

NOTICE OF FILING

Details of Filing

Document Lodged: Defence - Form 33 - Rule 16.32
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File Number: NSD507/2026
File Title: JACQUELINE ELLEN HENDERSON & ANOR v COMMONWEALTH
BROADCASTING CORPORATION PTY LTD (ACN 000 019 796) & ANOR
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.



Defence to the Cross-Claim

No. NSD507 of 2026

Federal Court of Australia
District Registry: New South Wales
Division: Fair Work

Jacqueline Ellen Henderson and another

Applicants

Commonwealth Broadcasting Corporation Pty Ltd (ACN 000 019 796) and another

Respondents

Commonwealth Broadcasting Corporation Pty Ltd (ACN 000 019 796) and another

Cross-claimants

Jacqueline Ellen Henderson and another

Cross-respondents

In response to the Statement of Cross-claim filed on 22 April 2026 (**Cross-Claim**), the Cross-respondents (the **Henderson Parties**) respond as follows.

1. The Henderson Parties deny paragraph 1 of the Cross-Claim, and:
 - a. say that ARN is not an officer of CBC; and
 - b. rely on clause 32 of the Henderson BSA for its full force, meaning and effect.
2. The Henderson Parties deny paragraph 2 of the Cross-Claim.
3. The Henderson Parties deny paragraph 3 of the Cross-Claim and say that any loss and damage suffered by CBC (which is not admitted) did not directly arise out of any action of the Henderson Parties.

Filed on behalf of (name & role of party)	Jacqueline Ellen Henderson and Henderson Media Pty Ltd, the Cross-respondents
Prepared by (name of person/lawyer)	Peta Cherie Tumpey
Law firm (if applicable)	HWLE Lawyers
Tel	+61 2 9334 8894
Fax	
Email	ptumpey@hwle.com.au slambros@hwle.com.au rlduffy@hwle.com.au
Address for service (include state and postcode)	Level 9, 5 Martin Place, Sydney NSW 2000

4. The Henderson Parties deny paragraph 4 of the Cross-Claim.
5. In response to paragraph 5 of the Cross-Claim, the Henderson Parties:
 - a. say that the paragraph is vague, embarrassing and liable to be struck out as it fails to plead the material facts which are said to amount to the “*uncured breach of the Henderson BSA*”;
 - b. under the cover of that objection, deny the paragraph; and
 - c. repeat and rely on the matters pleaded above at paragraphs 1 and 3.
6. The Henderson Parties deny paragraph 6 of the Cross-Claim.
7. The Henderson Parties deny paragraph 7 of the Cross-Claim.

Date: 4 May 2026

A handwritten signature in black ink, appearing to be 'Peta Cherie Tumpey', written in a cursive style.

Signed by Peta Cherie Tumpey
Lawyer for the Cross-respondents

This pleading was prepared by Vanja Bulut of counsel and Peta Cherie Tumpey, lawyer for the Cross-respondents.

Certificate of lawyer

I, Peta Cherie Tumpey certify to the Court that, in relation to the defence filed on behalf of the Cross-respondents, the factual and legal material available to me at present provides a proper basis for:

- (a) each allegation in the pleading; and
- (b) each denial in the pleading; and
- (c) each non admission in the pleading.

Date: 4 May 2026

A handwritten signature in black ink, appearing to be 'PCT', written in a cursive style.

Signed by Peta Cherie Tumpey
Lawyer for the Cross-respondents