband, Gregor Cameron, over Zoom. Mr Cameron was introduced to me as a company director of AI Film and I understood him to be its CEO. This was the first time Mr Cameron had been brought into any conversation. [REDACTED]

[REDACTED] After speaking with Ms Ghost and Mr Cameron, I sent them an email which attached the draft script that Ms Reilly had prepared and linked to a number of songs from the ATYP staged workshop. I also mentioned Ms MacInnes to them. I noted that Ms MacInnes was “fresh out of drama school...and I think is a really good option for the film”. A copy of this email is contained at page 64 of bundle exhibit RW-1. I remember thinking that Ms MacInnes and Tara Morice would be great for a film version after watching their performances at ATYP.

40. On 1 August 2022, I received an email from Vince Holden, Mr Cameron’s co-director of AI Film, containing a draft offer of finance in relation to the project.

41. This offer was the subject of a negotiation between my agents, Charles Collier and Ms Wood, and AI Film and Unigram which lasted a number of months. Around this time, Ms Ghost explained to me that AI Film and Unigram were essentially interchangeable because both were financially backed by Sir Blavatnik and made films and Ms Ghost claimed to be the ‘boss’ of both these companies. She said that Mr Holden was her employee.

42. On 29 September 2022, I had lunch with Sir Blavatnik at his private residence in Kensington Palace Gardens. Ms Ghost was also at this lunch. Ms Ghost and I told Sir Blavatnik about what we were working on in relation to The Deb and Sir Blavatnik seemed to give it his blessing. I took this as a good sign and was very pleased with how everything was going.

43. On 30 September 2022, I attended a further meeting with Ms Ghost, Mr Cameron, Mr Holden, and Mr Collier at the Corinthia Hotel in London. We discussed the terms of a co-production between Camp Sugar and AI Film. The terms we discussed are reflected in the Co-Production Deal Memo I signed on behalf of Camp Sugar on 27 February 2023 (**Co-Production Deal Memo**). In essence, it was agreed that I would take over writing duties of the script and work on the film’s music, direct and co-star in the film in exchange for AI Film financing the production. A copy of the Co-Production Deal Memo is exhibited to this affidavit and contained at pages 65 to 71 of bundle exhibit RW-1.

### **Pre-production**

44. The project begun picking up momentum after the meeting on 30 September 2022. With AI Film’s commitment to funding the film, I continued working on the script and music.

45. Around this time Ms Reilly told me that Ms MacInnes had signed with an American film and television production company, 3 Arts Entertainment. Ms Reilly believed Ms MacInnes' performance as Maeve in the stage show was excellent and that she should be cast in the same role in the film. A copy of the email Ms Reilly sent me on 6 October 2022 telling me about Ms MacInnes' deal with 3Arts is exhibited to this affidavit and contained at pages 72 to 74 of bundle exhibit RW-1.
46. I then sent a text message to Ms Ghost as she and I had spoken about Ms MacInnes and how we both thought she would be great for the role. Ms Ghost and I exchanged the following text messages about this:

*"Me: Shit – Charlotte the girl we like for THE DEB has just signed with 3Arts in America and booked some TV show*

*Ms Ghost: Noooooooooooo*

*Ms Ghost: When?*

*Ms Ghost: Does this mean we can't use her?*

*Me: I don't know – the writer Hannah just told me as she's friends with her*

*Me: I'll Instagram message her and ask her*

*Ms Ghost: Ok well we should move on that asap. I think she's a total star*

*Me: Yeah literally Hannah the writer is like "this girl is a star on the rise"*

47. On 7 October 2022, I emailed Ms Ghost, Mr Cameron, casting agent Kirsty McGregor and Esme Thompson of Unigram about Ms MacInnes' deal with 3Arts. Ms Ghost responded a little over an hour later and said "Thanks rebel. We are REALLY keen on Charlotte for this role so let's not lose momentum in trying to lock her in. Keep us posted and let me know if you need anything from us. Ax". Ms McGregor subsequently contacted Ms MacInnes' agent to try and secure her for the film. Copies of these messages are exhibited to this affidavit and contained at pages 75 to 78 of bundle exhibit RW-1.
48. In around mid-October 2022, I was principally in discussions with Mr Holden, but was also having discussions with Mr Cameron and Ms Ghost, about what the budget for film would look like. We also started having weekly Zoom meetings. These weekly meetings ran for a number of months. We discussed the progress of the film in general terms at these meetings. I was often given script notes by Unigram and AI Film representatives including Jan Pearson and later Danny Cohen.

49. On 21 October 2022, I sent another email to Ms McGregor about casting for the film. I included the names from the list that Ms Reilly had sent to me on 6 October 2022 and noted Ms MacInnes as the preferred candidate to play the character of Maeve. A copy of this email is exhibited to this affidavit and contained at pages 79 to 80 of bundle exhibit RW-1.
50. In early December 2022, Ms Ghost, Mr Cameron and I travelled to Australia to conduct preliminary castings for the film. This was an exciting but stressful trip for me. My daughter had been born a month before I arrived in Australia. While we were there, we held in person callbacks after nationwide auditions at ATYP. Several auditionees were flown in from interstate to Sydney. As a result of these auditions, the following lead cast members were selected: Natalie Abbott, Stevie Jean and Ms MacInnes. As director I had ultimate sign off on the casting. Ms Ghost, Mr Cameron and I all agreed to cast these lead actresses.
51. After the callback day at ATYP, Ms Ghost seemed very interested in Ms MacInnes and invited her back to the hotel where the producers were staying, The Park Hyatt Sydney. Ms Ghost told me the next day that she spent the rest of that afternoon and evening with Ms MacInnes. I did not know why they were together or what they did.
52. Pre-production of The Deb formally commenced after Camp Sugar and AI Film executed the Co-Production Deal Memo in February 2023. At this time, I didn't pursue other development projects or new acting projects because of the workload, apart from a film 'Bride Hard' that I was already attached to and had been delayed.
53. From February to May 2023, I worked nearly every day on The Deb. In addition to my writing work, I was involved in discussions with Ms Ghost, Mr Cameron and Mr Holden about the structure of the arrangement for the film including each parties' rights and responsibilities, the ownership of the intellectual property and the incorporation of special purpose production companies, Dunburn Debutantes Commissioning Company Pty Ltd (**DDCC**) and Dunburn Debutantes Pty Ltd (**DD**).
54. In around March 2023, Camp Sugar and AI Film partnered with a local Australian production company, **Bunya Productions**. Bunya is run by Greer Simpkin and David Jowsey. From the time this partnership was announced until Ms Simpkin was stood down by AI Film in September 2024, I dealt with Ms Simpkin on an almost daily basis. We became very close during our time working on The Deb. I believe she is an excellent film and television producer and did an amazing job on this film. She really cares about the artists she works with. I had less to do with Mr Jowsey, because he was recovering from health issues, but found him to be a very talented producer and a kind and decent person. Both Ms Simpkin and Mr Jowsey are focused on talent relationships, particularly with indigenous artists and are very supportive of the creative community in general.

55. In May 2023, I was invited to join other members of the cast and crew for an official launch of the film on Sir Blavatnik's yacht, Odessa II. This launch was during the Cannes Film Festival. I travelled to Cannes and then later to London to do some early pre-recording and rehearsing with Ms Abbott, Ms Jean and Ms MacInnes.
56. Ms Ghost took cast members Ms Abbott, Ms Jean and Ms MacInnes on Sir Blavatnik's private jet from London to Cannes.
57. On 24 May 2023, I attended the launch party for The Deb on Sir Blavatnik's yacht. He was on the yacht with Ms Ghost, Mr Cameron, Mr Holden and other invited guests including Warner Music artists, press and Screen Australia representatives. Together with Ms Abbott, Ms Jean and Ms MacInnes, we sang a number of the songs from the film and I spoke about how passionate I was about making this film and it being my directorial debut. We took some press photos with photographers to mark the occasion. The lunchtime event was very successful, and most people left the boat around 4pm. I left on the yacht's tender with the cast members between about 4 and 5 pm as it had been a long day with rehearsals, glam and then the performance and socializing. I told the young cast members to "stick together" and I told them that there are a lot of "seedy people" that hang out around film festivals.
58. The film's music received good reviews from those onboard Sir Blavatnik's yacht and there was a general excitement for the film generated by the event. It was unusual for an Australian film that hadn't even begun production to receive such attention.
59. I was staying with my wife, Ramona, while in Cannes at Hotel du Cap-Eden-Roc. Ms Abbott, Ms Jean and Ms MacInnes were sharing a hotel room at another hotel. After the day on Sir Blavatnik's yacht, I went back to my hotel room with Ramona. We then stayed in Cannes for a few more days visiting friends and attending the AMFAR Gala and flew to London for work with the cast members.
60. On 26 and 27 May 2023, I attended pre-record sessions and rehearsals with Ms Abbott, Ms Jean and Ms MacInnes at Dean St. Studios in Soho. Ms Ghost was also there for most of both sessions. The sessions started at midday and went until 6pm. During a break on the first day, Ms MacInnes told me that she had been taken by Ms Ghost to a party in Cannes on the night we had been on Sir Blavatnik's yacht. Ms MacInnes said she had been separated from her other cast members by Ms Ghost and taken to a party that Ms Abbott and Ms Jean could not get entrance to and then Ms Ghost took her at around midnight back via tender to Odessa II, Sir Blavatnik's yacht. Ms MacInnes told me she "performed" for Ms Ghost and Sir Blavatnik on his yacht until about 4am in the morning. I took this to mean that she had been singing for them. I felt uneasy about this because I thought it sounded inappropriate and unprofessional.

61. That night, I had purchased tickets for Ms Abbott, Ms Jean, Ms MacInnes and I to see the musical Oklahoma at a theatre in the West End. The performance was at the Wyndam Theatre, which is close to Dean St. Studios. As we were leaving Dean St. Studio, Ms MacInnes told me that she would not be joining us. She said she had been asked by Ms Ghost to remain at Dean St. Studios with her. I found this odd, but do not remember thinking anything further about it at the time.
62. We all went to watch Oklahoma except for Ms MacInnes. After the show, I had dinner with Ms Abbott and Ms Jean at J Sheekey, a restaurant near the theatre. I spoke to Ms Abbott and Ms Jean about what Ms MacInnes had said to me earlier that day. Ms Abbott and Ms Jean told me that they felt Ms MacInnes had been “singled out” by Ms Ghost on 24 May 2023. They said they had also gone to try and enter the party that they knew Ms MacInnes was at with Ms Ghost but when they got there, they were not allowed access. They said when this happened, they went back to their hotel room and went to bed. They told me that when Ms MacInnes arrived home at about 4 or 5 o'clock in the morning, she had told them that she had been on the yacht with Ms Ghost and Sir Blavatnik. Both Ms Abbott and Ms Jean said they found this to be “suspicious”. This information made me uncomfortable, especially given that Ms MacInnes had told me she had been brought back to “perform” for Ms Ghost and Sir Blavatnik earlier that day. I was also worried Ms Abbott and Ms Jean felt like Ms MacInnes was being given opportunities they were not and that this could sow disharmony and resentment amongst these actresses in rehearsals and on set.
63. At some point in early June 2023, I attended Unigram’s offices in London to meet with Ms Ghost. Since signing the Co-Production Deal Memo in February, I had repeatedly asked Ms Ghost, Mr Cameron and Mr Holden for copies of the budget. My requests went unanswered. While at Unigram’s offices, I asked Mr Holden and Mr Cameron again to see a copy of the budget. I was given a hard copy of the budget to review by Mr Holden. I reviewed the budget for about five minutes before I was asked to hand it back to Mr Holden, which I did. I recall the document being long. I did not have a chance to properly digest this document. It was impossible to comprehend and retain all of the detail in such a long document in such a short amount of time. During this meeting, and during discussions on other occasions, Mr Holden was, for whatever reason, insistent that the budget always be listed as \$15 million AUD when in all prior conversations I had said that it was \$15 million USD (approximately \$22 million AUD). He mentioned something unclear to me about two contracts.
64. The film paid for the expenses for the cast members for Cannes and London. However, Ms Ghost also held private sessions with Ms MacInnes and Ms Jean at recording studios such as Abbey Road. I understand these sessions were paid for out of the film’s budget. I was invited to Abbey Road studios to hear songs created by Ms MacInnes and Ms Jean and

other music producers. One song from MacInnes was called Siren Song. One song from Ms Jean was called Wildfire. I was told by Ms Ghost that because I could sign these cast members to Rebellionaire that I should look for opportunities for their music. I took this seriously and arranged Ms MacInnes' song Siren Song into my next film 'Bride Hard' as the song a group of bridesmaids perform at a wedding rehearsal video. [REDACTED]

[REDACTED] I thought the chorus of Ms Jean's song Wildfire, during a vocal session in New York for backing vocals with Ian Eisendrath, could be utilised in an existing song from the staged workshop production called Lit that didn't have a melodic chorus. I worked with Ian Eisendrath to mesh Wildfire with Lit which ended up in The Deb film.

*Rehearsals in Sydney: 4-20 September 2023*

65. In June 2023 I was working on the set of Bride Hard as an actress. While I was working on Bride Hard, I learned that Ms MacInnes might be staying with Ms Ghost when rehearsals for The Deb started in Sydney in early September. I cannot recall now how I learned about this but I did not think this was appropriate and told Ms Ghost this. I called Ms Ghost and told her that this was "not a good idea" and that I believed Ms MacInnes should stay in whatever accommodation was being organised for those members of the cast and crew who were not from Sydney. In saying this to Ms Ghost I had two main concerns. I thought it was inappropriate for a young actress in her debut film to be staying with a middle-aged producer given the obvious power imbalance between the two and the fact that The Deb was, after all, a workplace. I was also concerned about how this might affect the rest of the cast and crew, particularly the other young actresses like Ms Abbott and Ms Jean who may have already perceived favouritism towards MacInnes. Ms Ghost did not confirm that Ms MacInnes would be staying with her. As a result of this conversation, I assumed that the issue had been resolved and that Ms MacInnes would not be staying with Ms Ghost.

66. At the Toronto Film Festival in September 2024, myself and Ramona learned from Ms Abbott that Ms MacInnes had disclosed to her in or around July 2023 that she would be staying with Ms Ghost during rehearsals. Ms Abbott told me that Ms MacInnes had asked her if this was normal or appropriate because Ms MacInnes had never worked on a film before and Ms Abbott was more experienced. Ms Abbott told me she said to Ms MacInnes that it was "highly inappropriate" for her to be staying with Ms Ghost and that she advised her to instead stay in the same place as the rest of the cast and crew. I agreed with Ms Abbott when she told me this.

67. Vocal records and rehearsals for the film started in Sydney in late August 2023. I arrived in Sydney in July 2023 for other pre-production work that I had to complete as the film's director. This included design meetings, other casting work, hiring meetings and location

scouting. Ramona and our daughter, Royce, joined me in August where we initially stayed with my mother Sue. Most of the cast and crew were in Sydney for the rehearsals and recordings from early September 2023.

[REDACTED]

69. Ms Ghost was staying in a penthouse apartment at The Pacific Bondi Beach which had been paid for by the production company for the use of the film's producers. Other members of the cast and crew were staying in serviced apartments near where the rehearsals and recordings took place.
70. The vocal recordings during pre-production were occurring at Studios 301 in Surry Hills, Sydney. The production offices were at Callan Park in Rozelle where I had an office and conducted various Heads of Department and production meetings.
71. On 6 September 2023 I arrived at Studios 301. I was already working long days at this point, often in meetings or sessions all day and then doing writing for the film at night. At some stage during the day, Ms MacInnes and I were sitting on the couch in the studio during a break. It was only the two of us in the conversation. I do not know where Ms Ghost was, but she was not with me at this time. While we were sitting on the couch, Ms MacInnes said to me "Amanda asked me to have a bath and shower with her and it made me feel uncomfortable". I was shocked by this. Given where Ms Ghost and I had left our conversation about Ms MacInnes staying with her in June, I was surprised to learn that Ms MacInnes was in fact staying with Ms Ghost. I was very troubled by the idea that something untoward or sexual had happened between Ms MacInnes and Ms Ghost. I understood that what Ms MacInnes was telling me was in keeping with an allegation of sexual harassment and discomfort in the context of an obvious power imbalance between her and Ms Ghost.
72. Later that day I told Ms Simpkin what Ms MacInnes had told me. I said to Ms Simpkin that Ms MacInnes had been "uncomfortable" when she was having a bath and shower with Ms Ghost the day before. I told Ms Simpkin that I did not know what to do because as director I felt responsible for the safety of all cast and crew. Ms Simpkin and I discussed what I should do about this. We agreed that I needed to tell Ms Ghost what Ms MacInnes had said

to give her the opportunity to respond. I resolved that I would raise it with Ms Ghost the next day, 7 September 2023.

73. As soon as I walked in the door that night, I told Ramona about what Charlotte had said to me on the couch. I told Ramona that the day before, Ms MacInnes and Ms Ghost had had a bath and shower together and that Ms MacInnes had felt “uncomfortable”. I said to Ramona that I was not surprised she felt uncomfortable given she had had a shower and a bath with a middle-aged woman who she did not really know and who was effectively her boss. I told Ramona that I thought this was a workplace issue and that I did not know how to handle it. I said that because I was the director, I felt responsible for the health and safety of Ms MacInnes as well as all other members of the cast and crew. I told Ramona that Ms Simpkin and I had agreed I should tell Ms Ghost what Ms MacInnes had said and give her a chance to respond. Ramona and I agreed that I would need to carefully and gently raise this allegation with Ms Ghost. I had a lot of concerns, one of which was a worry that Ms Ghost may retaliate against Ms MacInnes. This was in the context of my earlier observations and discussions with Ms Ghost about her treatment of FKA Twigs.

74. After speaking to Ms Simpkin and Ramona, I also felt that I needed to discuss this with my agents, Mr Collier and Ms Wood. I spoke to Mr Collier and Ms Wood on a Zoom call. I told them what Ms MacInnes had told me and what I planned to do the next day in terms of raising the matter with Ms Ghost to give her an opportunity to respond. I told Mr Collier and Ms Wood that I saw it as my responsibility as the director to ensure that the cast and crew were safe and happy in their workplace. Mr Collier and Ms Wood agreed with me that this was an appropriate course of action.

75. On 7 September 2023, I was nervous about having to raise what Ms MacInnes had said with Ms Ghost. I was also very stressed because while shooting for the film was not due to start for over a month, I was working very hard to finalise the script and music and all of the other work I knew I needed to do to get the film ready in time. I had personally hired so many people on this project, creating hundreds of jobs, and I took that responsibility seriously. Not to mention that I'd spent years developing this project, I didn't want it to fall over right before production was about to begin. At some point that morning I took Ms Ghost aside and spoke to her privately whilst we went for a walk in the grounds at Callan Park. I told Ms Ghost that, the day before, Ms MacInnes had said that she had felt “uncomfortable” about having had a bath and shower with her. Ms Ghost reacted angrily to me telling her this. I recall her saying the words “how could she have said that”. Ms Ghost denied having done anything wrong, told me that Ms MacInnes had lied and then described her as a “lying idiot who cannot sing”. Ms Ghost did not say anything about going into anaphylactic shock or any other kind of medical condition or reaction. Ms Ghost asked me to go back to Ms MacInnes later that day and ask her to clarify what she had meant. I said that I would do so.



inappropriate. As a professional actress with 25 years experience, I would never stay in the same accommodation as a producer, and I have never been in a bath or shower with a producer.

79. On 9 September 2023, I travelled to Hamilton Island with Ramona and Ms Ghost to work on the missing song for the film for my character Janette. We were away for four nights. Ramona and I stayed together in one residence. Ms Ghost stayed by herself in another residence closer to the water. While there I did a lot of writing and sessions on the new song for my character as well as showing Ms Ghost and Ramona some touristy things on the island. We left Hamilton Island on 13 September 2023.

80. Ramona and I spent a lot of time with Ms Ghost at Hamilton Island. We ate most of our meals together and spent some time on the beach, including swimming together in ocean.

81. Over the five days we were there, I found Ms Ghost to be obsessed with Ms MacInnes and what had happened on 5 September 2023. On a number of occasions, Ms Ghost called Ms MacInnes a "liar" and said things like that she would never now receive a deal from Warner Music. Ms Ghost also spoke a lot about FKA Twigs. [REDACTED]

82. During one lunch, Ms Ghost, Ramona and I were talking about the bath and shower incident which had occurred on 5 September 2023. Ms Ghost mentioned that the incident had been prompted by a medical episode. Ms Ghost said that she had gone into anaphylactic shock because of the cold. Ms Ghost said she had been shaking and freezing cold as a result of going swimming in Bondi Beach. She used the words "medical emergency" to describe what had happened. I do not remember what I said in response to Ms Ghost, but I thought this was very strange as I had only heard anaphylactic shock in relation to things like nut allergies and that the treatment was carrying and using an EpiPen. This was the first time Ms Ghost had mentioned going into anaphylactic shock on the day she had a bath and shower with Ms MacInnes. Ms MacInnes had not mentioned anything about this to me either. I had never heard of someone having an anaphylactic reaction to swimming in cold water, let alone at Bondi Beach. I found it very odd that Ms Ghost, soon after the incident, went swimming at Bondi Beach again. She also went swimming at Hamilton Island every day we were there. Each time we went swimming Ms Ghost wore a bikini. I do not recall Ms Ghost complaining about the cold. I did not observe her suffer any anaphylaxis-like symptoms or any symptoms at all from swimming at Hamilton Island. She did not express any concern or hesitation to me about entering the water.

83. On 11 September 2023, while I was at Hamilton Island, I sent a text message to Ms Simpkin about the fact that Ms MacInnes would not be attending the upcoming cast dinner. There was a cast dinner scheduled during rehearsals as a way of getting everyone together to try and build rapport and camaraderie. I recall being disappointed that Ms MacInnes was not going to attend the cast dinner as I thought she should. However, I thought it was understandable that she did not want to attend given what had happened with Ms Ghost on 5 September 2023.

[REDACTED]

[REDACTED]

86. On the morning we left Hamilton Island, Ms Ghost told me that Ms MacInnes would be leaving the penthouse apartment at the Pacific that they had been staying in together. Ms Ghost also said multiple times that she was thinking of recasting Ms MacInnes because of the drama. [REDACTED]

87. After we got back from Hamilton Island, rehearsals recommenced. At this point we were about four weeks from starting filming, also known as “principal photography”. We were recording and rehearsing every day. It was a very busy and stressful time for me having never directed before. I understood that Ms Ghost was the access point to Sir Blavatnik’s money that was financing the film. At this point, I understood from Ms Simpkin that the money, which was needed to pay for production and development of the film, was only being released weekly. It meant I needed to maintain a good professional relationship with Ms Ghost to make sure the project did not fall over. Most days were spent at the recording studios we had rented, Studios 301 and at the Callan Park production offices. I would drive between the two. I was working 16-hour days. I spent my days with the cast and crew, sometimes one-on-one, sometimes in small groups. Given her experience in the music industry, Ms Ghost was particularly involved with the recording and rehearsing at 301 Studios.

[REDACTED]

[REDACTED]



- [REDACTED]
- [REDACTED]
93. On 16 September 2023, I attended a special diamond jubilee event to celebrate ATYP's 60<sup>th</sup> birthday. This was a very special night at which I was the special guest given my connection and ongoing affiliation with ATYP. Ms MacInnes performed a song from The Deb at the dinner with Katelin Koprevic. During the song 'In the Spotlight' Ms MacInnes broke down in tears and appeared to be looking straight at Ms Ghost, who was sitting in her eyeline. I found the incident odd and unsettling.
94. In September 2023, an issue arose in relation to Ms MacInnes disclosing confidential information to Ms Reilly and others in ways she should not have been. A [REDACTED] [REDACTED] Ms Reilly had tried to renegotiate the deals she had signed years earlier. She threatened to sue the production if she was not paid \$650,000. This was in circumstances where all key creatives including myself and composer Megan Washington had reduced the fees we had originally been entitled to so that more money could be used to properly make the film. These issues continued during production of the film and culminated with Ms Reilly instituting arbitration proceedings against me over the writing credits for the film. I understood that Ms MacInnes was providing information about what was happening during pre-production and rehearsals to Ms Reilly which she should not have been doing. Ms Reilly was also trying to renegotiate the deals that we had brokered in relation to the song writing percentages and her writing deal and payments. Ms Reilly had previously claimed that she wrote materials for the staged workshop which were in fact written by Matthew Predny. This issue had to be dealt with contractually.
95. Ms Ghost and I discussed these issues extensively, and on 5 September 2023 we identified Ms MacInnes as the person leaking information to Ms Reilly. I sent Ms Simpkin a text message about this that day which said: "Fuck – we've found the leak! Charlotte's been feeding Hannah info". When we discussed it, Ms Ghost and I agreed that Ms MacInnes supporting Ms Reilly felt like a slight against us given she knew about the issues we were having with Ms Reilly.
96. Finally, on around 17 or 18 September 2023 I was told by Ms Simpkin that she had been in touch with Ms MacInnes' agent, Monica Keightley of Mollison Keightley Management. Ms Simpkin said she had raised two issues with Ms Keightley. The first was what Ms MacInnes had said to me on 6 September 2023. The second concerned Ms MacInnes' unauthorised disclosure of materials to Ms Reilly.
- [REDACTED]

97. On the first issue, Ms Simpkin told me that Ms Keightley was concerned about what was happening to Ms MacInnes. Ms Simpkin said to me that she had spoken to Ms Keightley about Ms MacInnes needing to write a statement about the “bath and shower incident”. Ms Simpkin also told me that Ms Keightley had said to her that Ms MacInnes would need to write this statement before Ms Ghost would talk to her again. I believe this was on 17 September 2023 because on 18 September I received an email from Ms Ghost at 9.03pm. The email I received from Ms Ghost forwarded on two further emails: a long email from Ms Keightley to Ms Simpkin, and an email from Ms Simpkin to Ms Ghost with the letters “FYI”. A copy of this email chain is exhibited to this affidavit and contained at pages 81 to 84 of bundle exhibit RW-1.
98. On the second issue, Ms Simpkin told me that Ms Keightley would separately raise the issue of unauthorised disclosures with Ms MacInnes and reinforce to her the need for Ms MacInnes to comply with all of the agreements she has signed in relation to The Deb, which included confidentiality obligations.
99. After I received this email from Ms Ghost, she and I exchanged the following text messages over the course of a few hours:

*“Ms Ghost: Yes please!!!*

*Ms Ghost: Text from Charlotte’s agent. Greer – Spoke to Charlotte, who is very aware Amanda is keeping her distance. Happy to chat through with you; I know you are having a huge day so didn’t want to butt in with a phone call. Charlotte has categorically stated that she was never uncomfortable with Amanda and Charlotte is hoping to chat to Amanda about it asap. I’ve asked her to hold off for now but am hoping we can arrange that chat and Amanda will be open to it? It is definitely just a misunderstanding and Charlotte just wants to get back to normal. As you may know Charlotte just could t (sic.) think more highly of Amanda, so this turn of events is discombobulating for Charlotte. Call me anytime and I can fill you in – it appears there’s been a possible miscommunication in the conversation Rebel had with Charlotte.*

*Me: I just read the email – so basically she’s denying telling me the statement!!!*

*Me: And now saying I misunderstood!!!*

*Me: She’s obviously very upset she’s fallen out of favour*

*Me: At least you have in writing that she never felt uncomfortable*

*Ms Ghost: Just re read that email, hmmmmm, not sure I buy what she’s saying”.*

100. After I received this email from Ms Ghost, and around the time I was exchanging messages with her, I also exchanged the following text messages with Ms Simpkin:

*“Me: Hey Greer, I just saw the text and email from Charlotte’s agent*

*Me: I 100% did not misunderstand what Charlotte said to me and repeated it accurately to Amanda*

*Ms Simpkin: Hi Rebel, I felt I should send it directly to Amanda to ruminate first. Without any editorialising from me. I have not heard from Amanda. So did not pass on to you. What do we do? There are two issues. One is the terrible claim that Charlotte made to you about Amanda which she is now walking back. And for which she says she is grateful for your duty of care. The other is with the NDA and her misunderstanding or wilful disrespect of what it means. The agent is raising the second issue with Charlotte tomorrow. I am unsure what Amanda feels about the written response. I feel that, whilst it is different to what has been recounted by everyone it does at least resolve in writing that she is not uncomfortable in Amanda’s presence. But it is clear that she is not being truthful. I am writing to Amanda to see show (sic.) she feels about it.”*

101. The email I received from Ms Ghost set out a version of events which was different from what Ms MacInnes had told me on 6 and 7 September 2023. I do not believe this later version is accurate or correct. On 6 September 2023, Ms MacInnes said to me, while we were on the couch and Ms Ghost was not there, “Amanda asked me to have a bath and shower with her and it made me feel uncomfortable”. Then, on 7 September 2023, Ms MacInnes retracted that she had felt “personally uncomfortable” but still described what happened between Ms Ghost and her as “strange and bizarre”. Ms MacInnes never said she was completely comfortable with what happened. She did not mention any medical emergency. Ms MacInnes never denied to me the bath and shower incident occurring. In fact, she confirmed on multiple occasions that she was living with Ms Ghost and that they had a bath and shower together. Both of these things were inappropriate. Pia Ashcroft, the Unigram Head of Music, told me whilst we were on a break at Bourke St Bakery that she had walked in on them in the bath together and that she was very uneasy about this. Ms Ashcroft told me she wanted me to know that she was not okay with things that were occurring between Ms Ghost and Ms MacInnes.

102. On 19 September 2023, at some point during the morning, I learned that Ms Ghost had asked for a private meeting with Ms MacInnes. I cannot recall how I learned this, but I believe I was told about it by Ms Simpkin. I found Ms Ghost and asked to be a party to the meeting as I wanted to make sure that everything was OK between one of my lead

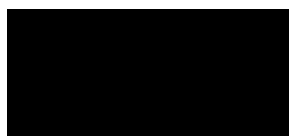
actresses and my co-producer. Or that if I wasn't present that another producer such as Ms Simpkin attend. I was concerned both for Ms MacInnes' welfare and the unity and cohesion of the cast and crew. I was also concerned MacInnes would be terminated which would have derailed the project. Ms Ghost told me I could not attend the meeting with Ms MacInnes, and I believe she held it when I was at the Callan Park production offices in a production meeting.

103. At some point later, I returned to 301 Studios and Ms MacInnes started recording in studio 2. After a short period, approximately ten minutes, with only Ms Ghost and the engineer, Simon, in her eye line, Ms MacInnes broke down in tears and stopped recording. Ms MacInnes was sobbing and rushed out of the studio. I did not speak to Ms MacInnes there and then as I wanted to give her space. Those present in the studio including the engineer Simon, the studio assistant and our Executive Music Producer, Ian Eisendrath, observed this.
104. Recording finished on 20 September 2023. On our last day at 301 Studios, at some point during the afternoon I saw Ms Ghost and Ms MacInnes talking. I was nearby and within earshot. As I looked over, I overheard Ms Ghost asking Ms MacInnes out for a drink. I thought Ms MacInnes looked uncomfortable at this request. Despite looking uncomfortable, Ms Ghost pushed Ms MacInnes to go for a drink with her. I saw and heard Ms MacInnes eventually agree to go for a drink with Ms Ghost.
105. Later that evening, I spoke to Ms Simpkin about what I saw. I told Ms Simpkin that I had seen Ms Ghost ask Ms MacInnes to go for a drink with her and that Ms MacInnes appeared uncomfortable.
106. Ms Simpkin told me that night that she had spoken to Ms MacInnes about this. Ms Simpkin told me Ms MacInnes had discussed the matter with Ms Keightley and that they had agreed that Ms MacInnes should not be hanging out with Ms Ghost.
107. Ms Ghost left Sydney and flew back to London on 22 September 2023. This was unexpected for a number of reasons. Ms Ghost was a producer on the film - it is not usual for a producer to leave before one frame of the film had even been shot. Most producers I have worked with are on set every day. I did not know why she left and there was a lot of work to do in Australia. I understand that this was the first film that Ms Ghost was receiving a producer credit on, so it made even less sense to me for her not to be there. From around then I moved into the apartment at the Pacific where she had been staying as it had been rented for the production and my family stayed there for about a week and half. My family and I then moved to a different apartment on the other side of the building that Airbnb had gifted us.

*Further pre-production issues*

108. Throughout the making of the film including pre-production, production and post-production, I was in constant contact with Ms Simpkin. I spoke with her every day. As the local producer, Ms Simpkin was responsible for managing the logistics behind the film, which included managing the production budget.
109. In the weeks before shooting started, Ms Simpkin came to me one evening and said “for months Vince has been telling me I can’t give you the budget and I think I’ve just worked out why.” Ms Simpkin proceeded to tell me that:
- a. she had grave concerns about the state of the film’s budget and whether or not the movie could be produced;
  - b. about a month earlier, Mr Cameron had emailed her a request to change the line items associated with the producer’s fees and asked her to increase the fees for him, his companies and Ms Ghost by \$900,000, but leave the fees the same for me and Camp Sugar;
  - c. she had been told on a number of occasions by Mr Holden and Mr Cameron that they had asked her not to tell me about what was in the budget and any of the amendments they were making to it;
  - d. that by taking \$900,000 from the budget and adding it to producers fees, there was a risk we would need to lose a week of filming in order to complete all of the work we needed to or otherwise we would run out of money; and
  - e. she had been having issues receiving payments from AI Film as money tended to be drip-fed through to DD rather than provided up front in large chunks. This meant she was constantly having to “sweet talk” and “stay in good favour” with AI Film in order to get them to send the money when needed.
110. I asked Ms Simpkin for a copy of the email she said she had received from Ms Cameron, but she said she was uncomfortable providing it to me at the time for fear of retribution. I was deeply concerned about what Mr Cameron’s request meant for the movie. I was very worried we would not have enough money to shoot the movie in the way that I had planned and that my co-producers were unfairly taking money from the budget for themselves.
111. On 22 September 2023 I exchanged the following text messages with Ms Simpkin:

*“Me: Morning – very boring text but just wanted to let you know this:*



*“As a quick recap the maximum producer fees they are allowed to take is (1) \$300k USD financing fee and (2) 3% of budget production (which you also get). So any fees appearing within the budget have to match this original agreement xxx”*

*I remember you saying something like Vince has added \$300k for himself, \$300k for Gregor and \$300k for Amanda as fees ...but if this is true this can't happen...AI/Unigram are only entitled to 3% of budget production fees to share amongst themselves no additional producer fees*

*Because I own all the rights in the material personally, I need to double check before signing my agreements because I wanna make sure things like this point are legit (basically because AI/Unigram are getting HUGE interest on their investment in the waterfall and so it's unfair if they're also taking fees cause that wasn't what was agreed)*

*Me: Anyway hoping to get all this sorted my end of this coming week*

*Me: Just occasionally Vince has said some things that sound shady and I wanna made sure all is above board”*

*Ms Simpkin: So it was Gregor that added the fees. It is \$300k for Amanda, \$300k for Gregor and a \$300k fee for Vince. Vince is a separate entity being AI. Is your agreement with Unigram or Access or AI? Normally there is some interest allowance in a budget in Australia for borrowing the offset. There technically isn't in the Deb although there are 'financing' fees (that could be the usual admin fee, legal fees). That allowance is going to be used up in legal fees I suspect.*

*Me: My agreement is with AI/Unigram as one*

*Me: The have a \$75k legal allowance separate”*

112. Ms Simpkin's messages only served to deepen my concerns. While I was very disturbed by Mr Cameron's conduct, my primary concern was trying to keep preparing the film ahead of filming commencing on 17 October 2023. Ms Simpkin subsequently provided this email to me on 18 October 2023 in circumstances which are addressed below at paragraphs [147] – [151].

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
114. Ms Simpkin also told me about inappropriate requests that were made of her by Mr Holden and Mr Cameron in relation to the location of expenses.
115. During this period and in the months prior, I made a number of further requests of Mr Cameron and Mr Holden for the budget or copies of the budget for the film. I made these requests orally and on Zoom calls. I asked my representatives to ask for these documents which they also did on multiple occasions.
116. I was finally provided with a copy of a budget on or around 20 October 2023, while I was in the middle of directing the film. I was provided with a budget by Ms Simpkin and, against the backdrop of what occurred on 18 October 2023 in Carcoar and the regular threats I was receiving in relation to AI Film pulling its funding, I agreed to the budget that Ms Simpkin sent me. This was a difficult time. I was on set filming, working 16 hour days and having little sleep because of the stress I was under.
117. Throughout this pre-production period my relationship with Ms Ghost, Mr Cameron and Mr Holden deteriorated significantly. I believe that this was largely as a result of my conversation with Ms Ghost on 7 September 2023 in which I told her what Ms MacInnes had said to me on 6 September 2023. While there had been some stressors in our relationship leading up to pre-production, including Mr Cameron and Ms Ghost's concerns about the extent of my commitments with the film 'Bride Hard', [REDACTED], [REDACTED], I noticed a significant shift in how Mr Cameron, Ms Ghost and Mr Holden dealt with me after 6 September 2023. Despite the fact that our communications remained professional and, for the most part, courteous, the closer we got to filming the more things began to unravel.

*Shooting the film: 17 October 2023 – 8 December 2023*

118. On 7 October 2023, I was asked by Ms Ghost and Mr Holden to attend a Zoom meeting with them. Leading into the meeting I was nervous about this meeting with Ms Ghost and Mr Holden because of the shift I had felt in my relationship with Ms Ghost and Mr Cameron after 6 September 2023. In particular, I was concerned about what I perceived to be their ever-changing positions and demands in relation to key aspects of the project, such as the stage rights and ownership of the film's music. Prior to formal agreements, I had owned the stage rights to The Deb because of funding the development and staged workshop production and had owned the film's music under my company Camp Sugar. As a result of these concerns, I asked for Mr Collier to join me as he had been negotiating with Mr Holden, Mr Cameron and Ms Ghost. Unfortunately, Mr Collier was unable to attend the meeting. He

told me this was because he could not log in properly on his phone. Mr Holden and Ms Ghost were attending by Zoom from the UK. I was in Sydney.

119. During this meeting which lasted for approximately one hour at 9pm on a Saturday night, Ms Ghost and Mr Holden were highly aggressive towards me, particularly Mr Holden. They demanded that I share the stage rights to The Deb with them. At one point I asked them about the email Mr Cameron had sent to Ms Simpkin asking her to amend the film's budget by increasing the producer's fees payable to AI Film and Ms Ghost. I told Mr Holden that I thought this conduct was "unconscionable" because Mr Cameron had asked Ms Simpkin to amend the budget without my consent and in circumstances where I understood he and Mr Holden had previously directed Ms Simpkin not to discuss the budget with me. When I put this allegation to them, Mr Holden and Ms Ghost fobbed it off and became aggressive. We also discussed the film's music on this Zoom meeting. During the meeting Ms Ghost said she was entitled to a million dollars to produce the soundtrack. I told them this was not fair nor ever a part of our deal. This was the first signs I had that AI Film would not honour the 50/50 agreement that has always been in place. I understood Mr Holden was essentially 'moving the goal posts' of the deal, ten days out from production when 300 people had been employed by me and believed that they had jobs up until Christmas.

120. Near the end of the meeting Mr Holden said AI Film would pull its funding of the film if I didn't comply with their demands. He accused me of not fulfilling my duties as a producer and director which I found to be outrageous and baseless.

121. After the meeting I exchanged the following text messages with Ms Simpkin over the course of the next 24 or so hours:

*"Me: It went really fucking badly Greer*

*Ms Simpkin: Oh no!!' I have been sitting with them so couldn't reply. We have gone now. So can talk*

*Me: I'll call you in the morning hun, I am so upset*

*Ms Simpkin: Oh Rebel this is awful. I am so sorry.*

*Me: Can you let me know when you are awake G? X*

*Ms Simpkin: Hi Rebel, sorry I was talking to my Mum a bit this morning. I can talk now or whenever you can.*

*Me: I'll let you know as soon as I have an update x and please let me know if that 2.5 million reaches the account, cause I'll be on them until it has!!*

*Me: I will speak to my UK agent and in a few hours when he wakes up to work out some compromise with them*

*Me: Gregor has requested I personally go through the script with him – it's really odd – especially considering what's going on contract wise. I'm just saying I'm still working on amendments*

...

*Me: My UK agents think their behaviour is really bad*

*Ms Simpkin: I do too. It will be interesting to see if Angela says anything. I don't like being on shifting sands like this. So much hard work has gone in and it feels like they would abandon the project without any thought to the fall out we would face (you, me and our crew). Once Gregor meets everyone tomorrow and sees what has been done, I am hoping he will get it."*

122. I also exchanged the following text messages with Mr Cameron:

*"Me: Gregor, that call went really badly.*

*Mr Cameron: Oh dear – why? Vince?*

*Me: Let's talk in person, maybe tomorrow if you have time"*

123. The next day, Ms Simpkin then sent me a further message which said:

*"Ok. I had a conversation with Amanda this morning, and she said to take out all the \$900k above the line fees. And the funds have just arrived in our bank account. So that is good."*

124. On the morning after the meeting, I sent an email to Ms Wood and Mr Collier outlining what occurred. Mr Collier and I exchanged some further emails within the same email chain. A copy of this email chain is exhibited to this affidavit and contained at pages 85 to 86 of bundle exhibit RW-1.

125. I was very upset about this meeting. [REDACTED]

[REDACTED] I went for a short walk with Mr Cameron at Bondi Beach where he belittled me and my skillset. He claimed that I had no power to do anything and that he and his colleagues had all the power. He explained that he had a special relationship with Sir Blavatnik after many events he organized for the billionaire such as those on Sir Blavatnik's yacht, Sir Blavatnik's 60<sup>th</sup> birthday party and gatherings at Blenheim Palace. He showed me pictures of himself, Ms Ghost and Sir Blavatnik. I felt intimidated by what he was telling me.

126. That afternoon, Ramona and I agreed that she would call Sir Blavatnik about the issues I was having with Ms Ghost, Mr Cameron and Mr Holden. Ramona speaks Russian fluently and had known Sir Blavatnik socially. She had his phone number from these interactions. We hoped this call might act as a circuit breaker in the lead up to filming starting on 17 October 2023. My goal was to make a great film in a safe and respectful environment. Ms Ghost and Mr Holden from afar, and now Mr Cameron in Sydney, were making my job extremely difficult.
127. That night, 8 October 2023, Ramona called Sir Blavatnik. The call was short, I believe it lasted for five minutes or so. I was in the room when this call took place. The conversation took place in Russian, so I did not understand what was discussed. Afterwards Ramona told me that she had raised my deteriorating relationships with Ms Ghost, Mr Cameron and Mr Holden, including those issues I was having in relation to the stage and music rights, with Sir Blavatnik. Ramona said to Sir Blavatnik, "Is it true you want Rebel's stage rights?" Ramona said Blavatnik responded, "No. I don't want any stage rights." Ramona also told me that she mentioned issues with the budget, where she understood that Ms Ghost, Mr Cameron and Mr Holden had tried to claim some "personal fees" in the amount of \$900,000 from the budget and raised the fact that Ms MacInnes had had some issues with Ms Ghost. Ramona told me Sir Blavatnik sounded upset when he heard about these matters.
128. The next day, 9 October 2023, I sent an email to Danny Cohen, who is the President of Sir Blavatnik's Access Entertainment. I did not know Mr Cohen very well but knew that he was a film producer with more experience than Ms Ghost and Mr Cameron. I knew that he was to be listed as an Executive Producer on the project and my agent Ms Wood thought that it would be a good idea to reach out to him. She told me that Sir Blavatnik often called in Mr Cohen to "deal with the messes" of Ms Ghost. In my email to Mr Cohen, I said "I am struggling with a few things right now Angharad [Wood] may have alerted you to. Am hoping everything can be resolved but am extremely stressed and upset."
129. Later that day, Mr Cohen responded to me thanking me for my email and saying that he was "talking to [Ms Wood]". I understood they were talking about the meeting I had with Ms Ghost and Mr Holden on 7 October 2023 as well as the general deterioration of my relationship with Ms Ghost, Mr Cameron and Mr Holden after 6 September 2023. This email chain is exhibited to this affidavit and contained at pages 87 to 89 of bundle exhibit RW-1.
130. Around this time, I was told to stop work on The Deb. I cannot recall who told me that, but I recall not going into work for a day or so. Given the timing, and what Mr Cameron told me on 11 October 2023, I believe this was the result of Ramona's call with Sir Blavatnik on Sunday, 8 October 2023.

131. On 10 October 2023, I received a further email from Mr Cohen which said that he had “just received more details from Charles Collier”. A copy of this email is exhibited to this affidavit and contained at page 90 of bundle exhibit RW-1. As a result of Mr Cohen’s email, we had a telephone call on or around 10 October 2023.

132. That night, Mr Cohen and I eventually spoke on the telephone. The call lasted for 48 minutes. During this call with Mr Cohen, I told him about the issues I had been having with Ms Ghost, Mr Cameron and Mr Holden. I told Mr Cohen about what Ms MacInnes had said to me on 6 September 2023, the fallout from this, what Ms Simpkin had told me at the end of rehearsals about Mr Cameron’s attempts to amend the budget and expressed concern that I was being bullied and harassed by Ms Ghost and Mr Cameron as a result of having raised all of these issues with them. I raised the conversations I had had with Mr Cameron where I thought he was gaslighting me and belittling me. In relation to what Ms MacInnes told me on 6 September 2023, I said Mr Cohen should conduct an independent investigation into what happened to get to the bottom of it. Mr Cohen told me that he would do this. I am not aware of an investigation ever being conducted, or at least if it was, I was never interviewed or asked any questions about what Ms MacInnes had said and I have never seen any documents confirming that an investigation ever took place.

133. After this call, Mr Cohen sent me a text message saying he had “just sent a note to Charles Collier which I hope moves us forward.” I understand Mr Collier sent an email to Mr Cohen in response in which he asked for Mr Cohen to confirm that Ms Ghost would not visit the set in person. I do not know if Mr Cohen responded to this, but Ms Ghost did attend the set briefly right at the very end of the filming.

134. The next day, on 11 October 2023, I had two very heated conversations with Mr Cameron. The first was on the phone at around 10am. The second was in person at 11am at the Callan Park production offices.

[REDACTED]

[REDACTED]

[REDACTED]

136. By 11am I was in the middle of performing some camera tests with Mr Emery on set in Sydney. Mr Cameron arrived at this time. I left the tests to speak with him. This conversation lasted for approximately ten minutes.
137. During this conversation, Mr Cameron told me that Sir Blavatnik had called Ms Ghost as a result of him speaking to Ramona. Mr Cameron said Ramona had made accusations of money stealing and sexual assault to Sir Blavatnik. I told him that was not the case. I said Ramona had spoken to Sir Blavatnik about the issues I had been having with him, Ms Ghost and Mr Holden about the stage and music rights, and that she had raised the matters to do with the budget and Ms MacInnes being made to feel uncomfortable on 5 September 2023.
138. Mr Cameron told me that he thought Ramona's conversation with Sir Blavatnik was inappropriate. I responded by saying to him "Gregor, this is very difficult for me to tell you this, because Amanda is your wife, but she has behaved inappropriately on a number of occasions during pre-production and I personally have been a witness to it. Charlotte did make the comment to me, she said "Amanda asked me to have a bath and shower with her and it made me feel uncomfortable." This was followed up by me with Charlotte the next day. There were multiple times Amanda was talking with Charlotte and Charlotte subsequently broke down sobbing. One important occasion was at 301 Studios, on the second last day of pre-records, as witnessed by the music team where Charlotte was unable to perform because she was crying so much." Mr Cameron responded by saying that he wanted to speak to Ms MacInnes. I told him I did not think this was appropriate given he is Ms Ghost's husband and that if anyone was going to speak to her about what she had told me on 6 September 2023 it should be someone independent. Mr Cameron then told me Sir Blavatnik wanted to have a police investigation and that he would pay for lawyers. I found this strange as I never understood Ms MacInnes to be making a sexual assault allegation that required the involvement of police. I responded to this by saying "I think an investigation would be a good thing to carry out, so that there is no threat of liability from the production's side. I am very happy to be helpful to any investigation and say what I witnessed."
139. I wanted an independent investigation by a third party company who deals in human resource complaints and who would make recommendations about what professionally should be done. Usually in all my professional work contracts there is a "morality clause" in them, meaning that if you do something deemed as immoral you can be terminated from the project. I did think that the best thing to do at this point would be to hold an investigation and that if Ms Ghost, Mr Cameron or Mr Holden were found to have not behaved morally that they would be terminated from the project. I considered that Sir Blavatnik was the only person with the power to do this, but I had heard in some other disputes that Mr Cohen had been brought in to be the acting producer for AI Film. As Mr Cohen had recently worked on

a movie receiving a lot of Oscar discussion called 'The Zone of Interest,' I thought that the best thing for the movie would be for Mr Cohen to take over as Blavatnik's representative on the film.

140. I wound up this conversation by asking Mr Cameron whether he was proceeding with our deal given Ms Ghost had emailed me telling me I should halt production in very clear language. Mr Cameron confirmed that he was not pulling the financing and everything should continue as planned. I recorded the above conversations with Mr Cameron in an email I sent to Mr Collier and Ms Wood on the day they happened.
141. Around this time, which I believe to be after my conversations with Mr Cameron, Ms Simpkin came to me and told me that Mr Holden threatened to cancel AI Film's financing of the film. Ms Simpkin said she was very worried the whole project would fall over and that all of our cast and crew would be out of work. I shared her concerns. It was not the last time I received this threat. This same threat was made over and over again during filming and post-production. This threat was often associated with the addition from Mr Cameron to the effect that Sir Blavatnik will pull all the money because he's so rich he doesn't care and he will do what we tell him to do.
142. Shooting for the Film ran from 17 October 2023 to 8 December 2023. A copy of the schedule is exhibited to this affidavit and contained at pages 91 to 132 of bundle exhibit RW-1.
143. Filming started in Carcoar, New South Wales. Despite all of the issues that I had had with Ms Ghost, Mr Cameron and Mr Holden since 6 September 2023, I continued to work incredibly hard on the film in the lead up to filming. I was desperate to make sure that the film was as good as it could be. I was working day and night to turn my directorial dream into a reality. I had had a Zoom with director Guillermo Del Toro to get tips about directing where we went through scenes from the movie. I had received supportive advice from Australian directors Phillip Noyce and Baz Luhrmann. I would stay up until often 2.00 am rewriting the script or dealing with production issues.
144. The first day of filming was an amazing experience for me. While I have appeared in a lot of films, and been involved in a lot of productions, I found the experience of directing the movie to be exhilarating. I was helped significantly by my 1<sup>st</sup> Assistant Director Drew Bailey and really appreciated the great teamwork I had with him and Mr Emery. Both men were extremely supportive and helpful throughout the directing process and generous with sharing their wisdom and experience.
145. However, this first day of filming was not without issues. At some point I received a call from Ms Wood who told me that Ms Ghost had demanded an urgent Zoom meeting with her.

She said Ms Ghost continued to call her throughout the night and in the early hours of the morning. I was worried Ms Ghost was trying to cause trouble over the fact that aside from the Co-Production Deal Memo, none of the other agreements had been finalised. I was also worried about what she might be saying to people about me given what I had heard her say about FKA Twigs. After I received this call I had the following text message exchange with Ms Simpkin over approximately the next nine hours:

*“Me: Greer sorry to call you so late. My UK agent just called saying Amanda is being aggressive and demanding a Zoom in an hour with them*

*Me: I fear she is causing trouble and as I don't have any signed deals it is concerning me she's trying to pull something*

*Ms Simpkin: Gregor said he is worried about closing the agreements today. We don't have any detail about what is going on but it makes sense they want to close the financing. Hopefully they just want to get it all done because we are shooting. Are you guys close on the deal? I assume you don't have to do the Zoom do you? Can you leave the agents to do it?*

*Ms Simpkin: Are you worried it is something else?*

*Me: I was told the deal was all organized on Friday?*

*Me: I've been waiting for the new draft to sign (shrug emoji)*

*Ms Simpkin: So your agents said the deals are finalised? Oh wow. I thought that it wasn't finalised. I am very confused now.*

*Me: Yeah I was told the wording on the stage rights compromise was sorted on Friday (shrug emoji)*

*Me: Otherwise I wouldn't have come to Carcoar if there was some issue*

*Me: Amanda messaged my UK agent Angharad 5 times overnight demanding this Zoom*

*Me: The issue from Angela was that will Amanda sign over her work on the music to the SPV? Which is what I was doing with my work on the music*

*Me: Amanda co-wrote UGLY and WILDFIRE”.*

*Ms Simpkin: Sorry I fell back asleep last night and didn't see your later texts. I was really tired. I hope it went OK last night. Been dreaming all day about the zoom! G x*

*Me: Morning. It was one of those weird ones where they recorded the Zoom and started interrogating my agent – about the situation with Charlotte – it was only Amanda & Gregor on the Zoom. My agent just said it was super weird. So nothing about the deals”*

146. The second day of filming was a disaster.

147. On 18 October 2023, at approximately 2 pm, Mr Cameron called me into what he said was a ‘meeting’ with Ms Simpkin and Mr Jowsey. We met in a fairly empty room which was upstairs away from the rest of the cast and crew. I recall only a few chairs in the room and one table. After I walked in, Mr Cameron locked the door behind me. The meeting lasted for a long time, approximately 90 minutes, which in the middle of a filming day is an expensive amount of time. Mr Cameron stood in front of the door preventing me from leaving. Ms Simpkin and I were told to sit around the empty table in the room and Mr Cameron raised a number of issues. Mr Jowsey who had not been feeling well was seated in the corner of the room. Mr Cameron raised the allegations relating to Ms Ghost having made Ms MacInnes uncomfortable on 5 September 2023, the status of agreements, and outstanding issues such as the music rights. Mr Cameron reiterated that he thought Ramona’s conversation with Sir Blavatnik on 8 October 2023 was inappropriate and that he needed to set the record straight. He was very angry that Ramona had contacted Sir Blavatnik. Mr Cameron said that AI Film’s funding of the film was conditional on me, Ms Simpkin and Mr Jowsey all signing a “statement” confirming that we do not make any allegations against either Mr Cameron or Ms Ghost. Mr Cameron said that if we did not do this he would immediately stop funding the project and that production would cease. I was very scared in this room for both my safety, the film and the livelihoods of all of the cast and crew who were with us in Carcoar. At one point in the room I said “what is going on here? This is like the KGB.” I believe it was in response to being told that I was going to have to sign a statement if we wanted production of the film to continue to be financed by these people. Ms Simpkin was crying and I was shaking. I felt very stressed and intimidated by Mr Cameron during this meeting. Several times an assistant director, who I believe was Second Assistant Director, Noni Roy, knocked on the door trying to ascertain my whereabouts. Mr Cameron yelled out “go away”. Ms Simpkin and I tried to raise the fact as to why Mr Cameron and Ms Ghost wouldn’t sign producer contracts with a “morality clause” in them. Mr Cameron said that they were not bound by the same rules that the other producers were because of their relationship with Sir Blavatnik. Ms Simpkin and Mr Jowsey said that as circumstances had changed, Ms Wilson should license her music to the film and retain ownership of the publishing because Ms

Ghost was now not assigning her interests in the film's music to the film's special purpose vehicle (**SPV**).

148. After an extended period and increasing knocks on the door from people, Mr Cameron let us out of the room if we agreed to sign a document that Ms Simpkin would amend. We refused to sign Mr Cameron's document but agreed to sign an amended one. We all left the room. Both Ms Simpkin and I were visibly upset and I had never experienced something like that in my 25 year career.

149. Approximately two hours later, while on set still shaken by what had just happened, Ms Simpkin brought to me the "amended document." I initially refused to sign it, but Mr Cameron reiterated to me that if I did not sign it, he would immediately cease funding the project. I felt forced to sign the document and I did so. I signed the document under duress. I recall Ms Simpkin saying to me that we did not need to worry because the document was signed under duress and could not be enforceable and that she amended the document to include some positive things, such as how well I was doing as director and that I shouldn't be assigning my music away for free to the SPV, but that it should only be licensed. This "minutes" document that I signed does not accurately depict what Ms MacInnes said to me on 6 September 2023. The true version of what she said is detailed in this affidavit. A copy of the document is exhibited to this affidavit and contained at pages 133 to 134 of bundle exhibit RW-1.

150. That night, I spoke to Ms Simpkin about what had happened. We were both shaken up by Mr Cameron having locked us in a room and then demanded that we sign the "minutes" document. I raised with Ms Simpkin what she had told me after rehearsals had finished in late September about the budget (which is detailed above in paragraph 109). I asked Ms Simpkin whether she would provide me with the email given what had taken place that day. She agreed that she would. Later that night, Ms Simpkin sent me a copy of the email she had received from Mr Cameron on 14 August 2023 in which he directed her to alter the budget. A copy of the email I received from Ms Simpkin is exhibited to this affidavit and contained at page 135 of bundle exhibit RW-1.

151. Ms Simpkin also sent me a text message which said "David and I wanted to say that you were an absolute trouper this afternoon and we are so impressed that you just get on with doing a brilliant job. It was a shock today. I am here for you anytime just call. Gx". I really appreciated this message from Ms Simpkin. During this horrible and stressful period, she was an incredible support for me.

152. Approximately two to three days after the incident with Mr Cameron on 18 October 2023, I reached out to FKA Twigs, who I had met on 14 May 2022 with Ms Ghost. I reached out to

FKA Twigs because I could not shrug the sense that there was more to the story than what Ms Ghost had told Ramona and me while on Hamilton Island and other cast and crew members at 301 Studios. Given the way I was being treated, I found the way Ms Ghost had spoken about their falling out to be strange. I obtained FKA Twigs' phone number through a friend and spoke with her on the phone. When I spoke to her, we had a lengthy phone call. During this call FKA Twigs told me some very troubling things about Ms Ghost, including that:

- a. she and Ms Ghost fell out because she believed Ms Ghost was bullying and harassing her and trying to control her;
- b. whilst on a work trip in Miami, Ms Ghost had initiated unwanted sexual contact towards FKA Twigs;
- c. despite having signed a lucrative deal with Atlantic Records, a label within Sir Blavatnik's Warner Music Group, Ms Ghost had set out to destroy her career by blocking the release of her latest album. FKA Twigs said she had invested over two years' worth of work into that album and that her career was faltering because it was being withheld from release despite having been ready for some time;
- d. Ms Ghost had left her with a crippling expense bill at around the time they fell out which FKA Twigs had had to repay that was around US \$4 million;
- e. she had written to Sir Blavatnik to complain about Ms Ghost and visited Sir Blavatnik in person at his Kensington home to plead with him to help her. This ultimately made matters worse as Ms Ghost engaged in retaliatory bullying against her which made things even worse because she had involved Sir Blavatnik; and
- f. as a result of Ms Ghost's harassment, she had lost several film roles and projects she was attached to such as a Lee Daniels film called 'Bertha' and a film project based on the musical 'Porgy & Bess.'

153. FKA Twigs subsequently confirmed these things to me when we had lunch together in May 2024 with Ramona.

154. I was very concerned about what FKA Twigs was telling me. I found it frightening to think that someone I had partnered with had apparently treated someone with whom she had previously worked and had a very close relationship so badly. I was also very concerned about the parallels between what FKA Twigs told me and what I was experiencing from Ms Ghost. Despite having entered into an arrangement with AI Film and Sir Blavatnik over The Deb, I was becoming increasingly concerned by the fact that each of

Ms Ghost, Mr Cameron and Mr Holden were repeatedly threatening to withdraw the funding for the film at such a late stage. I was most worried about FKA Twigs' recounting of the retaliatory bullying. I felt like this was exactly what was happening to me after Ramona's call with Sir Blavatnik on 8 October 2023 and my complaints to Mr Cohen following the 7 October 2023 Zoom call.

155. Following this call with FKA Twigs, she sent me a copy of the message she sent to Sir Blavatnik asking for his help. I understand she sent this message in September 2023. The message detailed FKA Twigs' concerns with Ms Ghost's conduct. She told Sir Blavatnik "i feel bullied, violently lied about and i continue to be harassed. it's been two years of torture." FKA Twigs also sent me a copy of a message she said she sent to Craig Kallman from Atlantic Records. These messages resonated with me as I identified with the fears FKA Twigs expressed about her career and the effect of Ms Ghost's conduct on it. A screenshot of this message is exhibited to this affidavit and contained at page 136 of bundle exhibit RW-1.

156. This was the first of a number of discussions with FKA Twigs. All of our conversations revolved around her treatment by Ms Ghost. FKA Twigs also put me in touch with other people who had had bad experiences with Ms Ghost whom I also spoke with. These people told me of their experiences with Ms Ghost which were very similar to mine, including intellectual property disputes and financial concerns. They also spoke about the close relationship between Ms Ghost and Sir Blavatnik.

157. In response to the incident on 18 October 2023, I engaged private security to protect me while on set. I did not feel safe while working on The Deb after the incident on 18 October 2023. On 31 October 2023, when I knew Mr Cameron was returning to Sydney after traveling back to London, I engaged Peter Grant of Mi5 Bodyguarding and Security to provide bodyguarding and security services to me while on set. I retained Mr Grant from 31 October 2023 until shooting finished on 8 December 2023. Mr Grant accompanied me most of the time I was on set and he was an invaluable support to me during this time. I paid for Mr Grant's services out of my own pocket, the money did not come out of the film's budget. I have never been on the set of a movie where a director has had personal security to protect them like this.

158. Over the next two months, I continued to direct and produce the film. I continuously worked 16 hour days including on weekends. While I was also playing the role of Janette, most of my energy was spent directing and producing. The cast and crew did an amazing job during this time. Despite all of the issues between me and the UK producers, I felt like all members of the cast and crew supported and respected each other and believed in what

we were doing. I received many kind cards, messages and emails from cast and crew about the lovely experiences they had had making the film.

159.

Mr Cameron and Ms Ghost were not on set for all of filming. Mr Cameron was much more involved than Ms Ghost, but unfortunately his mother passed away during filming and he returned to the United Kingdom.

Daillies and rushes are raw footage of what is shot. Each day they are circulated amongst the production team.

While I did my best to keep the atmosphere on set light and positive, I feel like some cast and crew recognised that there were tensions between me and the other international producers, Ms Ghost, Mr Cameron and Mr Holden. I only saw Ms Ghost back in Australia at the end of the shoot. I had limited interactions with her as Ms Simpkin and my security kept both her and Mr Cameron away from me for the most part. Ms Simpkin would set up a “producers monitor” usually 50-100 meters away from where I was stationed as the director.

160. During the production of the film, I was very stressed. I had large bags under my eyes on certain days from extreme tiredness which was digitally removed from the film’s footage. I was working very hard and trying to not let the issues I was having with Ms Ghost, Mr Cameron and Mr Holden cause any angst or issues for the rest of the cast and crew. I generally did not speak to other members of the cast or crew about these issues. However, I spoke with Ms Simpkin about them almost every day. We spoke about these issues in detail and exchanged a large volume of messages sharing concerns for each other’s welfare during this period. I also spoke with other members of the cast and crew who I am friends with at a more general level, including mark-up artist Lynne O’Brien and costume designer Margot Wilson. I do not believe I went into the same detail with Ms O’Brien or Margot Wilson as I did with Ms Simpkin.

161. One constant source of stress between me and Ms Ghost, Mr Cameron and Mr Holden was, as already addressed, the film’s budget. For me, the fact that I was excluded from budget-related decisions and the concerns I had about Mr Cameron’s 14 August 2023 email to Ms Simpkin made me very worried about the control and influence they had over the film’s finances. One topic that regularly came up was overruns. Mr Holden, in particular, consistently complained about what he thought were unnecessary costs and overruns associated with production. I disagreed because Ms Simpkin and myself were limiting expenses. Ms Ghost had also told us to essentially ‘mind our own business’ and that the

budget was not our concern. I was concerned that Mr Holden was trying to set up Ms Simpkin for mismanaging the budget.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[REDACTED]

166. I never had any access to Sir Blavatnik's funds or any bank accounts associated with DDCC or DD, so have never accessed any of the funds allocated to the film. I was given weekly cost reports by Ms Simpkin post 20 October 2023 until the delivery of the film. The reports have never shown income and receipts generated by the film – which were Australian government rebates totally over US\$6.6 million, product placement deals totally approximately US\$150,000 and a GBP£250,000 advance on a soundtrack from Warner Music. Ms Simpkin told me that Mr Holden insisted those monies be sent immediately to AI Film and/or Unigram upon receipt.

167. While directing the film, I had regular, almost daily, contact with Ms MacInnes as she was one of the co-leads of the film. As Ms Ghost was not on set much during the time we were filming, I do not recall observing them together much during this period. But I do recall heads of departments saying Ms MacInnes was often on the phone to Ms Ghost.

[REDACTED]

169. On 18 November 2023, Ms Simpkin reported to me that there had been an issue with Ms MacInnes through Ms Ghost. Ms Simpkin sent me a text message which said: "Saw your text to Amanda. My goodness. If it comes up on the zoom I will tell Amanda that I am going to speak to Charlotte and her agent Monday first thing to get to the bottom of it." Ms MacInnes had made a complaint to Ms Ghost about veteran costume designer Margot Wilson. Margot Wilson told me that Ms MacInnes has said something unkind to co-lead Ms Abbott about her appearance which made Ms Abbott visibly upset on set. Margot Wilson then told me that Ms MacInnes had started a dispute with her and another employee on the costume team and taken her complaint to Ms Ghost.

170. The next day Ms Simpkin sent me a follow up message about this which said: "Have put in a call to Charlottes agent as she has been busy on the mobile since 9am (so left message at office. No response yet. I am going to book them in for the lunch break at 6pm to 6.45pm, right? If so I will get onto Stevie's agent whilst I wait for Charlotte."

171. Ms Simpkin then sent me another text message later that said: "Spoke to Charlottes agent. I guess you are in with Jane. Call me when you are travelling to set maybe? Charlotte has basically said there was no issues now that she is less tired as it was 'a late night.' And

[REDACTED]

that she and Amanda have a close and comforting relationship as they are working on the music and ever since London so that is why she would have spoken to her. She said 'I will ask Charlotte if she wants to have a meeting' and I said 'no this is not a choice, we do want to talk to Charlotte as we want to make sure that we deal with any issues she has at the time as busy set etc There are people on set she can speak to. Like me.'"

172. Ms Simpkin and I had a short meeting, about ten minutes in length, the following day at Disney Studios where we communicated to Ms MacInnes appropriate film set protocol. We explained that if any inappropriate conduct occurred, a complaint could always be made to Ms Simpkin or Ms Roy. MacInnes apologised and said she would retract her comments and that she was tired and had said some things she did not mean. [REDACTED]

173. During both pre-production and production, I thought Ms MacInnes and I had a good relationship. I respect her talent and thought she did a good job for someone that is so young working on her first feature film. As was the case with the majority of the cast, we took hundreds of photos and videos together during this time and I felt like we enjoyed a normal director-actress relationship. Ms MacInnes was photographed smiling with me, my mother Sue, my daughter Royce and Ramona on various occasions. All these people were known to Ms MacInnes as my family members, and she knew them by name. Ms MacInnes never made any complaints that I am aware of about me to anyone on the production.

### **Post-Production**

174. Following the conclusion of filming on 8 December 2023, the Film moved into post-production. After a small holiday break, I returned to Australia to edit the film with editor Jane Moran at the Post Lounge in Sydney. I flew to the US for my in-person meeting with Sir Blavatnik but spent a period of months in Australia finishing the film in early 2024 which also included some music work in Los Angeles with composer Michael Yezerski.

175. When I returned from the Christmas break in January 2024 to do some editing, I stayed at the Park Hyatt in Sydney. Coincidentally, Ms Ghost was also staying there. It surprised me to learn that Ms Ghost was still in Sydney. Despite the complete breakdown in the professional relationship, I agreed to have breakfast with Ms Ghost at the Park Hyatt to see whether anything could be resolved and to discuss the subject of the film's sales agent.

176. Over breakfast, I learned that Ms Ghost had stayed in Sydney to spend time with Ms MacInnes, but Ms Ghost suggested Ms MacInnes was avoiding her. Ms Ghost belittled Ms MacInnes' acting and singing ability. I spoke about the assembly of the film that had been created before Christmas and that work was going to have to be done on Ms MacInnes'

scenes to make them better. We spoke about how several scenes of Ms MacInnes' were cut completely from the film because they did not work because of her acting delivery. We were needing to do something called "split screen" to take various reactions that weren't done by Ms MacInnes in the moment and stitch them into the scenes to make the scenes work. We discussed how, by way of contrast, Ms Abbott, who is a more experienced performer, did not need any visual effects work to improve her performance. The matters I had raised about Ms Ghost were brought up over breakfast. Ms Ghost told me that she was "untouchable" for reasons that she described. As I walked out of that meeting, I knew that I would never willingly speak to Ms Ghost again.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

185. Throughout post-production, a large number of “automated dialogue replacement” (ADR) sessions were held. ADR sessions allow me to overlay lines or music taken later back into the film. In my experience, these are very common sessions after a film has finished shooting. I attended ADR sessions with most of the main members of cast, including Ms Abbott and Ms Jean. Some ADR sessions were ‘remote’ where I would be on a video link and the cast member in the recording studio would be on a video link so that we

[REDACTED]

[REDACTED]

could communicate. There were no issues with any of those sessions. These sessions tended to be set up by Henry Karjalainen, the film's post-production supervisor and Ms Simpkin. I was told by Mr Karjalainen in around April and May 2024 that he was having difficulties setting up an ADR session with Ms MacInnes. He told me he did not have any difficulties with any other members of the cast who he had to schedule ADR sessions with. Eventually, an ADR session for Ms MacInnes was organised for 30 May 2024, which is addressed below.

186. Almost as soon as the film entered post-production, Ms MacInnes' availability became an issue. On 10 January 2024, I exchanged the following text messages with Ms Simpkin:

*"Ms Simpkin: An exchange with Charlotte's agent: ME Saw that you called. Do the dates work ok?"*

*AGENT: Yes! Which is great – but we would need to shift a potential recording week in NY (not yet set, but looking like first week of Feb) with Amanda Ghost. Is it OK to share with AG that this AACTAs gig is potentially on the table given her relationship with the Deb? Cautious about overstepping given you mentioned it's in the vault – but as a record producer she will probably ask why Charlotte wants to allow for being in Oz on Feb 10...*

*Me: OMG*

*Ms Simpkin: Yep*

*Me: I knew Amanda was promising Charlotte some NY trip*

*Me: Buuuut how was she planning on paying for that?*

*Me: Because it's NOT coming from us and the Warners label deal isn't done so it can't come from there*

*Me: There's no way that'll be done in time to fund anything*

*Ms Simpkin: Right. Cos I was just about to ask if that is what it was for.*

*Me: You could just write back and say Amanda Ghost is aware of AACTAs*

*Ms Simpkin: Ok will do.*

*Me: But soo weird Amanda was dissing Charlotte majorly when we met in person saying how shit she is and can't act!!!*

*Ms Simpkin: Weird that we don't know about it. Presume Stevie might be going as well. (shrug emoji)*

*Me: Yeah I think Stevie is promised that trip too (shrug emoji)*

*Ms Simpkin: We are both saying weird at the same time.*

*Ms Simpkin: Cos it is*

*Me: So weird"*

187. I inferred from this that Ms Ghost had funded Ms MacInnes' trip to New York as it was not paid for out of the production budget. I found the idea of her travelling there very weird and unnecessary.

188. The "AACTAs gig" referred to in the messages above is a reference to the performances I arranged for Ms MacInnes and Ms Abbott to give at the Australian Academy of Cinema and Television Arts Awards night held on 10 February 2024. I hosted the awards and arranged for Ms MacInnes and Ms Abbott to perform a song from The Deb during the televised event. This was an amazing opportunity for Ms MacInnes and Ms Abbott and a good marketing opportunity for the film. They were both very grateful and thanked me for setting it up for them. Consistently with the strong working relationship I had with Ms MacInnes during production of the film, Ms MacInnes spent that evening hanging out with me and Ramona. We all had a great time dancing and posing for photos together. I introduced Ms MacInnes and Ms Abbott to Cate Blanchett, Margot Robbie, director Ron Howard and others.

189. I did not feel there were any issues between Ms MacInnes and I at this time. We participated in funny social media videos and posed for photos together. She mentioned at the AACTA awards that the next day she was being flown by Ms Ghost to stay with her. That night of the AACTA awards was the last time I saw Ms MacInnes.

[REDACTED]

[REDACTED]

[REDACTED]

191. In April 2024, two months after Ms MacInnes moved overseas [REDACTED] Ms MacInnes was cast as Daisy in the stage production of Gatsby which was based in Boston, Massachusetts. I knew that the Gatsby production Ms MacInnes was cast in was produced by Ms Ghost because she had told me about it during the time we had worked together on The Deb. Ms Ghost had also mentioned that several high profile Tony and Oscar nominees had auditioned for the lead role of Daisy and were being considered for the role by the creative team. I do not recall precisely when she told me this, but when she did she also said Gatsby, like all of her business ventures, would be financed by Sir Blavatnik. Sir Blavatnik was mentioned in later press materials. Ms Ghost had told me Sir Blavatnik had invested around US\$25 million in the production. It is rare for a relatively unknown and untested person to be cast in the lead role in such an expensive production. I found out about Ms MacInnes being cast in Gatsby from Ms Simpkin, who emailed me about it on 11 April 2024. As a result of this, it was difficult to arrange a time to conduct ADR sessions with Ms MacInnes. While I expected Ms MacInnes was very busy with rehearsals and preparations for Gatsby, I did not understand why it was so difficult to arrange a one-hour ADR session with her. I was also disappointed when Ms MacInnes knew that the film needed a picture of her in a bikini for the opening joke of the film and then refused for months to give permission to the film to use a photo of her she had posted to her Instagram already. I felt like Ms MacInnes was not properly prioritising finishing her work with me on The Deb. We eventually arranged for an ADR session to be held on 30 May 2024. Ms MacInnes would attend a studio in Boston, while I would join via Zoom from my home in Los Angeles and other members of the crew would join from Sydney. Because of the time difference, the ADR session started at 6am in Los Angeles / 9am in Boston / 11pm in Sydney. It was difficult to find a time that worked for everybody across three time zones.

192. On 30 May 2024, I logged onto Zoom at 6am and was joined by the Sydney-based members of the crew, who had logged on at 11pm. Ms MacInnes was about an hour late to the ADR session. After approximately 30 minutes of waiting, we were told by one of the sound engineers who was in Boston that Ms MacInnes was on her way and would be accompanied by Mr Cameron. The sound engineer also told me that Ms MacInnes had made an odd request that “no cameras be turned on inside the studio”. I had never heard of this before. I have been involved in hundreds of remote ADR sessions over my career and at every one of them the camera(s) inside the studio are always on so that everyone can see as well as hear what is going on. I was also shocked to learn that Mr Cameron would be attending with Ms MacInnes. I found this very odd. When Ms MacInnes arrived she did

what was required and we got the recordings that we needed, but I felt like her refusal to the allow any cameras to be turned on impeded my ability to do my job as director.

193. After the session I was worried about Ms MacInnes. I exchanged the following text messages with Ms Simpkin:

*“Me: ADR gossip: Charlotte was 55 mins late to ADR*

*Me: And Gregor accompanied her and asked for Charlotte’s camera to be turned off! So we couldn’t see her face*

*Ms Simpkin: Oh Rebel! Wtf.*

*Ms Simpkin: So rude to be so late. That would have been midnight here. And very early for you. How disrespectful*

*Me: Greer – it was really weird”.*

194. That day, I emailed Ms Keightley to check that Ms MacInnes was OK. I asked Ms Keightley:

*“Is everything ok with Charlotte? She was 55 mins late to the ADR session today and then at the 30 minute mark we got a weird request through from the Boston studio saying she had asked for NO CAMERAS to be on in the studio. This is something I’ve never heard an actor say for an ADR session?”*

A copy of this email is exhibited to this affidavit and contained at pages 143 to 149 of bundle exhibit RW-1.

195. Then, on 1 June 2024, I sent another email about Ms MacInnes’ ADR session to Mr Cohen. Amongst other things, I said to Mr Cohen:

*“In the meantime I’d like to express my concern and bring it to your attention – it was a very odd situation, witnessed also by Jane Moran and Liam Egan. It felt like Gregor Cameron was controlling the actress’.”*

A copy of this email chain is exhibited to this affidavit and contained at pages 150 to 152 of bundle exhibit RW-1.

196. Mr Cohen and I exchanged further emails about this but ultimately the issues I had with the ADR session were never addressed or resolved.

**TIFF**

197. I delivered a final cut of the film in June 2024 and also around this time I made a submission for it to premiere at the Toronto International Film Festival (**TIFF**).
198. TIFF is one of the biggest and most prestigious film festivals in the world. It is one of the five biggest film festivals in the world, alongside those held in Cannes, Venice, Berlin and the Sundance Film Festival. I was in a film called 'JoJo Rabbit' that premiered at TIFF and went on to be nominated for multiple Oscars. Often the top films premiering at Toronto are nominated for Golden Globes and Oscars. In my experience TIFF is an amazing place to launch a film.
199. Between January 2024 and April 2024, I spoke with Mr Cohen regularly about the sale and distribution of the film. We both wanted (and I still want) to make sure the film is a success. On a number of occasions, I told Mr Cohen that, in my view, the best premiere and sales strategy for the sale and distribution of the film was for it to premiere at a major international film festival, such as Cannes or Toronto.
200. As time went by, I told Mr Cohen that the film was unlikely to be ready to premiere in Cannes, but could premiere at TIFF in September 2024. He said that he agreed this was what should happen. On 24 April 2024, Ms Simpkin and I exchanged messages about how we should focus on TIFF. We agreed that this was the best strategy.
201. In May 2024, Ms Simpkin and I submitted the film for consideration by TIFF. I paid for the submission.
202. On 22 June 2024, I arranged for Cameron Bailey, CEO of TIFF, to view the film as I had been told by Deborah McIntosh from the film's sales agent, William Morris Endeavour (**WME**), that The Deb was "in the mix" for a prestigious slot at TIFF. On 23 June 2024, Mr Karjalainen supplied Mr Bailey with a link to watch the film so he could consider whether to award The Deb an important slot at TIFF. A copy of the email chain is exhibited to this affidavit and contained at pages 153 to 155 of bundle exhibit RW-1.
203. On 28 June 2024, Mr Bailey offered the film a position to be the closing night film at TIFF. This would include a gala red carpet premiere, reserved for only about 12 films in the whole festival where thousands of audience members would attend. I was told this by Ms McIntosh in a telephone call with Mr Cohen. I was elated when I found this out. This was one of the most amazing pieces of news I have ever received. I felt like it was the ultimate compliment for someone like Mr Bailey, who runs such an important festival, to want the movie that I had spent the last five years of my life working on. I told Ms McIntosh and Mr Cohen that I was thrilled about this and was so excited for the film to premiere at TIFF. Ms

McIntosh asked Mr Cohen about TIFF's offer. Instead of accepting it on the spot like I expected him to, he said "wait, wait wait, we might not approve this." Mr Cohen said he would need to obtain instructions from AI Film. I was shocked by this. For months, Mr Cohen and I had discussed how TIFF was the perfect place for The Deb to premiere. And now, having been offered such an amazing opportunity, Mr Cohen did not accept the offer on the spot. I found this very strange, deflating and concerning.

204. On 1 July 2023, I wrote to Mr Bailey and said "After conversations today with all investors and their counsel, we are all good to formally accept the closing night slot for TIFF for THE DEB. Going to be amazing! Please let me know when you think you might be announcing it, so I can also release it on my social media." I sent this email as a result of discussions I had with Mr Cohen and others in which I understood them to have finally signed off on it. A copy of this email, and Mr Bailey's reply, is exhibited to this affidavit and contained at page 156 of bundle exhibit RW-1.

205. On 2 July 2023, I received an email from Ms McIntosh which contradicted what I had said to Mr Bailey the day before. Ms McIntosh's email said that she had spoken to Mr Cohen and that "Access", being Sir Blavatnik's group of companies which include AI Film, "has not agreed to have the film play in Toronto". I was shocked and distressed by this. I did not understand how, after having spoken to Mr Cohen the day before and having been left with the understanding that AI Film consented to the film premiering at TIFF, that he would then withhold consent and jeopardise the film's position at TIFF. A copy of Ms McIntosh's email is exhibited to this affidavit and contained at page 157 of bundle exhibit RW-1.

206. On 3 July 2024, I received an email from Mr Cohen confirming that AI Film withheld its permission for the film to premiere at TIFF because of what it described as "so many outstanding issues, now including the AWG's warning on the withdrawal of the Australian tax credits". This email was in response to a question I had asked during the course of confidential settlement discussions. I was appalled by this decision by AI Film and found their reasons for non-acceptance of the TIFF offer non-sensical. I have never heard of the AWG (Australian Writer's Guild) stopping tax credits that were accurately applied for. All tax credits for the film were never in jeopardy and were all on track to be received. Aside from being completely at odds with everything Mr Cohen and I had spoken about in the six-or-so months prior to TIFF, I considered that non-acceptance of the TIFF offer was plainly a decision that was not in the best interests of the film. All the biggest movie stars in the world had films premiering at TIFF that year. I found it outrageous and spiteful that they refused to accept the TIFF offer. A copy of this email is exhibited to this affidavit and contained at pages 158 to 159 of bundle exhibit RW-1.

207. Between 3 and 10 July 2024, I was desperate to get AI Film's consent to let the film premiere at TIFF. I remained of the view that premiering the film at TIFF was the best way to ensure it was a commercial success. I felt like AI Film were unreasonably withholding the film from premiering at TIFF and in doing so were jeopardising the hard work of everyone who worked on The Deb. I spoke to a large number of people to try and organise a way through but I felt like I was not making any headway as I did not understand why AI Film would take this position. On 7 July 2024, I contacted the head of my then agency WME, Ari Emmanuel, to try and get him to convince Sir Blavatnik to step in and break the deadlock between me and AI Film. I knew Mr Emmanuel had previously spoken to Sir Blavatnik about the issues I was having with Ms Ghost, Mr Cameron and Mr Holden in relation to the film. I also knew that Mr Emmanuel had had to speak with Sir Blavatnik about issues that director Baz Luhrmann had had with Ms Ghost. A copy of my email is exhibited to this affidavit and contained at pages 160 to 161 of bundle exhibit RW-1.

208. On 10 July 2024, Ms McIntosh told me that TIFF would move on from its offer to have The Deb close out TIFF. I was extremely upset about this. I could not understand why AI Film would want to block the premiere at TIFF. It made no sense to me. I assumed they were just doing it because I had spoken out about the issues I had had with Ms Ghost, Mr Cameron and Mr Holden. I felt like their blocking of the film was in retaliation against me for this. Aside from the damage that I thought the saga with TIFF was causing to me and my reputation, I felt the delay and uncertainty was causing severe damage to the film. I felt like all of my hard work, and all of the hard work of everyone involved in the film, was being jeopardised by AI Film withholding its consent in relation to TIFF. In a moment of utter despair, and in response to these events, later that day, believing that that afternoon another film was being given the slot originally awarded to The Deb, I posted a video of myself to Instagram in which I said:

*"Hey, everyone. Okay so, you know sometimes in life where you try so hard and you just don't know what to do? This is that situation. Um, okay, let me – let me try to explain as best I can.*

*Um, so you might have noticed that I did a post a couple – you know, like a week ago, about the – my film, the first film that I've directed that I'm so proud of, The Deb, which is a little Australian original musical that is so cute and it's – it's awesome um, that it got selected for closing night of the Toronto Film Festival which is like – the hugest – you know, best platform, and to be a first-time female director it's just like – I mean, it's huge. It's massive.*

*Um, so to have the joy of the movie being selected is one thing, but then to have the business partners that are involved in that movie turn around and say that no, the movie can't premiere um, is just beyond devastating.*

*Um, why are they saying this? Why are they stopping it from premiering at Toronto? Well, this dates back to October of last year, where I discovered bad behaviour by these business partners. And let me just, you know, I – I just tell it how it is, so I'm just going to tell you who they are. They are so called producers of the film; I use that phrase very lightly. Their names are Amanda Ghost and Gregor Cameron and an executive producer who works with them called Vince Holden. So, these are the people involved.*

*Um, and – so I said – reported, I guess you would say, their bad behaviour when I found out. Um, not minor things, big things, you know, inappropriate uh behaviour towards the lead actress of the film, um embezzling funds from the film's budget, which we really needed because we're a small movie uh you know – so kind of really important things.*

*Uh, since I reported that behaviour, I have been met with absolute viciousness and retaliatory behaviour. So, I'm – I'm there on set, I'm trying to film my movie with my gorgeous Australian cast and crew who are so amazing, shout out to all of you guys, uh and yet every step of the way these people, who I complained about, then tried to make my life hell. In the meantime though, I still finished the movie, I made this great movie, *The Deb*. And then – now, you know, almost at the finish line, they're saying, you know, it can't come out. They might not release it. They might bury it. This is work of hundreds of people who have put their heart and soul into this. And this behaviour is absolutely vile and disgusting. Now, these people, you know, Amanda Ghost in particular, has – has a history of doing this kind of thing, mainly to music artists but also to people in the film business. So, the thing is, these people are forced to sign NDAs or, you know, otherwise threatened or bullied to not speak out.*

*As you guys know, I'm not like that. I won't be threatened uh I will speak the truth, and, um you know, warn people about these people in the industry. Who are just not behaving ethically. Uh, yeah, so that's my dilemma. If the movie doesn't play at Toronto, it's because of these absolute fuckwits."*

209. This video was me speaking from my heart, trying to get the film to premiere at TIFF.

210. On 12 July 2024, Ms Ghost, Mr Cameron and Mr Holden commenced defamation proceedings against me in the Superior Court of California over this publication (**US Proceedings**). I am defending that litigation and know that I was only speaking the truth in that video.

211. Because of the video, TIFF CEO Cameron Bailey gave me an additional 48 hours to see whether an agreement could be reached with AI Film. About 30 minutes before this new deadline was up, I was informed by Mr Emmanuel that AI Film relented and agreed for the film to premiere at TIFF. I do not know why this happened but Mr Emmanuel indicated that he spoke again with Sir Blavatnik. While I was thrilled about this, I was devastated at what it took to simply get AI Film to accept what I regarded as such an amazing honour to close out TIFF. About ten minutes later, I found out in the press that Ms Ghost, Mr Cameron and Mr Holden were suing me for defamation. I do not believe this was a coincidence.

212. On 13 July 2024, I emailed Mr Emmanuel about the TIFF acceptance thanking him for his help. I believe it was Mr Emmanuel who persuaded AI Film to let The Deb premiere at TIFF. When I spoke again to Mr Emmanuel, he referred to Mr Cohen as being “milk toast” which was a phrase I wasn’t familiar with and had to look it up. Mr Emmanuel told me that Mr Cohen was doing whatever Ms Ghost wanted and that’s why the TIFF offer had been rejected and that only Sir Blavatnik could overrule Ms Ghost. I believed he knew this information because of the dispute between Mr Luhrmann and Ms Ghost. He also told me that Sir Blavatnik had funded a number of unethical people who he named.

[REDACTED]

214. I attended sales screenings of the movie, introduced all screenings and did two Q&A’s with the audiences at TIFF.

215. Unfortunately, Ms MacInnes did not attend TIFF. I was very upset and disappointed about this.

216. The Deb ultimately premiered at TIFF on closing night, 14 September 2024. It was one of the best nights of my life. I felt such a massive sense of achievement at having directed my first feature film. The audience applauded after several songs in the film and gave the film a standing ovation. I am so proud of all of the cast and crew who helped turn The Deb

[REDACTED]

[REDACTED]

into the great film that it is. The film received very positive reviews and press and multiple offers for distribution and release.

**AI Film fail to sell the film**

217. I have been cut out of any negotiations or discussions about the sale and distribution of the movie. I understand they have been exclusively conducted by AI Film and its representatives. I was aware from Deborah McIntosh of the offers received after TIFF, including a \$1 million offer from Sony for the Australian territory alone. Most offers were dependent though on the litigation started by AI Film being dropped. AI Film to my knowledge never considered dropping their litigation in order to take a distribution deal. I screened the movie for top movie studios post-TIFF such as Disney and Universal and Apple acquirers was told that if the lawsuits were dropped, they would be interested in making worldwide offers for the film. Of the at least 8 offers made in writing regarding the distribution of The Deb, I do not know what happened to these as I was cut out of all conversations. All I know is that they were obviously not accepted by AI Film.

[REDACTED]

220. After the US Proceedings were initiated, I felt they were going to hinder the sale and distribution of the film. I felt like the allegations in the US Proceedings risked swamping all of the goodwill and positivity that should have surrounded the film's premiere at TIFF. While I held this opinion myself, I was told by a number of others, including Ms McIntosh and other sales agents at WME, that the US Proceedings would make selling and distributing the film difficult. On 13 July 2024 I sent Ms Simpkin a text message asking her for a statement in support of my defence to the US Proceedings. In that message I said:

[REDACTED]

[REDACTED]

“Hi Greer, you’ll see I just put you and David on a group email with some other key people working on the film. My lawyers asked if I could do it as I have to respond to the defamation suit asap and hopefully get it knocked out. WME Sales said it is not great to have a litigation on the film because buyers might therefore not be interested. So I am just trying to see what I can do to resolve. I know you are in a tricky spot being in the middle of things and still having contact with the UK folks but I didn’t not want to put you on the email. So no pressure either way, just wanted you to know what was happening. A number of people from cast & crew were emailing asking to help which has been lovely x speak soon x”

221. I was also told this by Greg Foster, a very senior and respected person in the film industry. I have a very good working relationship with Mr Foster and respect him immensely. Mr Foster is an independent consultant who consults for major movie studios and streaming services including Apple. Mr Foster and I spoke about the Film on a monthly basis following its premiere at TIFF. During one of these conversations, Mr Foster said to me that the US Proceedings are preventing Apple from making a worldwide, streaming offer for the Film and that if the US Proceedings settle, Apple will make an offer for the Film.

222. I was also told the US Proceedings were inhibiting the sale and distribution of the film by Troy Lum, the founder of independent Australian entertainment company Kismet Movie. Mr Lum told me this in or around December 2024 and June 2025 when I spoke to him about Kismet possibly being appointed as the distributor for the film. Mr Lum also told me that the negative publicity, which I understand to have been released by AI Film and Unigram, was problematic.

223. Ms McIntosh and Katie Irwin from WME Sales also told me that the negative press put out by Ms Ghost, where Ms MacInnes was quoted, was also a key reason in why the film wasn’t getting a worldwide sale. They said they told Mr Holden this.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

227. Apart from what AI Film have alleged in court filings against me and Camp Sugar, I do not know what steps were taken to try to sell and distribute the film. I just know they didn't accept multiple offers.

[REDACTED]

229. Around this time two negative articles appeared in the media.

230. On 24 September 2024 an article titled "Actress at center of defamation suit against Rebel Wilson is REVEALED as drama from Australian star's new film 'The Deb' escalates" was published on the Daily Mail website at the following URL: <https://www.dailymail.co.uk/tvshowbiz/article-13881833/rebel-wilson-defamation-lawsuit-actress-revealed-deb-Charlotte-MacInnes.html>. A copy of this article is exhibited to this affidavit and contained at pages 167 to 175 of bundle exhibit RW-1.

231. In this article, Ms MacInnes identified herself as the actress the subject of the inappropriate conduct allegation that I made in my 10 July 2024 Instagram post. I had been careful not to name Ms MacInnes in anything I had publicly said previously. In my 10 July 2024 Instagram post I referred to "inappropriate uh behaviour towards the lead actress of the film". Ms MacInnes was one of five lead actresses in the film. While Maeve is a central character in the film, so are Taylah, Annabelle, Shell and Janette who are played by Ms Abbott, Ms Jean, Tara Morice and me. As someone who has experienced inappropriate sexual conduct on set, I would not publicly name someone in such circumstances.

[REDACTED]

[REDACTED]

232. Through a notice to produce that my solicitors issued on my behalf I learned that Ms MacInnes' "statement" quoted in the Daily Mail article was actually provided by Shoshanna Stone of Edge Publicity. A copy of that email is exhibited to this affidavit and contained at page 176 of bundle exhibit RW-1.

233. I understand Ms Stone is a very close friend of Ms Ghost. I know this because in the time I spent with Ms Ghost she regularly spoke to me about Ms Stone and how close the two of them were. On a number of occasions, I recall her describing her as her "best friend". Ms Stone was also the person who barred MacInnes' 'Siren Song' from appearing in my film 'Bride Hard'. To my knowledge that song has not been released.

234. I found Ms MacInnes' statement to the Daily Mail to be very upsetting and offensive. I am particularly upset by the idea that I created a false accusation which has undermined real victims of inappropriate sexual conduct or harassment. I regard myself as a champion of women and believe that my commitment to The Deb is an illustration of this. As a first time female director, my vision was to create an uplifting musical comedy which champions and showcases the talent of amazing young women. I believe The Deb achieves this.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

236. At the time of publishing the 23 September 2024 Post, I understood that Ms MacInnes had received a record deal from Warner Music in addition to being cast as Daisy in Gatsby. I also knew that prior to The Deb she was relatively unknown and understood she did not have the means to travel around the world in luxury. This surprised me as while I know Ms MacInnes to be talented, I knew her to be someone who did not have the means to do this. For example, on the first trip to Cannes in 2023, I remember that she needed per diems in order to afford meals whilst on the trip. I have since seen numerous images of Ms MacInnes on international trips, in expensive hotels and recording music in various parts of the world.

237. Following the Daily Mail article in September 2024, a further article was published online by The Guardian on 11 November 2024 reporting on the US Proceedings and recent steps in that case. This article reports on the contents of a declaration Ms MacInnes' filed in the US Proceedings in response to the Anti-SLAPP motion filed by my attorneys on 21 October 2024. I do not recall being approached for comment by anyone at The Guardian before this article was published. A copy of this article is exhibited to this affidavit and contained at pages 177 to 179 of bundle exhibit RW-1.

238. The article published by The Guardian reports on the contents of a declaration Ms MacInnes provided on behalf of Ms Ghost, Mr Cameron and Mr Holden in the US Proceedings. On account of the matters detailed in this affidavit, I believe Ms MacInnes' declaration to be false.

239. On 20 November 2024, I received an email from Katie Irwin, a sales agent employed by WME, summarising what was happening in relation to the sale and distribution of the film. A copy of this email is exhibited to this affidavit and contained at page 180 of bundle exhibit RW-1.

240. This email from Ms Irwin is the last substantive communication I received from WME in relation to the sale of the film. I have not had any substantive discussions with AI Film about the sale of the film since I received this email. As far as I know, none of the offers referred to in Ms Irwin's email were accepted by AI Film. I do not know why they were not accepted. No directors meeting of DDCC was ever called by my co-directors to discuss the sale and distribution of the film. Myself and my mother recently called a Director's Meeting to obtain information and were not given information requested by Mr Holden or Mr Cameron. We were also told that no soundtrack agreement had been made for the film in circumstances where I understand that Mr Cameron's company Unigram received GBP£250,000 pounds from Warner Music UK as a soundtrack advance.

**Commencement of proceedings against me in Australia**

241. On 24 July 2025, AI Film, DDCC and its wholly owned subsidiary, Dunburn Debutantes Pty Ltd commenced proceedings against me in the New South Wales Supreme Court. Myself and my mother, company directors of DDCC never agreed to commence those proceedings.

242. I found out that I had been sued not by being served with plaintiffs' Summons and Commercial List Statement, but by reading about it in the media. The first plaintiff in that proceeding, AI Film, has admitted that it provided its Commercial List Statement to media outlets before I was served with the document.

243. I published the 25 July 2025 Post (as defined in paragraph 13 of Ms MacInnes' Statement of Claim) in response to these articles. I do not recall being approached for comment about any articles telling me that I was being sued in Australia, or if I was, I don't recall providing any comment. It was very distressing for me to learn that I was being sued in Australia through the media. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

244. Similarly, I was sent a copy of Ms MacInnes' concerns notice on 7 August 2025.

Before I had opened my emails to read the concerns notice for myself, I knew that it had been sent because I had already read about it in the media. Ms MacInnes has admitted that she published her concerns notice to journalists at *The Australian*, News Corporation and the *Sydney Morning Herald*.

Affirmed by the deponent  
In London, United  
Kingdom  
on 24 December 2025  
Before me:

)  
)  
)  
)  
)



Signature of deponent



Signature of witness

Georgina Kate Austin  
Level 30, 500 Bourke Street, Melbourne Victoria 3000  
Solicitor

**This document was signed and witnessed in accordance with section 14G of the  
*Electronic Transactions Act 2000***

