

NOTICE OF FILING

Details of Filing

Document Lodged:	Chronology
Court of Filing	FEDERAL COURT OF AUSTRALIA (FCA)
Date of Lodgment:	25/06/2025 9:19:48 AM AEST
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File Number:	NSD1386/2024
File Title:	GIGGLE FOR GIRLS PTY LTD (ACN 632 152 017) & ANOR v ROXANNE TICKLE
Registry:	NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



A handwritten signature in blue ink that reads "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.



Federal Court of Australia

NSD 1386 of 2024

District Registry: New South Wales

Division: Administrative and Constitutional and Human Rights

On Appeal from the Federal Court of Australia

GIGGLE FOR GIRLS PTY LTD (ACN 632 152 017) & ANOR – Appellants

ROXANNE TICKLE – Respondent

Appellants' Chronology

No.	Date	Event	Reference
01	8 March 2019	Giggle for Girls Pty Ltd established by Second Appellant to develop a female-only social media App	J [95]
02	February 2020	Beta version of the App launched on iOS and Android platforms. Registration required email and selfie, assessed by AI and often also visually by Second Appellant to determine whether applicant appeared female	J [95], [98], [101]
03	18 September 2020	Respondent's birth certificate amended to record sex as female under Queensland law	J [88]
04	February 2021	Respondent registered and was granted access to the App after selfie review	J [17], [18], [110-111], [127]

Filed on behalf of (name & role of party)	Giggle for Girls Pty Ltd & Sall Grover (Appellants)		
Prepared by (name of person/lawyer)	Katherine Deves		
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No.	Date	Event	Reference
05	September 2021	Second Appellant reviewed Respondent's selfie and Respondent's access to the App was blocked	J [19], [24], [116], [123-126], [128(b),(c)]
06	4 Oct – 5 Nov 2021	Respondent contacted Appellants via email, SMS and phone. Second Appellant replied with a request for a mobile number	J [20], [119-122], [128(d)]
07	5 December 2021	Respondent lodged a complaint with the AHRC	J [21]
08	20 January 2022	AHRC provided the complaint to Appellants	J [22]
09	3 March 2022	Appellants declined to participate in conciliation	J [22]
10	5 April 2022	AHRC terminated the complaint under s 46PH(1B)(b) <i>Australian Human Rights Commission Act 1986</i> (Cth) (AHRCA)	J [25]
11	6 June 2022	Respondent commenced proceedings in the Federal Circuit and Family Court under s 46PO(4) AHRCA	J [27]
12	4 July 2022	Notice of Discontinuance filed	J [27]
13	August 2022	Giggle App permanently removed from all app stores and shut down	J [28]
14	22 December 2022	Respondent filed an Originating Application and affidavit in the Federal Court seeking relief under the <i>Sex Discrimination Act 1984</i> (Cth)(SDA) and the AHRCA	J [27], AB A [1], AB B [22]

No.	Date	Event	Reference
15	24 March 2023	Respondent filed a Statement of Claim alleging gender identity discrimination	J [1]
16	6 April 2023	Appellants filed a Defence	AB A [02]
17	4 May 2023	Respondent filed Amended Statement of Claim	J [1], AB A [03]
18	16 June 2023	Sex Discrimination Commissioner granted leave to appear as amicus curiae	J [13]
19	9 April 2024	Final hearing before Bromwich J commenced	AB A [11]
20	23 August 2024	Judgment delivered in favour of Respondent	AB A [11]
21	5 September 2024	Declaration entered	AB A [13]
22	2 October 2024	Notice of Appeal Filed pursuant to extension of time granted by Bromwich J on 5 September 2024	AB A [14], [15]

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Sia Lagos

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IN THE FEDERAL COURT OF AUSTRALIA
DISTRICT REGISTRY: New South Wales Registry
DIVISION: General

NSD 1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017
and another named in the schedule

Appellants /
Cross-Respondents

and

ROXANNE TICKLE

Respondent /
Cross-Appellant

MS TICKLE'S CHRONOLOGY OF RELEVANT EVENTS¹

No.	Date	Event	Reference ²
1.	~June 2017	Ms Tickle has been living as a woman through a "gradual process of transitioning her gender, including social, medical and legal components"	J[87]
2.	Later in 2017	Ms Tickle started to use the female name "Roxy Tickle"	Ms Tickle's Affidavit ³ at [5]
3.	19 May 2018	The Queensland Register of Births, Deaths and Marriages re-issued a birth certificate for Ms Tickle to reflect her new legal name as "Roxanne Lily Tickle"	J[88]; Ms Tickle's Affidavit at [5]
4.	8 March 2019	Giggle is incorporated	J[95]
5.	~October 2019	Ms Tickle undergoes gender affirming surgery	J[88]
6.	~February 2020	Unofficial launch of Beta version of the Giggle App	J[95], [98]
7.	~June 2020	Giggle adopted a view that no transgender women should be given access to that Giggle App	J[92]

¹ Order of Perry J dated 23 May 2025 at [3(c)]; Orders of Abraham J dated 4 July 2025 at [2].

² Reasons for Judgment (**J**) for the orders the subject of the appeal: *Tickle for Girls Pty Ltd (No 2)* [2024] FCA 960; 333 IR 296: Appeal Book Part A (**AB Pt A**) Tab 11 pp 122-191.

³ Affirmed 13 September 2023 (**Ms Tickle's Affidavit**); Appeal Book Part B (**AB Pt B**) Tab 23.

Filed on behalf of: The Respondent / Cross-Appellant

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No.	Date	Event	Reference ²
8.	19 July 2020	Ms Grover publishes a blog post titled “I Guess I’m a Terf Then – part II”	J[92], [100]; Ms Tickle’s Affidavit at [36(b)] and Annexure RT-10
9.	18 September 2020	The Queensland Register of Births, Deaths and Marriages re-issued Ms Tickle’s birth certificate with a female sex marker	J[88]; Ms Tickle’s Affidavit at [7]
10.	2 December 2020	Giggle App’s Terms of Use	J[99]; Ms Tickle’s Affidavit at [11] and Annexure RT-4
11.	~2020	Ms Grover has approximately 45,000 Twitter (now X) followers	J[94]
12.	14-15 January, 3 February 2021	Ms Tickle and Ms Grover exchange messages on Twitter (now X) about the McIver’s Ladies Baths	J[108]-[109]; Ms Tickle’s Affidavit at [9] and Annexure RT-3; Ms Grover’s Affidavit ⁴ at [80]-[87]
13.	~February 2021	Ms Tickle downloaded the Giggle App and is granted access via the Kairos Artificial Intelligence (AI) software	J[17], [89], [110], [127]
14.	20 February 2021	<p>Ms Grover posts to Twitter (now X):</p> <p>“Let’s make it clear: GIGGLE is an app for ALL FEMALES. It’s not our nor anyone else’s place to redefine what female is. We are here for all FEMALES, in every race, religion & region, including females in the LGBTIQ community”</p> <p>Ms Grover also posts to Twitter (now X) as follows:</p> <ul style="list-style-type: none"> • In response to the question “So trans people are allowed on giggle or no?”, Ms Grover stated: “Trans and non binary identifying females are more than welcome” and “Not a single trans man has ever asked to be on Giggle. Hasn’t happened. However, they’re female so they technically could” • In response to the question, “What about trans women?”, Ms Grover stated: “There are 	Ms Grover’s Affidavit at [54] and Annexure SG-4

⁴ Affirmed 23 October 2023 (**Ms Grover’s Affidavit**); AB Pt B Tab 03.

No.	Date	Event	Reference ²
		many other apps for trans women. Giggle is not one of them, Giggle is for females”	
15.	~February to September 2021	Ms Tickle had access to the various features on the Giggle App	J[19]
16.	~July, August or September 2021	Ms Tickle noticed that her access to the Giggle App had been restricted	J[115]
17.	~September 2021	Giggle App has approximately 20,000 users	J[98]
18.	~late September 2021	Ms Tickle contacts Giggle through its in-app contact form to alert it of her restricted use of the Giggle App	Ms Tickle’s Affidavit at [17] and Annexure RT-5;
19.	~September 2021 or early October 2021	Ms Tickle’s account with the Giggle App is restricted after Ms Grover’s review of Ms Tickle’s “selfie” ⁵ some time before Ms Tickle contacts Ms Grover	J[123]-[124], [128(a)-(d)]
20.	4 October 2021	Ms Tickle sends an email to Ms Grover: “I sent this message through your app a week ago but haven’t received a response as yet. Sorry to disturb you, but would you mind passing it on to the appropriate person please? I couldn’t find any other way of contacting tech support. Thanks in advance! Cheers, Roxy”	J[119(a)]; Ms Tickle’s Affidavit at [18], [31] and Annexure RT-7
21.	8 October 2021	Ms Grover sends an email in response to Ms Tickle’s email of 4 October 2021: “Hi Roxy, I am so sorry for this! Can you send me your phone number and I will personally look into it right now. All the best, Sall founder & CEO www.joinagiggle.com [Ms Grover’s mobile phone number] [Ms Grover’s Twitter handle]”	J[119(b)], [122]; Ms Tickle’s Affidavit at [19], [31] and Annexure RT-7
22.	11 October 2021	Ms Tickle responds to Ms Grover’s email of 8 October 2021: “Hi Sall, Sorry for the delay!	J[119(c)]; Ms Tickle’s Affidavit at [20], [31] and Annexure RT-7

⁵ Ms Tickle’s “selfie” is reproduced in Ms Grover’s Affidavit at [70].

No.	Date	Event	Reference ²
		I try and put my email away for the weekend and then I had a massive day at work today. My phone number is [Ms Tickle's mobile phone number]. Thanks for your help. Cheers, Roxy"	
23.	16 October 2021	Ms Tickle sends a follow-up email to Ms Grover	J[120]; Ms Tickle's Affidavit at [21], [31] and Annexure RT-7
24.	20 October 2021	Ms Tickle sends a follow-up email to Ms Grover	J[120]; Ms Tickle's Affidavit at [22] and Annexure RT-7
25.	22 October 2021	Ms Tickle sends a follow-up email to Ms Grover	J[120]; Ms Tickle's Affidavit at [23], [31] and Annexure RT-7
26.	28 October 2021	Ms Tickle sends "bug-report" within the Giggle App and a follow-up email to Ms Grover	Ms Tickle's Affidavit at [24]-[25], [31] and Annexure RT-7
27.	29 October 2021	Ms Tickle calls Ms Grover's mobile phone number but her call is unanswered, and Ms Tickle does not leave a voicemail message. Ms Tickle sends a follow-up email to Ms Grover, in which she stated: "I tried to call this afternoon but didn't catch you unfortunately...I might try again on Tuesday afternoon"	J[120]-[121]; Ms Tickle's Affidavit at [26]-[27], [31] and Annexure RT-7
28.	30 October 2021	Ms Tickle misses a call from Ms Grover's mobile phone number. Ms Grover does not leave a voicemail message. Ms Tickle sends Ms Grover a text message: "Thanks for calling. Sorry I missed your call...I actually didn't think you would be available on the weekend but I could make time to talk tomorrow if that suited you better than waiting til Tuesday? Cheers Roxy"	J[120]-[121]; Ms Tickle's Affidavit at [28] and Annexure RT-6
29.	5 November 2021	Ms Tickle sends a follow-up email to Ms Grover, in which she stated: "Sorry I didn't get a chance to call you on Tuesday...really busy week. I tried just	J[120]; Ms Tickle's Affidavit at [29]-[31] and Annexure RT-7

No.	Date	Event	Reference ²
		before 5pm today but my call went straight to voice mail. I will try again in the morning”	
30.	15 November 2021	<p>Ms Grover posts to Twitter (now X) as follows:</p> <ul style="list-style-type: none"> • In response to a user’s statement (named “Jasmine”) “I’m transgender and I joined your app [smiley face emoji]”, Ms Grover stated: “If you are a trans man, you are welcome. [Red Heart emoji]” • In response to Jasmine’s subsequent statement “I’m a trans woman lol. I have effortlessly infiltrated your sacred female space”, Ms Grover stated: “You prove why security is needed for a female space. Thank you for the evidence” 	Ms Grover’s Affidavit at [54] and Annexure SG-4
31.	5 December 2021	Ms Tickle lodges a complaint with the Australian Human Rights Commission (AHRC) under s 46P of the <i>Australian Human Rights Commission Act 1986</i> (Cth) (AHRC Act) alleging discrimination on the grounds of her gender identity under s 22 of the <i>Sex Discrimination Act 1984</i> (Cth) (SDA)	J[21]; Ms Tickle’s Affidavit at [33] and Annexure RT-8
32.	3 March 2022	Ms Grover / Giggle inform the AHRC that they declined to participate in the AHRC conciliation process	J[22], [235(a)], [252]-[253]
33.	21 March 2022	<p>Ms Grover posts to Twitter (now X):</p> <p>“In January 2022, I received an [AHRC] complaint against both Giggle & me personally, from a trans identified male who wanted to use a social networking app for females & for me to be re-educated on sex & gender.</p> <p>I am finally able to talk about it”</p>	Ms Tickle’s Affidavit at [36(a)] and Annexure RT-9 ⁶
34.	5 April 2022	A delegate of the President of the AHRC terminated Ms Tickle’s complaint pursuant to s 46PH(1B)(b) of the AHRC Act on the ground that there were no reasonable prospect of the matter being settled by conciliation	J[25]
35.	~August 2022	The Giggle App ceases to be available	J[28], [106]
36.	22 December 2022	Originating application filed by Ms Tickle ⁷	AB Pt A Tab 01 pp 1-8

⁶ See, Originating Application at [16]: AB Pt A Tab 01 p 4.

⁷ By extension of time under s 46PO(2) of the AHRC Act: Orders of Bromwich J dated 1 June 2023 at [1]: AB Pt A Tab 10 pp 119-121; *Tickle v Giggle For Girls Pty Ltd* [2023] FCA 553 at [5].

No.	Date	Event	Reference ²
37.	23 March 2023	Statement of Claim filed by Ms Tickle	AB Pt A Tab 03 pp 16-25
38.	6 April 2023	Defence filed by Ms Grover / Giggle, in which it is stated (at [1]): “The Respondents do not know and cannot admit whether the Applicant is a natural person capable of being sued in the name ‘Roxanne Tickle’” and a denial (at [6]) that Ms Tickle is a woman. ⁸	AB Pt A Tab 02 pp 9-15
39.	13 April 2023	Ms Grover is reported as having stated to Andrew Bolt on <i>The Bolt Report</i> on the Sky News Channel: “This case is about sex it’s not about gender; I discriminated on the basis of sex...A woman is an adult human female and that was excepted by everybody until men decided that they wanted to be women and the only way for a female-only space to exist is if it excludes males so we’re going to be arguing that”	Ms Tickle’s Affidavit at [36] and Annexure RT-11
40.	4 May 2023	Amended Statement of Claim filed by Ms Tickle	AB Pt A Tab 3 pp 16-25
41.	1 June 2023	Bromwich J makes a maximum costs order in respect of Ms Grover and Giggle’s costs pursuant to r 40.51 of the <i>Federal Court Rules 2011</i> (Cth) in the sum of \$50,000 “confined to the constitutional validity and statutory construction issues” (at [3]) ⁹	AB Pt A Tab 10 pp 119-120
42.	1 June 2023	Ms Grover posts on Twitter (formerly X) linking to the Etsy store selling ‘Team Giggle’ and associated merchandise	AB Pt B Tab 28 p 4
43.	25 October 2023	Opening submissions of Ms Grover / Giggle are filed, which include (at [1]): “The Applicant is not a woman. The Applicant is a man” and (at [25]) “...a man with breast implants, who has undergone hair removal, is not a woman”.	AB Pt A Tab 08 p 72 & p 80
44.	8 April 2024	The “Giggle Crowdfunding” website indicates that Ms Grover / Giggle raised \$442,816	AB Pt B Tab 28 pp 12-14; Affidavit of Kylie Stone ¹⁰ at [8]
45.	9-11 April 2024	Trial before Bromwich J (3 days)	N/A

⁸ cf Amended Statement of Claim filed 4 May 2023 at [1] & [6]; AB Pt A Tab 3 pp 17-18.

⁹ See, *Tickle v Giggle For Girls Pty Ltd* [2023] FCA 553: AB Pt A Tab 09 pp 93-118.

¹⁰ Affirmed on 26 February 2025 and filed in this proceeding on the same date. Ms Stone was an employed lawyer of Ms Tickle’s former legal representative, Barry Nilsson Lawyers (at [1]). See, too, Ms Tickle’s submissions for security for costs filed on 26 February 2025 at [1], [10(c)] & [13].

No.	Date	Event	Reference ²
46.	10 April 2024	Ms Grover has ~93,000 Twitter (formerly X) followers	TS p 151 l27-28
47.	23 August 2024	Bromwich J orders Ms Grover / Giggle to pay Ms Tickle \$10,000 within 60 days (at [2])	AB Pt A Tab 12 pp 192-193
48.	5 September 2024	Bromwich J makes a declaration that Ms Grover / Giggle have engaged in unlawful discrimination against Ms Tickle pursuant to s 22 of the SDA (read with s 5B(2) of the SDA) by: “imposing a condition on the use of a service, the Giggle App, that users have the appearance of cisgender women, which had the effect of disadvantaging women with a transgender gender identity relative to women with a cisgender gender identity, resulting in the exclusion of Ms Tickle from the use of the Giggle App”	AB Pt A Tab 13 p 194
49.	2 October 2024	Notice of Appeal filed by Ms Grover / Giggle ¹¹	AB Pt A Tab 15 pp 196-201
50.	9 October 2024	Notice of Constitutional Matter pursuant to s 78B of the <i>Judiciary Act 1903</i> (Cth) filed by Ms Grover / Giggle	AB Pt A Tab 16 pp 202-205
51.	22 October 2024	Ms Grover and Giggle due to pay Ms Tickle damages in the sum of \$10,000 (being 60 days since the date of judgment)	AB Pt A Tab 12 pp 192-193
52.	25 February 2025	Notice of Cross-Appeal filed by Ms Tickle ¹²	AB Pt A Tab 19 pp 281-286
53.	8 July 2025	The damages and costs below have not been paid by Ms Grover or Giggle	N/A

¹¹ By an extension of time: Orders of Bromwich J dated 5 September 2024: AB Pt A p 195.

¹² By an extension of time: Orders of Abraham J dated 12 February 2025 at [2].