

## **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: 12/12/2025 3:27:57 PM AEDT  
Date Accepted for Filing: 12/12/2025 3:27:55 PM AEDT  
File Number: NSD285/2021  
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.

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



Document number	Details	Paragraph	Page
4	Confidential Exhibit DY-14, being a copy of an extract of the Respondents' Jaguar and Selcomm Records, showing the monthly revenue derived from every customer of the Respondents who subscribed to Cordell Connect between 2016 and 2024.	[44]	USB

I, Damian Young, of 10 Brandon Street, Wellington, New Zealand say on oath:

**Background**

1. I am a Director of Commercial Finance in the employ of the second respondent, RP Data Pty Ltd. I have held that role since March 2018.
2. In making this affidavit, I refer to the respondents generically as the **Respondents**.
3. I have previously sworn an affidavit in these proceedings on 17 October 2025 (**First Affidavit**).
4. In my role I have access to the Respondents' books and records. I accessed those documents for the purposes of making my First Affidavit and this affidavit.
5. I make this affidavit for the purposes of clarifying matters set out in my First Affidavit.

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

█ [REDACTED]


█ [REDACTED]

█ [REDACTED]

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Deponent

  
Solicitor

[REDACTED]

**Data sources**

7. There were two main data sources I used for the purposes of producing my First Affidavit and the annexures to that affidavit.

8. **First**, the Respondents' hold databases known as Jaguar and Selcomm (**Finance Records**). The Finance Records:

- (a) record an account number, which is unique to the particular customer, for each customer;
- (b) record the name of each of the Respondents' customers, including customers of its product known as **Cordell Connect**, for the period including, relevantly, 1 January 2016 until the present time; and
- (c) the revenue earned from each of the Respondents' customers, including Cordell Connect customers for the period just mentioned;
- (d) revenue from sales of subscriptions to Cordell Connect;
- (e) includes details of the months in which the respondents received revenue from customers, including customers of Cordell Connect.

9. I am informed by Mr Joseph Law, an accountant in the employ of the second respondent, and verily believe that a true copy of the Finance Records were discovered to the applicant by way of data transfer, as follows:

- (a) the Selcomm records were discovered on 19 February 2025; and
- (b) the Jaguar records were discovered on 19 March 2025.

10. The matters stated in the Finance Records are, to the best of my knowledge, true and correct.

[REDACTED]

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Dependent 

Solicitor  3

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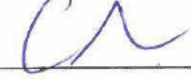
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Deponent



Solicitor





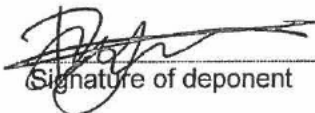


every customer of the Respondents who subscribed to Cordell Connect between 2016 and 2024.

- 45. Confidential Exhibit DY-14 to this affidavit records, as extracted from the Finance Records:
  - (a) in Column A, the account number for each of the entities who subscribed to Cordell Connect, or who were identified to match with names in the Confidential Annexures by Mr Ross, respectively;
  - (b) in Column B, the relevant product from which the Respondents recorded revenue in respect of the customer with the account number in Column A; and
  - (c) in Columns C to DO, the monthly revenue for each customer, including a yearly summary of the revenue recorded from each customer in columns O, AB, AO, BB, BO, CB, CO, DB and DO.
- 46. For each month in which revenue was recorded in Confidential Exhibit DY-14, the customer with the account number recorded in Column A was a customer of the Respondents in that month.
- 47. If the customer with the account number recorded in Column A did not have any revenue recorded in a particular month, the customer was not a customer of the Respondents during that month.
- 48. I believe the contents of Confidential Exhibit DY-14 are true and correct.

Sworn by the deponent  
at New Zealand  
on 12 December 2025

Before me: *Callum James Aitken*

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)  
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) \_\_\_\_\_  
) Signature of deponent


*CA*

Signature of witness

*Callum James Aitken*, Solicitor Mills Oakley

This affidavit was made in the form of an electronic document and was made, signed and witnessed under part 6A of the *Oaths Act 1867* (Qld).

I understand that a person who makes an affidavit that the person knows is false in a material particular commits an offence.

  
\_\_\_\_\_  
Deponent

*CA*  
\_\_\_\_\_  
Solicitor