

Form 59  
Rule 29.02(1)

## Affidavit

No. NSD372 of 2023

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

### MEHREEN FARUQI

Applicant

### PAULINE HANSON

Respondent

Affidavit of: **Andrea-Marie Farrugia**  
Address: Level 4, 343 George Street, Sydney, NSW 2000  
Occupation: Solicitor  
Date: 25 April 2024

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Document number	Details	Paragraph	Page
1	Affidavit of Andrea-Marie Farrugia in relation to Second notice of intention to adduce tendency evidence, dated 25 April 2024.	[1] - [6]	1 – 3
2	Annexure "AF-5", being a copy of my email sent to the solicitors for the Respondent on 25 April 2024 serving the Second Notice.	[3]	4 – 5

I, Andrea-Marie Farrugia, solicitor, of Level 4, 343 George St, Sydney NSW 2000 affirm:

- I am a solicitor of the firm Marque Lawyers, the solicitors for the Applicant.
- On 25 April 2024, Marque Lawyers filed a Second notice of intention to adduce tendency evidence for filing with the Federal Court Registry (**Second Notice**) on behalf of the Applicant. As explained at paragraphs 3 and 4 of my earlier affidavit in these proceedings affirmed on 20 February 2024, the Applicant has previously filed a Notice of intention to adduce tendency evidence (**Original Notice**). The Second Notice supplements the Original Notice.

Filed on behalf of (name & role of party) Mehreen Faruqi, Applicant  
Prepared by (name of person/lawyer) Andrea-Marie Farrugia  
Law firm (if applicable) Marque Lawyers  
Tel (02) 8216 3000 Fax (02) 8216 3001  
Email [michaelb@marquelawyers.com.au](mailto:michaelb@marquelawyers.com.au); [laureng@marquelawyers.com.au](mailto:laureng@marquelawyers.com.au);  
[andreaaf@marquelawyers.com.au](mailto:andreaaf@marquelawyers.com.au)  
**Address for service** Level 4, 343 George Street  
(include state and postcode) Sydney NSW 200

*A Farrugia*

*L*

3. At 11:05am on 25 April 2024, I sent an email to the solicitors acting for the Respondent serving a sealed copy of the Second Notice. Annexed at **pages 4 – 5** of this affidavit and marked **Annexure AF-5** is a screenshot of my email.
4. During the period 16 April 2024 to 24 April 2024, I sourced material to be included in the Second Notice.
5. In relation to line item 1 of the Second Notice:
  - (a) On 16 April 2024, I became aware that the Respondent had uploaded a media release to her Twitter account “@PaulineHansonOz” (**Twitter Account**) titled, “Islamist terror imports must stop” (**Media Release**). I saw the Respondent’s post and media release on my personal Twitter feed on 16 April 2024.
  - (b) On 24 April 2024, I caused Ms Sophie Puterflam, a paralegal at Marque Lawyers to undertake searches of the Respondent’s Twitter Account and Facebook account (Pauline Hanson’s Please Explain) (**Facebook Account**) on and from 16 April 2024.
  - (c) On 24 April 2024, Ms Sophie Puterflam sent me a link to the Respondent’s post on her Facebook Account uploaded on 16 April 2024 in relation to the Media Release.
6. In relation to line item 2 of the Second Notice:
  - (a) On 24 April 2024, Ms Puterflam sent me links to the Respondent’s posts on her Twitter Account and Facebook Account uploaded on 18 April 2024 which included footage of the Respondent’s television interview with Danica De Giorgio on the television program, “The Kenny Report”.
  - (b) On 24 April 2024, at my request, Ms Puterflam sent me a transcription of the Respondent’s interview with Ms De Giorgio which she created. I reviewed Ms Puterflam’s transcription, verified its accuracy against the video footage of the Respondent’s interview and subsequently included that material on page 3 of the Second Notice (see line item 2, column 3 (“Conduct”)).
  - (c) In drafting this affidavit, I identified the following typographical errors in the transcription of the Respondent’s statements to Ms De Giorgio:
    - (i) “breading” should be “breeding”; and
    - (ii) “shariah” should be “sharia”.

Affirmed by the deponent  
at Sydney  
in New South Wales  
on 25 April 2024  
Before me:



Signature of witness  
Lauren Gasparini  
Solicitor  
Marque Lawyers  
Level 4, 343 George Street  
Sydney NSW 2000

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*A Farrugia*  
Signature of deponent

***This affidavit was affirmed and witnessed via audio visual link in accordance with Part 2B of the Electronic Transactions Act 2000 (NSW).***

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**MEHREEN FARUQI**

Applicant

**PAULINE HANSON**

Respondent

**ANNEXURE AF-5**

This is the annexure marked "**AF-5**" referred to in the affidavit of Andrea-Marie Farrugia affirmed 25 April 2024 before me:



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Lauren Gasparini  
Solicitor

## NSD372/2023 Mehreen Faruqi v Pauline Hanson -Second tendency notice [Marque-DOCUMENTS.FID103782]



Andrea Farrugia

To: [Nicola Sanchez](#); [Fisher, Asaf](#)Cc: [Lauren Gasparini](#); [Michael Bradley](#); [Anthony Jefferies](#); [David Collinge](#); [Megan Winfield](#); [Thornton, Simon](#); [Crain, Aurora](#); [Chenoweth, Jack](#); +1 otherBcc: [AHRC complaint\\_Hanson\\_14217\\_File](#)

Reply



Reply All



Forward



Thu 25/04/2024 11:05 AM

(Filed) Second Notice of intention to adduce tendency evidence(4323380.1)(4323385.1).pdf  
2 MB

Dear all

Further to my email below and in accordance with the notice requirements under section 97 of the Evidence Act 1995 (Cth), please see attached by way of service the Applicant's Second Notice of intention to adduce tendency evidence, filed today.

Kind regards  
Andrea

Andrea Farrugia  
Lawyer

MARQUE Lawyers Pty Ltd

Certified



Corporation

P: +61 2 8216 3323

Galgal Country | Level 4, 343 George Street, Sydney NSW 2000

[marquelawyers.com.au](http://marquelawyers.com.au) / [LinkedIn](#) / [Twitter](#) / [Instagram](#)Official lawyers for [TCDxSydney](#)

We do not disclaim anything about this email. We're quite proud of it, really.