

NOTICE OF FILING

Details of Filing

Document Lodged:	Affidavit of Service - Form 59 - Rule 29.02(1)
Court of Filing	FEDERAL COURT OF AUSTRALIA (FCA)
Date of Lodgment:	6/02/2025 11:19:11 AM AEDT
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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

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.

Form 59
Rule 29.02(1)

Affidavit of Service

No. NSD1386 of 2024

Federal Court of Australia
District Registry: New South Wales
Division: Appeals and Related (Human Rights)

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

Appellants

ROXANNE TICKLE

Respondent

Affidavit of: **Katherine Deves**
Address: 1005 Botany Road, Rosebery NSW 2018
Occupation: Legal Practitioner
Date: 6 February 2025

Filed on behalf of (name & role of party) Giggle for Girls Pty Ltd & Sally Grover, First and Second Appellants
Prepared by (name of person/lawyer) Katherine Deves
Law firm (if applicable) Pryor Tzannes & Wallis, Solicitors & Notaries
Tel (02) 9669 6333 Fax (02) 9693 2726
Email katherine@ptwlaw.com.au
Address for service 1005 Botany Road, Rosebery NSW 2018
(include state and postcode)

[Version 3 form approved 02/05/2019]

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	which there is a copy a letter to the Attorney-General of the Commonwealth of Australia enclosing a copy of the Section 78B Notice.		
13	Annexure "KD12", being a copy of the email, dated 10 October 2024, sent by way of service to the Attorney-General of the State of New South Wales attached to which there is a copy of the letter to the Attorney-General of the State of New South Wales enclosing a copy of the Section 78B Notice.	16	37-38
14	Annexure "KD13", being a copy of the email, dated 10 October 2024, sent by way of service to the Attorney-General of the State of Queensland attached to which there is a copy of the letter to the Attorney-General of the State of Queensland enclosing a copy of the Section 78B Notice.	17	39-40
15	Annexure "KD14", being a copy of the email, dated 10 October 2024, sent by way of service to the Attorney-General of the State of Victoria attached to which there is a copy of the letter to the Attorney-General of the State of Victoria enclosing a copy of the Section 78B Notice.	18	41-42
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17	Annexure "KD16", being a copy of the email, dated 10 October 2024, sent by way of service to the Attorney-General of the State of Tasmania attached to which there is a copy of the letter to the Attorney-General of the State of Tasmania enclosing a copy of the Section 78B Notice.	20	45-46
18	Annexure "KD17", being a copy of the email, dated 10 October 2024, sent by way of service to the Attorney-General of the State of Western Australia attached to which there is a copy of the letter to the Attorney-General of the State of Western Australia enclosing a copy of the Section 78B Notice.	21	47-48
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I, Katherine Deves of 1005 Botany Road, Rosebery 2018 in the State of New South Wales, Legal Practitioner, state on oath:

1. I, Katherine Deves, am a Solicitor under supervision, employed by Pryor Tzannes & Wallis Solicitors & Notaries, and I am the legal practitioner with day-to-day carriage of this matter for the First and Second Appellants.
2. I previously acted as the legal practitioner with day-to-day carriage of this matter for the First and Second Appellants as a Solicitor, under supervision, of Alexander Rashidi Lawyers at Level 12, Suite 1205, 239 George Street, Brisbane 4000 in the State of Queensland.
3. I make this affidavit to the best of my knowledge and recollection.

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4. On **9 October 2024**, the First and Second Appellants filed a Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 ("**Section 78B Notice**").

Annexed to this affidavit and marked "KD1" is a copy of the sealed "Notice of a Constitutional matter under section 78B of the Judiciary Act 1903" accepted for filing on 9 October 2024.

5. On **9 October 2024**, the Section 78B Notice was sealed by a Registrar of the New South Wales Registry of the Federal Court of Australia.

Annexed to this affidavit and marked "KD1" is a copy of the sealed "Notice of a Constitutional matter under section 78B of the Judiciary Act 1903" accepted for filing on 9 October 2024.

Provision of Notice

6. On **9 October 2024**, a letter was drafted by me to the Attorney-General of the Commonwealth of Australia enclosing a copy of the Section 78B Notice.

Annexed to this affidavit and marked "KD2" is a copy of this letter to the Attorney-General of the Commonwealth of Australia enclosing a copy of the section 78B Notice, dated 9 October 2024.

7. On **9 October 2024**, a letter was drafted by me to the Attorney-General of the State of New South Wales enclosing a copy of the Section 78B Notice.


Annexed to this affidavit and marked "KD3" is a copy of this letter to the Attorney-General of the State of New South Wales enclosing a copy of the section 78B Notice, dated 9 October 2024.

8. On **9 October 2024**, a letter was drafted by me to the Attorney-General of the State of Queensland enclosing a copy of the Section 78B Notice.


Annexed to this affidavit and marked "KD4" is a copy of this letter to the Attorney-General of the State of Queensland enclosing a copy of the section 78B Notice, dated 9 October 2024.

9. On **9 October 2024**, a letter was drafted by me to the Attorney-General of the State of Victoria enclosing a copy of the Section 78B Notice.

Annexed to this affidavit and marked "KD5" is a copy of this letter to the Attorney-General of the State of Victoria enclosing a copy of the section 78B Notice, dated 9 October 2024.


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10. On **9 October 2024**, a letter was drafted by me to the Attorney-General of the State of South Australia enclosing a copy of the Section 78B Notice.
- Annexed to this affidavit and marked "KD6" is a copy of this letter to the Attorney-General of the State of South Australia enclosing a copy of the section 78B Notice, dated 9 October 2024.**
11. On **9 October 2024**, a letter was drafted by me to the Attorney-General of the State of Tasmania enclosing a copy of the Section 78B Notice.
- Annexed to this affidavit and marked "KD7" is a copy of this letter to the Attorney-General of the State of Tasmania enclosing a copy of the section 78B Notice, dated 9 October 2024.**
12. On **9 October 2024**, a letter was drafted by me to the Attorney-General of the State of Western Australia enclosing a copy of the Section 78B Notice.
- Annexed to this affidavit and marked "KD8" is a copy of this letter to the Attorney-General of the State of Western Australia enclosing a copy of the section 78B Notice, dated 9 October 2024.**
13. On **9 October 2024**, a letter was drafted by me to the Attorney-General of the Northern Territory enclosing a copy of the Section 78B Notice.
- Annexed to this affidavit and marked "KD9" is a copy of this letter to the Attorney-General of the Northern Territory enclosing a copy of the section 78B Notice, dated 9 October 2024.**
14. On **9 October 2024**, a letter was drafted by me to the Attorney-General of the Australian Capital Territory enclosing a copy of the Section 78B Notice.
- Annexed to this affidavit and marked "KD10" is a copy of this letter to the Attorney-General of the State of the Australian Capital Territory enclosing a copy of the section 78B Notice, dated 9 October 2024.**

Service of Notice

15. On **10 October 2024**, the letter and copy of the Section 78B Notice, previously referred to as "KD2" was emailed to the Attorney-General of the Commonwealth of Australia by way of service. This email was sent by me in capacity as a solicitor for my former employer, Alexander Rashidi Lawyers.
- Annexed to this affidavit and marked "KD11" is a copy of this email, dated 10 October 2024, sent by way of service to the Attorney-General of the Commonwealth of Australia attached to which there is a copy a letter to the**

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Attorney-General of the Commonwealth of Australia enclosing a copy of the Section 78B Notice.

16. On **10 October 2024**, the letter and copy of the Section 78B Notice, previously referred to as "KD3" was emailed to the Attorney-General of the State of New South Wales by way of service. This email was sent by me in capacity as a solicitor for my former employer, Alexander Rashidi Lawyers.

Annexed to this affidavit and marked "KD12" is a copy of this email, dated 10 October 2024, sent by way of service to the Attorney-General of the State of New South Wales attached to which there is a copy of the letter to the Attorney-General of the State of New South Wales enclosing a copy of the Section 78B Notice.

17. On **10 October 2024**, the letter and copy of the Section 78B Notice, previously referred to as "KD4" was emailed to the Attorney-General of the State of Queensland by way of service. This email was sent by me in capacity as a solicitor for my former employer, Alexander Rashidi Lawyers.


Annexed to this affidavit and marked "KD13" is a copy of this email, dated 10 October 2024, sent by way of service to the Attorney-General of the State of Queensland attached to which there is a copy of the letter to the Attorney-General of the State of Queensland enclosing a copy of the Section 78B Notice.

18. On **10 October 2024**, the letter and copy of the Section 78B Notice, previously referred to as "KD5" was emailed to the Attorney-General of the State of Victoria by way of service. This email was sent by me in capacity as a solicitor for my former employer, Alexander Rashidi Lawyers.

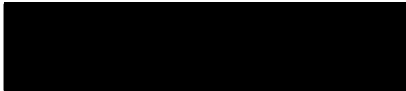
Annexed to this affidavit and marked "KD14" is a copy of this email, dated 10 October 2024, sent by way of service to the Attorney-General of the State of Victoria attached to which there is a copy of the letter to the Attorney-General of the State of Victoria enclosing a copy of the Section 78B Notice.

19. On **10 October 2024**, the letter and copy of the Section 78B Notice, previously referred to as "KD6" was emailed to the Attorney-General of the State of South Australia by way of service. This email was sent by me in capacity as a solicitor for my former employer, Alexander Rashidi Lawyers.

Annexed to this affidavit and marked "KD15" is a copy of this email, dated 10 October 2024, sent by way of service to the Attorney-General of the State of South Australia attached to which there is a copy of the letter to the Attorney-General of the State of South Australia enclosing a copy of the Section 78B Notice.


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20. On **10 October 2024**, the letter and copy of the Section 78B Notice, previously referred to as “KD7” was emailed to the Attorney-General of the State of Tasmania by way of service. This email was sent by me in capacity as a solicitor for my former employer, Alexander Rashidi Lawyers.

Annexed to this affidavit and marked “KD16” is a copy of this email, dated 10 October 2024, sent by way of service to the Attorney-General of the State of Tasmania attached to which there is a copy of the letter to the Attorney-General of the State of Tasmania enclosing a copy of the Section 78B Notice.

21. On **10 October 2024**, the letter and copy of the Section 78B Notice, previously referred to as “KD8” was emailed to the Attorney-General of the State of Western Australia by way of service. This email was sent by me in capacity as a solicitor for my former employer, Alexander Rashidi Lawyers.

Annexed to this affidavit and marked “KD17” is a copy of this email, dated 10 October 2024, sent by way of service to the Attorney-General of the State of Western Australia attached to which there is a copy of the letter to the Attorney-General of the State of Western Australia enclosing a copy of the Section 78B Notice.

22. On **10 October 2024**, the letter and copy of the Section 78B Notice, previously referred to as “KD9” was emailed to the Attorney-General of the Northern Territory by way of service. This email was sent by me in capacity as a solicitor for my former employer, Alexander Rashidi Lawyers.

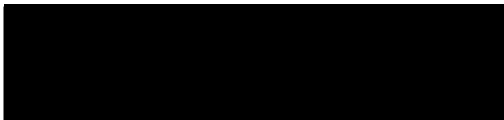
Annexed to this affidavit and marked “KD18” is a copy of this email, dated 10 October 2024, sent by way of service to the Attorney-General of the Northern Territory attached to which there is a copy of the letter to the Attorney-General of the Northern Territory enclosing a copy of the Section 78B Notice.

23. On **10 October 2024**, the letter and copy of the Section 78B Notice, previously referred to as “KD10” was emailed to the Attorney-General of the Australian Capital Territory by way of service. This email was sent by me in capacity as a solicitor for my former employer, Alexander Rashidi Lawyers.

Annexed to this affidavit and marked “KD19” is a copy of this email, dated 10 October 2024, sent by way of service to the Attorney-General of the Australian Capital Territory attached to which there is a copy of the letter to the Attorney-General of the Australian Capital Territory enclosing a copy of the Section 78B Notice.


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Response to the Notice

24. On **5 December 2024** I received a response from Ms Alice Nagel, Senior Lawyer for the Australian Government Solicitor's office, via email and an enclosed letter. Ms Nagel advised on behalf of the Attorney-General of the Commonwealth of Australia that the Attorney-General "will not be intervening in this proceeding in the Federal Court of Australia, nor will he be applying to remove the cause from that Court to the High Court." Ms Nagel stipulated that "If the proceeding is taken further on appeal, or is removed to the High Court, the Attorney-General might decide to intervene at that stage."

Annexed to this affidavit and marked "KD20" is a copy of the correspondence, dated 5 December 2024, outlining the response of the Attorney-General of the Commonwealth of Australia regarding intervening in the proceeding.


25. On **13 January 2025** I received a response from Mr Matthew McLeod, Solicitor for Crown Solicitor New South Wales, via email and an attached letter. Mr McLeod advised on instruction "that the Attorney General has decided not to intervene in these proceedings." Mr McLeod stipulated that the Attorney General may reconsider the question of intervention on a further s78B notice on appeal or removal of the matter to the High Court.

Annexed to this affidavit and marked "KD21" is a copy of the correspondence, dated 13 January 2025 and 6 December 2024 respectively, outlining the response of the Attorney-General of New South Wales regarding intervening in the proceeding.

26. On or around **6 November 2024** Mr Alexander Rashidi received a response from Mr Rob Hutchings, the Assistant Crown Solicitor of the Queensland Government for the Crown Solicitor, via email and an enclosed letter. Mr Rashidi provided this correspondence to me soon after. Mr Hutchings advised that the Attorney-General "will not be intervening in the proceedings." Mr Hutchings qualified that "should the matter proceed to the High Court the Attorney-General will reconsider the question of intervention."

Annexed to this affidavit and marked "KD22" is a copy of the correspondence, dated 6 November 2024, outlining the response of the Attorney-General of the State of Queensland regarding intervening in the proceeding.

27. On **11 November 2024** I received a response from the Solicitor-General of South Australia Per: Mr Matthew Lindner of the Attorney-General's Department, via email and an enclosed letter. Mr Lindner advised that the Attorney-General "does not wish to


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intervene in this matter.” Mr Lindner stipulated that “Could you please inform me if the matter proceeds to the High Court of Australia, as the Attorney-General will give further consideration as to intervention at that stage.”

Annexed to this affidavit and marked “KD23” is a copy of the correspondence, dated 11 November 2024, outlining the response of the Attorney-General of the State of South Australia regarding intervening in the proceeding.

28. On **15 October 2024** I received a response from the Solicitor-General of Tasmania Per: Ms Jenny Rudolf, Assistant Solicitor-General, via email and an enclosed letter. Ms Rudolf advised on behalf of the Attorney-General of the State of Tasmania that the Attorney-General “does not wish to intervene in the in proceedings whilst the matter is before the Federal Court.” Ms Rudolf stipulated that “should the proceedings be removed or otherwise find their way to the High Court... the Attorney-General may wish to reconsider whether or not to intervene.”

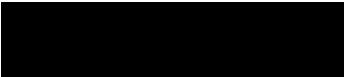
Annexed to this affidavit and marked “KD24” is a copy of the correspondence, dated 15 October 2024, outlining the response of the Attorney-General of the State of Tasmania regarding intervening in the proceeding.

29. On **16 October 2024** I received a response from Ms Sophie Cullingford for the State Solicitor’s Office, via email and an enclosed letter. Ms Cullingford advised on behalf of the Attorney-General of the State of Western Australia that the Attorney-General “does not intend to intervene in the in proceedings in the Federal Court of Australia at New South Wales.” Ms Cullingford stipulated that “should the matter go to the High Court either on appeal or by removal, I would appreciate being informed and supplied with the relevant documentation.”

Annexed to this affidavit and marked “KD25” is a copy of the correspondence, dated 16 October 2024, outlining the response of the Attorney-General of the State of Western Australia regarding intervening in the proceeding.

30. On **31 January 2025** I received a response from the Government Solicitor of the Australian Capital Territory Per: Mr James Harris, Solicitor Assisting the Solicitor-General, via email and an enclosed letter. Mr Harris advised that the Attorney-General of the Australian Capital Territory “does not intend to intervene in these proceedings.”

Annexed to this affidavit and marked “KD26” is a copy of the correspondence, dated 31 January 2025, outlining the response of the Attorney-General of the Australian Capital Territory regarding intervening in the proceeding.


Deponent

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31. As at the date of swearing this affidavit I have not received a response in my capacity as the legal practitioner with day-to-day carriage of this matter at Pryor, Tzannes & Wallis, from the Attorney-General of the State of Victoria.
32. As at the date of swearing this affidavit I have not received a response in my capacity as the legal practitioner with day-to-day carriage of this matter at Pryor, Tzannes & Wallis, from the Attorney-General of the Northern Territory.

Sworn by the deponent
at Rosebery
in the State of New South Wales
on 6 February 2025
Before me:

)
)
)
)
)

Signature of deponent

Signature of witness

Joel Alexander Johnson
Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Address: 1005 Botany Road, Rosebery NSW 2018

[Redacted signature]

Deponent

[Redacted signature]

Witness

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 4 pages comprise the document referred to as Annexure KD1 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD1"

NOTICE OF FILING

Details of Filing

Document Lodged:	Notice of a Constitutional Matter under s78B Judiciary Act 1903 - Form 18 - Rule 8.11(2)
Court of Filing	FEDERAL COURT OF AUSTRALIA (FCA)
Date of Lodgment:	9/10/2024 5:53:03 PM AEDT
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File Title:	GIGGLE FOR GIRLS PTY LTD (ACN 632 152 017) & ANOR v ROXANNE TICKLE
Registry:	NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



Sia Lagos

Registrar

Important Information

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"ANNEXURE KD1"

Form 18
Rule 8.11(2)



Notice of a Constitutional matter under section 78B of the Judiciary Act 1903

No. NSD1386 of 2024

Federal Court of Australia

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 AND ANOTHER

Appellants

ROXANNE TICKLE

Respondent

The Appellants give notice that the proceeding involves a matter arising under the Constitution or involving its interpretation within the meaning of section 78B of the *Judiciary Act 1903*.

Nature of Constitutional matter

The Appellants apprehend that the matter as framed by the Notice of Appeal filed in the proceedings on 2 October 2024, gives rise to the question of whether s 5B of the *Sex Discrimination Act 1984* (Cth) (**SDA**) is inoperative as it pertains to the Appellants.

Facts showing that section 78B Judiciary Act 1903 applies

1. The Respondent is a natal male who asserts a gender identity of a "female" and a personhood protected from being unlawfully discriminated against because of a "**perceived** gender identity as a transgender person." [emphasis added]
2. The Respondent was born in the state of Queensland and has had been issued with a birth certificate, pursuant to Part 4 of the *Births, Deaths and Marriages, Registration Act 2003* (Qld) which records the Respondent's sex as "female".

Filed on behalf of (name & role of party)	Giggle for Girls Pty Ltd & Sally Grover, First & Second Appellants
Prepared by (name of person/lawyer)	Katherine Deves, Solicitor for the Appellants
Law firm (if applicable)	Alexander Rashidi Lawyers
Tel	07 2139 0100
Fax	
Email	admin@rashidi.com.au
Address for service (include state and postcode)	PO Box 12781 GEORGE ST QLD 4003

[Version 2 form approved 09/05/2013]

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"ANNEXURE KD1"

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3. The First Appellant was the provider of a digital application styled "Giggle for Girls" (**Giggle**) which is marketed as a digital platform exclusively for females as a "safe space". The CEO of the First Appellant is the Second Appellant.
4. Giggle is no longer operational.
5. At the time when Giggle was operational, to access it, a user was required to provide a self-taken photograph, referred to as a "selfie" and upload it to the application. The purpose of this was to ensure that the proposed user was female. An artificial intelligence feature was used to make this determination in the first instance.
6. The Respondent was originally granted access to the Giggle App based on a selfie uploaded.
7. The Respondent's access was removed, most likely, following a visual inspection by the Second Appellant for and on behalf of Giggle, on the basis that the Respondent had the characteristics that pertain generally to persons of the male sex or that are generally imputed to persons of the male sex.
8. The Respondent alleges that this is conduct which amounts to discrimination on the ground of gender identity for the purposes of section 5B of the SDA, by reason of the allegation that access to the Giggle App could only be granted to a "cisgendered female" or a person "determined as having cisgendered physical characteristics during the Application Process". This alleged conduct is alleged to be in breach of s 22 of the SDA on the grounds of gender identity because the Respondent, a transwoman, was treated less favourably than a cisgender woman, and thereby was discriminated against by the Appellants on the basis of "gender identity" within the meaning of s 5B of the SDA.
9. Sections 5B of the SDA are amendments made to the SDA by the *Sex Discrimination Amendment (Sexual Orientation, Gender Identity and Intersex Status) Act 2013* (Cth).
10. The federal Parliament has very limited constitutional powers to enact laws concerning discrimination. The constitutional basis for the SDA is s 51(xxix) to implement Convention on the Elimination of Discrimination Against Women (**CEDAW**). To be constitutionally valid, the proposed legislation must implement an international obligation or secure a benefit under a treaty in a manner which is appropriate and adapted to implementing the treaty. Discrimination on the basis of gender identity is not the subject of a specific treaty like CEDAW and nor could it plausibly be said that by enacting anti-discrimination provisions concerning gender identity, the Parliament is in some way giving effect to a Convention or treaty. It is doubtful that the provision could be validly enacted pursuant to the external affairs power by reference to an isolated Article of the


"ANNEXURE KD1"

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international instruments¹, or, indeed, Article 26 of the International Covenant on Civil and Political Rights.

11. Further, Giggle is not a "trading and financial" corporation within the meaning of s 51 (xx) of the Constitution.
12. Accordingly, the Appellants will contend that s 5B of the SDA inserted into the SDA by the *Sex Discrimination Amendment (Sexual Orientation, Gender Identity and Intersex Status) Act* 2013, and s 22 of the SDA, is inoperative in so far as it purportedly pertains to them.

Date: 9 October 2024



Signed by Katherine Deves
Alexander Rashidi Lawyers
Lawyer for the Appellants

¹ Explanatory Memorandums to the Sex Discrimination Amendment (Sexual Orientation, Gender Identity And Intersex Status) Bill 2013

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD2 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD2"

Alexander Rashidi
Lawyers

Principal Alex Rashidi
Writer Katherine Deves
Direct Line 07 2139 0100
Email Katherine.d@rashidi.com.au
Our ref.: AR:KD:23GIG001
Your ref.: 23002443

9 October 2024

Attorney-General of the Commonwealth of Australia
Australian Government Solicitor
Locked Bag 35
KINGSTON ACT 2604

By email only: processservice@ags.gov.au

Dear Sir/Madam,

**RE: GIGGLE FOR GIRLS PTY LTD & ANOR -v- ROXANNE TICKLE
NSD1386/2024**

We refer to the above matter and confirm that we act for the First and Second Appellants, Giggle for Girls Pty Ltd ACN 632 152 017 and Ms Sally Grover.

Please find **enclosed** by way of service, a sealed copy of a Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 filed in the Federal Court of Australia on **9 October 2024**.

Should you have any further questions please contact our office.

Yours faithfully
Alexander Rashidi Lawyers

Katherine Deves
Lawyer

Attachment.

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD3 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD3"

Alexander Rashidi
Lawyers

Principal	Alex Rashidi
Writer	Katherine Deves
Direct Line	07 2139 0100
Email	Katherine.d@rashidi.com.au
Our ref.:	AR:KD:23GIG001
Your ref.:	202301161

9 October 2024

The Crown Solicitor
Crown Solicitor's Office
GPO Box 25
SYDNEY NSW 2001

By email only crownsol@csso.nsw.gov.au

Dear Sir/Madam,


**RE.: GIGGLE FOR GIRLS PTY LTD & ANOR -v- ROXANNE TICKLE
NSD1386/2024**

We refer to the above matter and confirm that we act for the First and Second Appellants, Giggle for Girls Pty Ltd ACN 632 152 017 and Ms Sally Grover.

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Should you have any further questions please contact our office.

Yours faithfully
Alexander Rashidi Lawyers



Katherine Deves
Lawyer

Attachment.

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD4 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD4"

Alexander Rashidi
Lawyers

Principal	Alex Rashidi
Writer	Katherine Deves
Direct Line	07 2139 0100
Email	Katherine.d@rashidi.com.au
Our ref.:	AR:KD:23GIG001
Your ref.:	PL8/ATT110/747/UWE

9 October 2024

Crown Law
Department of Justice and Attorney-General
GPO Box 5221
BRISBANE QLD 4001

By email only: crownlaw@qld.gov.au

Dear Sir/Madam,

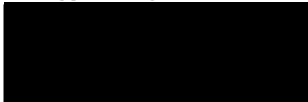
**RE: GIGGLE FOR GIRLS PTY LTD & ANOR -v- ROXANNE TICKLE
NSD1386/2024**

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Should you have any further questions please contact our office.

Yours faithfully
Alexander Rashidi Lawyers


Katherine Deves
Lawyer

Attachment.

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD5 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD5"

**Alexander Rashidi
Lawyers**

Principal Alex Rashidi
Writer Katherine Deves
Direct Line 07 2139 0100
Email Katherine.d@rashidi.com.au
Our ref.: AR:KD:23GIG001
Your ref.: 2203655

9 October 2024

Victorian Government Solicitor's Office
PO Box 4356
MELBOURNE VIC 3001

By email only: enquiries@vgso.vic.gov.au

Dear Sir/Madam,

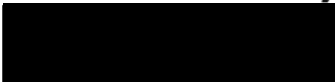
**RE: GIGGLE FOR GIRLS PTY LTD & ANOR -v- ROXANNE TICKLE
NSD1386/2024**

We refer to the above matter and confirm that we act for the First and Second Appellants, Giggle for Girls Pty Ltd ACN 632 152 017 and Ms Sally Grover.

Please find **enclosed** by way of service, a sealed copy of a Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 filed in the Federal Court of Australia on **9 October 2024**.

Should you have any further questions please contact our office.

Yours faithfully
Alexander Rashidi Lawyers


Katherine Deves
Lawyer

Attachment.

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD6 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD6"

Alexander Rashidi
Lawyers

Principal	Alex Rashidi
Writer	Katherine Deves
Direct Line	07 2139 0100
Email	Katherine.d@rashidi.com.au
Our ref.:	AR:KD:23GIG001
Your ref.:	SGO\201720 or LM209845

9 October 2024

Solicitor-General's Chambers of South Australia
GPO Box 464
ADELAIDE SA 5001

By email only: sg.chambers@sa.gov.au

Dear Sir/Madam,

**RE: GIGGLE FOR GIRLS PTY LTD & ANOR -v- ROXANNE TICKLE
NSD1386/2024**

We refer to the above matter and confirm that we act for the First and Second Appellants, Giggle for Girls Pty Ltd ACN 632 152 017 and Ms Sally Grover.

Please find **enclosed** by way of service, a sealed copy of a Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 filed in the Federal Court of Australia on **9 October 2024**.

Should you have any further questions please contact our office.

Yours faithfully
Alexander Rashidi Lawyers

Katherine Deves
Lawyer

Attachment.

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD7 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD7"

Alexander Rashidi
Lawyers

Principal Alex Rashidi
Writer Katherine Deves
Direct Line 07 2139 0100
Email Katherine.d@rashidi.com.au
Our ref.: AR:KD:23GIG001
Your ref.:

9 October 2024

Office of the Solicitor-General of the Department of Justice Tasmania
Level 5, 15 Murray Street
HOBART TAS 7000

By email only: solicitor.general@justice.tas.gov.au

Dear Sir/Madam,


**RE: GIGGLE FOR GIRLS PTY LTD & ANOR -v- ROXANNE TICKLE
NSD1386/2024**

We refer to the above matter and confirm that we act for the First and Second Appellants,
Giggle for Girls Pty Ltd ACN 632 152 017 and Ms Sally Grover.

Please find **enclosed** by way of service, a sealed copy of a Notice of a
Constitutional matter under section 78B of the Judiciary Act 1903 filed in the
Federal Court of Australia on **9 October 2024**.

Should you have any further questions please contact our office.

Yours faithfully
Alexander Rashidi Lawyers


Katherine Deves
Lawyer

Attachment.

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD8 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD8"

Alexander Rashidi
Lawyers

Principal	Alex Rashidi
Writer	Katherine Deves
Direct Line	07 2139 0100
Email	Katherine.d@rashidi.com.au
Our ref.:	AR:KD:23GIG001
Your ref.:	

9 October 2024

State Solicitor's Office - Western Australian Government
Daid Malcolm Justice Centre
28 Barrack Street
PERTH WA 6000

By email only sso@sso.wa.gov.au

Dear Sir/Madam,

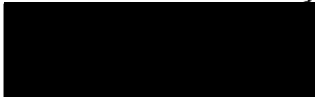
RE: GIGGLE FOR GIRLS PTY LTD & ANOR -v- ROXANNE TICKLE
NSD1386/2024

We refer to the above matter and confirm that we act for the First and Second Appellants, Giggle for Girls Pty Ltd ACN 632 152 017 and Ms Sally Grover.

Please find **enclosed** by way of service, a sealed copy of a Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 filed in the Federal Court of Australia on **9 October 2024**.

Should you have any further questions please contact our office.

Yours faithfully
Alexander Rashidi Lawyers


Katherine Deves
Lawyer

Attachment.

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD9 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD9"

**Alexander Rashidi
Lawyers**

Principal Alex Rashidi
Writer Katherine Deves
Direct Line 07 2139 0100
Email Katherine.d@rashidi.com.au
Our ref.: AR:KD:23GIG001
Your ref.:

9 October 2024

Solicitor-General
Department of the Attorney-General and Justice of the Northern Territory
GPO Box 1722
DARWIN NT 0801

By email only sarah.mcmaster@nt.gov.au

Dear Sir/Madam,

**RE: GIGGLE FOR GIRLS PTY LTD & ANOR -v- ROXANNE TICKLE
NSD1386/2024**

We refer to the above matter and confirm that we act for the First and Second Appellants, Giggle for Girls Pty Ltd ACN 632 152 017 and Ms Sally Grover.

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Should you have any further questions please contact our office.

Yours faithfully
Alexander Rashidi Lawyers



Katherine Deves
Lawyer

Attachment.

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD10 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD10"

**Alexander Rashidi
Lawyers**

Principal	Alex Rashidi
Writer	Katherine Deves
Direct Line	07 2139 0100
Email	Katherine.d@rashidi.com.au
Our ref.:	AR:KD:23GIG001
Your ref.:	642083:CP:ns 23-1192

9 October 2024

Australian Capital Territory – Government Solicitor
GPO Box 158
CANBERRA ACT 2601

By email only actgso@act.gov.au

Dear Sir/Madam,

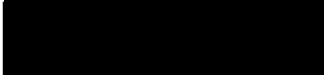
**RE: GIGGLE FOR GIRLS PTY LTD & ANOR -v- ROXANNE TICKLE
NSD1386/2024**

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Should you have any further questions please contact our office.

Yours faithfully
Alexander Rashidi Lawyers



Katherine Deves
Lawyer

Attachment.

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD11 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD11"

Joel Johnson

From: Katherine Deves <katherine.d@rashidi.com.au>
Sent: Thursday, 10 October 2024 10:00 AM
To: processservice@ags.gov.au
Cc: Alex Rashidi; Aisha Rashidi
Subject: Document for Service | Giggie -v- Tickle | NSD1386/2024 | 23GIG001
Attachments: ARL Letter serving s78B Notice - Cth 09.10.2024.pdf; Appeal - Giggie s78B Notice 23GIG001 09.10.2024 SEALED.pdf

Categories: LEAP

Dear Attorney-General,

Please find **attached by way of service** a sealed copy of a Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 filed in the Federal Court of Australia on 9 October 2024.

Kind regards,

Katherine Deves
Lawyer
T +61 7 2139 0100 | M +61 423 675 015
E katherine.d@rashidi.com.au

Alexander R

Level 12, Suite 1205, 239 George Street, Brisbane QLD 4000

www.rashidi.com.au

Important information

This email including any attachments is only intended for the addressee and may contain confidential and privileged information (and neither is waived or lost by mistaken delivery). Alexander Rashidi Lawyers does not represent or warrant that the integrity of this email transmission has been maintained. If you have received this email transmission in error, please immediately advise the sender by return email and then delete the email transmission and any copies of it from your system. We collect personal information to provide and market our services and for other purposes. Our privacy policy sets out how we handle personal information and can be obtained from our website.

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There has been an increase in the number of criminal cyber fraud attempts. Please telephone your contact person at Alexander Rashidi Lawyers if you are concerned about the authenticity of any communication you receive from us. It is especially important that you do so to verify details recorded in any electronic communication (text or email) from us requesting that you pay, transfer or deposit money. This includes any notice of change to our bank account details. Note that we will never contact you by electronic communication alone to tell you of a change to our payment details.

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD12 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD12"

Joel Johnson

From: Katherine Deves <katherine.d@rashidi.com.au>
Sent: Thursday, 10 October 2024 10:00 AM
To: crownsol@cs0.nsw.gov.au
Cc: Alex Rashidi; Aisha Rashidi
Subject: Document for Service | Giggie -v-Tickle | NSD1386/2024 | 23GIG001
Attachments: ARL Letter serving s78B Notice - NSW 09.10.2024.pdf; Appeal - Giggie s78B Notice 23GIG001 09.10.2024 SEALED.pdf

Categories: LEAP

Dear Colleagues,

Please find **attached by way of service** a sealed copy of a Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 filed in the Federal Court of Australia on 9 October 2024.

Kind regards,

Katherine Deves
Lawyer
T +61 7 2139 0100 | M +61 423 675 015
E katherine.d@rashidi.com.au

Alexander R

Level 12, Suite 1205, 239 George Street, Brisbane QLD 4000

www.rashidi.com.au

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IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD13 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD13"

Joel Johnson

From: Katherine Deves <katherine.d@rashidi.com.au>
Sent: Thursday, 10 October 2024 10:00 AM
To: crownlaw@qld.gov.au
Cc: Alex Rashidi; Aisha Rashidi
Subject: Document for Service | Giggie -v-Tickle | NSD1386/2024 | 23GIG001
Attachments: ARL Letter serving s78B Notice - QLD 09.10.2024.pdf; Appeal - Giggie s78B Notice 23GIG001 09.10.2024 SEALED.pdf

Categories: LEAP

Dear Colleagues,

Please find **attached by way of service** a sealed copy of a Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 filed in the Federal Court of Australia on 9 October 2024.

Kind regards,

Katherine Deves
Lawyer
T +61 7 2139 0100 | M +61 423 675 015
E katherine.d@rashidi.com.au

Alexander R

Level 12, Suite 1205, 239 George Street, Brisbane QLD 4000

www.rashidi.com.au

Important information

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Cyber fraud warning

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IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD14 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

From: Katherine Deves
Sent: Thursday, 10 October 2024 10:00 AM
To: enquiries@vgso.vic.gov.au
Cc: Alex Rashidi; Aisha Rashidi
Subject: Document for Service | Giggle -v-Tickle | NSD1386/2024 | 23GIG001
Attachments: ARL Letter serving s78B Notice - VIC 09.10.2024.pdf, Appeal - Giggle s78B Notice 23GIG001 09.10.2024 SEALED.pdf
Categories: LEAP

Dear Colleagues,

Please find **attached by way of service** a sealed copy of a Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 filed in the Federal Court of Australia on 9 October 2024.

Kind regards,

Katherine Deves
Lawyer
T +61 7 2139 0100 | M +61 423 675 015
E katherine.d@rashidi.com.au

**Alexander Rashidi
Lawyers**

Level 12, Suite 1205, 239 George Street, Brisbane QLD 4000

www.rashidi.com.au

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IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD15 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD15"



RE: Document for Service | Giggle -v- Tickle | NSD1386/2024 | 23GIG001

From AGD:Solicitor-General's Chambers <sg.chambers@sa.gov.au>

Date Thu 10/10/2024 10:12 AM

To Katherine Deves <katherine.d@rashidi.com.au>

Cc Alex Rashidi <alex.r@rashidi.com.au>

OFFICIAL: Sensitive

Dear Ms Deves,

Thank you, I confirm receipt.

For the purposes of taking instructions, are you able to advise whether the appeal has a listing date?

Yours faithfully,

Matt Lindner | Solicitor

Solicitor-General's Chambers

Level 19, 10 Franklin St Adelaide SA 5000

P: 7424 6459 | E: matthew.lindner@sa.gov.au

Attorney-General's Department Disclaimer:

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From: Katherine Deves <katherine.d@rashidi.com.au>

Sent: Thursday, October 10, 2024 9:30 AM

To: AGD:Solicitor-General's Chambers <sg.chambers@sa.gov.au>

Cc: Alex Rashidi <alex.r@rashidi.com.au>; Aisha Rashidi <aisha.r@rashidi.com.au>

Subject: Document for Service | Giggle -v- Tickle | NSD1386/2024 | 23GIG001

You don't often get email from katherine.d@rashidi.com.au. [Learn why this is important](#)

Dear Solicitor-General,

Please find **attached by way of service** a sealed copy of a Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 filed in the Federal Court of Australia on 9 October 2024.

Kind regards,

Katherine Deves

Lawyer

T +61 7 2139 0100 | **M** +61 423 675 015

E katherine.d@rashidi.com.au

Alexander Rashidi
Lawyers

Level 12, Suite 1205, 239 George Street, Brisbane QLD 4000

44/71

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD16 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD16"

Joel Johnson

From: Katherine Deves <katherine.d@rashidi.com.au>
Sent: Thursday, 10 October 2024 10:00 AM
To: solicitor.general@justice.tas.gov.au
Cc: Alex Rashidi; Aisha Rashidi
Subject: Document for Service | Giggie -v-Tickle | NSD1386/2024 | 23GIG001
Attachments: ARL Letter serving s78B Notice - TAS 09.10.2024.pdf; Appeal - Giggie s78B Notice 23GIG001 09.10.2024 SEALED.pdf

Categories: LEAP

Dear Solicitor-General,

Please find **attached by way of service** a sealed copy of a Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 filed in the Federal Court of Australia on 9 October 2024.

Kind regards,

Katherine Deves
Lawyer
T +61 7 2139 0100 | M +61 423 675 015
E katherine.d@rashidi.com.au

Alexander R

Level 12, Suite 1205, 239 George Street, Brisbane QLD 4000

www.rashidi.com.au

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IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD17 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD17"

Joel Johnson

From: Katherine Deves <katherine.d@rashidi.com.au>
Sent: Thursday, 10 October 2024 10:00 AM
To: sso@sso.wa.gov.au
Cc: Alex Rashidi; Aisha Rashidi
Subject: Document for Service | Giggie -v-Tickle | NSD1386/2024 | 23GIG001
Attachments: ARL Letter serving s78B Notice - WA 09.10.2024.pdf; Appeal - Giggie s78B Notice 23GIG001 09.10.2024 SEALED.pdf

Categories: LEAP

Dear Colleagues,

Please find **attached by way of service** a sealed copy of a Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 filed in the Federal Court of Australia on 9 October 2024.

Kind regards,

Katherine Deves
Lawyer
T +61 7 2139 0100 | M +61 423 675 015
E katherine.d@rashidi.com.au

Alexander R

Level 12, Suite 1205, 239 George Street, Brisbane QLD 4000

www.rashidi.com.au

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IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 2 pages comprise the document referred to as Annexure KD18 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD18"

Joel Johnson

From: Sarah McMaster <Sarah.McMaster@nt.gov.au>
Sent: Thursday, 10 October 2024 10:20 AM
To: Katherine Deves; Minister Boothby
Cc: Alex Rashidi; Aisha Rashidi
Subject: RE: Document for Service | Giggle -v-Tickle | NSD1386/2024 | 23GIG001
Attachments: ARL Letter serving s78B Notice - NT 09.10.2024.pdf; Appeal - Giggle s78B Notice 23GIG001 09.10.2024 SEALED.pdf

Categories: LEAP

Thank you for this correspondence

For all future correspondence, can this please be directed to the Attorney-General via Minister.Boothby@nt.gov.au

I will assist to action these for you today.

Regards

Sarah McMaster

Senior Department Liaison Officer

Attorney-General
Minister for Tourism and Hospitality
Minister for Major Events
Minister for Parks and Wildlife
Minister for Racing

Northern Territory Government
Suite 1, Level 5, Parliament House
Darwin NT 0800

PO Box 3146, Darwin NT 0801

p ... 08 8999 8604

m .. 0419 428 851

e ... sarah.mcmaster@nt.gov.au

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From: Katherine Deves <katherine.d@rashidi.com.au>
Sent: Thursday, October 10, 2024 8:30 AM
To: Sarah McMaster <Sarah.McMaster@nt.gov.au>
Cc: Alex Rashidi <alex.r@rashidi.com.au>; Aisha Rashidi <aisha.r@rashidi.com.au>
Subject: Document for Service | Giggle -v-Tickle | NSD1386/2024 | 23GIG001

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"ANNEXURE KD18"

Dear Ms McMaster,

Please find **attached by way of service** a sealed copy of a Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 filed in the Federal Court of Australia on 9 October 2024.

Kind regards,

Katherine Deves

Lawyer

T +61 7 2139 0100 | M +61 423 675 015

E katherine.d@rashidi.com.au

Alexander R

Level 12, Suite 1205, 239 George Street, Brisbane QLD 4000

www.rashidi.com.au

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IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD19 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD19"

Joel Johnson

From: Katherine Deves <katherine.d@rashidi.com.au>
Sent: Thursday, 10 October 2024 10:00 AM
To: actgso@act.gov.au
Cc: Alex Rashidi; Aisha Rashidi
Subject: Document for Service | Giggie -v-Tickle | NSD1386/2024 | 23GIG001
Attachments: ARL Letter serving s78B Notice - ACT 09.10.2024.pdf; Appeal - Giggie s78B Notice 23GIG001 09.10.2024 SEALED.pdf

Categories: LEAP

Dear Government Solicitor,

Please find **attached by way of service** a sealed copy of a Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 filed in the Federal Court of Australia on 9 October 2024.

Kind regards,

Katherine Deves
Lawyer
T +61 7 2139 0100 | M +61 423 675 015
E katherine.d@rashidi.com.au

Alexander R

Level 12, Suite 1205, 239 George Street, Brisbane QLD 4000

www.rashidi.com.au

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IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD20 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD20"



Our ref. 24009434

5 December 2024

Australian Government Solicitor
Level 34, 600 Bourke Street Melbourne VIC 3000
GPO Box 2853 Melbourne VIC 3001
T 03 9242 1222
www.ags.gov.au

Ms Katherine Deves
Alexander Rashidi Lawyers
PO Box 12781, George Street
QLD 4003

Canberra
Sydney
Melbourne
Brisbane
Perth
Adelaide
Hobart
Darwin

By email: Katherine.d@rashidi.com.au

Dear Ms Deves

**Giggle for Girls Pty Ltd & Anor v Roxanne Tickle – Federal Court of Australia –
Proceeding No. NSD1386/2024**

We refer to your letter dated 9 October 2024 to the Commonwealth Attorney-General giving him notice pursuant to s 78B of the *Judiciary Act 1903* of a constitutional issue in the above proceeding. We are replying on the Attorney-General's behalf.

The Commonwealth Attorney-General will not be intervening in this proceeding in the Federal Court of Australia, nor will he be applying to remove the cause from that Court to the High Court.

If the proceeding is taken further on appeal, or is removed to the High Court, the Attorney-General might decide to intervene at that stage. This would be considered upon the receipt of the appropriate notice under s 78B of the *Judiciary Act 1903*.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Alice Nagel', with a stylized flourish at the end.

Alice Nagel
Senior Lawyer
T 03 9242 1205
alice.nagel@ags.gov.au

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 3 pages comprise the document referred to as Annexure KD21 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD21"

Joel Johnson

From: Matthew McLeod <Matthew.McLeod@cso.nsw.gov.au>
Sent: Monday, 13 January 2025 9:07 AM
To: Katherine Deves
Cc: Joel Johnson; Gemma Namey; Christopher Frommer
Subject: RE: Giggle -v- Tickle NSD1386/2024 | Notice of a Constitutional Matter 78B_NSW_24560
Attachments: Letter to Katherine Deves - 06 December 2024.pdf

EXTERNAL EMAIL: DO NOT CLICK links or attachments unless you have carefully viewed the display name as well as the associated email address of the sender and know the content is safe.

Dear Ms Deves

Thank you for your email. Please find **attached** a letter sent to the first and second appellants' previous solicitors on 6 December 2024, confirming that the Attorney General has decided not to intervene in these proceedings.

Kind regards

Matthew McLeod (*Mr/he/him*)
Solicitor
for Crown Solicitor

T 02 9474 9506 E matthew.mcleod@cso.nsw.gov.au

 www.cso.nsw.gov.au



Crown Solicitor's Office

From: Katherine Deves <katherine.deves@ptwlaw.com.au>
Sent: Wednesday, January 8, 2025 4:29 PM
To: CrownSol <crownsol@cso.nsw.gov.au>
Cc: Joel Johnson <Joel.Johnson@ptwlaw.com.au>
Subject: Giggle -v- Tickle NSD1386/2024 | Notice of a Constitutional Matter 78B_NSW_24560

Dear Sir/Madam,

We refer to the above matter.

We act for the First and Second Appellants, Giggle for Girls Pty Ltd and Sall Grover.

"ANNEXURE KD21"

We confirm a sealed copy of the Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 was served on the Crown Solicitor of New South Wales by the Appellants' previous solicitors on 10 October 2024 (**attached**).

For ease of reference, please find a sealed copy of the abovementioned Notice of a Constitutional matter under section 78B of the Judiciary Act 1903 and Notice of Appeal **attached**.

We would be grateful if the Attorney-General could advise us if he intends to intervene in this matter so that we may inform the Court.

Kindest regards,
Katherine Deves | Solicitor



PRYOR
TZANNES
& WALLIS
SOLICITORS & NOTARIES



Our knowledge. Your advantage.

Pryor Tzannes & Wallis Solicitors & Public Notaries

1005 Botany Road Rosebery NSW 2018
PO Box 411 Mascot NSW 1460
t: 02 9669 6333 f: 02 9693 2726
e: katherine.deves@ptwlaw.com.au
w: www.ptwlaw.com.au

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[Faint, illegible text, likely a placeholder or a very low-quality scan of a signature block.]

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Crown Solicitor's Office



6 December 2024

Your Ref: AR:KD:23GIG001

My Ref: 202404124

Ms Katherine Deves
Alexander Rashidi Lawyers
Level 12, Suite 1205
239 George Street
Brisbane QLD 4000

By email: Katherine.d@rashidi.com.au

Dear Ms Deves

**Giggle for Girls Pty Ltd & Anor v Tickle (NSD1386/2024): Notice pursuant to s 78B
Judiciary Act 1903**

I refer to your Notice to the Attorney General for New South Wales under s 78B of the *Judiciary Act 1903* dated 9 October 2024, informing the Attorney General of certain constitutional questions arising in this matter.

I am instructed to inform you that the Attorney General has decided not to intervene in these proceedings. However, if the matter proceeds to appeal (including if any leave to appeal is sought), or if the matter is removed to the High Court, then further notices under s 78B should be given and the Attorney General will reconsider the question of intervention.

Please do not hesitate to contact Matthew McLeod on (02) 9474-9506, or via email on matthew.mcleod@csso.nsw.gov.au, if you have any queries in relation to this matter.

Yours faithfully

Matthew McLeod
Solicitor
for Crown Solicitor

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD22 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD22"



Crown Law

Department of
Justice and Attorney-General

Your ref: AR:KD:23GIG001
Our ref: PL8/ATT110/747/UWE
Contact: Wendy Ussher
Direct ph: 07 3031 5622
Direct fax: 07 3031 5605

6 November 2024

Ms Katherine Deves
Lawyer
Alexander Rashidi Lawyers
PO Box 12781
GEORGE STREET QLD 4003

By email: katherine.d@rashidi.com.au

Dear Ms Deves

Giggle for Girls Pty Ltd ACN 632 152 017 and Anor v Roxanne Tickle
Federal Court of Australia, New South Wales Registry No. NSD1386/2024

I refer to your letter of 9 October 2024 enclosing a Notice of a Constitutional Matter issued pursuant to s 78B of the *Judiciary Act 1903* (Cth) in respect of the above proceedings.

The matter has been examined and you are advised that the Attorney-General for the State of Queensland will not be intervening in the proceedings. However, should the matter proceed to the High Court the Attorney-General will reconsider the question of intervention.

Yours sincerely

Rob Hutchings
Assistant Crown Solicitor
for **Crown Solicitor**

Document No: 17106717

State Law Building
50 Ann Street Brisbane
GPO Box 5221 Brisbane
Queensland 4001 Australia
Telephone 07 3031 5600
Facsimile 07 3031 5998
ABN 13 846 673 994

61/71

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD23 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD23"



Government of South Australia

Attorney-General's Department

Solicitor-General's Chambers

Level 19
10 Franklin Street
Adelaide SA 5000
GPO Box 464
Adelaide SA 5001
DX 336

If calling please ask for:
Matthew Lindner
Telephone: **08 7424 6459**
Our Reference: 219095

11 November 2024

Katherine Deves
Lawyer
Alexander Rashidi Lawyers

By email only to: katherine.d@rashidi.com.au

Dear Ms Deves,

GIGGLE FOR GIRLS PTY LTD V ROXANNE TICKLE| NSD 1386/2024

I refer to the Notice of a Constitutional Matter filed in the above matter.

I advise that the Attorney-General for the State of South Australia does not wish to intervene in this matter.

Could you please inform me if the matter proceeds to the High Court of Australia, as the Attorney-General will give further consideration as to intervention at that stage.

Yours faithfully,

SOLICITOR-GENERAL

Per:
Matthew Lindner

A handwritten signature in blue ink, appearing to read "Matthew Lindner", written over a horizontal line.

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 2 pages comprise the document referred to as Annexure KD24 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 



Giggle v Tickle

From Solicitor General <Solicitor.General@justice.tas.gov.au>

Date Tue 10/15/2024 11:54 AM

To Katherine Deves <katherine.d@rashidi.com.au>

 1 attachments (20 KB)

Giggle v Tickle.pdf;

Dear Katherine,

Please find attached correspondence in relation to this matter.

Kind Regards,

Heather Coetzee | Executive Officer

Office of the Solicitor-General | Department of Justice

p (03) 6165 3614 | **e** heather.coetzee@justice.tas.gov.au | **w** www.justice.tas.gov.au

15 Murray Street, Hobart, TAS 7000 | GPO Box 825 Hobart, TAS 7001

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TASMANIA

SOLICITOR-GENERAL OF TASMANIA

15 MURRAY STREET, HOBART 7000

Telephone: (03) 6165 3614

Fax: (03) 6173 0264

DX: 15 Hobart

e-mail: solicitor.general@justice.tas.gov.au

Our reference: 40100-24:JR
Your reference: AR:KD:23GIG001

15th October 2024

Katherine Deves
Lawyer
Alexander Rashidi Lawyers

Email: Katherine.d@rashidi.com.au

Dear Katherine

Giggle v Tickle

On behalf of the Attorney-General of Tasmania I acknowledge receipt of your notice under s 78B of the *Judiciary Act 1903* dated 9th October 2024 in relation to this matter.

The Attorney-General does not wish to intervene in the proceedings whilst the matter is before the Federal Court. However, would you please inform me should the proceedings be removed or otherwise find their way to the High Court, as in that circumstance the Attorney-General may wish to reconsider whether or not to intervene.

Yours faithfully,

SOLICITOR-GENERAL

A handwritten signature in black ink, appearing to be 'JR' with a flourish.

Per:
JENNY RUDOLF
ASSISTANT SOLICITOR-GENERAL

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 2 pages comprise the document referred to as Annexure KD25 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed: 

"ANNEXURE KD25"



GIGGLE FOR GIRLS PTY LTD & ANOR v ROXANNE TICKLE

From Mestichelli, Lana <l.mestichelli@sg.wa.gov.au>

Date Wed 10/23/2024 12:46 PM

To Katherine Deves <katherine.d@rashidi.com.au>

1 attachments (390 KB)

DOC004.PDF;

Dear Ms Deves

Please see the attached letter.

Kind Regards

Lana Mestichelli | Office Administrator | Solicitor-General's Office

Level 28, David Malcolm Justice Centre, 28 Barrack Street, Perth WA 6000 Australia | T (08) 9264 1806 | F (08) 9321 1385 |

l.mestichelli@sg.wa.gov.au

Monday	Tuesday	Wednesday	Thursday	Friday
Office	Office	Office	Office	Non-Work Day

Acknowledgement of Country: We acknowledge Traditional Custodians of Country throughout Western Australia. We recognise their stories, traditions and cultural practices. We pay our respects to Aboriginal people; and to Elders, past, present and future.

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"ANNEXURE KD25"

STATE SOLICITOR'S OFFICE

David Malcolm Justice Centre
28 Barrack Street
Perth, Western Australia 6000

GPO Box 883 Perth WA 6838
Telephone (08) 9264 1888
Fax (08) 9264 1440
Email sso@sso.wa.gov.au
DX 175

Your ref: AR:KD:23GIG001

Alexander Rashidi Lawyers
PO Box 12781
GEORGE ST QLD 4003

Attention: Katherine Deves

By Email: katherine.d@rashidi.com.au

Dear Madam

GIGGLE FOR GIRLS PTY LTD & ANOR v ROXANNE TICKLE

I acknowledge receipt of notice of the above matter pursuant to section 78B of the Judiciary Act.

On behalf of the Attorney General of Western Australia I wish to advise that the State does not intend to intervene in proceedings in the Federal Court of Australia at New South Wales.

However, should the matter go to the High Court either on appeal or by removal, I would appreciate being informed and supplied with relevant documentation.

Yours faithfully

for SOPHIE CULLINGFORD
STATE SOLICITOR

16 October 2024

IN THE FEDERAL COURT OF AUSTRALIA

District Registry: New South Wales

Division: Appeals and Related (Human Rights)

FILE NO: NSD1386 of 2024

GIGGLE FOR GIRLS PTY LTD ACN 632 152 017 & ANOR

(Appellants)

AND

ROXANNE TICKLE

(Respondent)

ANNEXURE SHEET

The following 1 pages comprise the document referred to as Annexure KD26 in the affidavit of Katherine Deves sworn on 6 February 2025 before me.

Justice of the Peace in and for the State of New South Wales
Reg. No. 256003

Name: Joel Alexander Johnson

Signed

**Australian Capital Territory
Government Solicitor**



Your Reference
AR:KD.23GIG001

Our Reference
642527:JH:ns
25-0142
24-4419

Contact
James Harris
02 620 50945
james.harris@act.gov.au

31 January 2025

By email only: katherine.deves@ptwlaw.com.au

Ms Katherine Deves
Solicitor
Pryor Tzannes & Wallis

Dear Ms Deves

**Section 78B Notice of a Constitutional Matter: Giggle for Girls Pty Ltd & Anor v
Tickle - Federal Ct - NSD1386/2024**

We refer to your email of 8 January 2025 and the Notice of a Constitutional Matter served by you under letter dated 9 October 2024 on the Attorney-General of the Australian Capital Territory in the above matter.

This letter is to advise that the Attorney-General of the Australian Capital Territory does not intend to intervene in these proceedings.

Yours sincerely

ACT Government Solicitor

A handwritten signature in blue ink, appearing to read 'James Harris'.

James Harris
Solicitor Assisting the Solicitor-General

CC: Ms Sophie Elder-Harris
sophie.elder-harris@act.gov.au