

NOTICE OF FILING

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File Title: BCI MEDIA GROUP PTY LTD ACN 098 928 959 v CORELOGIC
AUSTRALIA PTY LTD ACN 149 251 267 & ORS
Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA

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.

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Form 59
Rule 29.02(1)

Affidavit

No. NSD 285 of 2021

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

BCI MEDIA GROUP PTY LTD (ACN 098 928 959)

Applicant

CORELOGIC AUSTRALIA PTY LTD (ACN 149 251 267) and others

Respondents

Affidavit of: **Anthony Murton**
Address: 23 Culburra Avenue, Frankston Victoria 3199
Occupation: Business Development Manager
Date: **24** November 2025

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4	Exhibit AM-3, being a bundle of the Post-Meeting Emails	[21]	175-224



Deponent



Solicitor

Filed on behalf of (name & role of party) The First to Fourth Respondents
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[Version 3 form approved 02/05/2019]

Document number	Details	Paragraph	Page
5	Exhibit AM-4, being a copy of an email from Anthony Murton to Peter Worcester from McConnell Dowell dated 14 June 2016 at 11:38am	[26]	225-228


I, Anthony Murton, of 23 Culburra Avenue, Frankston, in the state of Victoria say on oath:

Background

1. I am currently a Business Development Manager for Peninsula. Prior to this, I was employed by RP Data Pty Ltd as a Senior Business Consultant from October 2015 to January 2022. Before that, I worked at Cordell Connect from September 2003 to October 2015 in the roles of Victoria Senior Business Consultant and Victoria Sales Manager.
2. During my employment with RP Data, my sales process involved:
 - (a) initial contact with prospective customers and scheduling of meetings.
 - (b) meeting with a prospective customer involving the conduct of live comparisons between Cordell Connect and LeadManager where the meeting was with an existing customer of the applicant.
 - (c) meeting with prospective customers who were not customers of the applicant and demonstrating the functionality and use of Cordell Connect.
3. The presentations to existing customers of the applicant involved the customer using their LeadManager login alongside my Cordell Connect login to run live comparisons and demonstrate real-time differences in data coverage and functionality between Cordell Connect and LeadManager.
4. I do not recall:
 - (a) using any comparative documents in any of my presentations to prospective customers; or
 - (b) sending any comparative documents to prospective customers.
5. The live comparisons were a very effective method of explaining the differences in both functionality and content.
6. In preparing this affidavit, I have been provided with a bundle of emails I sent to customers during my employment with RP Data.



 Deponent



 Solicitor

7. Upon reviewing the approximate 72 emails, I have categorised them into three distinct types:
- (a) 40 as **Pre-Meeting Emails**: These emails contain comparative details between Cordell Connect and LeadManager.
 - (b) 16 as **Meeting Invitations**: These emails do not contain any comparative details.
 - (c) 16 as **Post-Meeting Emails**: These emails include data tables or summaries based on the data sourced from live comparisons.

Pre-Meeting Emails

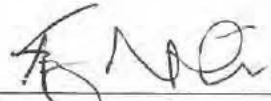
8. Exhibit **AM-1** are the emails I refer to as Pre-Meeting Emails.
9. I cannot recall the source of data for each email.
10. My recollection is that none of the Pre-Meeting Emails lead to a sale.
11. My experience was that customers were not persuaded by generalised comparisons.
12. I had success with the live comparisons conducted during meetings. These real-time demonstrations allowed customers to see firsthand how the platforms compared in relation to their data requirements.

Meeting Invitations


13. Exhibit **AM-2** are the emails I refer to as the Meeting Invitations.
14. The purpose of the Meeting Invitations, as shown in Annexure AM-2, was to arrange appointments with prospective customers and outline the format of the meeting. These emails [REDACTED] but served to inform customers that, if they had their BCI login credentials available, I could conduct a live comparison during the meeting.
15. Any comparisons conducted during meetings were live demonstrations using the customer's BCI login and my Cordell Connect login, as described in paragraph 7(c) of this affidavit and in further detail below.
16. I do not recall taking any comparative reports to meetings.

Live Comparisons

17. To demonstrate the benefit of Cordell Connect in comparison to LeadManager, it was my usual practice to sit down with the customer at their office, open Cordell Connect using my log in and ask the customer to open LeadManager with their login.



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18. These live comparisons were tailored to each customer's interests (for example, searching for McDonald's Restaurants) allowing them to directly assess platform performance. Cordell Connect consistently showed stronger project coverage.

19. [REDACTED]
[REDACTED]
Live comparisons enabled me to explore project data that was directly relevant to the customer's needs and were far more effective.

20. Following these in-person meetings, I would typically send a follow-up email that included a table summarising the key categories in which Cordell Connect had more projects than LeadManager observed during the face to face meetings. These tables reflected the results of the live comparisons conducted during the meeting [REDACTED]
[REDACTED]

Post-Meeting Emails

21. Exhibit **AM-3** are the emails I refer to as the Post-Meeting Emails. These emails were the follow-up communications described in paragraph 21 of this affidavit and typically included tables summarising the results of live comparisons conducted during the meeting.

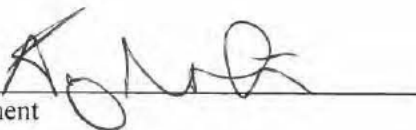
22. Where Post-Meeting Emails included tables with data counts, these were based on live comparisons conducted during the meeting using the customer's BCI login and my Cordell Connect login.

23. Beginning in 2019, I began including "generic" comparison tables in some Post-Meeting Emails alongside the live comparison results. Below is a screenshot of this "generic" table.

I have also listed some generic differences in the capturing of projects overall.

PROJECT VALUE	CORDELL	BCI
0 - \$5MILLION	90%	40%
\$5 - \$20 MILLION	90%	70%
\$20 MILLION PLUS	90%	80%
OVERALL CORDELL PROJECTS	100%	50%

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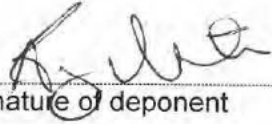
24. I cannot recall the exact source of data for these generic tables.
25. In preparing this affidavit I am aware that the production of comparative reports only commenced from February 2017. It was my usual practice to conduct live comparisons well before the production of comparative reports. See, for example, Annexure AM-4 to this affidavit which is a copy of an email I sent to Peter Worcester from McConnell Dowell dated 14 June 2016 at 11:38am, being approximately 8 months before the introduction of comparative reports.
26. Although generic comparison tables began appearing in some Post-Meeting Emails from 2019 onward, my usual practice was to rely on live comparisons. Given that comparative reports were only introduced in February 2017, and I was conducting live comparisons well before that, (see, for example, (Exhibit **AM-4**), I believe the comparisons in these tables were most likely derived from live demonstrations.

Sworn by the deponent
at Melbourne

on 4 November 2025

Before me: *Callum James Aikson*

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Signature of deponent



Signature of witness

Solicitor Mills Oakley

Filed on behalf of (name & role of party)	<u>The First to Fourth Respondents</u>
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