

Exhibit Certificate

No. NSD 689, 690 and 691 of 2023

Federal Court of Australia

District Registry: New South Wales

Division: General


Ben Roberts-Smith VC MG

Appellant

Fairfax Media Publications Pty Limited and others

Defendants

This is the exhibit marked '**NM-1**' now produced and shown to Nicholas David McKenzie at the time of affirming his affidavit on 14 April 2025 before me:



Michelle Nguyen
Solicitor

Filed on behalf of (name & role of party)	Fairfax Media Publications Pty Ltd and others, the Respondents
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NOTICE OF FILING

This document was lodged electronically in the FEDERAL COURT OF AUSTRALIA (FCA) on 5/04/2019 5:39:24 PM AEDT and has been accepted for filing under the Court's Rules. Details of filing follow and important additional information about these are set out below.

Details of Filing

Document Lodged:	Affidavit - Form 59 - Rule 29.02(1)
File Number:	NSD1485/2018
File Title:	BEN ROBERTS-SMITH v FAIRFAX MEDIA PUBLICATIONS PTY LTD (ACN 003 357 720) & ORS
Registry:	NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



A handwritten signature in blue ink, reading "Warwick Soden".

Dated: 5/04/2019 5:39:29 PM AEDT

Registrar

Important Information

As required by the Court's Rules, this Notice has been inserted as the first page of the document which has been accepted for electronic filing. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties.

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Outline of Evidence of Emma Roberts-Smith

No. NSD 1485 of 2018

Federal Court of Australia

District Registry: New South Wales

Division: General

Ben Roberts-Smith

Applicant

Fairfax Media Publication Pty Limited ACN 003 357 720

First Respondent

Nick McKenzie

Second Respondent

Chris Masters

Third Respondent

David Wroe

Fourth Respondent

1. My full name is Emma Lea Roberts-Smith.
2. I married my husband, Ben in 2003. We have twin daughters, Eve and Elizabeth, who are 8 years of age. I am a full-time housewife.

Articles published on 8 – 10 June 2018 – Fairfax

3. I am aware that Ben has instituted proceedings for defamation over articles by Nick McKenzie, Chris Masters and/or David Wroe published on 8 – 9 June 2018 (**the First Article**), 10 June 2018 (**the Second Article**) and 10 – 11 August 2018 (**the Third Article**).
4. I am also aware that Ben has instituted proceedings for defamation over articles published by the Straits Times on 6 September 2018 (**the Straits Times article**).

First Article - articles published on 8 – 9 June 2018

5. On the morning of Saturday, 9 June 2018 as a result of Ben having received a number of messages I read the online version of the First Article on my mobile telephone.

Filed on behalf of (name & role of party) Ben Roberts-Smith, Applicant

Prepared by (name of person/lawyer) Mark Geoffrey O'Brien

Law firm (if applicable) Mark O'Brien Legal

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[Form approved 01/08/2011]

6. My initial reaction was one of shock – the First Article made allegations that an SASR soldier named "Leonidas" had engaged in war crimes. I immediately took the reference to "Leonidas" to be about Ben because the article referred to "Leonidas" being part of an SASR patrol that involved tattoos, and Ben had a tattoo on his stomach. I also took the reference to "Leonidas" to be about Ben because the article stated:
- a. that "Leonidas" was deployed repeatedly to Afghanistan, and I knew that Ben had been deployed to Afghanistan six times;
 - b. that "Leonidas" had formed *"impeccable connections up the chain of command"*, and I knew that since having been awarded the Victoria Cross, that Ben had regular contact with senior officers of the Army;
 - c. that two SASR soldiers had been awarded the Victoria Cross medal, with Ben having been awarded the Victoria Cross on 23 January 2011.
7. I could not believe what had been written about Ben, and my heart sunk for him. I observed that Ben was extremely angry and upset about what had been written, and I tried to calm him down. I recall that he said to me words to the following effect:

"We have sacrificed so much for this country as a family, and this is what we get in return."

"I can't believe that they have written this."

"Where did they get this from?"

8. During the day, a large number of friends telephoned or messaged me about the article saying words to the following effect:

"Leonidas is Ben."

"How could they have written that about Ben."

"I can't believe what they have written about Ben."

In particular, I recall the following conversations:

- a. my mother and stepfather telephoned me and said to me words to the following effect:

My mother: *We've read the article. Are they saying "Leonidas" is Ben?*

My stepfather: *They can't be talking about Ben, can they?*

- b. my best friend Danielle Scott telephoned me, and asked me in words to the following effect:

"Is Ben Leonidas?"

- c. Debbie Rolfe telephoned me and said words to the following effect:

"Surely they are not saying that Ben has committed war crimes?"

I also received a text message from Debbie and a copy of the messages passing between us is annexed and marked "A".

9. Later that day, Ben had to speak as a keynote speaker at a corporate event. I observed that Ben became extremely anxious and stressed at having to attend. Upon his return, we then had to fly to Perth as Ben had to attend a meeting for Channel Seven on the Monday. The flight with Ben was horrendous, with Ben being extremely anxious and paranoid.

Second Article - articles published on 10 June 2018

10. During the night of 9 June 2018 we stayed in a hotel in Perth and neither Ben nor I could sleep, with Ben waking up wet with night sweats and his sheets soaked. At some stage during the night, Ben checked his mobile telephone and saw that the Second Article had been published. After reading it, he then showed it to me and I also read it. The article again said that an SASR soldier given the name of "Leonidas" had committed war crimes. As the name "Leonidas" had again been used, I took the reference to "Leonidas" to be about Ben. I could see that the allegations again shocked Ben and neither of us could sleep for the rest of the night.

11. On Sunday, 10 June 2018 I continued to receive phone calls and messages from friends and acquaintances who said to me words to the following effect:

"Leonidas is Ben."

"How could they have written that about Ben."

"I can't believe what they have written about Ben."

12. Over that weekend, including whilst we were in Perth, I observed that Ben had become completely consumed by what had been written about him, he was angry, dumbfounded, and completely and utterly shocked.
13. We returned to Brisbane on the Monday and Ben was again was extremely anxious and paranoid during the flight.
14. During the week following publication of the articles:

- a. I was at our childrens' school when a mother of one of the children at the school said to me words to the following effect:

"Is Ben meant to be 'Leonidas'?"

I told Ben about the conversation, and to my observation he became very upset.

- b. Diane Young, our housekeeper (and who had seen Ben walk around our house with his shirt off and his tattoos) said to me words to the following effect:

"Are they saying Ben is Leonidas?"

15. I recall that shortly after the publication of the first two articles that Ben had become more distant from our children, and our daughter Eve said to me words to the following effect:

"Why does dad not smile anymore?"

Neither she (nor her sister) had ever said anything similar to me before.

16. Copies of other messages I received from friends relating to the articles are annexed and marked "B".

Third article - articles published on 10 – 11 August 2018

17. On the morning of 10 August 2018, Ben was not at home as he was staying overnight in a hotel because of work. Early that morning, I recall that I received a text message from our friend Debbie Rolfe a copy of which is annexed and marked "C".
18. I then checked online and found the Third Article. I read the article and was completely numb and upset. I telephoned Ben and I said to him words to the following effect:

"You have been named in the news again. It is about our personal life. You need to read it and then call me back. I don't know how I will get through today as I have a school excursion for the girls that I have to go to."

Shortly thereafter, Ben telephoned me back and we had a conversation in words to the following effect:

Ben: *I can't believe that they have stooped so low. It is completely false. You need to go home.*

Myself: *I can't. I have committed with a teacher to go on the excursion.*

19. No-one at our childrens' school had known that Ben and I had been separated. That morning, I had a conversation with our daughter Eve's teacher in words to the following effect:

Teacher: *Is everything okay?*

Myself: *No. Ben has just been accused of domestic violence.*

Teacher: *Over you?*

Myself: *No. It's complicated.*

20. Ben and I had difficulty coping with what had been written. We had previously separated, with Ben having moved out of our home in about October 2017 to about April 2018, when we reconciled and he moved back in. I was aware that Ben had a relationship with another woman. The article had brought back the issues that led to our separation which we had been working on, and it was emotional, stressful, and hurtful for us both.

21. Ben was extremely distressed at what had been published about him, and I recall that he said to me words to the following effect:

"Not only does it say that I engage in domestic violence but also that I am a war criminal."

22. I recall that at some stage I said words to the following effect to Ben:

"I can't believe this. They are saying you had an affair without me knowing about it. I feel humiliated. How can I go out in public when everyone will be talking about us."

23. I recall that Ben became very hurt and upset as we had tried to keep our separation private and now the issue had been raised publicly for all to read about. I recall Ben said to me words to the following effect:

"It's completely false. Fairfax are using her to ruin my reputation."

24. I also received messages from friends and acquaintances and annexed hereto and marked "D" are copies of a number of them. I also received an email of support from our childrens' school Principal and primary school Principal, copies of which are annexed and marked "E". I showed the email to Ben and he said to me words to the following effect:

"I appreciate their help but it's terrible that it has gone throughout the school."

25. I recall that I received many telephone calls from friends and acquaintances on the Friday and weekend following publication of the Third Article who said to me words to the following effect:

"You must be devastated."

"I can't believe that this has happened."

"I can't believe this has been written."

"We are here for you."

I recall that Ben said to me words to the following effect:

"People will think that I beat women up."

26. I never thought for one second that Ben had hit the woman as alleged. I have never been threatened by Ben, and he has never done or said anything to me which would suggest to me that he could have hit a woman as alleged.

27. On the Sunday following publication of the article, I travelled to Sydney with our children to attend a concert for their birthdays. I was worried and concerned about Ben being on his own, and telephoned Ben to make sure he was fine. I also telephoned Ben's friend Jed Wheeler and we had a telephone call in words to the following effect:

Myself: *I'm concerned about Ben being on his own.*

Jed: *I've already spoken with him as I was also worried. I can go and see him if need be.*

28. As Ben and I were anxious about the safety of our children, we also went to see Stuart Meade, the headmaster of our childrens' school shortly after publication to discuss the article and safety issues regarding our children.

Straits Times Article

29. On about 6 September 2018, Ben telephoned me and we had a conversation in words to the following effect:

Ben: *There's another article about me, this time in the Straits Time from Singapore. They are just relentless.*

Myself: *Why are they writing about you in Singapore. I think I received an email about the same article from Kate, I will send it to you.*

A copy of the email that I sent to Ben is annexed and marked "F". The email I sent to Ben was from one of my close friends, Kate Mathias, who resides in Canberra.

30. On 12 October 2018, Ben and I received an email from the Victoria Cross and George Cross Association in London which referred to the "horrible time with the press" that we were facing. A copy of the email is annexed and marked "G".

The Articles

31. Since publication of the articles:

- a. Ben has expressed to me his fear that our daughters may find out about the allegations that have been made about him, and I recall him saying words to the following effect to me:

"It terrifies me that our children will read about this or may get teased about it"

- b. A number of parents from our childrens' school with whom we were friendly have stopped contacting us;
- c. Ben no longer sleeps well and often wakes up wet as a result of night sweats. He now takes Melatonin, which is a natural herb, to help him sleep. I recall that I often had to change sheets of our bed daily because of night sweats, especially following publication of each of the First, Second and Third Articles;
- d. Ben has lost weight – I have observed that if Ben is very stressed, he doesn't eat as much as he otherwise would;
- e. Ben has become paranoid and anxious that people will think that he is a war criminal. For example, I recall that Ben has said to me words to the following effect on a number of occasions when we are in public areas such as shopping centres, airports and elsewhere:

"I feel that when people look at me they think that I am a war criminal"

"I don't want to go. People think that I beat up women"

- f. Ben has been reluctant to go to a number of our children's school events, and has said to me words to the following effect:

"I hate going because they will think that I am a war criminal"

- g. Ben sits on a number of boards of organisations that seek to assist veterans. I recall that I had a conversation with Ben in words to the following effect when the topic of him attending a board meeting had been raised:

"I am not sure if I will be able to go. They will all think that I am a war criminal."

32. Prior to the articles being published, my husband Ben was a confident role model, active community member and attentive family man. Since publication of the articles, he now finds it difficult to attend public events and be the role model he used to be, for his family and within the community. Ben's self esteem is low, his anxiety high and has paranoia that people think it true that he is a war criminal and a person who hits women. Life with him at home as a father and husband will never be the same.

5 April 2019

"A"

Telstra 4G

3:12 pm

🔋 🔒 🔒



Deb

Far out Em, just read today's story -
you guys must be so stressed, so
awful and destructive 😞 xxx

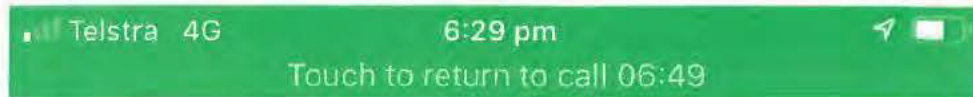
Morning Deb, thanks for your
message 🙏 it's exhausting and
they're relentless! There is
absolutely no truth in it and hence
why they are referring to b1s as a
ridiculous alias - he has to fly to
Perth this afternoon. I feel bad that
I'm not going, perhaps I should. It's
definitely taking its toll on him xxx

Oh gosh, you poor things. I know it
might be tough but if you can go
with him it might be good for him?
Have a chat and see how he
sounds? Xxx

I'm sure Ben will be ok over in Perth,
might be better for you to stay with
the girls? I just can't imagine what
you're going through 😞 xxx



"B"



Grant >

iMessage
Fri, 8 Jun, 7:22 am



May find interesting? No names

Yeh thanks grant, we knew this was coming! Pretty disappointing for veterans! They knew the what would come if they put brs name to it

Delivered

I agree!



Sun, 10 Jun, 9:21 AM

Hope your hanging in there chick..... just focus on what an amazing life you guys have created..... it's just not possible for anyone to take that away from two super strong, honest, loyal and connected bitches 🤔🤔 They can try but you guys WIN that's just what you do. The C***s will learn the hard way!! Xxx sending love and strength ❤️

Sun, 10 Jun, 10:02 PM

Hey mate thanks for the message. Forgot how much Perth sucks balls!! Been a big day. Looking forward to getting home! Hope you had a good weekend xx

Tue, 12 Jun, 4:55 PM



"C"

Telstra 4G

3:07 pm



Deb

Fri, 10 Aug, 7:04 am

Omg Em, just saw the article today,
you guys must be devastated, we
are thinking of you, call me any time
to vent!!!! 😞 xxx

Fri, 10 Aug, 10:39 am

Hi Em, no need to call back, was
just checking you are ok ❤️ xxx

Hey Deb, I'm devastated!! I'm just
trying to hold myself together. I'm
on a school tour with the girls
(which is the last place I'd rather
be!!) and Ben is currently dealing
with the lawyers. We are going to
release a statement and have
started deformation proceedings
this morning against Fairfax! Xxx

Gosh, you poor thing!! RR and I are
thinking of you guys constantly,
whatever we can do to help, we're
here for you!!!!!! Xxx



"D"



Just thinking of you all and to let you know we are here for you if needed. Carmel

Connors words on the Fairfax piece were "it's a hatchet job". Apparently he doesn't like them at all.

Thank you for your support 🙏 we very much appreciate it x



Hi Em, it's Tanya. Saw the article on Ben. Journos - I have no words! How are you? It can't be easy right now but you know Ben and what's true - the rest is just half truths and opinion. We're thinking of you all and sending hugs and kisses. 🤗🤗

Thank you for your support 🙏 we very much appreciate it x

Always! Hope today is better for you. 🤗

Hi! Just thought I'd check in and see how things are going? I hope stuff has settled a bit for you this week. I bet you're counting hours until your holiday xx





Hey my love, Thinking of you. I'm here if you want to chat/catch up
Lots of love 💖 Ali

Thank you for your support. 🙏 we very much appreciate it. x



Hi Emm talking to Tanya. We are thinking of you all love Auntie Shirley

Thank you for your support. 🙏 we very much appreciate it. x

Always be there for you all Emm. Family stick together. Xxxx💖

🥰 and I love the best one!

Hi Emm how are you holding up? Thinking of you always. 💖 xxxxx

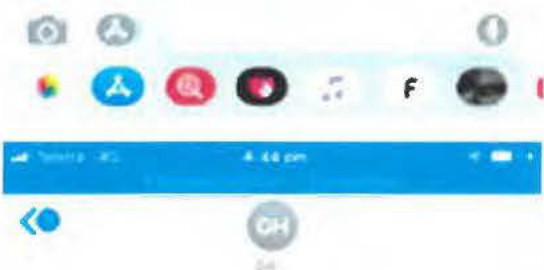




Hi em. This must be a hard time for you guys, hope you are ok. x

Hey Sarah, thanks for msg. 🙏 hope all is ok with you x

Thank you x



Thinking of you both x x

Thank you for your support 🙏 we very much appreciate it x

Just want you to know I'm here x





Hi Em, sending hugs to you and the family for whatever you are dealing with at the moment. 🤞 lots of love Jodi x

Thank you for your support 🙏 we very much appreciate it x



Sending our love and support to you and Ben. Hope you are ok. ❤️ ❤️

Thank you for your support 🙏 we very much appreciate it x

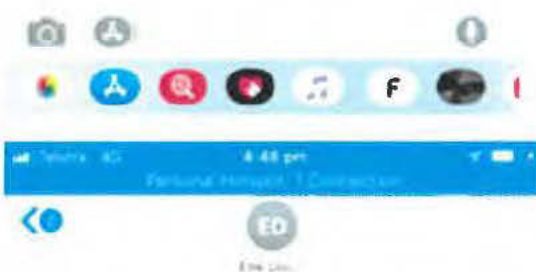
Let me know if there is anything I can do, even if it's just a coffee chat! Happy to help out with the girls as well. You both are amazing and stay strong! 🤞





Xo ring if you want to chat. Xc

Thank you for your support 🚩 we
very much appreciate it x



Thinking of you! Stay strong. It will
be over soon. Sending you all my
love ❤️

Thank you for your support 🚩 we
very much appreciate it x





Reacher

I just saw some things come up on my abc news feed and wanted to send you a message to say that I'm thinking of you and the fam and that the media can be right royal shits sometimes. You and Ben have been incredible friends, supporters and mentors to both Curt and I in so many difficult times. I'm really fucked off that you have to deal with this shit. You're both bloody awesome and are two of the best people I know. If you have time to catch up for a chat at any time let me know and I'll drive up and say hello or always have time for you on the phone...and there's always two spare rooms in Burleigh for both you and the girls to come down and hang out too if you want to come stay! We have a bottle of RWT wine waiting to be drunk with you! Hope to see up soon and sending you lots of love and big fuck you army mojo xxx



Reacher

very much appreciate it x





Hey Em, I've just read all the shit that's going on with Ben. I hope you are ok. Stay strong. I'll drive up if you need me to. I'm off Wednesday but will come sooner if you need a cuddle and a trusted friend. Let me know if you're ok. Love you. Don ❤️

Hey lovely, are you ok? I'm so worried about you. xx

Hey sorry don, just been full on & I'll give you a buzz in a couple of days if that's ok? Thanks for your message! 🙏❤️



We're thinking of you guys, we're here for you ❤️❤️❤️❤️. Please call if you need anything at all, don't hesitate xxx

❤️ keralee & mark xx



Mobile 4G 4:34 pm Personal Messages - Conversation



Me

Hey Mate, Just reaching out hoping you guys are ok. I can't imagine it is a easy time for Ben or you and the family, and personally I don't believe it. Unfortunately there is always someone in the wings to try and pull you down, and I hope that it isn't too rough on you both. As I know you have tried to keep your private life private and this will be difficult. Always here in your corner and love to you all ❤️❤️
[I realise you will be getting messages left right and centre, so I don't need a reply, just letting you know we are thinking of you) xx.

Thank you for your support 🙏 we very much appreciate it x

Stay strong luv ❤️



Mobile 4G 4:35 pm



Deb

Darling, I'm here if you need me. I wish I was closer so I could give you a hug.
I've argued with myself all day about whether to call, or text or just leave you alone but I know if I were in your shoes despite having many others reaching out to lend a hand, or offer a shoulder there are certain people who it just means that little bit more from. I hope I am that for you, and I hope you know I genuinely wish I could take some of the hurt your family is going through away. ❤️

Thanks debb, total shit time right now (and has been for some time) public stuff makes it 10 times harder. We are trying to hold it all together!! A position I wouldn't wish on my worse enemy. But the truth always wins and we've started defamation proceedings which is



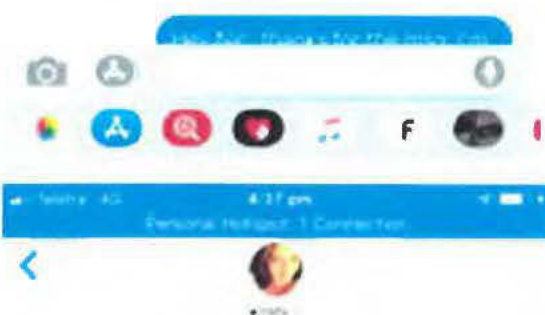


Hey Nic, sorry I missed your call.
Thanks for the support, we very
much appreciate it. 🙏 I hope all is
well with you guys x

Don't apologise. I know life gets
busy. I'm often in my own drams to
notice much else in this world at the
moment. I know you would be under
a bit of stress at the mo. Know that
you have so many friends backing
you. Always here if you need an ear
👂

Thanks Nic 🙏🙏

Hey how you holding up? Have
things settled?



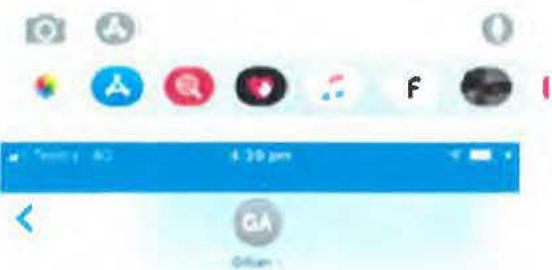
Thinking of you, not an easy day ❤️
❤️❤️👂

Thank you for your support 🙏 we
very much appreciate it x





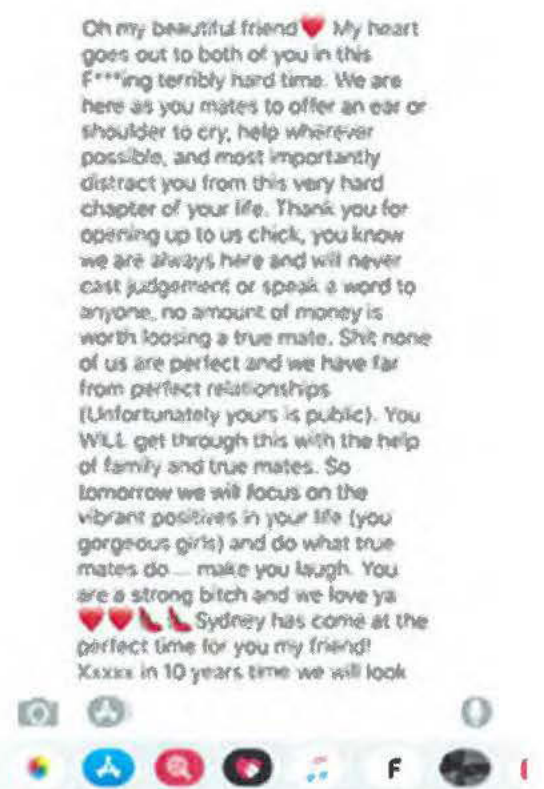
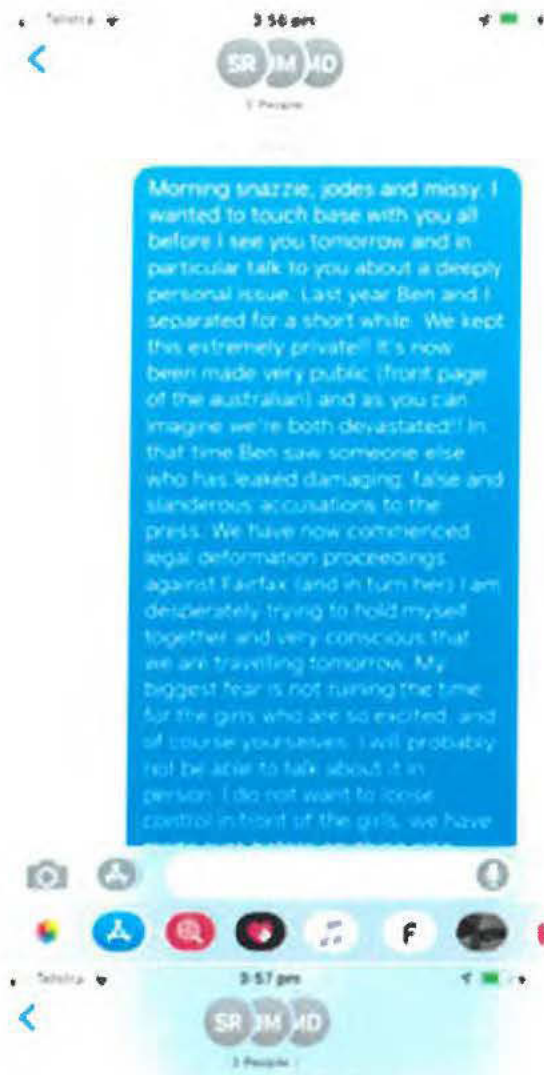
Hey hun. Just wanted to send you some love and let you know that you guys have our support. No need to reply (((Big hugs))) Leigh & Brett x



Hi Em
We caught up with Richard and Deb last night and missed not seeing you and Ben but completely understand. Just wanted you to know that we are thinking of you and you have our full support. Please let me know if there is anything we can do. Know that there are many, many people who love you both and are believe in you both. Xxxx

Dear Gillian. Thank you for your message and support. It's been a horribly tough time. We very much appreciate everything you and Brendan do for us. We are extremely lucky to have you both in our lives. Sorry we missed dinner last night. It would have been lovely to see you. Xxxx



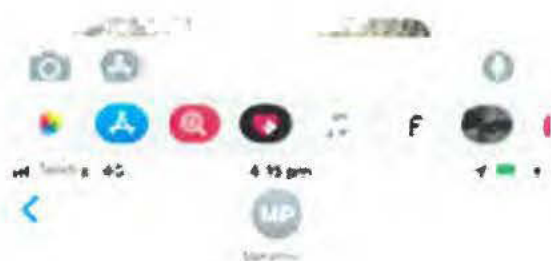




vibrant positives in your life (you gorgeous girls) and do what true mates do ... make you laugh. You are a strong bitch and we love ya ❤️❤️💪 Sydney has come at the perfect time for you my friend! Xxxxx in 10 years time we will look back with a vino and remember this shitty time and many other shitty chapters we will all have to go through... it will be well in the past. See you tomorrow sexy lady x



Em, of course we will be there for you and your beautiful girls, they will have a wonderful time and hopefully we can be a support for you without needing to talk About !! You Will beat these stupid journos ! S



Just sending love to you both from both of us ❤️❤️

Thank you for your support 🙏 we very much appreciate it x

Hi just thinking about you and wanted to know which is the best email for you? Big hugs marylou x





Hi Emma,
So sorry to hear all the nonsense.
Don't let it ruin your time away.
Always here to talk "fluffy retail
crap."
Much Love April
💕

Thank you for your support! 🙏 we
very much appreciate it! 🙏



Hi Emma: Can't believe the trash
you hear, all about bringing a tall
poppy down. Ben is such a lovely
person, and you are a beautiful
family - hold your heads high and
continue on as you always do. Lots
of love to you all, God will look over
you and get you through this rough
patch which is all gutter trash. The
media can be so cruel. Love you
guys. 💕

Thanks for your message Laurelle
🙏 we very much appreciate your
support. I hope you're home and
feeling better? 🙏

Still in Emma, hoping to be better
soon. 💕💕





Hey Emma...I'm sorry to hear of all the shit you are being put through. It's a disgrace, but not really surprising. This is how the grubby media and bureaucrats gradually wear down the good people in the world. I hope you guys sue the shit out of everyone involved...Todd

Hey toddy...Thanks so much for your message 🙏 It's been very difficult! Yes, we are suing and have started a defamation case against Fairfax media. We've been dignified and now it's time to fight for the truth!

Stick it to them, you will have the support of the majority of sensible Australians who don't like having military heroes and their families trashed...good to see the former PMs providing some sensible context...



I was very sorry to read that shit on [news.com.au](https://www.news.com.au) this morning. If you need anything just let me know xx

Thanks for your message 🙏 we appreciate the support x

I hope it was ok to send. I couldn't not reach out - thinking of you both and sending love xx





I'm good darling but was SO worried about you. I'm sure you're probably used to these things but I wanted to go FULL IPSWICH on someone's ASS! I'm so glad to hear you had a great time. The pics looked sensational! We're all good here too xs

Thank you 🙏 it's not ideal, it's been horrible! But we've commenced a huge legal fight against Fairfax now so that will take all my might! And yes, I've gone into "tippy chick" mode privately several times 😊😊 our main priority is protecting the girls, they are not the alien which is perfect 🙌 see you today 🥰



Hey mate, just wanted to reach out to say g'day to you guys and see how you're travelling. Obviously a lot of shit going on at the moment but if you ever want some company, a chat and of course sneaky wine/beer let us know. Take care to you all and chat soon. All our wishes Marcus and Hayley

Thank you for your support 🙏 we very much appreciate it x



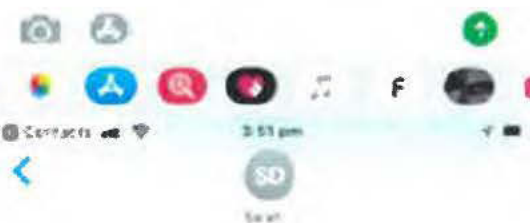


Hi gorgeous, seen the news about ben I can't believe it. I'm still in shock. I believe ben has given an interview in the Australian so going out to get a copy. I'm here for you all especially you darling as I can only image what you are going thru. If you need me ill be on the first plane out to you. We are family em and families stick together even when we are 1000s miles away. I'm sending you a huge hug wish I was there to give it to you. Sending oots of love Sharon xxx

xxxxx

Thank you for your support! we very much appreciate it & I have the best family and I'm so thankful

Yes we do xx



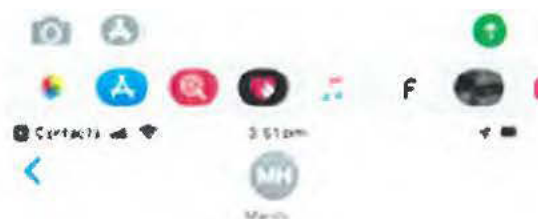
Hi hunni, I've just seen Ben's name in a few press articles today. How are you holding up? Thinking of you and the girls and sending you all my love xxx





This is a very hard time for you both. You have many friends and colleagues that are with you on a journey you weren't expecting. Our love and support are with you. Need anything you know what to do. Xxx

Thanks daisy and carol! 🙏 it's a total sh*t time right now, but we very much appreciate your support xx



Hi Em... it's us from the Wild West! Just wanted you to know that we are thinking of you heaps and hoping that you will be ok. If there's anything we can do for you even if it's just to have a listen... don't hesitate to call. Mandy and Greg xxx

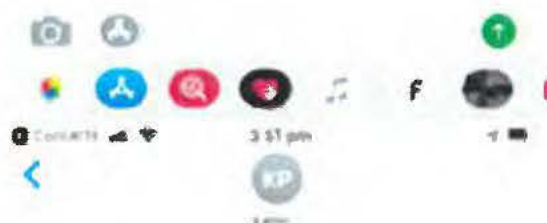
Thank you for your support 🙏 we very much appreciate it x





Hey beautiful. Have just been talking to Carmel and wanted to say we love you all. Be strong and know that we are thinking of you. ❤️👉❤️👉👉 Let us know if you need anything. All our love Gerry, John and the boys.

OK should read love you all



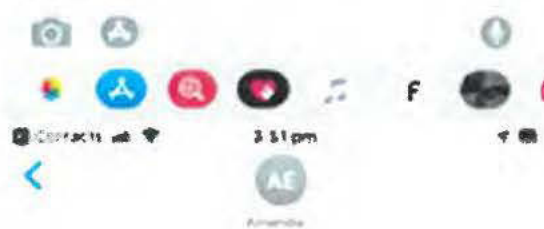
Evening Emma. I've been thinking of you these last few days. Unfortunately I know too well what it's like to have some of your private life made public (just last week there was a cartoon of Andy and me in the Australian which was so lame). I hope you're getting the love and support you need from family and friends (along with a bit of wine :)). Good on you both for taking a stand too - you're both incredible people! Cheers, Kallie





Hey Ent, just wanted to send my love to you and then fam, sorry to see you're going through this, you don't deserve any of it, love you and miss you all heaps! Xxx Pip

Thanks for your message Pip. 🙏🏻💛
love you all xx



Hey Emma, thinking of you & hope you guys are ok. Let me know if you need any help or support xxx.

Thanks for your message Amelia
🙏🏻 we very much appreciate it x

Most welcome. Take care. Xxx





Sending ❤️

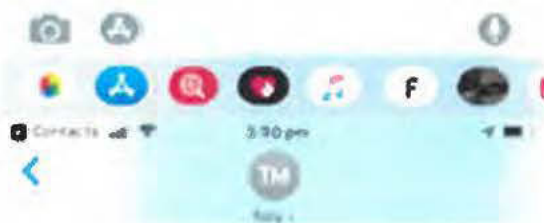
Thank you Kate! 🙏 we very much appreciate it & hope all is well with you x





Hi Emma, I'm home now, in a jetlag haze. I'll be in touch when I get myself together. In the meantime I'm sending love. My goodness honey, you must be under enormous stress. I hope you are taking care of yourself. Xx

Hey Marlene, welcome home 🍷 I hope the jet lag passes quickly! Yes, the stress has been huge, it's incredibly tough, and wouldn't wish it on anyone! Thank you for your message and I do hope to catch up soon, much love xxx are on the goldy? Xxx



Hey Em, we couldn't miss the media stuff. It must be real tough at the moment for you guys. Beck and I just want you to know that we are here if you guys need a cup of sugar, a cup of tea or some one safe to talk to or just vent. Whatever you need, let us know how we can help.

Tony and Beck.

Thank you for your support 🙏 we very much appreciate it x





DM

If you need anything at all -
 professional advice, a safe house, a
 drinking buddy or a sounding board
 - yell out!
 I'm here mate, and good in a shit
 storm.
 Take care and much love
 Dixie

Thank you for your support! 🙏 we
 very much appreciate it x



From: Stuart Meade <smeade@mfac.edu.au>

"E"

Subject: Support

Date: 10 August 2018 3:12:30 PM AEST

To: Emma and Ben Roberts-Smith <ers@rsgrouppaustralia.com>

Good afternoon Ben and Emma

I have read the article in the Sydney Morning Herald today. I simply want to say you have my support and if the girls need any moral support or anything else that we can provide at the school, please do not hesitate to let us know.

The more I read the report, the angrier I became. We have spoken of the tall poppy syndrome in this country before, well, here it is in spades.

I know you will do what is required to clear this slur.

The photo you gave to me all those years ago at Hale, remains firmly on my wall! I am proud to know you and support all you stand for.

regards
Stuart



From: Trudi Edwards <tedwards@mfac.edu.au>

Subject: Evie and Lizzie

Date: 11 August 2018 2:58:54 PM AEST

To: Emma <emma@rsgrouppaustralia.com>

Hi Emma,

I expect you and Ben have had a rough couple of days.

Just touching base to let you know to please be in touch if the girls are experiencing any difficulties
- we are here to support them!

I'm in Sydney at a conference until Wednesday, but please don't hesitate to email and I can follow up and get either Chris or Alec involved if the girls need a wingman at any time.

Take care,

Cheers

Trudi



From: Em <groomyrs@hotmail.com>

Date: 12 September 2018 at 9:44:17 am AEST

To: Ben Roberts-Smith <ben@rsgroupaustralia.com>

Subject: Fwd: Aussie war hero accused of misconduct and abuse, Australia/NZ News & Top Stories - The Straits Times

"F"

Sent from my iPhone

Begin forwarded message:

From: Kate Mathias <kate.m.mathias@gmail.com>

Date: 8 September 2018 at 11:03:00 am AEST

To: Emma Roberts-smith <groomyrs@hotmail.com>

Subject: Fwd: Aussie war hero accused of misconduct and abuse, Australia/NZ News & Top Stories - The Straits Times

Hey babe,

Thanks for having me last week, it was so good to see all of you. The girls are just gorgeous, Em.

After catching up I couldn't help myself, occupational hazard of 20 years in PR, I googled BRS this morning and found this. It would seem Nick McKenzie is recruiting his mates to give the story oxygen offshore weeks after it broke here, the below is a bad cut paste job...surely that has to be the definition of malice?

I cannot imagine how you are dealing with the relentless onslaught from the media boys' club. Back in the day when I was wrangling media they actually had some integrity, it's sad to see the profession resort to personal vendettas to justify the rubbish they write to sell papers.

Hang in there, the truth always prevails.

1

<https://www.straitstimes.com/asia/australianz/aussie-war-hero-accused-of-misconduct-and-abuse>

Aussie war hero accused of misconduct and abuse

During a hard-fought battle in a small village in Afghanistan in 2010, Australian corporal Ben Roberts-Smith cemented his reputation as a war hero after ignoring a volley of bullets to distract enemy machine gunners and rescue a patrol that was under heavy fire.

For his remarkable gallantry, Mr Roberts-Smith, who was a member of Australia's elite Special Air Service (SAS) Regiment, became a rare recipient of the nation's highest military honour, the Victoria Cross, making him one of the nation's best-known and most decorated soldiers.

The citation for the honour said that he showed "a total disregard for his own safety" and "his valour was an inspiration".

But his reputation has come under question after he was accused of misconduct and breaches of ethics in a scandal that has prompted debate about the nation's veneration of its soldiers.

In a series of explosive investigative reports by Fairfax Media, Mr Roberts-Smith, 39, was accused of criminal misconduct on the battlefield, including violence against Afghan prisoners and bullying fellow Australian soldiers.

The allegations were reportedly leaked from an inquiry into Australia's elite forces, which have been accused of widespread misconduct that included unlawfully killing detainees in Afghanistan.

According to a Fairfax Media report on Aug 11, dozens of veterans, officials, witnesses and soldiers who served with Mr Roberts-Smith accused him of misconduct towards his fellow soldiers and detainees.

The claims included "bullying, intimidation and his involvement in small SAS teams suspected of the abuse of unarmed civilians and the use of force that goes well beyond what is acceptable in the theatre of war". This followed a series of reports which began to emerge last year raising questions about the conduct of Mr Roberts-Smith, who is married with children.

Mr Roberts-Smith has denied all allegations and launched defamation proceedings against Fairfax Media in the Federal Court. He has also requested that the Australian Federal Police investigate whether there has been illegal leaking of evidence.

He told The Australian on Aug 18 that the allegations arose from a smear campaign by jealous and disgruntled former elite soldiers.

The allegations against Mr Roberts-Smith came as a shock and received widespread coverage, partly because he has attracted a high profile since receiving his decoration. He left full-time army duties in 2013 and is a general manager of the Seven Network television station in Queensland.

The attack on his service record and reputation prompted fierce debate over the treatment of Australian war heroes.

Some figures leapt to the defence of Mr Roberts-Smith, including former defence minister Brendan Nelson, now director of the Australian War Memorial. "War is a messy business," he told 2GB Radio on Aug 15.

"Ben Roberts-Smith is, by any standard, one of the greatest Australians in terms of heroism the country has produced. His reputation is being traduced by elements of the media that, in my opinion, diminish the

respect that we have for them and the job that they should be doing."

But some historians criticised Dr Nelson's approach, saying it was important to ask difficult questions about the military's conduct in war.

"A democratic society requires a media that's capable of asking difficult questions, as well as historians asking similar questions," Australian National University Professor Frank Bongiorno told Fairfax Media on Aug 17.

"The idea there are no-go areas or areas that belong to the sacred, that journalists, historians and other academics shouldn't encroach on is dangerous for a democracy."

A similar debate previously arose over the veneration of the Australian soldiers who fought at the famous Gallipoli campaign in World War I.

Some commentators have urged the nation to take a more critical approach to the role of its troops, saying myth-making does not do justice to the reality of the war and can sometimes be misused to promote nationalism or patriotism.

For now, this debate has spilt into the courts, which will decide whether Mr Roberts-Smith's reputation was unfairly maligned.

Sent from my iPhone

"G"

From: VC and GC Association <secretary@vcandgc.org>
Subject: Christmas Cards
Date: 12 October 2018 2:27:25 AM AEST
To: Ben Roberts-Smith VC <ben@rsgrouppaustralia.com>, RS
Group Admin <admin@rsgrouppaustralia.com>

Dear Ben and Emma,

First of all I'm so sorry you have been having such a horrible time with the Press and the trouble-makers / people full of negative jealousies. You have been on all of our minds this side of the world and I hope things have calmed down. If there is anything at all that I can do please let me know. I know Diddy is in touch with you and I don't want to interfere in any way but if there is anything that I can help with, please, please just shout.

Also - being boringly practical, I sent out the attached form to everyone a couple of weeks ago and not having heard back from you am wondering whether you received it. I remember that you ordered some last year so I thought I would email again. Just let me know how many cards you would like, if you'd like any, and I will stick them in the post to you.

With best wishes to you both and the girls,
Becca

Rebecca Maciejewska (Mrs)
Chief Executive, The VC and GC Association
Horse Guards, Whitehall
London SW1A 2AX
www.vcgca.org

Tel: 020 7930 3506 / 07714265582

Charity number: 1162742

NOTICE OF FILING

This document was lodged electronically in the FEDERAL COURT OF AUSTRALIA (FCA) on 31/05/2019 4:11:28 PM AEST and has been accepted for filing under the Court's Rules. Details of filing follow and important additional information about these are set out below.

Details of Filing

Document Lodged:	Non-Prescribed Report
File Number:	NSD1485/2018
File Title:	BEN ROBERTS-SMITH v FAIRFAX MEDIA PUBLICATIONS PTY LTD (ACN 003 357 720) & ORS
Registry:	NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



A handwritten signature in blue ink, which appears to read "David Soden".

Dated: 7/06/2019 11:55:24 AM AEST

Registrar

Important Information

As required by the Court's Rules, 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 and time of lodgment also shown above are the date and time that the document was received by the Court. Under the Court's Rules the date of filing of the document is the day it was lodged (if that is a business day for the Registry which accepts it and the document was received by 4.30 pm local time at that Registry) or otherwise the next working day for that Registry.

Outline of Evidence – Person 17



No. NSD1485 of 2018

Ben Roberts-Smith

Applicant

Fairfax Media Publications Pty Limited and another

Respondents

The Respondents anticipate that at trial Person 17 will give evidence in substance in accordance with this outline of evidence. Where this outline of evidence refers to words spoken by a person the outline refers to the substance or effect of the words spoken.

1. Person 17 is a qualified lawyer who previously practised as a solicitor [REDACTED]. [REDACTED].
2. In late January 2017 Person 17 found out that in 2016 her husband had had an affair with another woman. From that time there were problems in Person 17's marriage.
3. On 13 October 2017 Person 17 met the Applicant at a charity event called the [REDACTED], at the [REDACTED]. The Applicant and Person 17 had sex that night in the Applicant's hotel room at [REDACTED]. During the night the Applicant said to Person 17 that he was married. The Applicant told Person 17 that he was not happy in his marriage but felt he could not leave. The Applicant said to Person 17 that he loved and cared for his wife but that he was not in love with her anymore.
4. Following that night the Applicant and Person 17 engaged in an intimate sexual relationship which continued until 6 April 2018.
5. During the course of that relationship Person 17 spent time with the Applicant on the following dates in the following locations:
 - (a) 29 – 30 October 2017: Cairns, where they stayed at The Hilton;
 - (b) 9 – 10 November 2017: Brisbane, where they stayed at The Milton;
 - (c) 19 – 21 November 2017: Sydney, where they stayed at The Hyatt Regency;
 - (d) 21 November 2017: [REDACTED], where they stayed at [REDACTED];
 - (e) 22 – 23 November 2017: Townsville, where they stayed at the Grand Hotel and Apartments;
 - (f) 7 – 9 December 2017: Brisbane, where they stayed at The Milton;
 - (g) 13 – 14 December 2017: Brisbane, where they stayed at The Oaks Casino Towers;
 - (h) 14 – 15 December 2017: Brisbane, where they stayed at The Milton;

- (i) 15 – 16 December 2017: Brisbane, where they stayed at The Oaks Casino Towers;
 - (j) 18 – 19 December 2017: Brisbane, where they stayed at The Milton;
 - (k) 19 – 21 December 2017: Gold Coast, where they stayed at The Star;
 - (l) 27 – 28 February 2018: Brisbane, where they stayed at The Milton;
 - (m) 6 – 7 March 2018: Brisbane, where they stayed at The Milton;
 - (n) 13 – 14 March 2018: Brisbane, where they stayed at The Sofitel;
 - (o) 25 – 26 March 2018: Brisbane, where they stayed at The Milton;
 - (p) 26 – 29 March 2018: Canberra, where they stayed at The Realm; and
 - (q) 5 - 6 April 2018: Brisbane, where they stayed at The Novotel, Brisbane Airport.
6. In addition to the meetings referred to in the preceding paragraph during the course of the relationship Person 17 and the Applicant communicated via voice and video calls and text messages, including using the messaging services WhatsApp and Telegram. The telephone numbers and identifiers that the Applicant used to communicate with Person 17 from time to time during the course of the relationship included:
- (a) From about 18 October 2017 to 16 November 2017: mobile phone number +62 822 471 24182 (an Indonesian number);
 - (b) From 16 November 2017 to 26 December 2017: mobile phone number +61 467 832 139 and linked WhatsApp with username 'Echo 21';
 - (c) From 20 December 2017 to 6 April 2018: mobile phone number +61 400 790 377 and linked Telegram account.
7. When Person 17 and the Applicant were in Sydney between 19-21 November 2017 the Applicant told Person 17 that he loved her and stated that it felt like they were meant to meet and be together. The Applicant said that he wanted to move to the US and asked Person 17 if she would go with him. He said that he had wanted to leave Australia for some time but his boss, Kerry Stokes, said it would look like he was "running away".
8. On 20 November 2017 the Applicant and Person 17 went, amongst other places, to the Orient Hotel for drinks. During the time the Applicant and Person 17 were at the Orient the Applicant told his wife that he was "out to dinner with an old Army friend".
9. Towards the end of the night at the Orient Person 17 observed someone at a nearby table holding their phone up in the air and looking at the screen. This made Person 17 believe that the person was taking photos of or filming the Applicant and Person 17.

10. When they returned to the hotel the Applicant told Person 17 that he had lost his phone at the Orient, being the Applicant's main business/work phone, not the one he used to communicate with Person 17. The Applicant told Person 17 that he was going back to the Orient to try to find his phone and left the hotel room for about 45 minutes.
11. On 6 December 2017 the Applicant called Person 17 and told her that when his wife had collected the mail that morning there had been a letter addressed to him from someone claiming to know that he had been with another woman in Sydney and urging him to end the affair and save his marriage. The Applicant told Person 17 that his wife had opened the letter and been upset by it, but that he had convinced her that there was no substance to it. The Applicant told Person 17 that 6 December was the date of his wedding anniversary.
12. On 9 December 2017, the Applicant told Person 17 that his wife's brother worked for the Australian Federal Police (Person 17 now understands that the Applicant's wife's brother works or worked for the Queensland Police Service). The Applicant called Person 17 from a wedding reception that evening that he was attending with his wife. He said to Person 17 that he wished Person 17 was there with him and that he was finding it very hard to be away from her and to keep pretending that he was in love with his wife.
13. In mid-2017 it was planned that Person 17 would spend time in London on a family holiday from January to March 2018. It was also planned that the Applicant would spend time in late January 2018 on a family holiday in Singapore.
14. During the time Person 17 and the Applicant spent together in Brisbane in early-mid December 2017, Person 17 and the Applicant discussed the future of their relationship and how they planned to be together long-term. The Applicant told Person 17 that he was worried that if their affair was known to either Person 17's husband or the Applicant's wife, it would make life more difficult for everybody after they both divorced, because their spouses would be angry and bitter about the affair. The Applicant said that it would be better, both privately and publicly, if it appeared that the relationship only began after they had both left their marriages. The Applicant told Person 17 that he would start marriage counselling in January 2018, but he didn't intend for it to work out and that by the time Person 17 returned from London at the end of March he would have moved out of home and set himself up in an apartment in either Maroochydore or Brisbane. The Applicant and Person 17 further discussed going on holidays together in May 2018 to London (for the Applicant's bi-annual VC functions) and Spain, but that this would have to be kept very low profile. The Applicant told Person 17 that he intended to see out the majority of his contract with Channel 7 which was due to end in April 2019 and look to move to the US either at the end of 2018 or in mid-2019. The Applicant and Person 17 discussed that they would tell people they had met in Brisbane, after they had both separated, and that the Applicant and Person 17 would get married as soon as possible, so that Person 17 and one of her daughters would be able to go with him to live. The Applicant told Person 17 that he was going to buy her a pink Argyle diamond engagement ring while she was in London.

15. On 20 December 2017 the Applicant had drinks with a friend named James Harvey in the bar at the Star. Though the Applicant and Person 17 were staying at the Star together, the Applicant told Person 17 to meet him at the bar shortly after so that it would look like they had run into each other coincidentally. After Person 17 arrived the Applicant, Person 17 and Mr Harvey had drinks together. The Applicant introduced Person 17 to Mr Harvey as an in-house lawyer for Channel 7. After the drinks with Mr Harvey the Applicant attended a work Christmas function. Later that evening the Applicant said to Person 17 that he thought Person 17 had been flirting with Mr Harvey and that if he was going to leave his wife for Person 17, he needed to know that she was serious about him and their future together. The Applicant was intoxicated and aggressive and accusatory in this conversation. Person 17 responded that she did not think she had done anything wrong and that she loved the Applicant.
16. On 21 December 2017 Person 17 and the Applicant drove from the Gold Coast to Brisbane airport. During the drive The Applicant received a phone call from his wife, which he took on speaker. Person 17 heard, amongst other things, the Applicant's wife say that she was grocery shopping at the IGA and asking the Applicant what he wanted for dinner that night. During the course of the relationship the Applicant often participated in telephone calls and exchanged messages with his wife in Person 17's presence.
17. In about the period 19-21 December 2017 the Applicant told Person 17 to set up a Gmail account that they could each have access to for the purpose of leaving messages to each other in the 'Drafts' folder so that they could communicate whilst they were both overseas without leaving a trail through email servers. On 22 December 2017 Person 17 set up the account `rmrs2018@gmail.com` and messaged the Applicant the account details.
18. On Saturday 23 December 2017 the Applicant messaged Person 17 from his main/work phone (+61 400 790 377) and told her to download the app Telegram and use that to message him on that number. At about that time he told her that he had been asked about the other phone and might have to "get rid of it".
19. From 26 December 2017 Person 17's husband was aware of her affair with the Applicant.
20. During the time Person 17 was in London Person 17 and the Applicant continued to be in contact by telephone. During those conversations the Applicant told Person 17 that he wasn't sure what to do, because he felt he couldn't leave his family no matter how much he wanted to be with her. During these conversations the Applicant told Person 17 that he was struggling with the guilt of being "that guy" that has a girlfriend on the side and is lying to his wife. He said that he came home every day worried that his wife had found out about the affair and that he had come to terms with the fact that she eventually would. During these conversations the Applicant also told Person 17 that there were other things from his "old life" that would collide with the Applicant and Person 17 if they were together and that he didn't want Person 17 to have to deal with that.

21. On 7 February 2018 Person 17 found out she was pregnant as a result of a positive home pregnancy test. Person 17's husband had previously had a vasectomy. Person 17 had not had sexual intercourse with anyone other than the Applicant in the months prior to the positive result.
22. On 9 February 2018 after a phone call with the Applicant Person 17 was very distressed and left the apartment (in London) and did not return until the next morning. During the night her husband was worried and contacted the Applicant.
23. On 15 February 2018 Person 17 told the Applicant about the positive pregnancy test. The Applicant did not believe her and demanded that she prove it.
24. On 25 February 2018 Person 17 and the Applicant had a telephone conversation. During the conversation the Applicant stated that he was stressed about a number of things. Person 17 told the Applicant that one of the reasons her husband had given her for the affair he had had the previous year was stress about work issues and needing an escape. The Applicant responded "work issues, we're talking about fucking war crimes".
25. On 27 February 2018 Person 17 and the Applicant met in Brisbane. During that time the Applicant told Person 17 that he could not afford for his marriage to end, no matter how he felt about Person 17. The Applicant and Person 17 agreed that she would need to terminate the pregnancy.
26. Over the next few days Person 17 was having second thoughts about terminating the pregnancy. In telephone conversations about this the Applicant got angry and frustrated with Person 17 about the pregnancy and Person 17's indecision and stated that if she had the baby he would not stick around long term. Person 17 told the Applicant that she would travel to Brisbane to have a termination on the morning of 6 March 2018.
27. In early March 2018 Person 17 miscarried the baby.
28. On the afternoon of 6 March 2018 Person 17 met the Applicant in Brisbane. The Applicant was confrontational, angry and ranting when Person 17 arrived and they went into their hotel room. He asked Person 17 whether she had been lying to him about the pregnancy and which flight she had been on that day. The Applicant told Person 17 that he knew she had not been in Brisbane to have a termination that morning as he knew which flight she arrived on because he had access to the Virgin flight manifest, and that he had people following her (Person 17 had caught a flight that arrived at about lunchtime). The Applicant showed Person 17 video footage of her on his phone in which she was wearing the dress she had been wearing that day. Person 17 felt frightened and intimidated. The Applicant made Person 17 do a pregnancy test in front of him, which showed a positive result (in that hCG was still detectable in Person 17's system notwithstanding the miscarriage). Person 17 told the Applicant about the miscarriage. After the Applicant saw the positive result and was told about the miscarriage he calmed down.

29. During dinner that night the Applicant told Person 17 that he was “a good friend to have”, and that he was not someone she would want to get on the wrong side of. The Applicant did not use a threatening tone when he said this, but was assertive. The Applicant also told Person 17 a story about an Army friend whose wife ‘Chantelle’ had left him and had ended up with a (false) AVO taken out against her. He told Person 17 that if he wanted to he could get into her bank accounts. During dinner the Applicant asked Person 17 when she last checked her Telegram messages. Also during dinner the Applicant asked Person 17 if she ever thought about telling his wife about the affair, and told Person 17 that it would be dangerous for her to do that.
30. When Person 17 returned to the hotel room and checked her phone (which she had left in the room during dinner), she saw that the message chat thread between the Applicant and Person 17 had been deleted. Person 17 does not know how the Applicant managed to do this as he did not have direct access to her phone.
31. After this meeting Person 17 felt shaken and was worried about what the Applicant was capable of.
32. On about 13 March 2018 Person 17 met with an old friend of hers named Sue Newton who was a senior Queensland Police Officer as Person 17 was concerned by the Applicant's intimidating behaviour. Person 17 told Ms Newton about the state of her marriage and her relationship with the Applicant, and about the events of the previous week, referred to in paragraphs 28 to 30 above. Ms Newton advised Person 17 that she should stop seeing the Applicant.
33. In about March 2018 the Applicant told Person 17 that he had needed to “lose” the phone referred to in paragraph 7 above and needed Person 17 to be a witness to it being lost, even if that meant revealing the affair.
34. In about March 2018 the Applicant told Person 17 that on 9 February 2018 when Person 17 left the apartment in London (referred to in paragraph 22 above) he had accessed her phone to “check the geodata” to locate her, but by the time he did she was back at the apartment.
35. On 27 March 2018 the Applicant told Person 17 that he was considering job opportunities in the US, in the Napa Valley and Utah, and in Singapore. He asked Person 17 if she would travel with him when he went for final discussions/interviews, and if she would come and be with him in Singapore if he took a 6-month contract on offer there. The Applicant also asked Person 17 to travel to Hong Kong with him in July.
36. On the morning of 28 March 2018 Person 17 accompanied the Applicant to the Australian War Memorial where he gave an interview. After the interview Person 17 and the Applicant had lunch at Pialligo Estate Winery.
37. That evening Person 17 accompanied the Applicant as his guest to a dinner for the Prime Minister’s Veterans Employment Awards which was held in the Great Hall at Parliament House.

The Applicant was the Master of Ceremonies for the evening. The Applicant introduced Person 17 to people that evening as a client from Channel 7.

38. Throughout the night Person 17 was drinking and became intoxicated. At one point she dropped a half full glass of champagne as she went to put it down. The Applicant looked unhappy with Person 17 that night. During the night Person 17 spoke to various people including a private conversation with Vice-Admiral Ray Griggs. The Applicant was watching Person 17 as she spoke to the Vice-Admiral and did not look happy. The Applicant told Person 17 the following morning that that he had tried to leave the function several times, indicating to Person 17 to follow him out of the venue, but that Person 17 had not noticed.
39. As she was leaving the venue Person 17 asked a man to help her find the Applicant and indicated that she was supposed to be getting a lift back to her hotel with him. The man directed and accompanied Person 17 towards the car park.
40. The underground carpark, where the Applicant was waiting, was down a set of fire stairs. The steps comprised of two sets of concrete steps of about 8 steps each which turned back on themselves with a landing in between, and a railing. When Person 17 was about half way down the first set of steps she turned to look over her left shoulder to speak to the man behind her and slipped and fell. Person 17 fell down about 2-3 steps onto the landing. As she fell Person 17 hit her left thigh against the edge of a step and bumped the left side of her forehead against the adjacent concrete wall or stair railing. Person 17 did not suffer any cuts or bleeding to her head but her forehead hurt. The Applicant told Person 17 she had a lump on her forehead.
41. The Applicant and Person 17 were driven back to the hotel in a CommCar. During the trip there was discussion about whether Person 17 should be taken to a doctor or hospital. Person 17 was crying and hysterical and thought that she should. Person 17's father had fallen backwards from a height of only 2 steps onto concrete in March 2017. He fractured his skull in several places and suffered from bleeding on the brain, which badly affected him for many months. Person 17 was very worried about the effect of any form of head injury. The Applicant said that he didn't think Person 17 needed medical attention and instructed the driver to take them from Parliament House straight to the Realm Hotel.
42. When Person 17 and the Applicant arrived at their hotel room the Applicant became confrontational. While they were standing in the entrance area to the room the Applicant stood close to Person 17, grabbed her shoulders and shook her and said "Fuck [Person 17], what the fuck have you done". The Applicant was irate and appeared very stressed. The Applicant then started pacing around the room in the area between the entrance and the small dining table. The Applicant and Person 17 had an argument about Person 17's behaviour that evening. The Applicant was not shouting or yelling but his voice and tone was aggressive, direct, menacing and stern. The Applicant said to Person 17 that he had trusted her and let her into his world and that Person 17 had embarrassed him and treated the event "like a high school formal". The Applicant

said to Person 17 that she was “all over” the other men at the dinner and that they would all know they were having an affair. The Applicant told Person 17 that he wished he had just left her at the venue and that it was not good for him to be seen leaving with her at all, especially after she had embarrassed them both by falling down the stairs and causing a scene.


43. Person 17 said to the Applicant multiple times that she was sorry. Person 17 was standing in front of the Applicant and holding both of his hands trying to steady herself and trying to get him to calm down and come to bed. They were moving further into the room. Person 17 and the Applicant were both still fully dressed.
44. As they were standing close to the base of the bed and Person 17 was holding both of the Applicant's hands she said to him that her head was hurting. The Applicant replied “it's going to fucking hurt more” or “I'll show you what fucking hurt is”. The Applicant then withdrew his right hand from Person 17's hold and punched Person 17 on her left temple with a clenched right fist. It hurt Person 17 a lot. Person 17 staggered back towards the bed, and fell back on to a bench/ottoman along the end of the bed and ended up lying on the bed. She felt an immense, blinding, dull pain in her head. Person 17 felt shocked and emotional. She lay still as she didn't know what the Applicant was going to do next and she thought that he might hit her again. The Applicant did not say anything further, he walked around the bed and went into the bathroom. Person 17 then blacked out.
45. During the night Person 17 woke up. She was naked. She got up to go to the bathroom and the Applicant stood at the door watching her as she was dazed and unsteady on her feet. Person 17 said to the Applicant that her head was hurting and that she wanted to go to the hospital. The Applicant told Person 17 that she would be ok and that he would look after her. At some point during the night the Applicant initiated sex with Person 17. After sex the Applicant lay beside Person 17 in the bed and held her. Person 17 told the Applicant multiple times that she was sorry and that she loved him. He responded that he loved her too and that it was all going to be ok.
46. The Applicant woke Person 17 early the next morning as they were booked on a flight at about 7am. Person 17 struggled to open her left eye. When she looked in the mirror she saw that it was swollen and black. The left side of her forehead was enlarged. Her head was very sore, more sore than it had been after the fall and before the punch.
47. The Applicant had made Person 17 a coffee. He had packed all of her things and had laid out some clothes for her to wear. He had also charged her iPhone. Person 17 was worried about what the Applicant may have done to/with her phone while she was asleep. The Applicant showed Person 17 photos on his iPhone that he had taken of her lying in the bed naked and with what appeared to be a green Chux dishwashing cloth on her head. The Applicant told Person 17 that he had sat up all night putting ice on her head and checking her vital signs. The Applicant asked Person 17 if he needed to keep those photos with the time and date stamp on them. Person 17 didn't respond.

48. At the airport the Applicant bought Person 17 some painkillers. The Applicant and Person 17 did not talk much at the airport or on the flight as they did not sit next to each other.
49. When Person 17 and the Applicant arrived in Brisbane the Applicant and Person 17 spoke in the airport and then went to continue their conversation in his car. The Applicant was driving home from Brisbane and Person 17 had a connecting flight to [REDACTED] which was not for a few hours.
50. When they were in the car the Applicant said to Person 17 "What happens now for us will depend on you and what you say to [Person 17's husband] about how you got the black eye". The Applicant asked Person 17 "Do you remember what happened last night in the room?" Person 17 responded "No". Person 17 was too afraid to say otherwise. The Applicant then said "Good girl. You hurt yourself when you fell over." The Applicant also said "If you want there to be any hope for us to continue seeing each other you should do what I say. Tell [Person 17's husband] that you were drinking alone in your hotel room in Brisbane, that you were sad and emotional about the marriage breakdown, that you had taken a sleeping tablet to help you sleep, then when you went out to get food later in the night you were unsteady and fell down some stairs. If [Person 17's husband] asks tell him that I wasn't with you". The Applicant did not apologise to Person 17 for punching her or explicitly refer to it. It was implicit in the conversation that this was what they were talking about.
51. A photo Person 17 took of her eye on the morning of 29 March 2018 is annexed and marked **A**.
52. An exchange of Telegram messages between the Applicant and Person 17 on 29 March 2018 is annexed and marked **B**.
53. On the afternoon of 29 March 2018 Person 17 saw a doctor about her facial injuries. Her usual GP was not available so she saw another doctor. The doctor asked her how she got the injuries and asked if someone had hit her. She told the doctor that she fell down the stairs after a drunken night out.
54. A photo Person 17 took of her eye on 31 March 2018 is annexed and marked **C**.
55. Between about 31 March 2018 and 2 April 2018 Person 17 told her husband that the Applicant had assaulted her.
56. On the morning of 3 April 2018 Person 17 was approached by a man whilst she was walking on the beach near her house. The man showed Person 17 two sexually explicit photographs of the Applicant and Person 17 in what appeared to be a room at The Milton hotel. The man told Person 17 to tell the Applicant's wife about the affair otherwise he would make the photographs public.
57. On 3 April 2018 the Applicant telephoned Person 17 and said that they needed to end the relationship and that it had become dangerous and unhealthy for both of them, and they couldn't trust each other anymore. Person 17 knew this was right but was upset, and asked the Applicant if she could see him one last time so that things didn't end on a sour note.



58. On 5 April 2018 Person 17 met the Applicant at the Novotel, Brisbane Airport. During the time they were together the Applicant and Person 17 discussed the end of the relationship. The Applicant said "it is for the best" and "it needs to happen". Person 17 replied "I agree". The Applicant said to Person 17 "You are like crack and I am going to find it very hard to give you up." Person 17 said "I feel the same way." The Applicant and Person 17 discussed meeting up again in June to see where they were both at in their lives and respective marriages and how they both felt about each other then.
59. At dinner the Applicant said to Person 17 that he had been through her handbag on 28 March 2018, and showed her photographs of the contents of her handbag. The Applicant said to Person 17 "as long as we are on the same page all I will ever do is protect you. If you don't do anything stupid you will be fine. But I will burn your house down if you turn on me, and it might not be you who gets hurt but people that you love". The Applicant said these things as a matter of fact, and not in an aggressive way. Person 17 was very affronted by what the Applicant said and felt the threats were very real.
60. On 6 April 2018 Person 17 travelled to the Applicant's house to disclose the affair to the Applicant's wife. Person 17 believed that it was necessary to bring the affair into the open with the Applicant's wife so that the affair could end permanently.
61. The Applicant's wife was initially not home but Person 17 asked the lady she spoke to, who appeared to be a cleaner or housekeeper, if she would call the Applicant's wife on the phone and ask her to come home, which she did. Person 17 spoke to the Applicant's mother in law whilst she was there. The Applicant's mother in law asked Person 17 how she got the black eye, and whether the Applicant had hit her. When the Applicant's wife arrived back home, she also asked Person 17 whether the Applicant had caused the black eye. Person 17 did not tell the Applicant's mother in law or wife that the Applicant had punched her. She was scared that if she did she would be in greater danger from the Applicant than she already was for disclosing the affair. As Person 17 was preparing to leave, the Applicant's father-in-law joined the group conversation which was taking place and the Applicant's wife introduced Person 17 as "Ben's affair".
62. On 8 and 20 April 2018 Person 17 attended [REDACTED] police station in an attempt to report the assault and the Applicant's threats. Person 17 asked to speak to someone senior. Person 17 was concerned not to name the Applicant to just anyone due to his public profile and the connections she believed he had with the AFP, Queensland Police Service and military personnel. Person 17 was not able to speak to anyone senior so did not report the Applicant's conduct at these times.
63. In mid-April 2018 Person 17's husband told her that he heard there was a big news story coming out about the Applicant. Person 17 was concerned the story was about the affair and attempted to get in contact with the Applicant, including by giving the Applicant's personal assistant a new password for the Gmail account as the Applicant had changed his mobile number.




64. On or around 21 April, Person 17 looked at the 'recent activity' on the Gmail account and noticed that somebody had accessed the Gmail account and was googling Person 17's home address.
65. On 22 April 2018 Person 17 received an email on the Gmail account from a person purportedly named 'Danielle Kennedy'. Person 17 engaged in an email exchange with this person. Person 17 considered that 'Danielle Kennedy' was acting on the Applicant's behalf in an attempt to intimidate Person 17 and to prevent Person 17 from contacting people close to the Applicant about the domestic violence incident.
66. On 30 May 2018 Person 17 met with Federal Agent Carol Hugi and Federal Agent Stephen Cato from the AFP and reported the Applicant's conduct toward her. Person 17 told the officers that she was not seeking for them to bring charges against the Applicant but she wanted to report it as she was fearful for her safety and of retribution by the Applicant.
67. On 5 June 2018 Person 17 spoke with Detective Superintendent Scott Moller from the AFP. Person 17 told him that she was very worried about the consequences of making a formal complaint against the Applicant and that she did not know if she wanted to become involved in a criminal trial as a witness. On 7 June 2018 Person 17 telephoned Superintendent Moller and told him that she did not want charges to be brought against the Applicant.
68. The police investigation was referred to ACT Police. On 7 June 2018 Person 17 spoke with Detective Sergeant Matt Innes of ACT Police and repeated her concerns as outlined in paragraph 67 above.
69. On 14 and 15 June 2018 Person 17 met with Detective Sergeant Innes and Blake McClintock. Person 17 told the police officers that her position in relation to making a formal complaint had not changed. They replied that they would continue to investigate.
70. On 13 August 2018 Person 17 received a call from Detective Sergeant Innes. He said to her that she needed to confirm whether or not she was prepared to formalise the complaint against the Applicant because they could not proceed with charges in the absence of a formal statement and her willingness to then testify against the Applicant.
71. On 24 August 2018 Person 17 emailed Detective Sergeant Innes and told him that she had decided not to formalise the complaint.



Photograph of Person 17







29 March 2018



  **Deleted Account** 29.03.2018 09:46:37 09:47
I hope your head feels ok... are you leaving soon?



  **P17** 29.03.2018 09:51:10 09:51
Thanks. It's actually killing me. I feel awful. I board in half an hour. I made a drs appt for this afternoon. I spoke to  & sent him a photo. He reacted exactly how you predicted. I think he believes me but is a bit sceptical.



  **Deleted Account** 29.03.2018 09:51:55 09:52
I thought he would, what did you say?



  **Deleted Account** 29.03.2018 09:52:41 09:53
Does he think I did it?

  **P17** 29.03.2018 09:55:42 09:55
Yeah he did to begin with & he didn't believe that I'd fall down stairs. I just told him what we talked about.

  **Deleted Account** 29.03.2018 09:56:43 09:57
Did you say I was there at all

  **P17** 29.03.2018 10:00:35 10:00
No. I said I caught up with you earlier in the week but you had to go away for work. He was really worried I was by myself all night after such a bad fall & can't understand why I didn't call him or someone else for help.

  **Deleted Account** 29.03.2018 10:08:20 10:09
Just say you didn't realise until you woke up as it has swelled. Also say you were embarrassed call him

  **P17** 29.03.2018 10:17:08 10:17

P17

Yeah I said that last night I thought it was only a bit swollen up where I'd knocked it so I put some ice on it & fell asleep not realising until this morning how serious it was. I've some other bruises – including a massive one on my thigh on the same side of my body – which will hopefully make the falling story more believable. I think having my period will also work in my favour in terms of convincing him I wasn't with you.

P17

P17

10:26

Deleted Account 29.03.2018 10:24:52

Ok, well hopefully he believes you and is sympathetic... try and get another sleep on the plane.

P17

P17

10:41

P17 29.03.2018 10:41:25

I hope so too. I'm boarding now. My head is still so sore & I'm feeling it in my body now too. I'm starting to worry a bit actually.

P17

P17

10:47

Deleted Account 29.03.2018 10:47:24

Just get to the doc but it's ok, it's natural for you to get sorer over the next 24...

P17

P17

14:50

P17 29.03.2018 14:40:40

I just finished at the doctor. He said the black eye will be around for 3–4 weeks & will likely get worse & spread further down my face! Otherwise all ok. If I go backwards in the next couple of days he'll do a scan but that's very unlikely.

P17

P17

15:46

Deleted Account 29.03.2018 15:11:26

P17 I'm really glad to hear that your injuries are not worse and that you'll be better soon. I was legitimately worried last night which is why I stayed up but I'm sure that ice helped to some degree. I'm not going to bullshit you **P17** your behaviour has given me real cause to think and I'm a little in shock myself. Apart putting yourself in a dangerous situation I found it really disrespectful and inappropriate. In saying that however I acknowledge you have apologised and I accept your apology.

Photograph of Person 17

NOTICE OF FILING

This document was lodged electronically in the FEDERAL COURT OF AUSTRALIA (FCA) on 11/07/2019 5:02:51 PM AEST and has been accepted for filing under the Court's Rules. Details of filing follow and important additional information about these are set out below.

Details of Filing

Document Lodged: Affidavit - Form 59 - Rule 29.02(1)
File Number: NSD1485/2018
File Title: BEN ROBERTS-SMITH v FAIRFAX MEDIA PUBLICATIONS PTY LTD
(ACN 003 357 720) & ORS
Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



A handwritten signature in blue ink, reading "Warwick Soden".

Dated: 11/07/2019 5:03:05 PM AEST

Registrar

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Outline of Evidence of Emma Roberts-Smith

No. NSD 1485 of 2018

Federal Court of Australia

District Registry: New South Wales

Division: General

Ben Roberts-Smith

Applicant

Fairfax Media Publications Pty Limited ACN 003 357 720

First Respondent

Nick McKenzie

Second Respondent

Chris Masters

Third Respondent

David Wroe

Fourth Respondent

Background

1. As noted in my previous outline, Ben and I have been married since 2003. We have twin daughters, Eve and Elizabeth.
2. Our housekeeper, Diane Young, comes once a week on a Friday to help. I always try to make sure our twin girls are out of the house for at least part of the time Diane is there. Diane has been working for Ben and me for about five years.
3. In October 2017, Ben and I separated. I knew from conversations that I had had with Ben since we separated that he had been seeing someone by that name. Although Ben had moved out of the house during our separation, I continued to manage his

Filed on behalf of (name & role of party) Ben Roberts-Smith, Applicant
Prepared by (name of person/lawyer) Mark Geoffrey O'Brien
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Address for service Level 19, 68 Pitt Street, Sydney NSW 2000
(include state and postcode) _____

[Form approved 01/08/2011]

public speaking engagements, he regularly came for dinner to see the girls and he would sometimes stay over at the house in the spare room. We also went on a family holiday to Singapore together in January 2018.

Events of 6 April 2018

4. On 6 April 2018, I left home at around 8:45am to take the girls to an art class.
5. At around 9.30am I received a call from Diane's phone. I said *"Hi Disey"*. A woman who was not Diane said to me in substance: *"I'm a friend of your husband's, I would like to speak with you."* I said: *"Who are you?"* She responded: *"My name is **** *****"*. I told her in substance: *"I know who you are. Tell me what you need to tell me"*. Person 17 said: *"No, I want to see you in person"*. I replied: *"I'm coming home now"*. I am aware that this person is to be referred to as "Person 17" in these proceedings.
6. I immediately telephoned Ben and said to him *"Person 17 is at our house"*. Ben asked: *"Who is there? Where are the girls?"* I said: *"Di is there - I have to go."*
7. I then rang Diane on her mobile and said in substance: *"It's her. I am on my way. I don't want her in our house"*. Diane responded: *"Don't worry. She is in the garden."*
8. I arrived home about 15 minutes later. Diane, my mother and my stepfather were all at the house. My mum and stepfather had previously arranged to come over to help me do some gardening. I could see Person 17 sitting on a chair in the front garden. I walked into the courtyard and I stood in front of her. I observed that she was wearing dark sunglasses.
9. I did not introduce Person 17 to my stepfather as *"Ben's affair"* as alleged in paragraph 61 of her Outline of Evidence. I was the last person to arrive at the house. It did not occur to me to introduce Person 17 to anyone. Person 17 and I had a conversation to the following effect:

Me: *What do you want to tell me? Just tell me what you have to say and never come here again.*

Person 17: *I wanted to see you.*

Me: *Can you take your sunglasses off. I want to look you in the eye.*

Person 17 took her sunglasses off and I observed that she had a black eye.

Me: *What happened to your face?*

Person 17: *I fell down some stairs when I was drunk.*

Me: *What stairs?*

Person 17: *At Parliament House. At the Prime Minister's Veterans Employment Awards.*

Me: *When?*

Person 17: *Last week. I have a massive bruise on my hip too.*

Me: *How did you find our address?*

Person 17: *I tried to Google you.*

Me: *Well that's not how you found us – we have a suppressed address.*

Person 17: *I needed to see Ben one more time. I got it off his driver's licence while he was in the shower.*

Me: *Why have you come here?*

Person 17 did not answer. She was crying.

Me: *Have you come for money?*

Person 17: *No. I'm not a prostitute.*

Me: *Have you come to tell me you are going to the press?*

Person 17 did not answer. I observed that Person 17 kept touching her bruised eye.

Person 17: *It's because of this he doesn't want to see me anymore.*

Me: *Because of what?*

Person 17: *Because I got so drunk and embarrassed him when I fell down the stairs. He doesn't want to see me anymore.*

Me: *Aren't you married?*

Person 17: *Yes. But my husband had an affair, so I had a "hall pass".*

Me: *So, your husband knows?*

Person 17: *Yes, I told him the day after I met Ben.*

10. I noticed that Person 17 had two mobile phones with her. On one phone I could see that she was receiving text messages from Ben. Each time she received a message from Ben, I observed that she "screenshot" the message. Our conversation continued as follows:

Me: *Why are you doing that?*

Person 17: *I've kept all his messages.*

Me: *Does he know?*

Person 17: *No, he thinks they're all deleted. But I've kept everything.*

11. Person 17 then handed me the mobile phone to show me the messages that she had screenshot and saved over the course of her relationship with Ben. When I told Person 17 that I did not want to see any more of the messages, she proceeded to read some of the messages Ben had sent to her out to me. I said to Person 17 again: *You are going to go to the media, aren't you?* Person 17 responded in substance: *"If the media find out it won't be my fault".*

12. Over the next two and a half hours Person 17 proceeded to tell me details of her relationship with Ben, details about her unhappy marriage and her issues with her children and her husband. She repeated on several occasions during our conversation the fact that Ben did not want anything more to do with her because she had embarrassed him when she fell down the stairs drunk at Parliament House. Person 17 was very emotional and at times appeared almost hysterical.

13. I did not say the words attributed to me in paragraph 61 of her Outline of Evidence. At no point during our discussion did I ask Person 17 whether Ben had given her the black eye. It never even occurred to me that that was a possibility. I have been in a relationship with Ben for 21 years. During those 21 years Ben has never raised or gone to raise a hand to me or made me feel in any way physically intimidated or threatened.

14. At or about 12:30pm I said to Person 17: *"I have to go and pick up my children. You need to leave. Don't ever come back to this house."* I opened the front gate and then walked over to the veranda where my mother and Diane were standing. Person 17 continued to sit in the garden for a few minutes before getting up and leaving.

9 July 2019

NOTICE OF FILING

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Document Lodged:	Non-Prescribed Report
File Number:	NSD1485/2018
File Title:	BEN ROBERTS-SMITH v FAIRFAX MEDIA PUBLICATIONS PTY LTD (ACN 003 357 720) & ORS
Registry:	NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



Sia Lagos

Dated: 3/05/2021 3:52:55 PM AEST

Registrar

Important Information

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Outline of Evidence – Emma Roberts



No. NSD1485 of 2018

Ben Roberts-Smith

Applicant

Fairfax Media Publications Pty Limited and Ors

Respondents

The Respondents anticipate that at trial Emma Roberts will give evidence about the following matters:

1. Emma Roberts was formerly known as Emma Roberts-Smith and was married to the Applicant until they separated in early 2020.
2. On 6 April 2018 Ms Roberts became aware that the Applicant had been having an affair with Person 17.
3. After that time the Applicant asked Ms Roberts to lie and say that they were separated at the time of the affair to protect him if the matter became public.
4. Ms Roberts is subject to a confidentiality agreement with the Applicant which prevents her from disclosing the evidence she will give at trial other than under compulsion. The Respondents anticipate that Ms Roberts will give evidence at trial in relation to the following topics:
 - (a) The Applicant's affair with Person 17 and the events of 6 April 2018 when Person 17 arrived at the Applicant's and Ms Roberts' home in Ilkley Rd on the Sunshine Coast (**Ilkley home**) to disclose the affair.
 - (b) The circumstances relating to the Applicant's request to Ms Roberts to lie about whether the Applicant and Ms Roberts were separated between October 2017 and April 2018, including in the outline of evidence for Ms Roberts filed by the Applicant in these proceedings.
 - (c) The Applicant's concealment of evidence, including by emailing documents to her in August 2018 and burying USBs in the backyard of the Ilkley home.
 - (d) Steps taken by the Applicant to communicate covertly with witnesses including Person 5, 11, 29 and 35.
 - (e) Steps taken by the Applicant in relation to witnesses against his interests, including Person 18.

NOTICE OF FILING

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Document Lodged:	Non-Prescribed Report
File Number:	NSD1486/2018
File Title:	BEN ROBERTS-SMITH v THE AGE COMPANY PTY LTD ACN 004 262 702 & ORS
Registry:	NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



Sia Lagos

Dated: 3/05/2021 4:23:26 PM AEST

Registrar

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Outline of Evidence – Danielle Scott



No. NSD1485 of 2018

Ben Roberts-Smith

Applicant

Fairfax Media Publications Pty Limited and Ors

Respondents

The Respondents anticipate that at trial Danielle Scott will give evidence in substance in accordance with this outline of evidence.

Background

1. Ms Scott is the best friend of Ms Emma Roberts (formerly known as Emma Roberts-Smith), who was married to the Applicant for 22 years. Ms Scott and Ms Roberts have been friends for 45 years.
2. Throughout their friendship Ms Scott and Ms Roberts have communicated very regularly via telephone and text message. Throughout the friendship, and particularly since late 2017, Ms Roberts has confided in Ms Scott.

The Applicant's affair with Person 17

3. To the best of Ms Scott's knowledge, the Applicant and Ms Roberts did not separate at any time prior to January 2020. Ms Scott believes that if the Applicant and Ms Roberts separated at any time earlier, Ms Roberts would have told her.
4. Between about October 2017 and April 2018, Ms Roberts regularly expressed concern to Ms Scott that the Applicant was having an affair.
5. On 6 April 2018 Ms Scott saw that she had a number of missed calls from Ms Roberts on her mobile phone. She called Ms Roberts back and they had a conversation in words to the following effect:

S: *"Is everything ok?"*

R: *"Are you sitting down?"*

S: *"Do I need to be?"*

R: *"Yes, I'm standing on my verandah and I'm looking at Ben's girlfriend (referring to Person 17)."*

6. During the conversation with Ms Roberts they had a conversation in words to the following effect:

R: *"She has a big black eye."*

S: *"How did she get that?"*

R: *"I asked her the same thing, she said she down the stairs at parliament house".*

7. Ms Scott stayed on the phone for some time. In the background she could hear voices she recognised as Christine Bradley (Ms Roberts' mother), Paul Bradley (Ms Roberts' step-father) and Diane Young (Ms Roberts' house keeper). The phone was passed around and she spoke from time to time to those other people. During the phone call Ms Scott had a conversation with Ms Bradley during which Ms Bradley said to Ms Scott words to the effect *"I asked her if Ben gave her the black eye and she said no."*
8. On 8 April 2018 Ms Scott engaged in a text message exchange with Ms Roberts, a copy of which is attached to this statement and marked **A**.

9. On about 20 April 2018, Ms Scott received a call from the Applicant and Ms Roberts. The Applicant and Ms Roberts were driving home from the Gabba in Brisbane, where the Applicant had spoken earlier in the day, and Ms Scott was on speaker phone. The Applicant and Ms Roberts informed Ms Scott that earlier that day Person 17 had contacted the Applicant's personal assistant, Ms Leonie Atkinson, asking the Applicant to log into the joint secret email account he maintained with Person 17. Ms Roberts and the Applicant asked Ms Scott to log into the email account and see what was there. Ms Scott did so and saw that there was a draft email in the account which suggested that Person 17 may have be in trouble and needed help.
10. Ms Scott spoke to the Applicant and said words to the effect "*do you need me to call her?*" The Applicant asked Ms Scott to try to contact Person 17. Ms Scott tried to call Person 17 at least twice that day and again the next day, from a private number. Person 17 did not answer.
11. On 22 April 2018 the Applicant sent Ms Scott the text of an email for her to send Person 17. A copy of that email is attachment **B**. Ms Scott set up a Gmail account using the name "Danielle Kennedy" (Kennedy being Ms Scott's mother's maiden name) and sent the email to Person 17.
12. On 24 April 2018 the Applicant sent Ms Scott the text of a further email to send to Person 17. A copy of that email is attachment **C**. Ms Scott sent the email to Person 17.
13. On 27 April 2018 Ms Scott engaged in a text message exchange with Ms Roberts, a copy of which is attached to this statement and marked **D**.
14. At about this time the Applicant said to Ms Scott that he had a video of Person 17 that he said proved she lied about having an abortion.
15. In about October 2018 Ms Roberts said to Ms Scott words to the effect "*Ben asked if you could contact John McLeod and ask for a copy of the video of [Person 17].*" Ms Roberts had previously told Ms Scott that the Applicant had fallout with Mr McLeod. Ms Scott contacted Mr McLeod and asked him for the file. On 22 October 2018 Mr McLeod sent the video to Ms Scott. A copy of a message from Mr McLeod to Ms Scott is attached and marked **E**. Ms Scott provided the video to the Applicant.
16. In about July 2019 Ms Roberts told Scott that she lied in her outline of evidence about being separated with the Applicant during his affair with Person 17 because the Applicant pressured her to do so on the basis that if she didn't, she would lose everything.

Conferring with witnesses and phones and SIM cards

17. On 9 May 2018 Ms Scott engaged in a text message exchange with Ms Roberts, a copy of which is attached to this statement and marked **F**.
18. On or around 9 June 2018, the Applicant asked Ms Scott to purchase him 2 x Telstra pre-paid sim cards and 2 x iPhones. The Applicant said to Ms Scott words to the effect "*I want to be able to contact the guys in the unit without our phones being tapped*".
19. On or around 9 June 2018, Ms Scott purchased 2 x Telstra sim cards and 2 x iPhones in cash from Officeworks and provided them to the Applicant.
20. Ms Scott set up the two iPhones using an Apple ID in her name and activated the sim cards (one in her name and one in her husband's).
21. On 28 June 2018, the Applicant's company transferred \$914 to Ms Scott as reimbursement for purchasing the sim cards and the iPhone.
22. From that time the Applicant and Ms Scott referred to the phones using the code names "handbag 1" and "handbag 2".
23. From time to time the Applicant asked Ms Scott to top up the credit on the sim cards and they would reimburse her for doing so.
24. In December 2018, the Applicant asked Ms Scott to purchase further sim cards. At about this time Ms Scott purchased a further 2 x Optus sim cards and provided them to the Applicant.
25. In January 2019 Ms Scott bought her son an iPhone which she activated using the same Apple ID as that used to activate the iPhones she gave to the Applicant in June 2018. When Ms Scott went

into the contacts on the phone to add her and her husband's contact details to her son's iPhone she noticed that there were five contacts already stored in the phone using the initials of those individuals. Ms Scott checked the number for one of the initials saved against the phone number for Person 11 which she had stored in her own phone (as she had previously been in contact with Person 11 in relation to arranging babysitting in Bali), and the phone numbers matched. Ms Scott asked Ms Roberts about the other initials and Ms Roberts said they were for Persons 35, 29, 5 and 56.

Documents

26. From about October 2017 Ms Roberts started forwarding documents to Ms Scott from time to time for safe-keeping. Ms Roberts said to Ms Scott words to the effect "*Dan can you keep these for me*".
27. On 17 August 2018 Ms Roberts sent to Ms Scott four emails. Copies of those emails, and their attachments, are attached and marked **G** to **J**.

Buried USBs

28. In or about late 2018, but prior to November 2018, Ms Scott had a telephone conversation with the Applicant and Ms Roberts (who were both on loud speaker). During that conversation the Applicant said words to the effect "*the boys are sending me photos*".
29. At some time prior to 15 March 2020 Ms Roberts told Ms Scott that she suspected that the Applicant had buried something in the backyard.
30. On about 16 March 2020 Ms Scott was visiting Ms Roberts and they looked in the backyard to see if they could find what had been buried. They noticed a rock on the ground under a hose reel and dug under it using a pitchfork. About 10-15cm down they found a lunchbox which contained six USBs that had been placed in a plastic snap lock bag. Ms Scott copied the contents of the USBs onto her computer. Ms Scott and Ms Roberts placed the USBs back in the bag and the lunchbox and re-buried it. Ms Scott was contacted by the AFP and she provided a copy of the contents of the USBs to them.
31. On 5 June 2020 just before 2pm, Ms Roberts and Ms Scott were on the phone. Ms Roberts told Ms Scott words to the effect "*Ben is coming over to collect some documents*". During that call they discussed that the Applicant may be coming to retrieve the USBs. Ms Roberts ended the call so she could go and take photos of the area where the lunchbox was buried.
32. After the call Ms Roberts sent Ms Scott four photos of the area where the lunchbox had been buried. Those photos are attached and marked **K**. The first two photos were taken at about 2:06pm and the second two were taken at about 2:32pm.
33. Screenshots of the file names of the documents Ms Scott copied off the USB are attached and marked **L**.

Enquiries regarding stamps and John McLeod

34. Ms Scott used to work at Australia Post. In the period prior to about June 2018 the Applicant contacted Ms Scott and ask her questions about how stamps and franking works, and whether letters could be traced based on the stamps or barcodes.
35. In or about February 2020 Ms Scott asked Ms Roberts in effect what happened between the Applicant and Mr McLeod. Ms Roberts replied words to the effect: "*Ben got John to send the threatening letters that were referenced in the Fairfax articles in June 2018 and once John realised that Ben had used him to send those letters, John approached Ben about it and they had a falling out.*"



Dylan Dexter

From: Ben Roberts-Smith <b.robertssmith@icloud.com>
Sent: Sunday 22 April 2018 04:35 PM
To: dscottfl@bigpond.com
Subject: Gmail

P17

My name is Danielle Kennedy and I represent Mr and Mrs Roberts-Smith. I am aware of all details pertaining to your particular situation and have been instructed to contact you using the gmail account details you supplied to Mr Roberts-Smith's office.

I have now try to call your mobile on multiple occasions on Friday 20 April and Saturday 21 April. I have also been corresponding with you via your gmail account and have tried to ascertain a suitable time to speak with you in person. Due to you not providing me an appropriate time to call I am now sending this email.

I will highlight that at no stage has Mr Roberts-Smith, his family, or any associates tried to communicated with you post Friday 06 April 2018 when you arrived without invitation and unannounced to the Roberts-Smith's private residence and were asked to leave.

Due to you calling Mr Roberts-Smith's place of employment and leaving a panicked message that included you stating you have been "threatened" by a 3rd party we feel an obligation to offer you assistance and as such recommend that if you have or are being threatened you should engage the Qld Police. If you require our assistance with that process we are able to connect you with the relevant people.

As Mr Roberts-Smith has made clear to you now on several occasions he does not wish to personally communicate with you through any means. Given the disturbing nature of your last message to Mr Roberts-Smith's office he has requested I assist you where and if required.

I can be contacted through my gmail account as attached. You can expect further correspondence shortly to follow up.

Sincerely

Danielle

Regards

BRS

Dylan Dexter

From: Ben Roberts-Smith <b.robertssmith@icloud.com>
Sent: Tuesday 24 April 2018 04:45 PM
To: dscottfl@bigpond.com
Subject: 2nd Letter

Hi Dan,

As discussed;

P17,

In regard to your letter of reply on the 22nd April.

We have offered you assistance as you requested and as was recorded through Mr Roberts-Smith's personal assistant on the 20 April at 12:57pm where you stated that you were being threatened and required Mr Roberts-Smith's help.

We now acknowledge that you have since changed your position and no longer require any assistance or help. As this is the case you can expect all communication from myself to cease immediately.

I will reiterate that Mr and Mrs Roberts-Smith have asked you to refrain from attempting to communicate with them, their family, all associates and places of employment.

Sincerely

Danielle Kennedy.

Happy for you to amend if required.

BRS



Emma Roberts-Sm...



Last seen on 24 February

27/4/18

11:37 ✓✓



BRS thinks if it hits the press I say
we were separated 😬

11:38

Ooooooh are you ok with that?

11:38 ✓✓



Not really 11:38

He thinks that will stop a story
lingering

11:39

No I didn't think so ...

But I can see his thinking around
this because he thinks it might be
the only way that the both of you
survive this

11:39 ✓✓



He thinks the press will go oh so
what no story and the girls won't
actually know when they're older

11:40

Type a message...

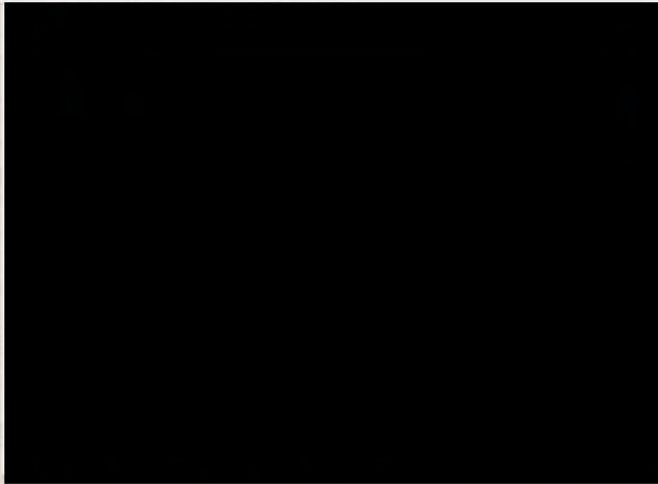


...





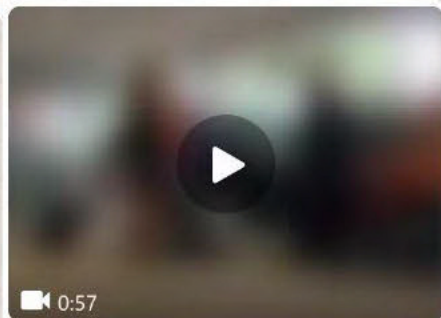
John Macleod



Thanks John, no luck on the other file yet?

16:22 ✓✓

22/10/2018



Here it's mate!!! That didn't take long !!!!

00:12



Thanks John looking a bit polished for somebody who's supposed to have undertaken that procedure 😊

06:17 ✓✓

Attachment E



Emma Roberts-Sm...



Last seen 10 min ago

9/5/18



Hey mate, yeh P□ rang brs late
😞 he was drilled for hours! Lots
of questions about Ben and even
to the point of questioning his VC
action 😞 hence to say he didn't
get much sleep! P□ was free to
leave for the US with 5 hrs until his
flight!!

5:41

Fark 6:04 ✓✓

So if they let P□ go ... that's
gotta be a good sign right?

6:11 ✓✓



Yeh 👍 6:13

It's obvious that someone has said
a hell of a lot about Ben

6:13

But they also have to be able to
prove it

6:14



Type a message...



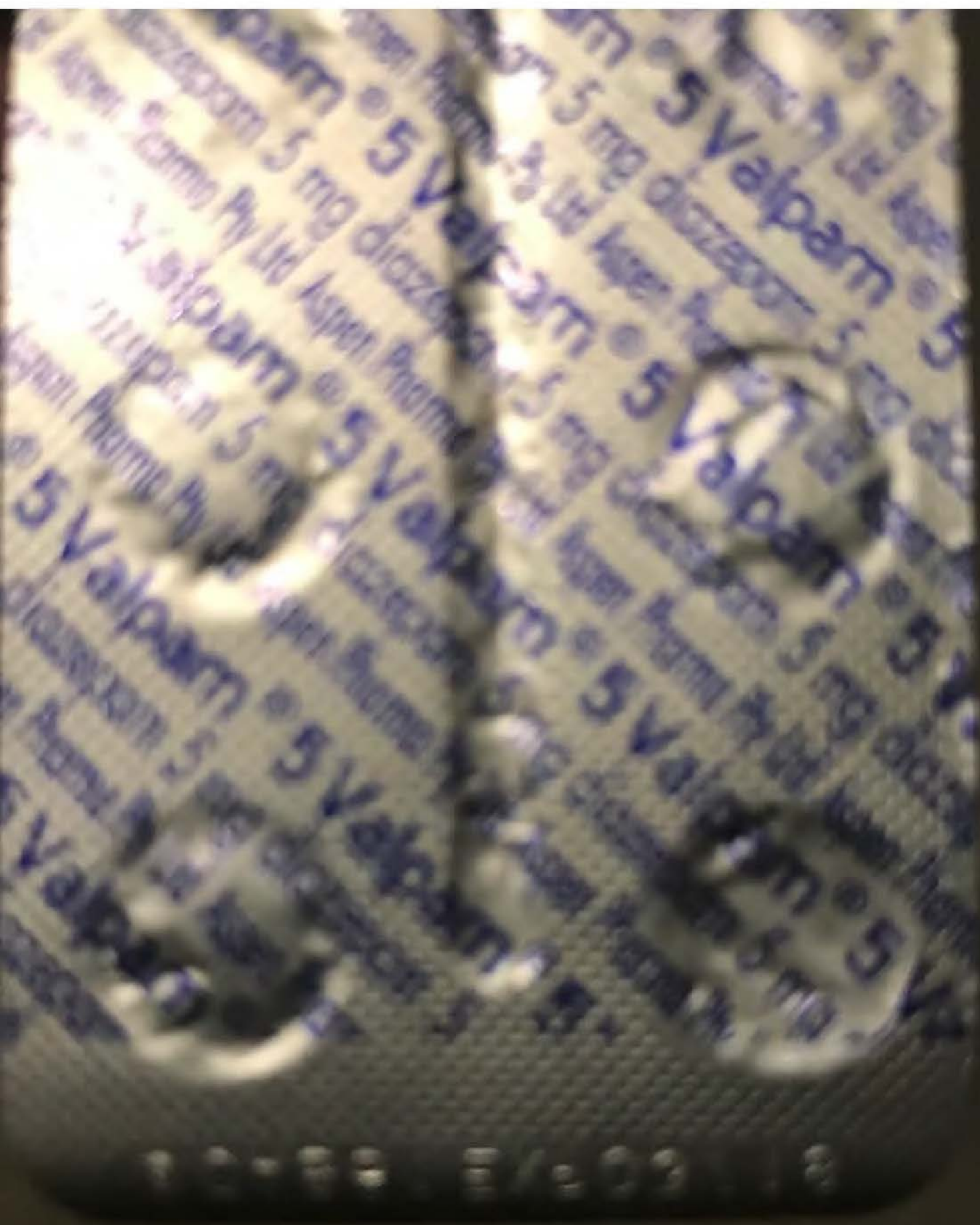
Attachment G

Subject: Fwd: Image 1
Date: Friday, 17 August 2018 at 2:06:56 pm Australian Eastern Standard Time
From: Emma
To: dscottfl@bigpond.com
Attachments: IMG_0399.jpg

Sent from my iPhone

Begin forwarded message:

From: Ben Roberts-Smith <b.robertssmith@me.com>
Date: 17 August 2018 at 1:56:30 pm AEST
To: Emma Roberts-Smith <emma@rsgroupaustralia.com>
Subject: Image 1




Attachment J

Subject: Fwd: Copy
Date: Friday, 17 August 2018 at 2:07:17 pm Australian Eastern Standard Time
From: Emma
To: dscottfl@bigpond.com
Attachments: IMG_0444.jpg, IMG_0445.jpg

Sent from my iPhone

Begin forwarded message:

From: Ben Roberts-Smith <b.robertssmith@me.com>
Date: 17 August 2018 at 1:58:46 pm AEST
To: Emma Roberts-Smith <emma@rsgroupaustralia.com>
Subject: Copy

 ChatsJenny Hosey 

... typing



April 6

No. It most certainly is not blackmail. I'm not asking for or expecting anything from you.

17:51

Please don't waste your time with intimidation or payback either. The benefit of seeing what you were capable of a few weeks back & knowing the threats you've made to me since is that I immediately put in place "insurance" in the event that anything should happen to me or my family. I know you will blame me but I hope you'll also remember that we're in this position because of what we've BOTH done.

18:20

What I did today wasn't planned & it's not something I ever thought I would do but I believe I made the right decision. I know you're angry but I did it for your own good. Some day I hope you'll see that & be thankful. If you love Emma & genuinely want to fix your marriage then it needed to come out. She deserves the truth & she was never going to get it from you. You've been lying to everybody & it's time to stop. To quote your message to me from this morning - I know you will be ok & you will work though it. Your marriage is strong &



Message

817



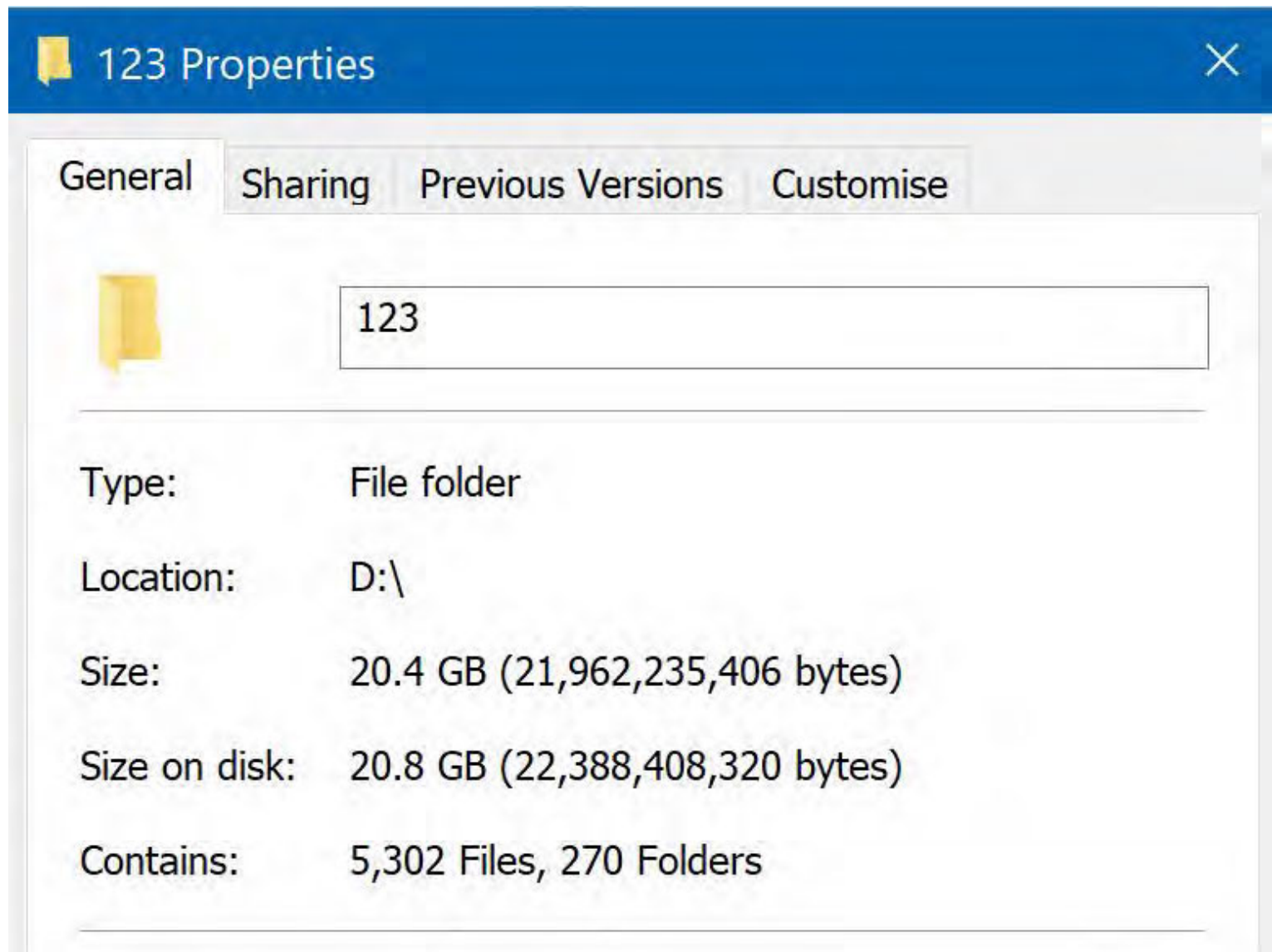
84

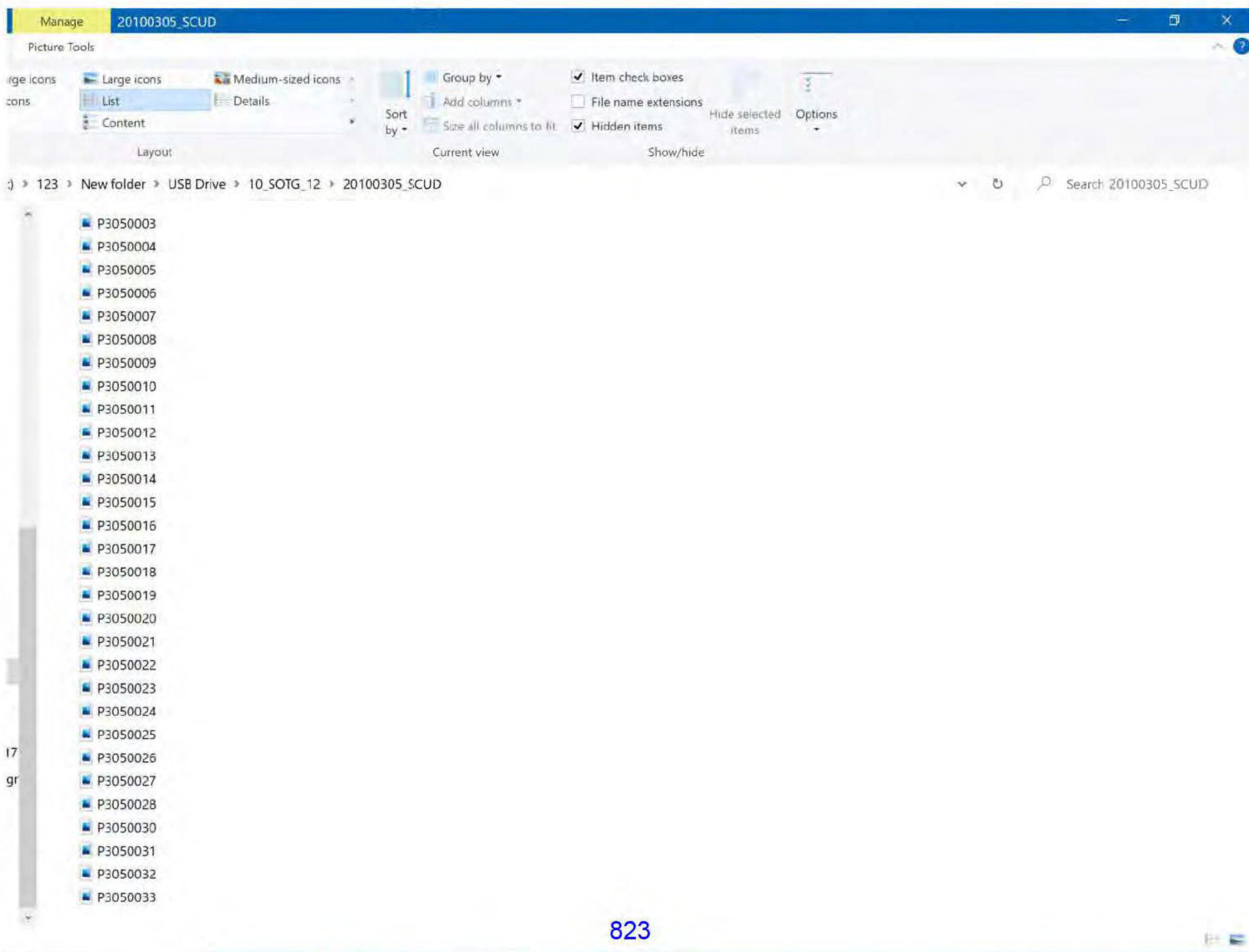


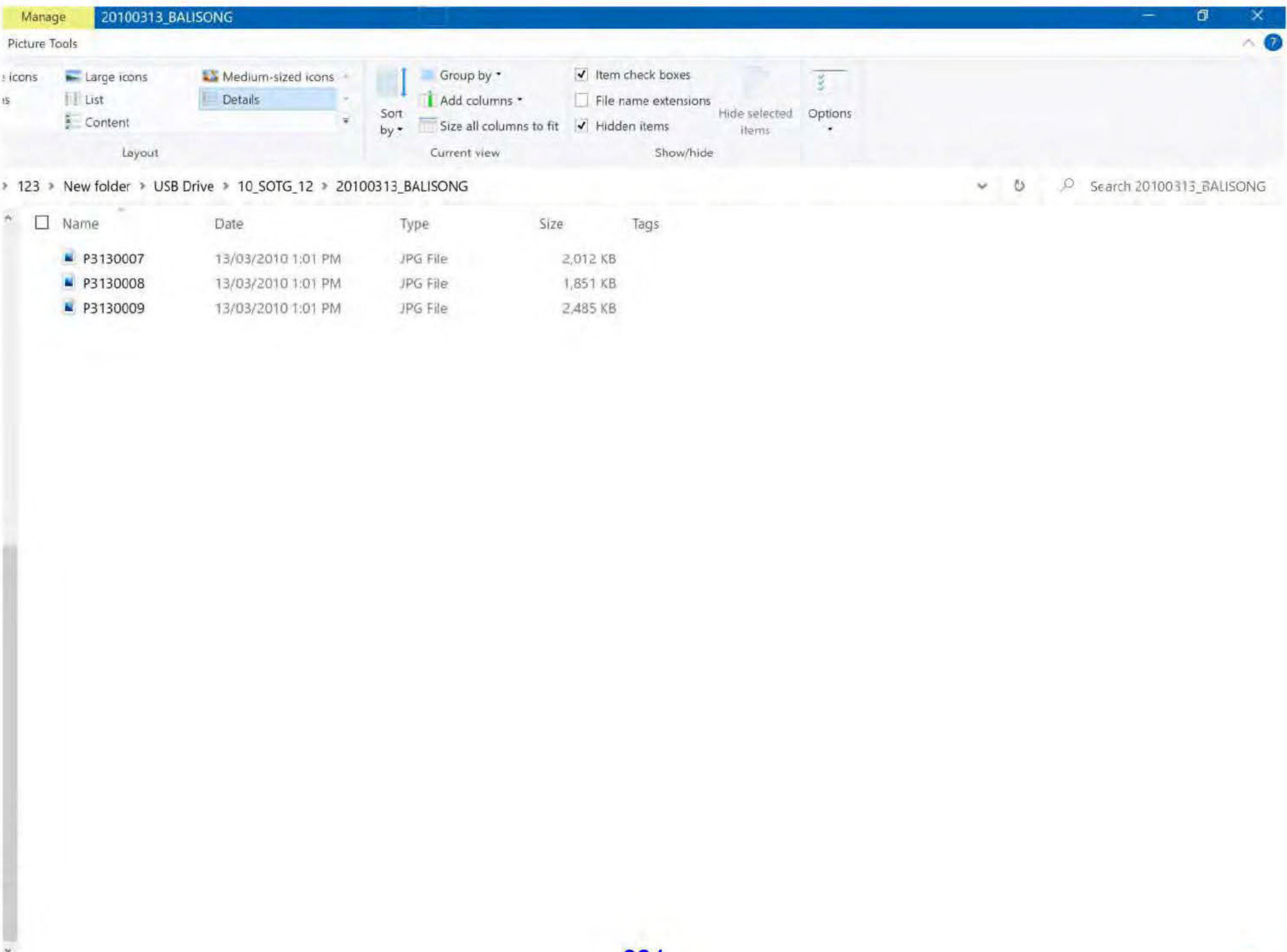


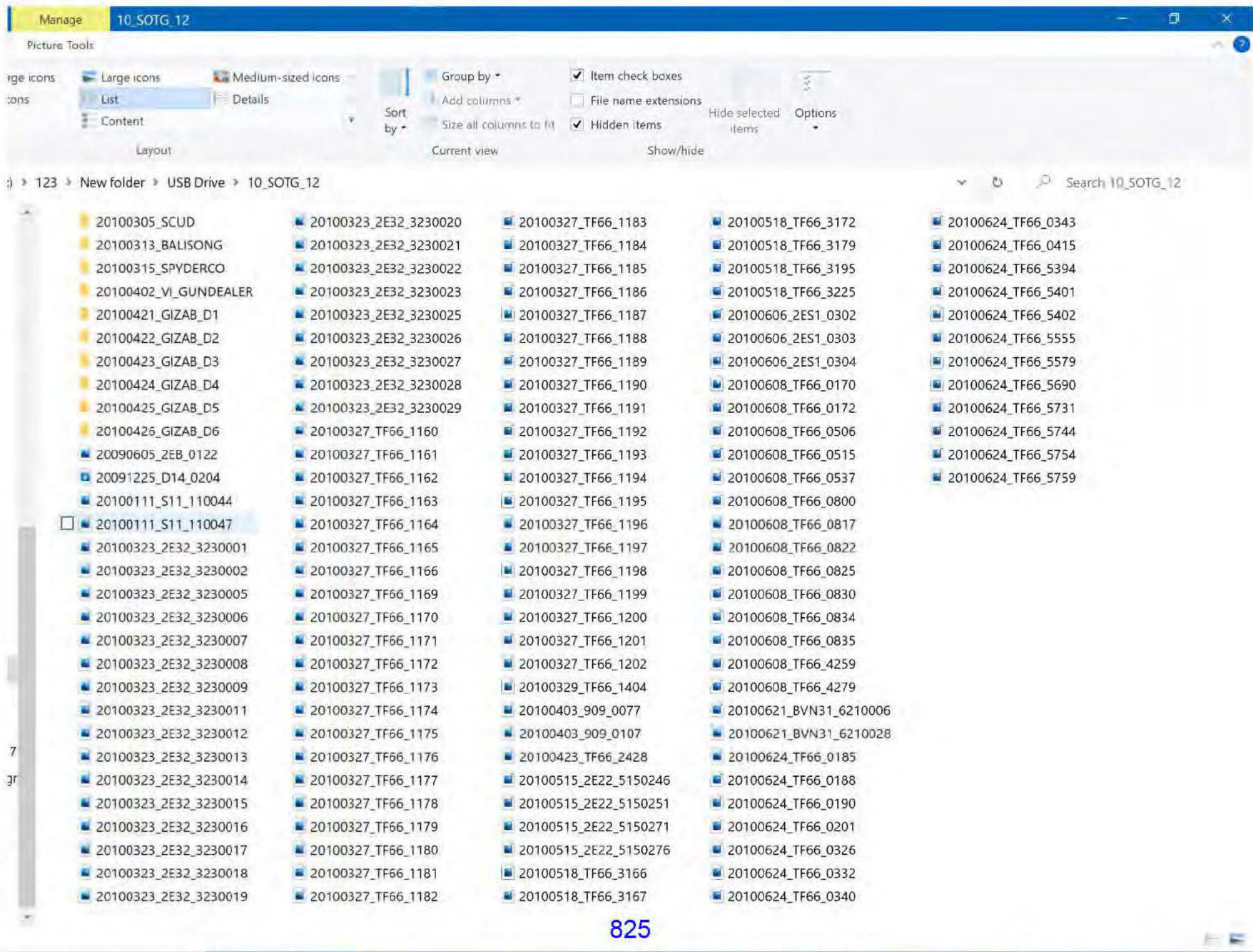


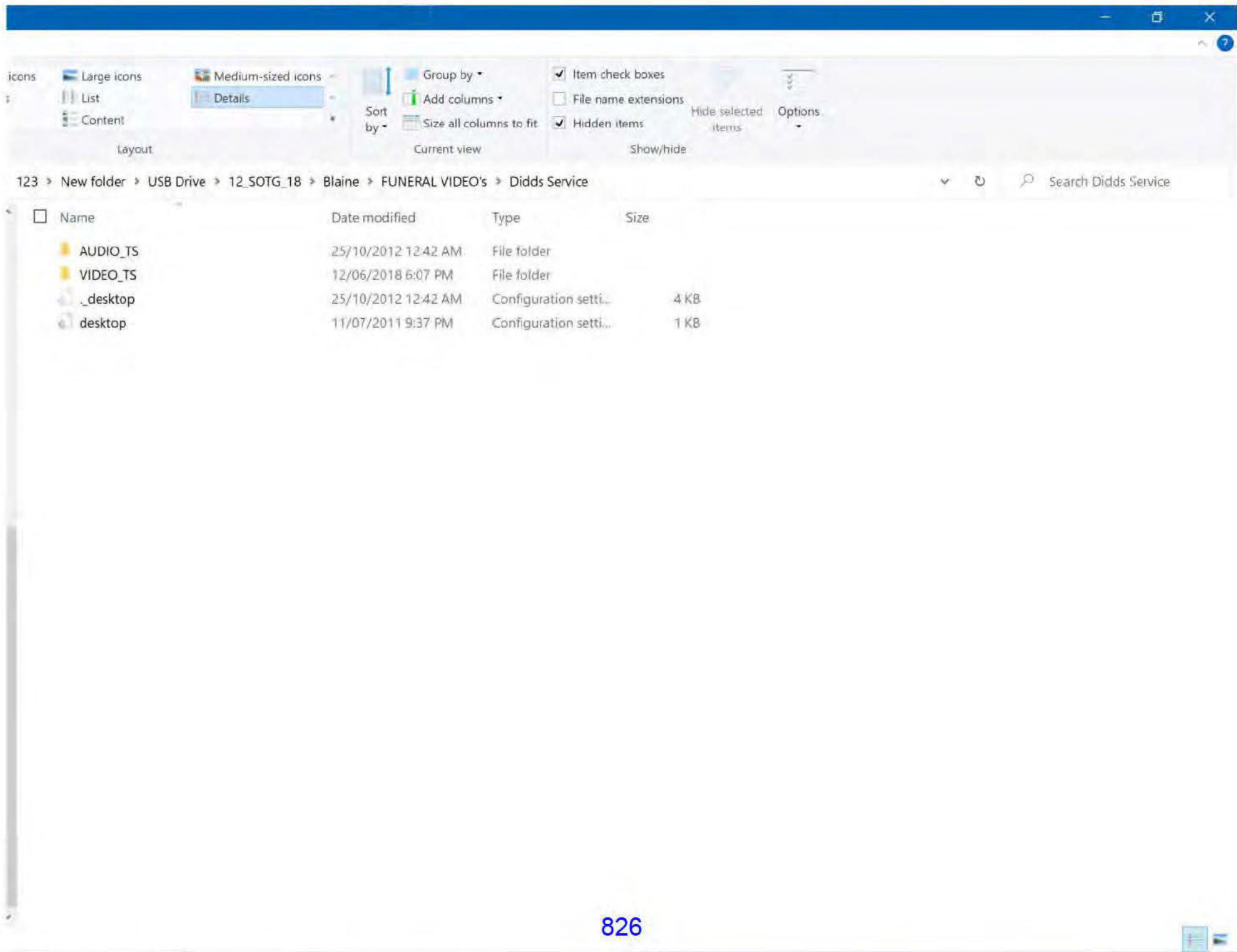


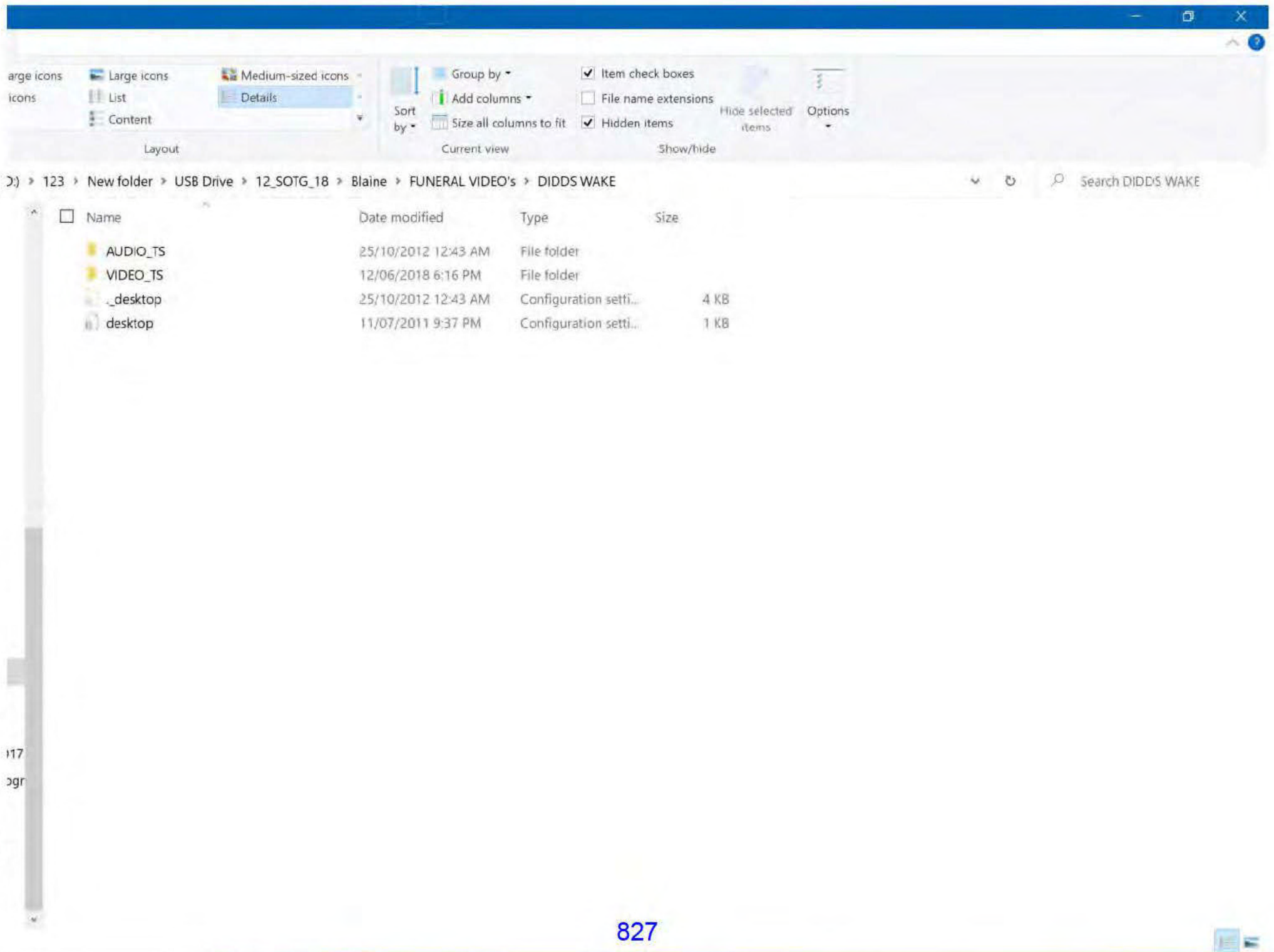


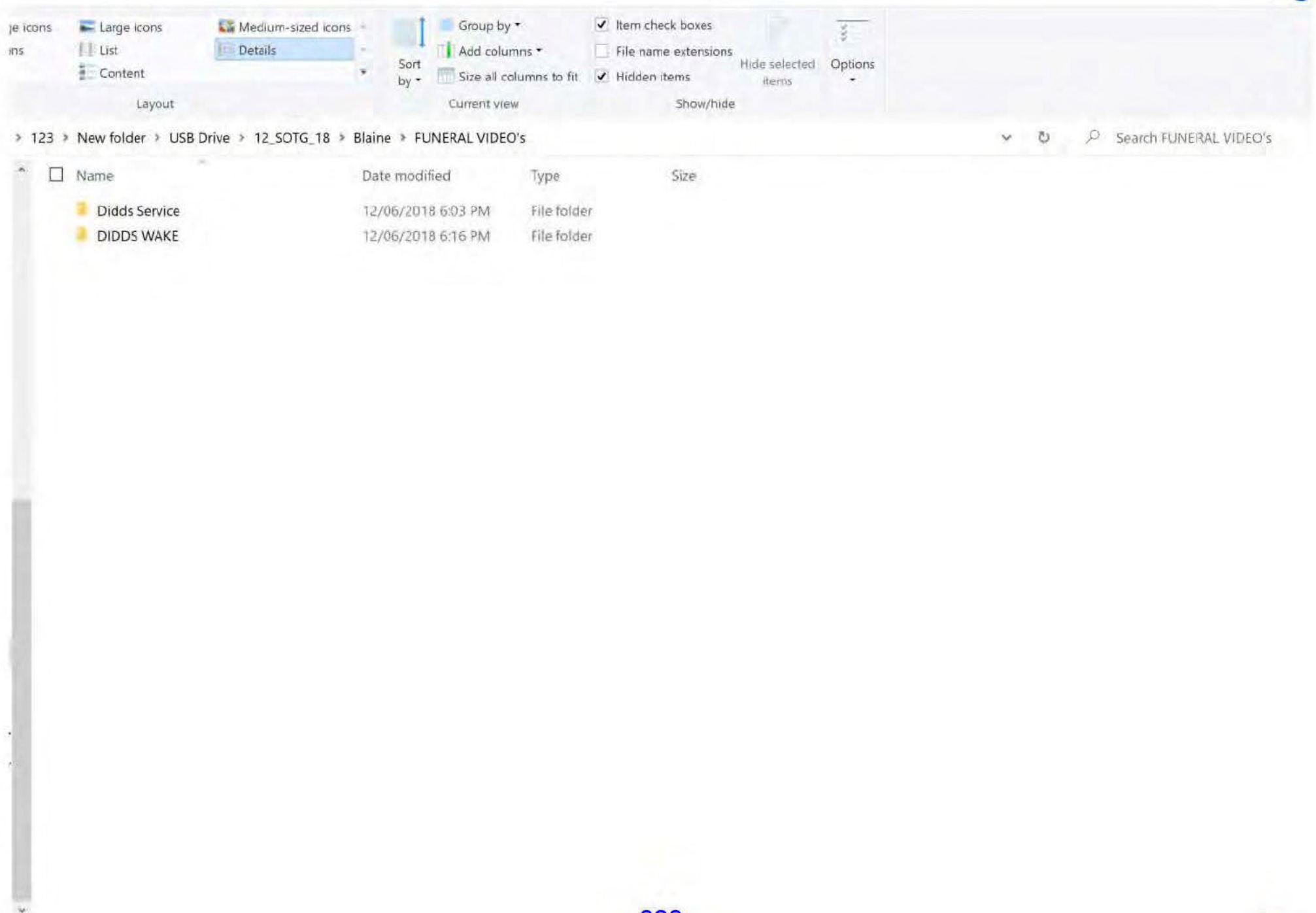


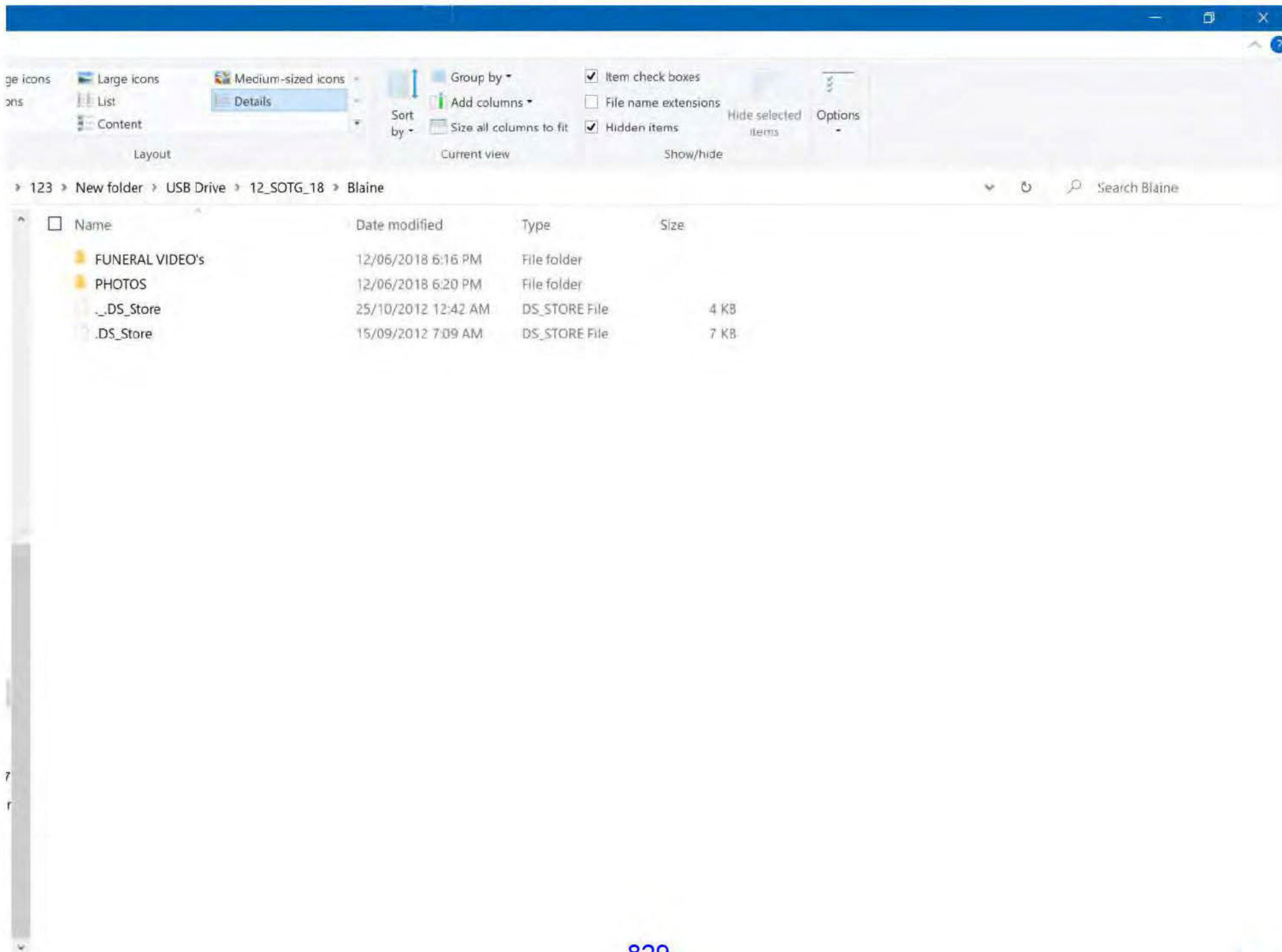












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Picture Tools

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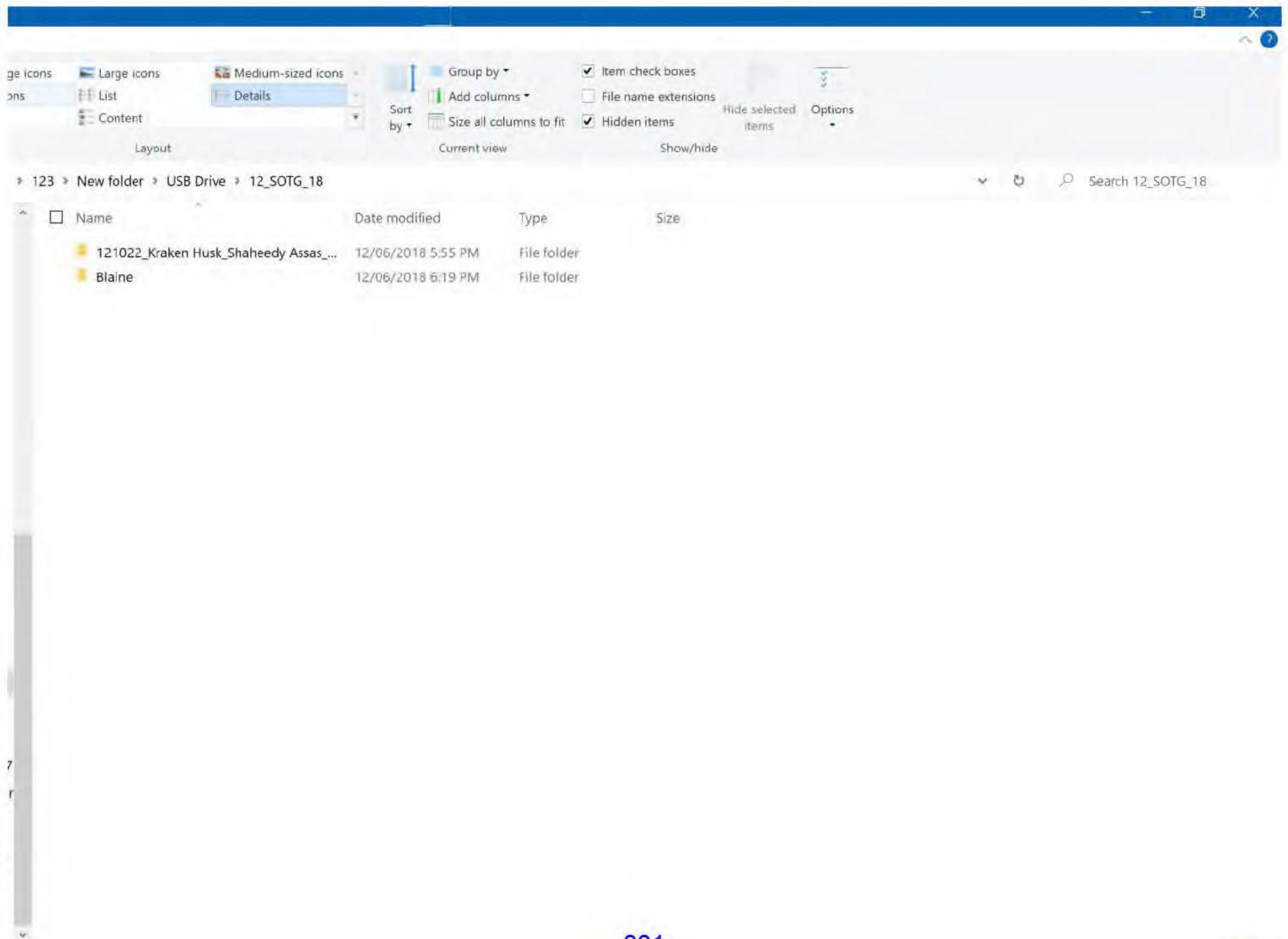
Item check boxes File name extensions Hidden items Hide selected items Options

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123 > New folder > USB Drive > 12_SOTG_18 > 121022_Kraken Husk_Shaheedy Assas

Search 121022_Kraken Husk...

Name	Date	Type	Size	Tags
DSCN0676	22/10/2012 10:25 AM	JPG File	7,099 KB	
DSCN0677	22/10/2012 10:26 AM	JPG File	6,735 KB	
DSCN0678	22/10/2012 10:26 AM	JPG File	6,664 KB	
DSCN0679	22/10/2012 10:26 AM	JPG File	6,557 KB	
DSCN0680	22/10/2012 10:26 AM	JPG File	6,695 KB	
DSCN0681	22/10/2012 10:26 AM	JPG File	6,514 KB	
DSCN0682	22/10/2012 10:28 AM	JPG File	6,128 KB	
DSCN0683	22/10/2012 10:28 AM	JPG File	6,359 KB	
DSCN0684	22/10/2012 10:30 AM	JPG File	6,580 KB	
DSCN0685	22/10/2012 10:30 AM	JPG File	7,333 KB	
DSCN0687	22/10/2012 10:33 AM	JPG File	6,374 KB	
DSCN0688	22/10/2012 10:35 AM	JPG File	6,894 KB	
DSCN0689	22/10/2012 10:35 AM	JPG File	6,994 KB	
DSCN0690	22/10/2012 10:36 AM	JPG File	7,106 KB	
DSCN0691	22/10/2012 10:36 AM	JPG File	6,652 KB	
DSCN0692	22/10/2012 1:53 PM	JPG File	5,121 KB	
DSCN0693	22/10/2012 1:53 PM	JPG File	4,849 KB	
DSCN0694	22/10/2012 1:53 PM	JPG File	5,190 KB	



Picture Tools

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List Details

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Hide selected items

Options

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> 123 > New folder > USB Drive > 09_SOTG_9 > 09-06-26 This is Your Life Search 09-06-26 This i...

pics 106	pics 138	pics 170	pics 203	pics 234	pics 267	pics 299	pics 332
pics 107	pics 139	pics 171	pics 204	pics 235	pics 268	pics 300	pics 333
pics 108	pics 140	pics 172	pics 205	pics 236	pics 269	pics 304	pics 334
pics 109	pics 141	pics 173	pics 206	pics 237	pics 270	pics 305	pics 335
pics 110	pics 142	pics 174	pics 207	pics 238	pics 271	pics 306	pics 337
pics 111	pics 143	pics 176	pics 208	pics 239	pics 272	pics 307	pics 338
pics 112	pics 144	pics 177	pics 209	pics 240	pics 273	pics 308	pics 339
pics 113	pics 145	pics 178	pics 210	pics 241	pics 274	pics 309	pics 340
pics 114	pics 146	pics 180	pics 211	pics 242	pics 275	pics 310	pics 341
pics 115	pics 147	pics 181	pics 212	pics 243	pics 276	pics 311	pics 342
pics 116	pics 148	pics 182	pics 213	pics 245	pics 277	pics 312	pics 343
pics 117	pics 149	pics 183	pics 214	pics 247	pics 278	pics 313	pics 346
pics 119	pics 150	pics 184	pics 215	pics 248	pics 279	pics 314	pics 348
pics 120	pics 151	pics 185	pics 216	pics 249	pics 280	pics 315	pics 349
pics 121	pics 152	pics 186	pics 217	pics 250	pics 281	pics 316	pics 350
pics 122	pics 153	pics 188	pics 218	pics 251	pics 282	pics 317	pics 352
pics 123	pics 154	pics 189	pics 219	pics 252	pics 284	pics 318	pics 353
pics 125	pics 155	pics 190	pics 220	pics 253	pics 286	pics 319	pics 354
pics 126	pics 156	pics 191	pics 221	pics 254	pics 287	pics 320	pics 355
pics 127	pics 157	pics 192	pics 222	pics 256	pics 288	pics 321	pics 356
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pics 129	pics 160	pics 194	pics 224	pics 258	pics 290	pics 323	pics 358
pics 130	pics 161	pics 195	pics 225	pics 259	pics 291	pics 324	pics 359
pics 131	pics 162	pics 196	pics 226	pics 260	pics 292	pics 325	pics 360
pics 132	pics 163	pics 197	pics 228	pics 261	pics 293	pics 326	pics 361
pics 133	pics 164	pics 198	pics 229	pics 262	pics 294	pics 327	
pics 134	pics 165	pics 199	pics 230	pics 263	pics 295	pics 328	
pics 135	pics 166	pics 200	pics 231	pics 264	pics 296	pics 329	
pics 136	pics 167	pics 201	pics 232	pics 265	pics 297	pics 330	
pics 137	pics 168	pics 202	pics 233	pics 266	pics 298	pics 331	

Picture Tools

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Current view

☒ Item check boxes☐ File name extensions☒ Hidden items

Show/hide

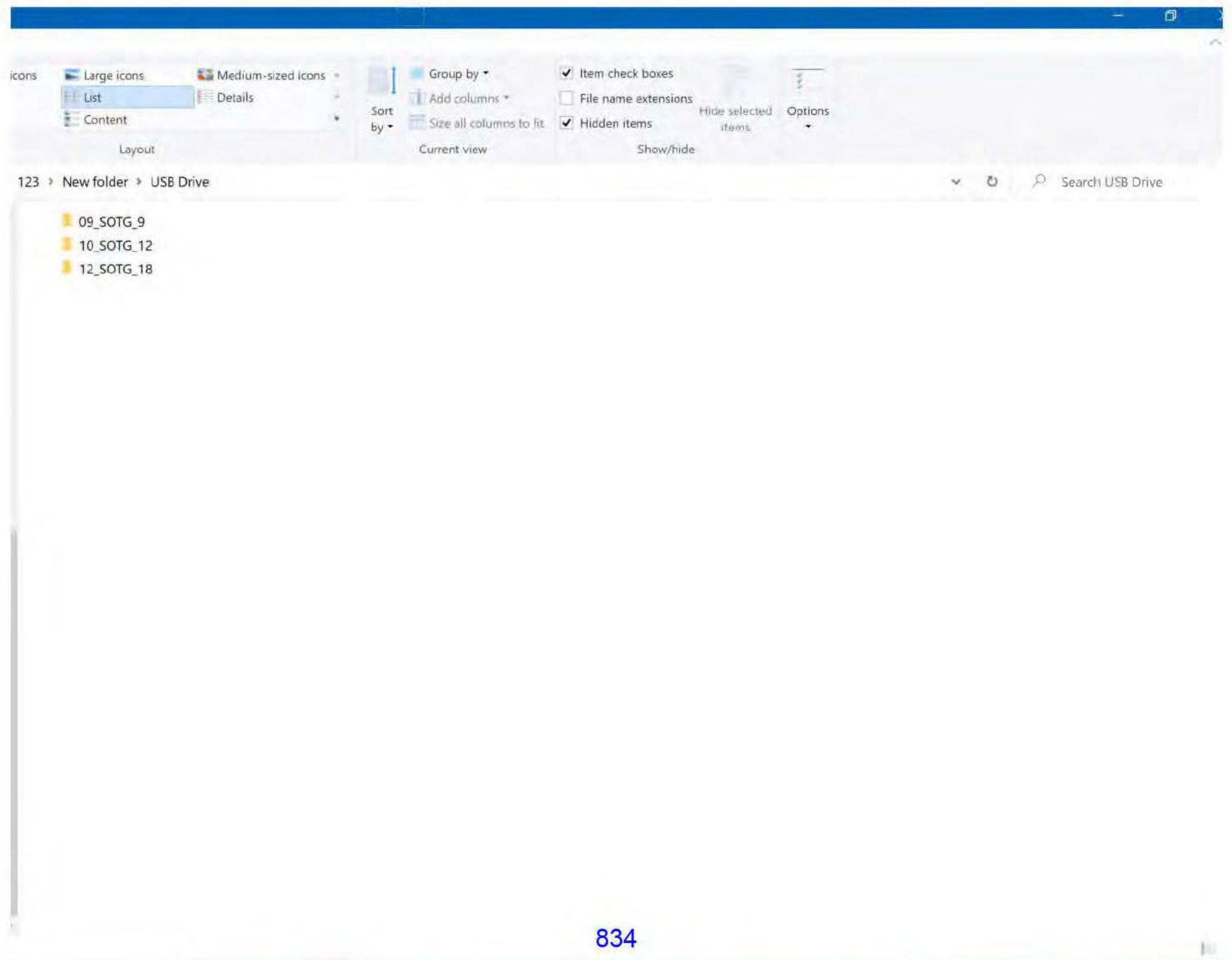
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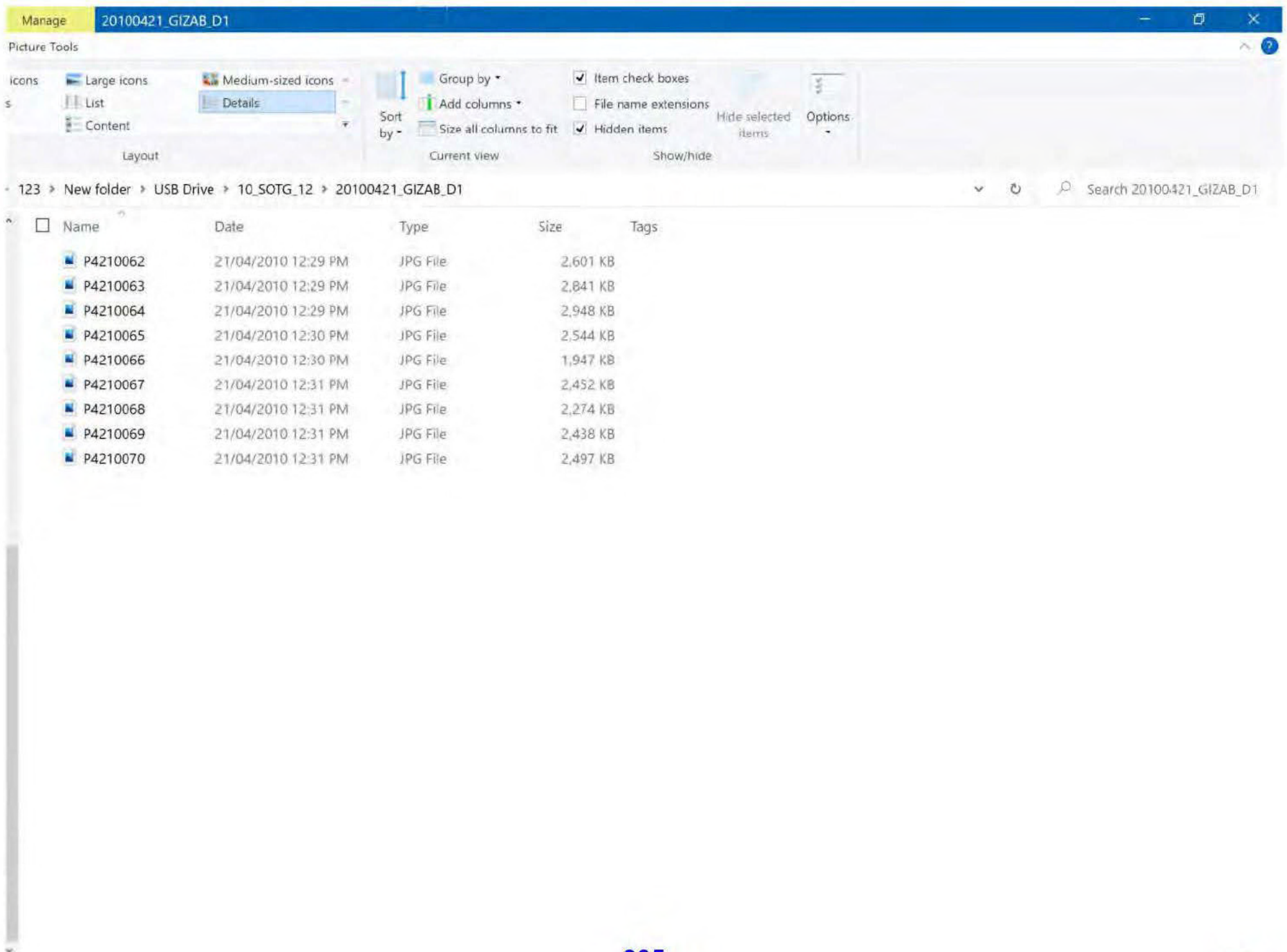
Options

> 123 > New folder > USB Drive > 09_SOTG_9

Search 09_SOTG_9

<input type="checkbox"/>	Name	Date	Type	Size	Tags
	09-06-26 [redacted] his is Your ...	18/10/2020 8:29 AM	File folder		
	Stilleto Quiz Night - [redacted]	18/10/2020 8:29 AM	File folder		
	P3250007	25/03/2009 7:27 PM	JPG File	2,140 KB	
	P4130050	13/04/2009 1:08 AM	JPG File	440 KB	
	P4130053	13/04/2009 1:14 AM	JPG File	401 KB	
	P4130061	13/04/2009 8:54 PM	JPG File	416 KB	





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Picture Tools

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☒ Item check boxes☐ File name extensions☒ Hidden items

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> 123 > New folder > USB Drive > 10_SOTG_12 > 20100422_GIZAB_D2

☐ Name

Date

Type

Size

Tags

P4220071

P4220072

P4220073

P4220074

P4220075

P4220076

P4220077

P4220078

P4220079

P4220080

P4220081

P4220082

P4220083

P4220084

P4220085

P4220086

P4220087

P4220088

22/04/2010 5:38 AM

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22/04/2010 6:33 AM

22/04/2010 6:35 AM

22/04/2010 6:36 AM

22/04/2010 6:36 AM

22/04/2010 6:37 AM

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2,819 KB

2,409 KB

2,230 KB

2,362 KB

2,273 KB

2,897 KB

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Picture Tools

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Group byAdd columnsSize all columns to fit

☒ Item check boxes☐ File name extensions☒ Hidden items

Hide selected itemsOptions

LayoutCurrent viewShow/hide

123 > New folder > USB Drive > 10_SOTG_12 > 20100423_GIZAB_D3

<input type="checkbox"/>	Name	Date	Type	Size	Tags
<input checked="" type="checkbox"/>	P4230089	23/04/2010 3:38 AM	JPG File	2,489 KB	
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<input checked="" type="checkbox"/>	P4230091	23/04/2010 3:38 AM	JPG File	2,714 KB	
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<input checked="" type="checkbox"/>	P4230097	23/04/2010 3:40 AM	JPG File	2,078 KB	

Search 20100423_GIZAB_D3

Manage20100424_GIZAB_D4

Picture Tools

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LayoutCurrent viewShow/hide

123New folderUSB Drive10_SOTG_1220100424_GIZAB_D4

Name	Date	Type	Size	Tags
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P4240099	24/04/2010 9:28 AM	JPG File	2,406 KB	
P4240100	24/04/2010 9:28 AM	JPG File	2,309 KB	
P4240101	24/04/2010 9:30 AM	JPG File	2,556 KB	
P4240102	24/04/2010 9:30 AM	JPG File	2,400 KB	
P4240103	24/04/2010 9:30 AM	JPG File	2,436 KB	
P4240104	24/04/2010 9:34 AM	JPG File	2,894 KB	
P4240105	24/04/2010 9:34 AM	JPG File	2,569 KB	
P4240106	24/04/2010 9:48 AM	JPG File	2,300 KB	
P4240107	24/04/2010 9:49 AM	JPG File	2,401 KB	
P4240108	24/04/2010 9:49 AM	JPG File	2,501 KB	
P4240109	24/04/2010 9:49 AM	JPG File	1,899 KB	
P4240110	24/04/2010 10:32 AM	JPG File	2,411 KB	
P4240111	24/04/2010 10:33 AM	JPG File	2,329 KB	

Picture Tools

icons Large icons Medium-sized icons Details List Content

Group by Add columns Sort by Size all columns to fit

☒ Item check boxes ☐ File name extensions ☒ Hidden items

Hide selected items Options

Layout Current view Show/hide

123 > New folder > USB Drive > 10_SOTG_12 > 20100425_GIZAB_D5

Search 20100425_GIZAB_D5

<input type="checkbox"/>	Name	Date	Type	Size	Tags
<input checked="" type="checkbox"/>	P4250112	25/04/2010 1:47 AM	JPG File	2,338 KB	
<input checked="" type="checkbox"/>	P4250113	25/04/2010 1:47 AM	JPG File	2,377 KB	
<input checked="" type="checkbox"/>	P4250114	25/04/2010 1:47 AM	JPG File	1,940 KB	
<input checked="" type="checkbox"/>	P4250115	25/04/2010 1:47 AM	JPG File	2,834 KB	
<input checked="" type="checkbox"/>	P4250116	25/04/2010 1:54 AM	JPG File	2,300 KB	
<input checked="" type="checkbox"/>	P4250117	25/04/2010 1:55 AM	JPG File	2,329 KB	
<input checked="" type="checkbox"/>	P4250118	25/04/2010 3:06 AM	JPG File	2,503 KB	
<input checked="" type="checkbox"/>	P4250119	25/04/2010 3:06 AM	JPG File	2,342 KB	
<input checked="" type="checkbox"/>	P4250120	25/04/2010 3:06 AM	JPG File	2,378 KB	
<input checked="" type="checkbox"/>	P4250121	25/04/2010 6:16 AM	JPG File	2,809 KB	
<input checked="" type="checkbox"/>	P4250122	25/04/2010 6:16 AM	JPG File	2,648 KB	
<input checked="" type="checkbox"/>	P4250123	25/04/2010 6:17 AM	JPG File	2,379 KB	
<input checked="" type="checkbox"/>	P4250124	25/04/2010 6:17 AM	JPG File	2,535 KB	
<input checked="" type="checkbox"/>	P4250125	25/04/2010 6:17 AM	JPG File	2,531 KB	
<input checked="" type="checkbox"/>	P4250126	25/04/2010 6:18 AM	JPG File	2,351 KB	
<input checked="" type="checkbox"/>	P4250127	25/04/2010 6:18 AM	JPG File	1,996 KB	
<input checked="" type="checkbox"/>	P4250128	25/04/2010 6:19 AM	JPG File	2,761 KB	
<input checked="" type="checkbox"/>	P4250132	25/04/2010 8:52 AM	JPG File	2,276 KB	
<input checked="" type="checkbox"/>	P4250133	25/04/2010 9:10 AM	JPG File	2,129 KB	
<input checked="" type="checkbox"/>	P4250134	25/04/2010 10:12 AM	JPG File	2,649 KB	
<input checked="" type="checkbox"/>	P4250135	25/04/2010 2:04 PM	JPG File	2,688 KB	
<input checked="" type="checkbox"/>	P4250136	25/04/2010 2:04 PM	JPG File	2,548 KB	
<input checked="" type="checkbox"/>	P4250137	25/04/2010 2:04 PM	JPG File	2,385 KB	
<input checked="" type="checkbox"/>	P4250138	25/04/2010 2:05 PM	JPG File	2,641 KB	
<input checked="" type="checkbox"/>	P4250139	25/04/2010 2:05 PM	JPG File	2,050 KB	
<input checked="" type="checkbox"/>	P4250140	25/04/2010 2:05 PM	JPG File	2,181 KB	
<input checked="" type="checkbox"/>	P4250141	25/04/2010 2:06 PM	JPG File	2,024 KB	
<input checked="" type="checkbox"/>	P4250142	25/04/2010 2:47 PM	JPG File	2,386 KB	
<input checked="" type="checkbox"/>	P4250143	25/04/2010 2:47 PM	JPG File	2,402 KB	

Picture Tools

icons

Large iconsMedium-sized iconsDetails

Sort by

Group by

☒ Item check boxes

☐ File name extensions

☒ Hidden items

Hide selected items

Options

LayoutCurrent viewShow/hide

123 > New folder > USB Drive > 10_SOTG_12 > 20100426_GIZAB_D6

Search 20100426_GIZAB_D6

<input type="checkbox"/>	Name	Date	Type	Size	Tags
<input checked="" type="checkbox"/>	P4260146	26/04/2010 5:59 AM	JPG File	2,466 KB	
<input checked="" type="checkbox"/>	P4260147	26/04/2010 5:59 AM	JPG File	2,329 KB	
<input checked="" type="checkbox"/>	P4260148	26/04/2010 5:59 AM	JPG File	2,238 KB	
<input checked="" type="checkbox"/>	P4260149	26/04/2010 6:00 AM	JPG File	2,420 KB	
<input checked="" type="checkbox"/>	P4260150	26/04/2010 6:08 AM	AVI File	4,704 KB	
<input checked="" type="checkbox"/>	P4260151	26/04/2010 6:13 AM	AVI File	18,436 KB	
<input checked="" type="checkbox"/>	P4260152	26/04/2010 6:24 AM	AVI File	2,648 KB	
<input checked="" type="checkbox"/>	P4260153	26/04/2010 6:25 AM	AVI File	13,592 KB	
<input checked="" type="checkbox"/>	P4260154	26/04/2010 6:25 AM	JPG File	2,285 KB	

Manage

Picture Tools

je icons
ins

Large icons
List
Content

Medium-sized icons
Details

Sort by

Group by

Add columns

Size all columns to fit

Item check boxes

File name extensions

Hidden items

Hide selected items

Options

Layout

Current view

Show/hide

123 > New folder > USB Drive > 10_SOTG_12 > 20100402_VI_GUNDEALER >

Search

Name	Date	Type	Size	Tags
P4020020	2/04/2010 8:05 PM	JPG File	3,058 KB	
P4020021	2/04/2010 8:06 PM	JPG File	3,317 KB	
P4020022	2/04/2010 8:06 PM	JPG File	2,031 KB	
P4020023	2/04/2010 8:07 PM	JPG File	3,161 KB	
P4020024	2/04/2010 8:07 PM	JPG File	3,085 KB	
P4020025	2/04/2010 8:08 PM	JPG File	3,128 KB	
P4020026	2/04/2010 8:17 PM	JPG File	3,016 KB	
P4020027	2/04/2010 8:17 PM	JPG File	3,098 KB	
P4020028	2/04/2010 8:18 PM	JPG File	3,193 KB	
P4020029	2/04/2010 8:20 PM	JPG File	3,004 KB	
P4020030	2/04/2010 8:20 PM	JPG File	3,150 KB	
P4020031	2/04/2010 8:21 PM	JPG File	3,231 KB	

Picture Tools

cons Large icons Medium-sized icons Details

Layout

Group by

Add columns

Sort by

Size all columns to fit

Item check boxes

File name extensions

Hidden items

Hide selected items






























Options

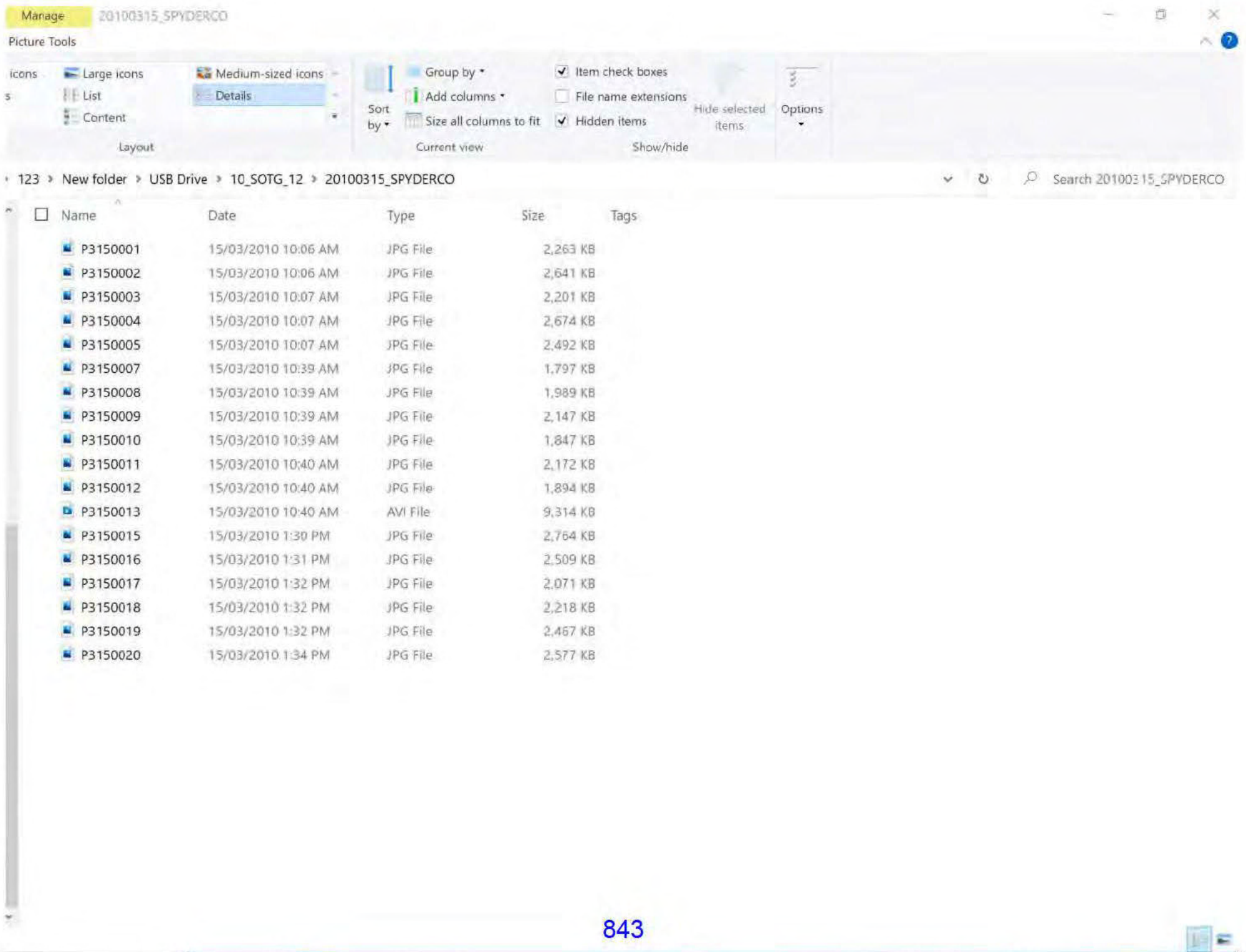
Current view

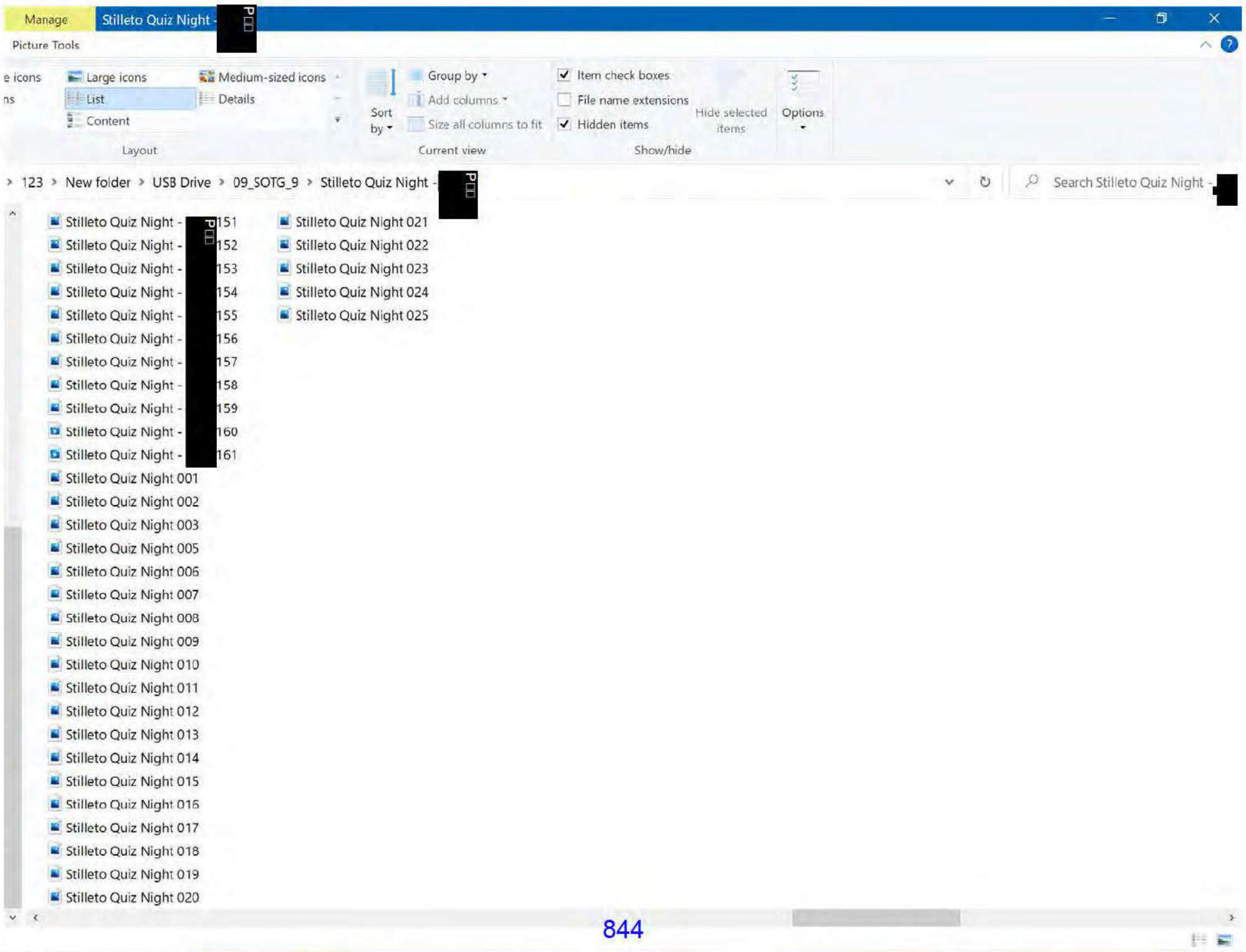
Show/hide

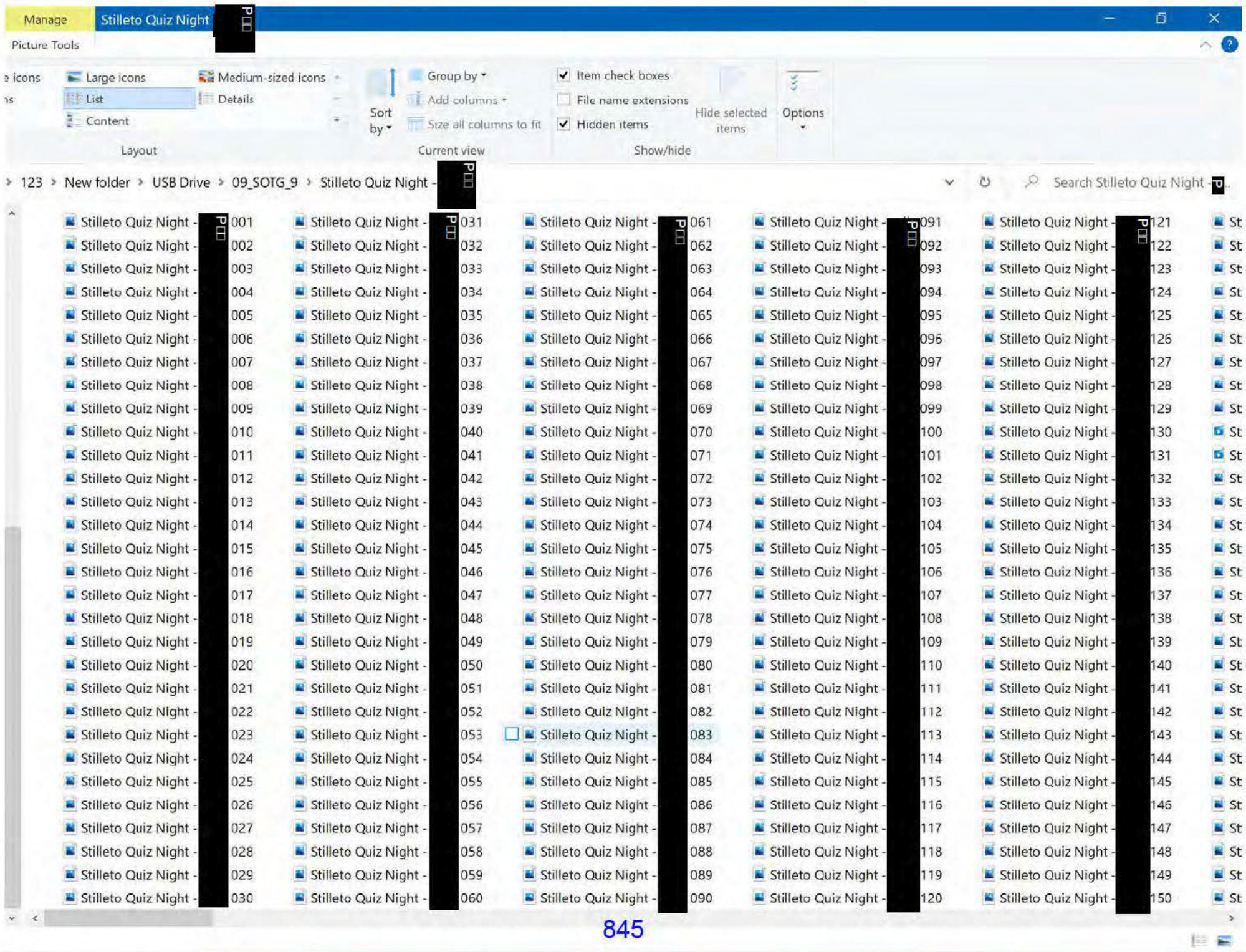
123 > New folder > USB Drive > 10_SOTG_12 > 20100402_VI_GUNDEALER

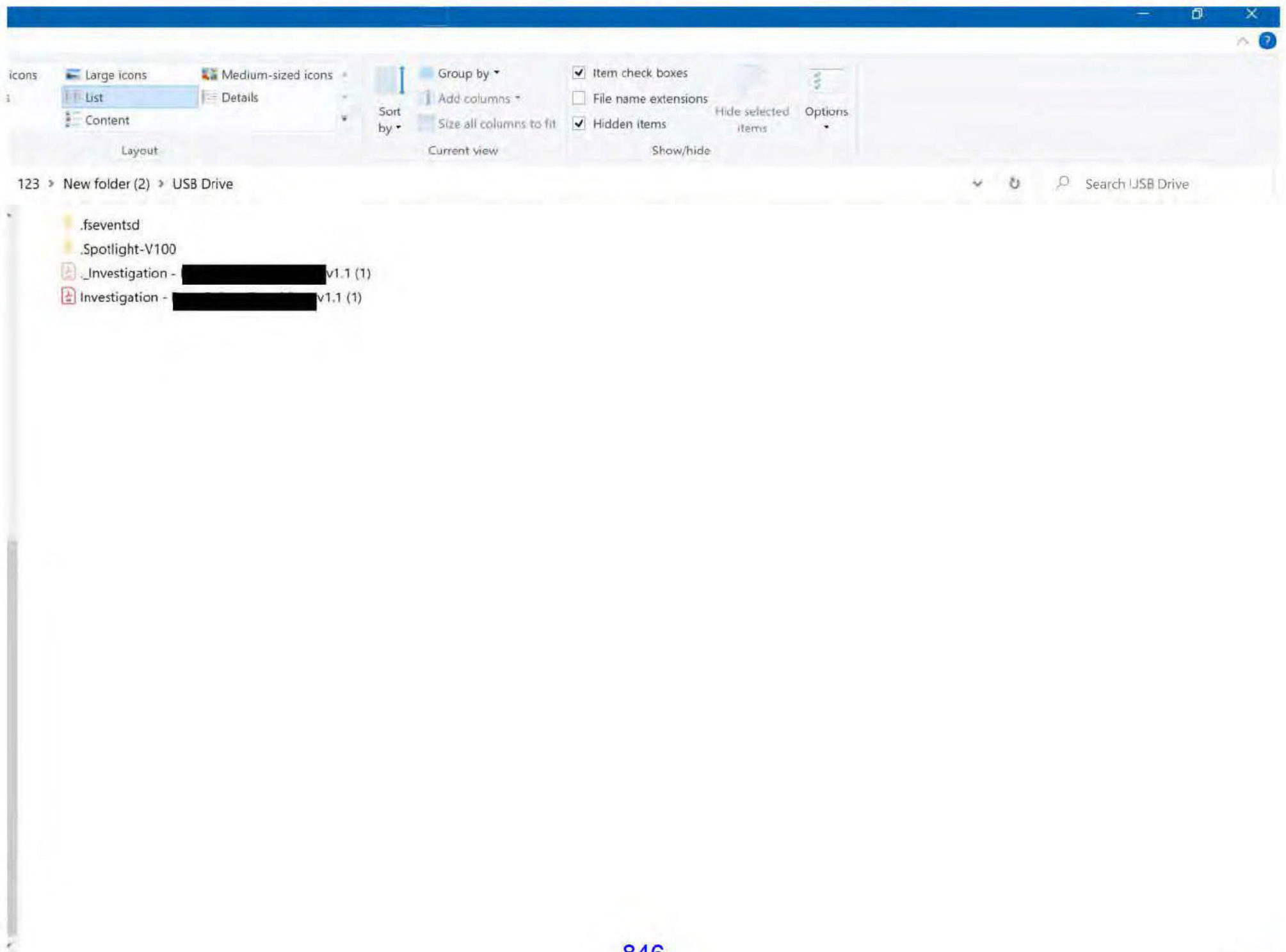
Search 20100402_VI_GUNDE...

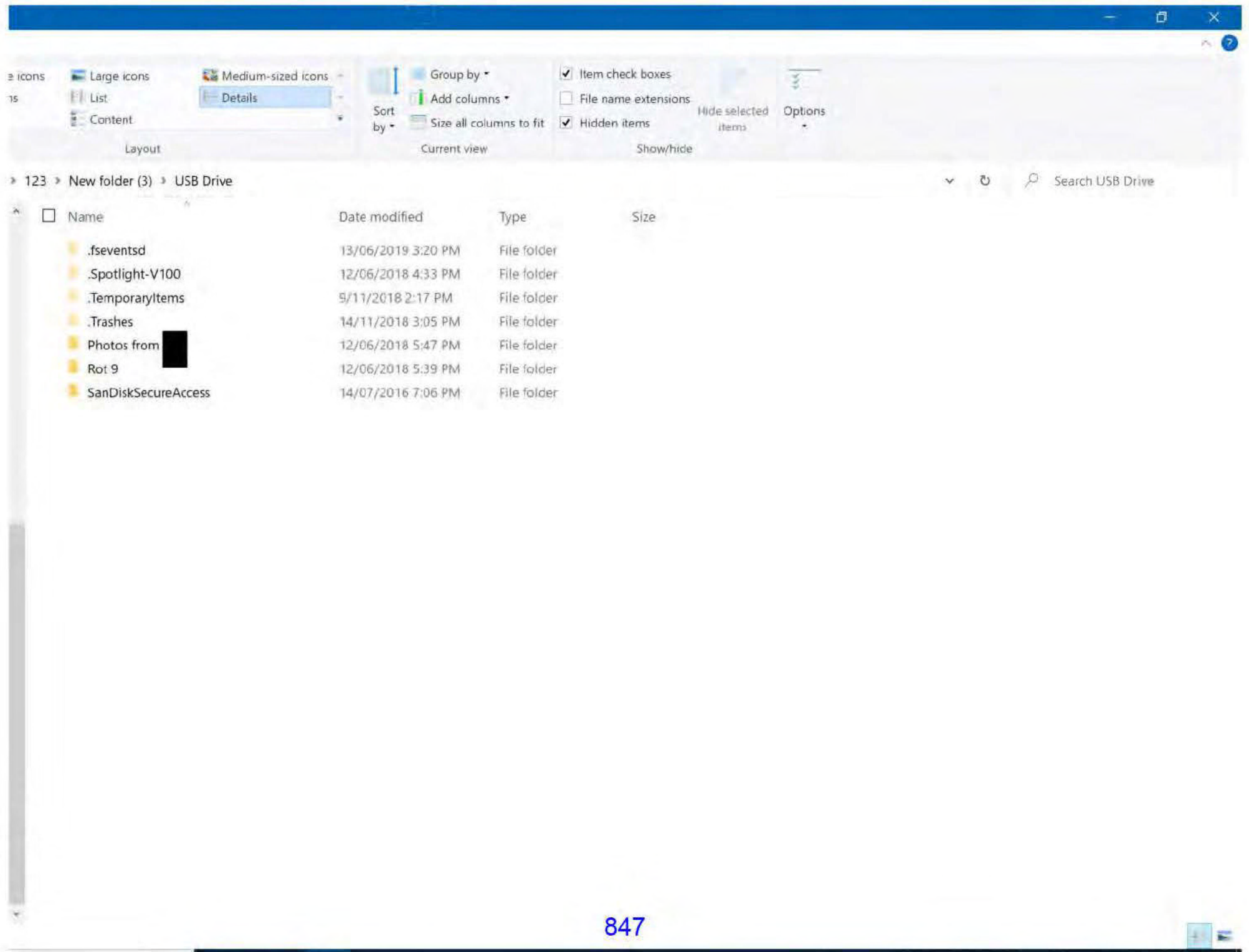
Name	Date	Type	Size	Tags
 [Redacted]	18/10/2020 8:30 AM	File folder		
 P4020001	2/04/2010 1:24 PM	JPG File	2,487 KB	
 P4020002	2/04/2010 1:24 PM	JPG File	2,327 KB	
 P4020003	2/04/2010 1:24 PM	JPG File	2,294 KB	
 P4020004	2/04/2010 2:09 PM	JPG File	2,807 KB	
 P4020005	2/04/2010 2:09 PM	JPG File	2,338 KB	
 P4020006	2/04/2010 2:09 PM	JPG File	2,040 KB	
 P4020007	2/04/2010 2:09 PM	JPG File	2,443 KB	
 P4020008	2/04/2010 2:16 PM	JPG File	2,238 KB	
 P4020009	2/04/2010 2:16 PM	JPG File	2,541 KB	
 P4020010	2/04/2010 2:16 PM	JPG File	2,648 KB	
 P4020011	2/04/2010 2:16 PM	JPG File	2,910 KB	
 P4020012	2/04/2010 2:17 PM	JPG File	2,275 KB	
 P4020013	2/04/2010 2:17 PM	JPG File	2,427 KB	
 P4020014	2/04/2010 2:21 PM	JPG File	2,292 KB	
 P4020015	2/04/2010 2:23 PM	JPG File	2,668 KB	
 P4020016	2/04/2010 2:23 PM	JPG File	2,844 KB	
 P4020017	2/04/2010 2:27 PM	JPG File	2,655 KB	
 P4020018	2/04/2010 2:27 PM	JPG File	2,939 KB	
 P4020019	2/04/2010 2:27 PM	JPG File	2,602 KB	
 P4020020	2/04/2010 2:27 PM	JPG File	2,535 KB	
 P4020021	2/04/2010 2:27 PM	JPG File	2,669 KB	
 P4020022	2/04/2010 2:28 PM	JPG File	2,531 KB	
 P4020023	2/04/2010 2:28 PM	JPG File	2,868 KB	
 P4020024	2/04/2010 2:28 PM	JPG File	2,418 KB	
 P4020025	2/04/2010 2:29 PM	JPG File	2,508 KB	
 P4020026	2/04/2010 2:29 PM	JPG File	2,567 KB	
 P4020027	2/04/2010 2:29 PM	JPG File	2,639 KB	
 P4020028	2/04/2010 2:29 PM	JPG File	2,042 KB	

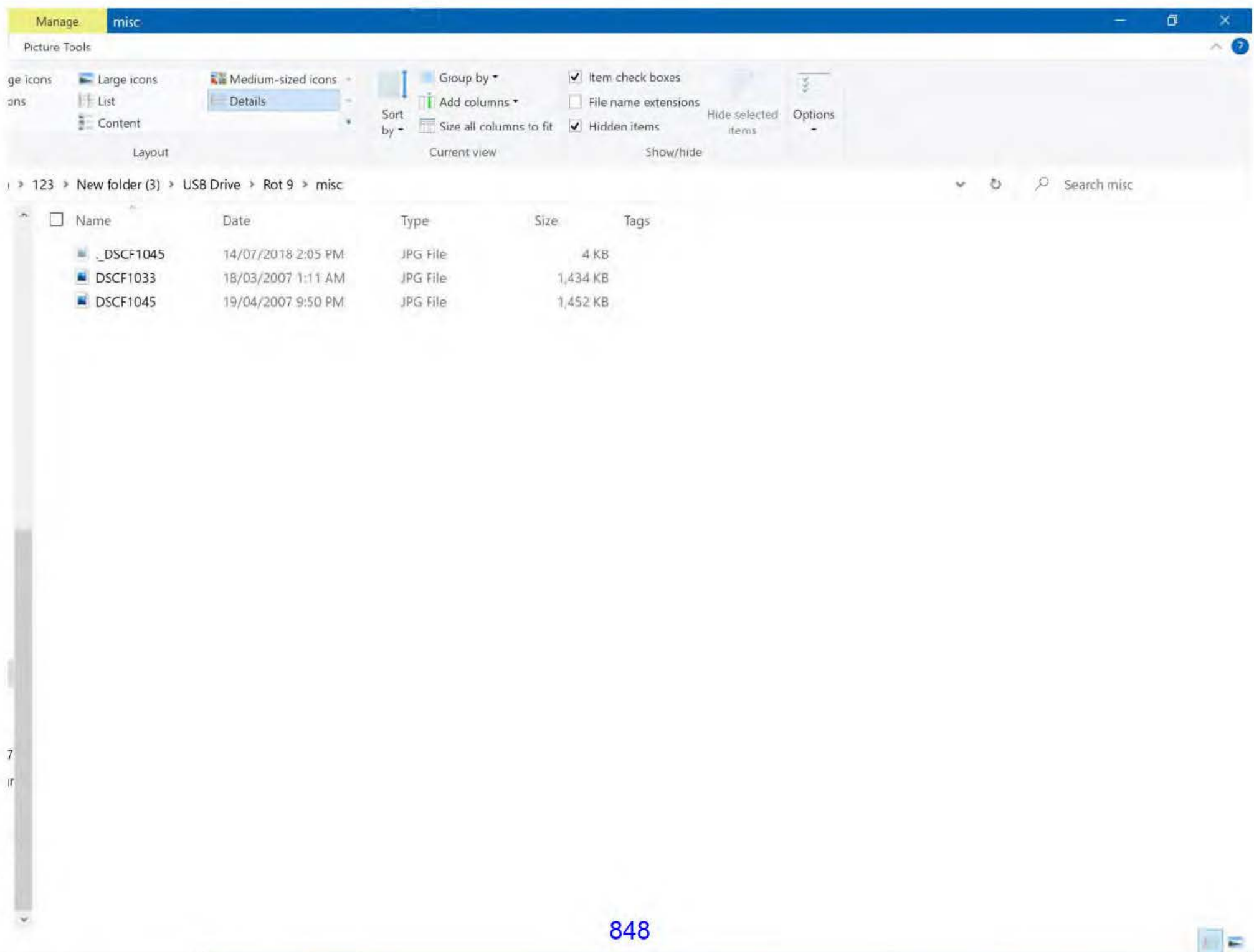












Manage Rot 9

Picture Tools

Icons: Large icons, Medium-sized icons, List, Content

Layout

Group by: Add columns, Size all columns to fit

Item check boxes, File name extensions, Hidden items

Sort by, Current view, Show/hide, Hide selected items, Options

123 > New folder (3) > USB Drive > Rot 9

Search Rot 9

Name	Date	Type	Size	Tags
misc	18/10/2020 8:32 AM	File folder		
Rot 12	18/10/2020 8:32 AM	File folder		
_20090511_TF66...	9/11/2018 2:26 PM	JPG File	4 KB	
_CLIP0011	12/06/2018 5:45 PM	AVI File	4 KB	
_DSC_0383	9/11/2018 2:26 PM	JPG File	4 KB	
_DSC_0390	9/11/2018 2:26 PM	JPG File	4 KB	
_P4020008	14/07/2018 2:06 PM	JPG File	4 KB	
_P4020009	14/07/2018 2:06 PM	JPG File	4 KB	
_P4030024	14/11/2018 5:40 PM	JPG File	4 KB	
_P4030025	9/11/2018 2:26 PM	JPG File	4 KB	
_P5150026	14/11/2018 5:40 PM	JPG File	4 KB	
_R9 Karez 41SQ5...	14/07/2018 2:04 PM	JPG File	4 KB	
_W108 (2)	9/11/2018 11:29 AM	JPG File	4 KB	
_W108 (3)	9/11/2018 11:30 AM	JPG File	4 KB	
_W108 (4)	9/11/2018 11:30 AM	JPG File	4 KB	
_W108	9/11/2018 11:30 AM	JPG File	4 KB	
20090308_TF66...	8/03/2009 9:46 PM	JPG File	11,927 KB	Camp Russell; 2SQN; Rot 9; Training; SASR
20090311_TF66...	11/03/2009 7:32 PM	JPG File	9,204 KB	2SQN; Rot 9; Training; SASR; FMP
20090311_TF66...	11/03/2009 7:32 PM	JPG File	8,684 KB	2SQN; Rot 9; Training; SASR; FMP
20090311_TF66...	11/03/2009 7:55 PM	JPG File	10,138 KB	2SQN; Rot 9; Training; SASR; FMP
20090311_TF66...	11/03/2009 8:17 PM	JPG File	8,591 KB	2SQN; Rot 9; Training; SASR; FMP
20090311_TF66...	11/03/2009 8:17 PM	JPG File	9,044 KB	2SQN; Rot 9; Training; SASR; FMP
20090311_TF66...	11/03/2009 9:04 PM	JPG File	9,314 KB	2SQN; Rot 9; Training; SASR; FMP
20090311_TF66...	11/03/2009 9:07 PM	JPG File	9,484 KB	2SQN; Rot 9; Training; SASR; FMP
20090402_TF66...	2/04/2009 8:48 PM	JPG File	3,822 KB	Camp Russell; 2SQN; Rot 9; SASR; Op Harpoon; PUC
20090402_TF66...	2/04/2009 8:50 PM	JPG File	6,607 KB	Camp Russell; 2SQN; Rot 9; SASR; Op Harpoon; PUC
20090402_TF66...	2/04/2009 8:55 PM	JPG File	7,176 KB	Camp Russell; 2SQN; Rot 9; SASR; Op Harpoon; PUC
20090402_TF66...	2/04/2009 8:56 PM	JPG File	6,719 KB	Camp Russell; 2SQN; Rot 9; SASR; Op Harpoon; PUC
20090403_TF66...	3/04/2009 12:38 AM	JPG File	9,621 KB	Camp Russell; 2SQN; Rot 9; SASR; Op Harpoon; PUC

849

Manage100CANON

Picture Tools

icons

Large icons

List

Content

Medium-sized icons

Details

Group by

Add columns

Sort by

Size all columns to fit

☒ Item check boxes

☐ File name extensions

☒ Hidden items

Hide selected items

Options

LayoutCurrent viewShow/hide

123 > New folder (3) > USB Drive > Rot 9 > Rot 12 > SOTG XII > 100CANON

Search 100CANON

<input type="checkbox"/>	Name	Date	Type	Size	Tags
	_IMG_0582	9/11/2018 3:20 PM	JPG File	4 KB	
	_IMG_0589	9/11/2018 3:21 PM	JPG File	4 KB	
	_MVI_0332	9/11/2018 3:21 PM	MOV File	4 KB	
	_MVI_0577	9/11/2018 3:20 PM	MOV File	4 KB	
	IMG_0570	5/06/2010 4:21 PM	JPG File	2,503 KB	
	IMG_0571	24/06/2010 9:37 PM	JPG File	2,646 KB	
	IMG_0572	24/06/2010 9:37 PM	JPG File	2,607 KB	
	IMG_0573	24/06/2010 9:37 PM	JPG File	2,028 KB	
	IMG_0574	24/06/2010 9:46 PM	JPG File	2,660 KB	
	IMG_0575	24/06/2010 9:46 PM	JPG File	2,724 KB	
	IMG_0580	24/06/2010 10:51 PM	JPG File	2,604 KB	
	IMG_0582	24/06/2010 10:52 PM	JPG File	2,130 KB	
	IMG_0583	24/06/2010 10:53 PM	JPG File	2,102 KB	
	IMG_0584	24/06/2010 10:53 PM	JPG File	1,953 KB	
	IMG_0585	24/06/2010 10:54 PM	JPG File	2,190 KB	
	IMG_0586	24/06/2010 10:54 PM	JPG File	2,209 KB	
	IMG_0587	24/06/2010 10:54 PM	JPG File	2,708 KB	
	IMG_0588	24/06/2010 10:55 PM	JPG File	2,241 KB	
	IMG_0589	24/06/2010 10:56 PM	JPG File	2,354 KB	
	IMG_0590	24/06/2010 11:32 PM	JPG File	2,014 KB	
	IMG_0591	24/06/2010 11:33 PM	JPG File	2,065 KB	
	IMG_0592	25/06/2010 4:23 AM	JPG File	2,324 KB	
	MVI_0331	23/04/2010 6:12 AM	MOV File	75,809 KB	
	MVI_0332	23/04/2010 6:13 AM	MOV File	40,720 KB	
	MVI_0333	23/04/2010 6:14 AM	MOV File	32,816 KB	
	MVI_0486.THM	9/05/2010 11:51 AM	THM File	10 KB	
	MVI_0577	25/06/2010 8:45 AM	MOV File	50,396 KB	
	MVI_0577.THM	24/06/2010 10:45 PM	THM File	10 KB	

118

52

851

Manage100421 - Battle for Gizab

Picture Tools

Large icons

Medium-sized icons

Details

Group by

Add columns

Sort by

Size all columns to fit

☒ Item check boxes

☐ File name extensions

☒ Hidden items

Hide selected items

Options

LayoutCurrent viewShow/hide

123

New folder (3)

USB Drive

Rot 9

Rot 12

SOTG XII

100421 - Battle for Gizab

Search 100421 - Battle for Gi...

Name	Date	Type	Size	Tags
._P4220008	9/11/2018 2:29 PM	JPG File	4 KB	
._P4220014	9/11/2018 2:29 PM	JPG File	4 KB	
._P4220021	9/11/2018 2:29 PM	JPG File	4 KB	
._P4220023	9/11/2018 2:29 PM	JPG File	4 KB	
._P4220024	9/11/2018 2:28 PM	JPG File	4 KB	
._P4220025	9/11/2018 2:29 PM	JPG File	4 KB	
._P4230039	9/11/2018 2:28 PM	JPG File	4 KB	
._P4230040	9/11/2018 2:28 PM	JPG File	4 KB	
._P4230041	9/11/2018 2:27 PM	JPG File	4 KB	
._P4240078	12/06/2018 4:34 PM	AVI File	55 KB	
._P4240079	12/06/2018 4:34 PM	AVI File	55 KB	
._P4240094	9/11/2018 2:30 PM	JPG File	4 KB	
._P4240108	9/11/2018 2:27 PM	JPG File	4 KB	
._P4250119	12/06/2018 4:34 PM	JPG File	4 KB	
._P4250121	12/06/2018 4:34 PM	JPG File	4 KB	
._P4250140	12/06/2018 4:35 PM	AVI File	57 KB	
._P4260146	12/06/2018 4:35 PM	AVI File	56 KB	
._P4260150	12/06/2018 4:35 PM	AVI File	56 KB	
P4080001	8/04/2010 12:49 PM	JPG File	4,559 KB	
P4080002	8/04/2010 12:49 PM	JPG File	4,059 KB	
P4080003	8/04/2010 12:49 PM	JPG File	3,576 KB	
P4080004	8/04/2010 1:02 PM	JPG File	4,693 KB	
P4220005	22/04/2010 9:32 AM	JPG File	3,840 KB	
P4220006	22/04/2010 9:32 AM	JPG File	4,368 KB	
P4220007	22/04/2010 9:33 AM	JPG File	3,868 KB	
P4220008	22/04/2010 9:33 AM	JPG File	5,164 KB	
P4220009	22/04/2010 9:34 AM	JPG File	4,227 KB	
P4220010	22/04/2010 9:34 AM	JPG File	4,582 KB	
P4220011	22/04/2010 9:34 AM	JPG File	5,082 KB	

to Gizab

view

Extra large icons Large icons Medium-sized icons Small icons List Details Files Content

Layout

Group by

Sort by

Add columns

Size all columns to fit

Current view

Item check boxes

File name extensions

Hidden items

Show/hide

Hide selected items

Options

SD (D:) > 123 > New folder (3) > USB Drive > Rot 9 > Rot 12 > SOTG XII > 100501 - Return to Gizab

Search 100501 - Return to Gi...

Name	Date	Type	Size	Tags
_P5020025	12/06/2018 4:35 PM	AVI File	55 KB	
_P5020027	9/11/2018 2:54 PM	JPG File	4 KB	
P5010001	1/05/2010 1:12 PM	JPG File	3,789 KB	
P5010002	1/05/2010 1:12 PM	JPG File	4,865 KB	
P5010003	1/05/2010 1:12 PM	JPG File	4,131 KB	
P5010004	1/05/2010 1:12 PM	JPG File	4,081 KB	
P5010005	1/05/2010 1:12 PM	JPG File	3,618 KB	
P5010006	1/05/2010 9:35 PM	JPG File	4,143 KB	
P5010007	1/05/2010 9:36 PM	JPG File	4,702 KB	
P5010008	1/05/2010 9:36 PM	JPG File	4,720 KB	
P5010009	1/05/2010 9:36 PM	JPG File	4,784 KB	
P5010010	1/05/2010 9:36 PM	JPG File	4,707 KB	
P5010011	1/05/2010 9:36 PM	JPG File	4,935 KB	
P5010012	1/05/2010 11:26 PM	JPG File	4,550 KB	
P5010013	1/05/2010 11:26 PM	JPG File	5,635 KB	
P5010014	1/05/2010 11:39 PM	JPG File	5,834 KB	
P5010015	1/05/2010 11:39 PM	JPG File	5,280 KB	
P5020016	2/05/2010 12:00 AM	JPG File	5,708 KB	
P5020017	2/05/2010 12:00 AM	JPG File	5,562 KB	
P5020018	2/05/2010 1:38 PM	JPG File	3,794 KB	
P5020019	2/05/2010 1:38 PM	JPG File	3,512 KB	
P5020020	2/05/2010 1:38 PM	JPG File	4,211 KB	
P5020021	2/05/2010 1:38 PM	JPG File	3,517 KB	
P5020022	2/05/2010 1:39 PM	JPG File	3,734 KB	
P5020023	2/05/2010 1:39 PM	JPG File	4,120 KB	
P5020024	2/05/2010 9:22 PM	JPG File	3,473 KB	
P5020025	2/05/2010 9:25 PM	AVI File	11,828 KB	
P5020026	2/05/2010 9:26 PM	JPG File	4,969 KB	
P5020027	2/05/2010 9:27 PM	JPG File	5,169 KB	

120

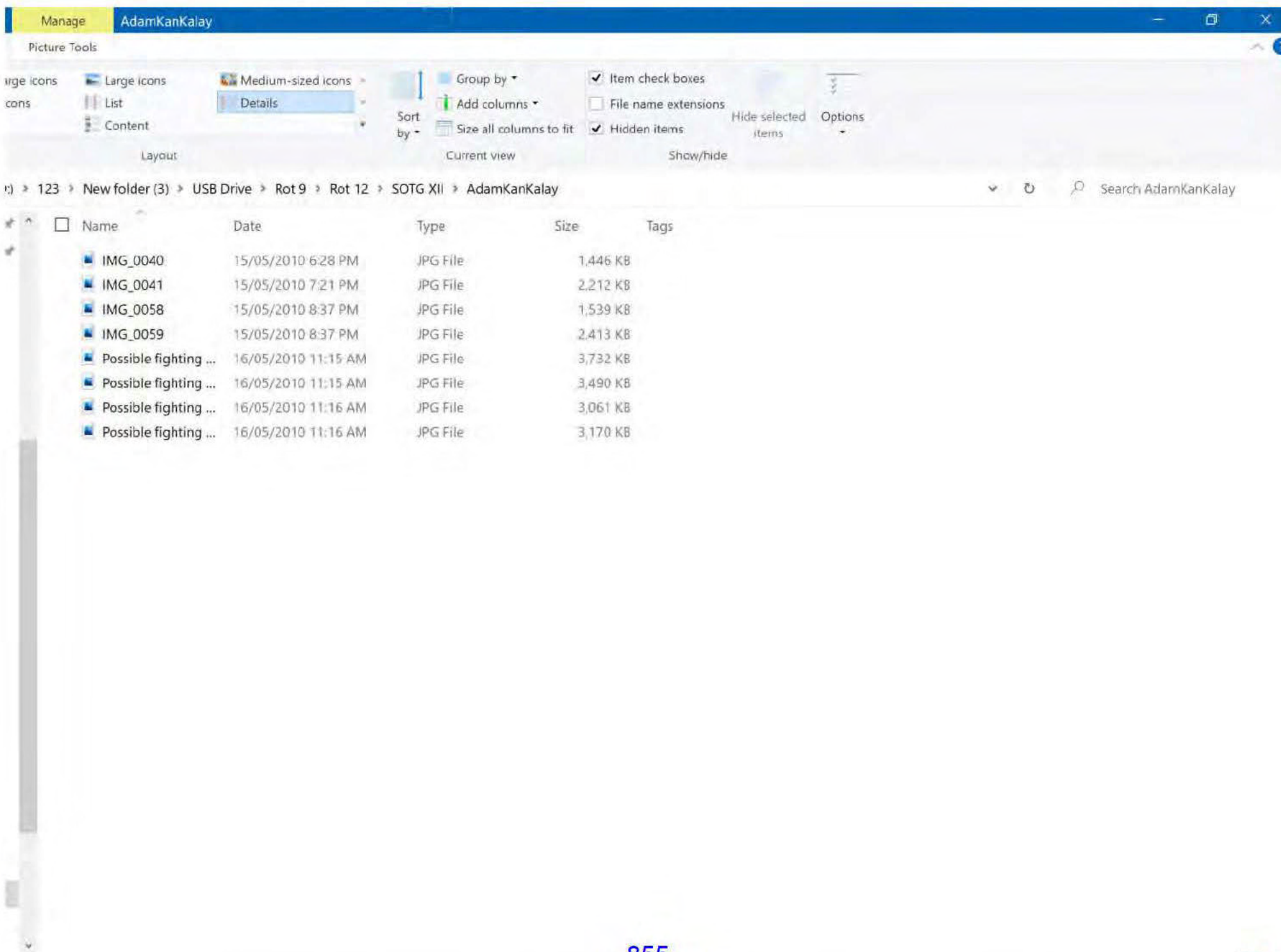
54

853

File Explorer ribbon: Icons (Large, Medium-sized, List, Content), Layout, Group by, Add columns, Sort by, Size all columns to fit, Current view, Item check boxes, File name extensions, Hidden items, Hide selected items, Options.

Path: 123 > New folder (3) > USB Drive > Rot 9 > Rot 12 > SOTG XII > 100516 - SOTG XII

Name	Date	Type	Size	Tags
._P5180012	9/11/2018 2:55 PM	JPG File	4 KB	
._P5210016	12/05/2018 4:36 PM	JPG File	4 KB	
._P6050057	12/05/2018 4:36 PM	AVI File	57 KB	
._P6050062	12/05/2018 4:36 PM	JPG File	4 KB	
._P6050063	12/05/2018 4:36 PM	JPG File	4 KB	
._P6050068	12/05/2018 4:36 PM	AVI File	54 KB	
._P6060101	12/05/2018 4:37 PM	AVI File	57 KB	
._P6060102	12/05/2018 4:37 PM	AVI File	55 KB	
._P6110112	12/05/2018 4:37 PM	AVI File	52 KB	
._P6110113	12/05/2018 4:37 PM	AVI File	57 KB	
._P6110115	12/05/2018 4:37 PM	AVI File	57 KB	
._P6110116	12/05/2018 4:37 PM	AVI File	57 KB	
._P6110117	12/05/2018 4:37 PM	AVI File	52 KB	
._P6110128	12/05/2018 4:37 PM	AVI File	55 KB	
P5160001	16/05/2010 11:16 AM	JPG File	4,422 KB	
P5160002	16/05/2010 11:16 AM	JPG File	3,951 KB	
P5160003	16/05/2010 11:20 AM	JPG File	4,323 KB	
P5160004	16/05/2010 11:32 AM	JPG File	5,376 KB	
P5160005	16/05/2010 3:01 PM	JPG File	5,432 KB	
P5160006	16/05/2010 3:02 PM	JPG File	5,386 KB	
P5160007	16/05/2010 3:02 PM	JPG File	5,098 KB	
P5160008	16/05/2010 3:02 PM	JPG File	5,173 KB	
P5160009	16/05/2010 3:02 PM	JPG File	5,083 KB	
P5180010	18/05/2010 5:34 PM	JPG File	4,903 KB	
P5180011	18/05/2010 5:34 PM	JPG File	5,152 KB	
P5180012	18/05/2010 5:34 PM	JPG File	5,244 KB	
P5210013	21/05/2010 1:16 AM	JPG File	3,469 KB	
P5210014	21/05/2010 1:16 AM	JPG File	5,381 KB	
P5210015	21/05/2010 1:17 AM	JPG File	5,463 KB	



ge icons Large icons Medium-sized icons List Content Layout

ons List Content Layout

Group by Add columns Size all columns to fit Sort by Item check boxes File name extensions Hidden items Hide selected items Options

Current view Show/hide

123 > New folder (3) > USB Drive > Rot 9 > Rot 12 > SOTG XII > CSAR 15may10 IVO Chamberack Pass

Search CSAR 15may10 IVO C...

<input type="checkbox"/> Name	Date	Type	Size	Tags
_IMG_0008	9/11/2018 3:18 PM	JPG File	4 KB	
IMG_0004	14/05/2010 11:50 PM	JPG File	1,649 KB	
IMG_0005	14/05/2010 11:50 PM	JPG File	1,919 KB	
IMG_0006	14/05/2010 11:50 PM	JPG File	1,908 KB	
IMG_0007	14/05/2010 11:50 PM	JPG File	2,400 KB	
IMG_0008	14/05/2010 11:51 PM	JPG File	2,140 KB	
IMG_0009	14/05/2010 11:51 PM	JPG File	1,701 KB	
IMG_0025	15/05/2010 12:46 AM	JPG File	2,182 KB	
IMG_0026	15/05/2010 12:47 AM	JPG File	2,311 KB	
IMG_0027	15/05/2010 12:47 AM	JPG File	2,328 KB	
IMG_0028	15/05/2010 12:47 AM	JPG File	1,141 KB	

path shortcut

Move to *

Copy to *

Delete

Rename

New folder

Easy access

New item

Properties

Open *

Edit

History

Select all

Select none

Invert selection

Organise

New

Open

Select

(D:) > 123 > New folder (3) > USB Drive > Rot 9 > Rot 12 > SOTG XII > Epic 04

Name

Date modified

Type

Size

2010-03-22 OH-58 Flight

12/06/2018 4:38 PM

File folder

2010-03-27 Serkay Naveh

12/06/2018 4:38 PM

File folder

2010-03-31 Cap Feathering Pt 1 - Mir...

12/06/2018 4:39 PM

File folder

2010-04-08 Gun Runner Job

12/06/2018 4:39 PM

File folder

2010-04-19 Bachi Langar

12/06/2018 4:40 PM

File folder

2010-04-26 21-26 Gizab

12/06/2018 4:40 PM

File folder

2010-04-30 Jericho - Snatch Grab

12/06/2018 4:41 PM

File folder

2010-05-02 NDS Pickup

12/06/2018 4:41 PM

File folder

2010-05-10 8000ft OP - Spina Kala

12/06/2018 4:41 PM

File folder

2010-05-11 NDS PSD

12/06/2018 4:42 PM

File folder

2010-05-14 West Derafshan - Abdul ...

12/06/2018 4:42 PM

File folder

2010-05-15 OBJ STAKE - Barmani

12/06/2018 4:42 PM

File folder

2010-05-16 Chenartu Disrupt 2&3 Sqn

12/06/2018 4:43 PM

File folder

2010-05-20 80's NIGHT

12/06/2018 4:43 PM

File folder

2010-05-22 CAS training

12/06/2018 4:44 PM

File folder

2010-05-25 camp davis

12/06/2018 4:44 PM

File folder

2010-05-25 Home Brew

12/06/2018 4:44 PM

File folder

2010-06-04 Spyderco Take 2

12/06/2018 4:44 PM

File folder

2010-06-05 Takht Kalay

12/06/2018 4:44 PM

File folder

2010-06-06 Pay Naveh

12/06/2018 4:45 PM

File folder

2010-06-14 Pay Navah - Take 2

12/06/2018 4:45 PM

File folder

2010-06-22 Chopper DART - Dasht

12/06/2018 4:45 PM

File folder

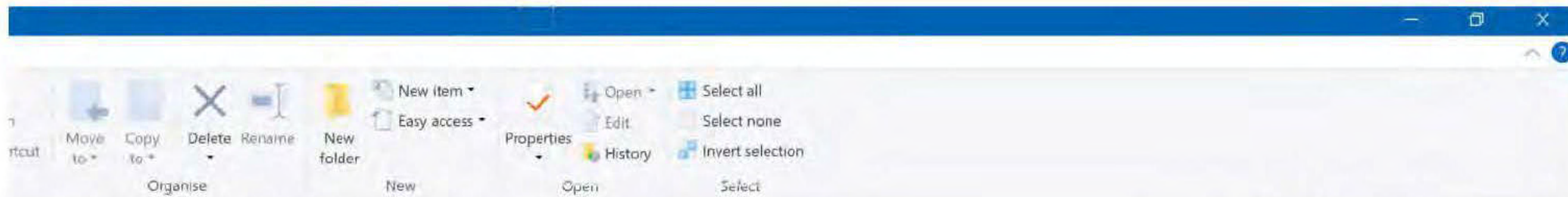
124

58

:017

ipdr

857



) > 123 > New folder (3) > USB Drive > Rot 9 > Rot 12 > SOTG XII > Epic 05

Search Epic 05

<input type="checkbox"/>	Name	Date modified	Type	Size
<input type="checkbox"/>	20100305_SCUD	12/06/2018 4:45 PM	File folder	
<input type="checkbox"/>	20100313_BALISONG	12/06/2018 4:46 PM	File folder	
<input type="checkbox"/>	20100315_SPYDERCO	12/06/2018 4:46 PM	File folder	
<input type="checkbox"/>	20100316_RANGE	12/06/2018 4:46 PM	File folder	
<input type="checkbox"/>	20100323_MFF	12/06/2018 4:46 PM	File folder	
<input type="checkbox"/>	20100326_FITICAL1	12/06/2018 4:50 PM	File folder	
<input type="checkbox"/>	20100327_PILLUM_TAI_CRAIG	12/06/2018 4:50 PM	File folder	
<input type="checkbox"/>	20100330_MIRABAD1	12/06/2018 4:50 PM	File folder	
<input type="checkbox"/>	20100331_MIRABAD2	12/06/2018 4:50 PM	File folder	
<input type="checkbox"/>	20100402_VI_GUNDEALER	12/06/2018 4:50 PM	File folder	
<input type="checkbox"/>	20100403_TK_BAZAAR	12/06/2018 4:50 PM	File folder	
<input type="checkbox"/>	20100406_AFS_TRG	12/06/2018 4:50 PM	File folder	
<input type="checkbox"/>	20100412_FITICAL2	12/06/2018 4:50 PM	File folder	
<input type="checkbox"/>	20100421_GIZAB_D1	12/06/2018 4:50 PM	File folder	
<input type="checkbox"/>	20100422_GIZAB_D2	12/06/2018 4:51 PM	File folder	
<input type="checkbox"/>	20100423_GIZAB_D3	12/06/2018 4:51 PM	File folder	
<input type="checkbox"/>	20100424_GIZAB_D4	12/06/2018 4:51 PM	File folder	
<input type="checkbox"/>	20100425_GIZAB_D5	12/06/2018 4:51 PM	File folder	
<input type="checkbox"/>	20100426_GIZAB_D6	12/06/2018 4:51 PM	File folder	
<input type="checkbox"/>	20100430_JERICHO	12/06/2018 4:51 PM	File folder	
<input type="checkbox"/>	20100516_TORTAIR	12/06/2018 4:51 PM	File folder	
<input type="checkbox"/>	20100518_ADAMKHAN_KALAY	12/06/2018 4:52 PM	File folder	
<input type="checkbox"/>	20100520_80's_NIGHT	12/06/2018 4:52 PM	File folder	
<input type="checkbox"/>	20100604_SPYDERCO_LILLYPAD	12/06/2018 4:52 PM	File folder	
<input type="checkbox"/>	20100605_GAYBLOCK	12/06/2018 4:52 PM	File folder	
<input type="checkbox"/>	20100606_CHENARTU	12/06/2018 4:52 PM	File folder	
<input type="checkbox"/>	20100607_MIRABAD_EPIC	12/06/2018 4:52 PM	File folder	
<input type="checkbox"/>	20100620_LASTDAY	12/06/2018 4:52 PM	File folder	
<input type="checkbox"/>	20100621_DART	12/06/2018 4:53 PM	File folder	

Picture Tools

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shortcut

Move to

Copy to

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Delete

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Rename

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New folder

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New item

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Easy access

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Properties

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Open

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Edit

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History

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Select all

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Select none

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Invert selection

Organise

New

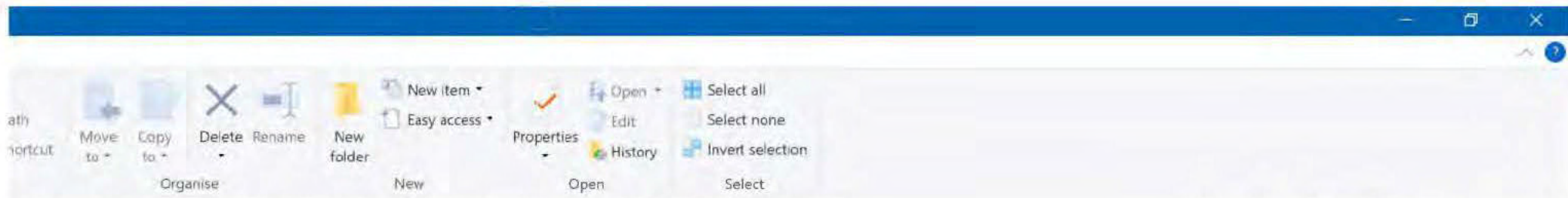
Open

Select

D:\
> 123
> New folder (3)
> USB Drive
> Rot 9
> Rot 12
> SOTG XII
> Ghan 2010 E2

▼
🔄
🔍
Search Ghan 2010 E2

☐	Name	Date	Type	Size	Tags
📁	Gizab 21-26 Apr	18/10/2020 8:36 AM	File folder		
📁	helo crash	18/10/2020 8:36 AM	File folder		
📁	jerhico	18/10/2020 8:36 AM	File folder		
📁	mini gun	18/10/2020 8:36 AM	File folder		
📁	ODA 80's night	18/10/2020 8:37 AM	File folder		
📁	ohhh the 80's	18/10/2020 8:37 AM	File folder		
📁	Pay Nowa	18/10/2020 8:37 AM	File folder		
📁	Qstaff	18/10/2020 8:37 AM	File folder		
📁	slayer	18/10/2020 8:37 AM	File folder		
📁	stake	18/10/2020 8:37 AM	File folder		
📁	Tizak	18/10/2020 8:37 AM	File folder		
📄	._P3130003	12/06/2018 4:53 PM	JPG File	4 KB	
📄	._P3230027	12/06/2018 4:53 PM	JPG File	4 KB	
📄	._P3270013	12/06/2018 4:53 PM	JPG File	4 KB	
📄	._P4120052	12/06/2018 4:53 PM	JPG File	4 KB	
📄	._P4190067	12/06/2018 4:53 PM	JPG File	4 KB	
📄	._P4300165	9/11/2018 2:59 PM	JPG File	4 KB	
📄	._P5020191	9/11/2018 2:59 PM	JPG File	4 KB	
📄	._P5020196	9/11/2018 2:59 PM	JPG File	4 KB	
📄	._P5140199	9/11/2018 2:58 PM	JPG File	4 KB	
📄	._P5140200	9/11/2018 2:59 PM	JPG File	4 KB	
📄	._P5140202	12/06/2018 4:53 PM	JPG File	4 KB	
📄	._P5140203	12/06/2018 4:53 PM	JPG File	4 KB	
📄	P3130001	13/03/2010 3:50 PM	JPG File	431 KB	
📄	P3130002	13/03/2010 4:13 PM	JPG File	453 KB	
📄	P3130003	13/03/2010 4:14 PM	JPG File	507 KB	
📄	P3220001	22/03/2010 12:41 PM	AVI File	8,211 KB	
📄	P3230001	23/03/2010 10:45 AM	JPG File	407 KB	
📄	P3230002	23/03/2010 10:45 AM	JPG File	402 KB	



D:\ > 123 > New folder (3) > USB Drive > Rot 9 > Rot 12 > SOTG XII > MFF C130 Video > 24-03-2010

Search 24-03-2010

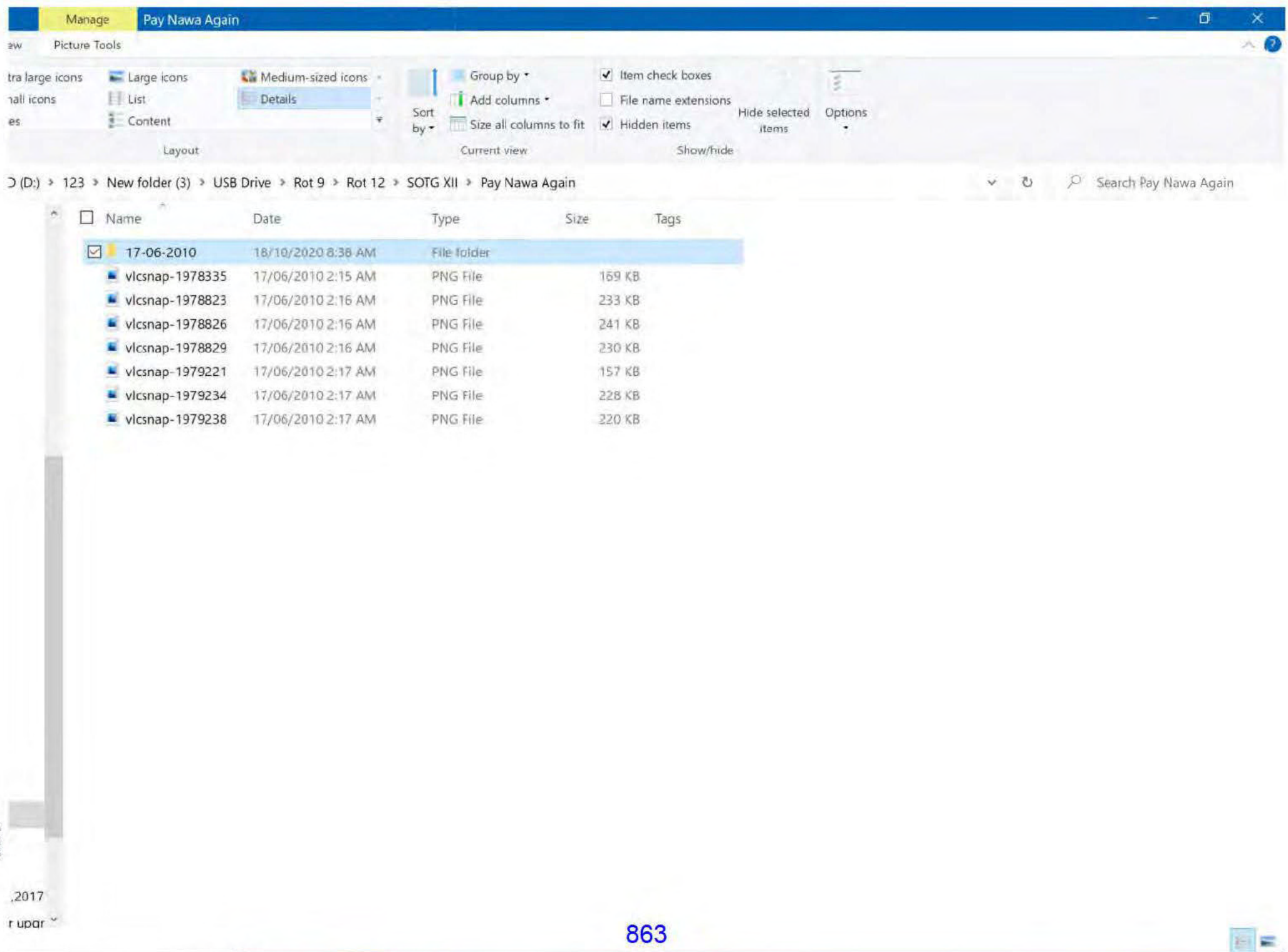
<input type="checkbox"/> Name	Date modified	Type	Size
_20100323201733	12/06/2018 4:58 PM	M2TS File	4 KB
_20100323202003	12/06/2018 4:58 PM	M2TS File	4 KB
_20100323202842	12/06/2018 4:58 PM	M2TS File	4 KB
_20100323205047	12/06/2018 4:58 PM	M2TS File	4 KB
_20100323210532	12/06/2018 4:58 PM	M2TS File	4 KB
_20100323213725	9/11/2018 2:45 PM	M2TS File	4 KB
_20100323222446	12/06/2018 4:58 PM	M2TS File	4 KB
_20100323222600	9/11/2018 2:45 PM	M2TS File	4 KB
_20100323222651	9/11/2018 2:47 PM	M2TS File	4 KB
_20100323222817	9/11/2018 2:47 PM	M2TS File	4 KB
_DSC00013	9/11/2018 2:46 PM	JPG File	4 KB
_DSC00015	12/06/2018 4:59 PM	JPG File	4 KB
_DSC00016	12/06/2018 4:59 PM	JPG File	4 KB
_DSC00017	9/11/2018 2:46 PM	JPG File	4 KB
20100323155730	24/03/2010 3:24 PM	M2TS File	4,320 KB
20100323155730.modd	24/03/2010 3:32 PM	MODD File	2 KB
20100323155730.moff	24/03/2010 3:32 PM	MOFF File	43 KB
20100323185332	24/03/2010 3:24 PM	M2TS File	30,528 KB
20100323185332.modd	24/03/2010 3:34 PM	MODD File	4 KB
20100323185332.moff	24/03/2010 3:34 PM	MOFF File	90 KB
20100323185528	24/03/2010 3:25 PM	M2TS File	17,568 KB
20100323185528.modd	24/03/2010 3:34 PM	MODD File	4 KB
20100323185528.moff	24/03/2010 3:34 PM	MOFF File	101 KB
20100323201733	24/03/2010 3:25 PM	M2TS File	76,608 KB
20100323201733.modd	24/03/2010 3:35 PM	MODD File	5 KB
20100323201733.moff	24/03/2010 3:35 PM	MOFF File	171 KB
20100323202003	24/03/2010 3:25 PM	M2TS File	33,408 KB
20100323202003.modd	24/03/2010 3:36 PM	MODD File	4 KB
20100323202003.moff	24/03/2010 3:36 PM	MOFF File	91 KB

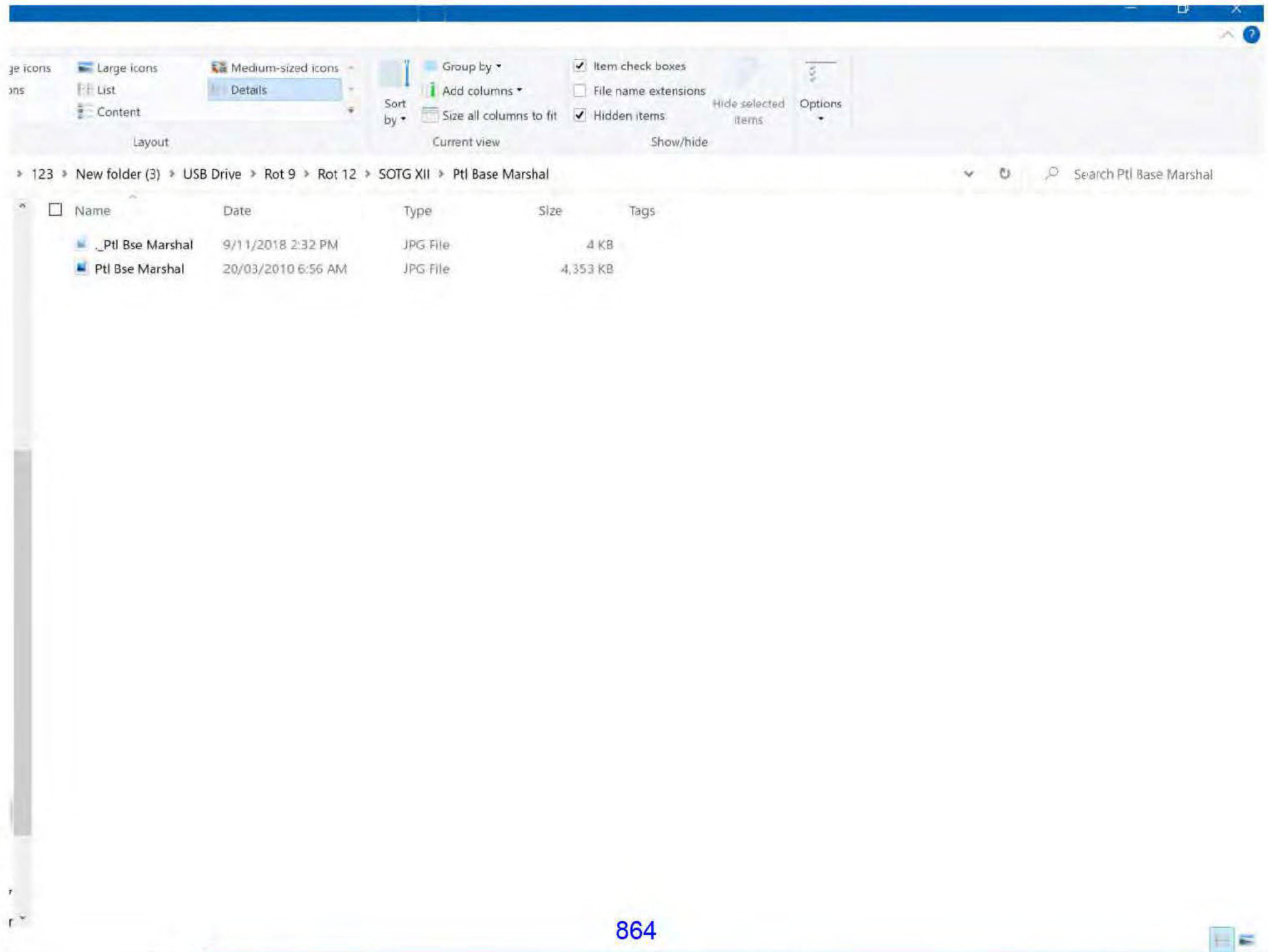
Large icons Medium-sized icons Details
 List Content
 Group by Add columns Sort by Size all columns to fit
☒ Item check boxes
☐ File name extensions
☒ Hidden items
 Hide selected items Options

D:\ > 123 > New folder (3) > USB Drive > Rot 9 > Rot 12 > SOTG XII > Pay Nawa

Search Pay Nawa

Name	Date	Type	Size	Tags
._DSC00101	9/11/2018 2:32 PM	JPG File	4 KB	
._DSC00321	9/11/2018 2:31 PM	JPG File	4 KB	
._DSC00327	9/11/2018 2:31 PM	JPG File	4 KB	
._DSC00328	9/11/2018 2:31 PM	JPG File	4 KB	
._DSC00332	9/11/2018 2:32 PM	JPG File	4 KB	
DSC00085	6/06/2010 6:39 AM	JPG File	3,578 KB	
DSC00086	6/06/2010 6:39 AM	JPG File	3,762 KB	
DSC00087	6/06/2010 6:39 AM	JPG File	3,745 KB	
DSC00088	6/06/2010 6:40 AM	JPG File	3,706 KB	
DSC00089	6/06/2010 6:40 AM	JPG File	3,636 KB	
DSC00090	6/06/2010 6:40 AM	JPG File	3,655 KB	
DSC00091	6/06/2010 6:40 AM	JPG File	3,637 KB	
DSC00092	6/06/2010 6:40 AM	JPG File	3,663 KB	
DSC00093	6/06/2010 6:40 AM	JPG File	3,746 KB	
DSC00094	6/06/2010 6:40 AM	JPG File	3,750 KB	
DSC00095	6/06/2010 6:40 AM	JPG File	3,523 KB	
DSC00096	6/06/2010 6:41 AM	JPG File	3,719 KB	
DSC00101	6/06/2010 6:43 AM	JPG File	3,543 KB	
DSC00122	6/06/2010 7:30 AM	JPG File	3,576 KB	
DSC00123	6/06/2010 7:31 AM	JPG File	3,537 KB	
DSC00124	6/06/2010 7:31 AM	JPG File	3,688 KB	
DSC00126	6/06/2010 7:32 AM	JPG File	3,633 KB	
DSC00127	6/06/2010 7:32 AM	JPG File	3,548 KB	
DSC00318	6/06/2010 7:22 AM	JPG File	3,692 KB	
DSC00319	6/06/2010 7:23 AM	JPG File	3,628 KB	
DSC00320	6/06/2010 7:24 AM	JPG File	3,615 KB	
DSC00321	6/06/2010 7:24 AM	JPG File	3,497 KB	
DSC00322	6/06/2010 7:25 AM	JPG File	3,527 KB	
DSC00323	6/06/2010 7:25 AM	JPG File	3,569 KB	





Large icons

Medium-sized icons

Details

Content

Group by

Add columns

Size all columns to fit

Sort by

Item check boxes

File name extensions

Hidden items

Hide selected items

Options

Layout

Current view

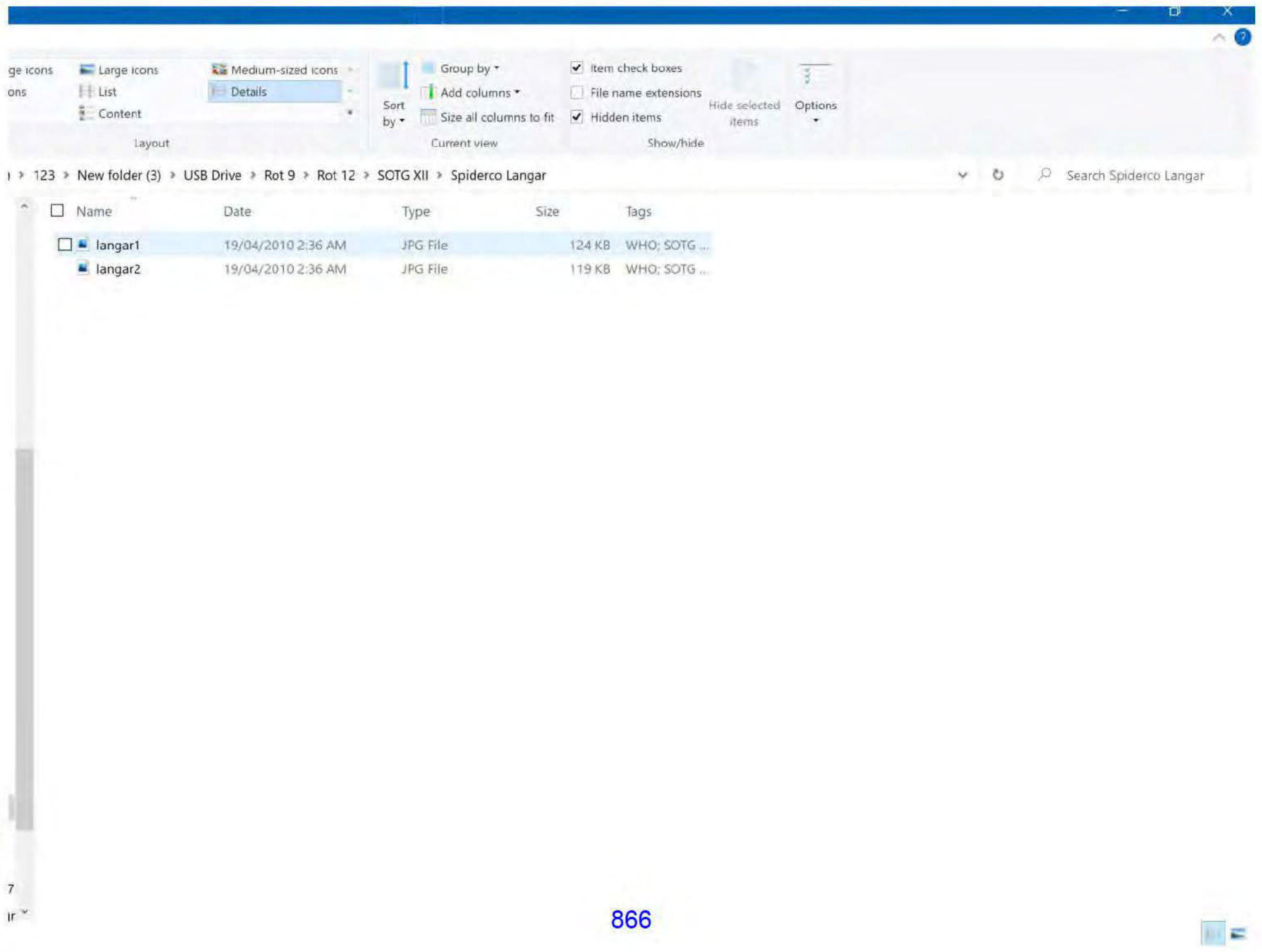
Show/hide

> 123 > New folder (3) > USB Drive > Rot 9 > Rot 12 > SOTG XII > Sorcnawa

Search Sorcnawa

<input type="checkbox"/>	Name	Date	Type	Size	Tags
<input type="checkbox"/>	._sorcnawa2	13/06/2019 3:30 PM	JPG File	4 KB	
<input type="checkbox"/>	sorcnawa2	27/03/2010 12:49 PM	JPG File	440 KB	OP SLIPPER ...
<input type="checkbox"/>	sorcnawa8	27/03/2010 3:35 PM	JPG File	1,974 KB	
<input type="checkbox"/>	sorcnawa9	27/03/2010 4:41 PM	JPG File	2,680 KB	





<input type="checkbox"/>	Name	Date	Type	Size	Tags
<input type="checkbox"/>	langar1	19/04/2010 2:36 AM	JPG File	124 KB	WHO; SOTG ...
<input type="checkbox"/>	langar2	19/04/2010 2:36 AM	JPG File	119 KB	WHO; SOTG ...

133
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je icons
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Large icons

Medium-sized icons

List

Content

Layout

Group by

Add columns

Size all columns to fit

☒ Item check boxes

☐ File name extensions

☒ Hidden items

Hide selected items

Options

Current view

Show/hide

123 > New folder (3) > USB Drive > Rot 9 > Rot 12 > SOTG XII > SQN PHOTOS

Search SQN PHOTOS

<input type="checkbox"/> Name	Date	Type	Size	Tags
_20100608_TF66...	14/07/2018 2:08 PM	JPG File	4 KB	
_20100608_TF66...	12/06/2018 5:02 PM	JPG File	4 KB	
_20100608_TF66...	14/07/2018 2:08 PM	JPG File	4 KB	
_20100608_TF66...	14/07/2018 2:07 PM	JPG File	4 KB	
20100608_TF66...	8/06/2010 10:59 AM	JPG File	3,932 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:09 AM	JPG File	6,385 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:09 AM	JPG File	6,158 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:10 AM	JPG File	6,301 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:10 AM	JPG File	5,742 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:10 AM	JPG File	6,631 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:10 AM	JPG File	5,455 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 10:56 AM	JPG File	5,846 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 10:56 AM	JPG File	5,165 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 10:56 AM	JPG File	4,612 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:09 AM	JPG File	6,446 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:09 AM	JPG File	6,421 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:09 AM	JPG File	6,167 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:09 AM	JPG File	6,276 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:09 AM	JPG File	6,452 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:09 AM	JPG File	6,416 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:09 AM	JPG File	6,341 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:09 AM	JPG File	6,262 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:09 AM	JPG File	6,358 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:09 AM	JPG File	5,770 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 11:09 AM	JPG File	6,288 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 10:49 AM	JPG File	3,972 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 10:53 AM	JPG File	6,089 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 10:58 AM	JPG File	4,020 KB	WHO; SOTG ...
20100608_TF66...	8/06/2010 10:58 AM	JPG File	3,961 KB	WHO; SOTG ...

Large icons
List
Content

Medium-sized icons
Details

Group by
Add columns
Size all columns to fit

☒ Item check boxes
☐ File name extensions
☒ Hidden items

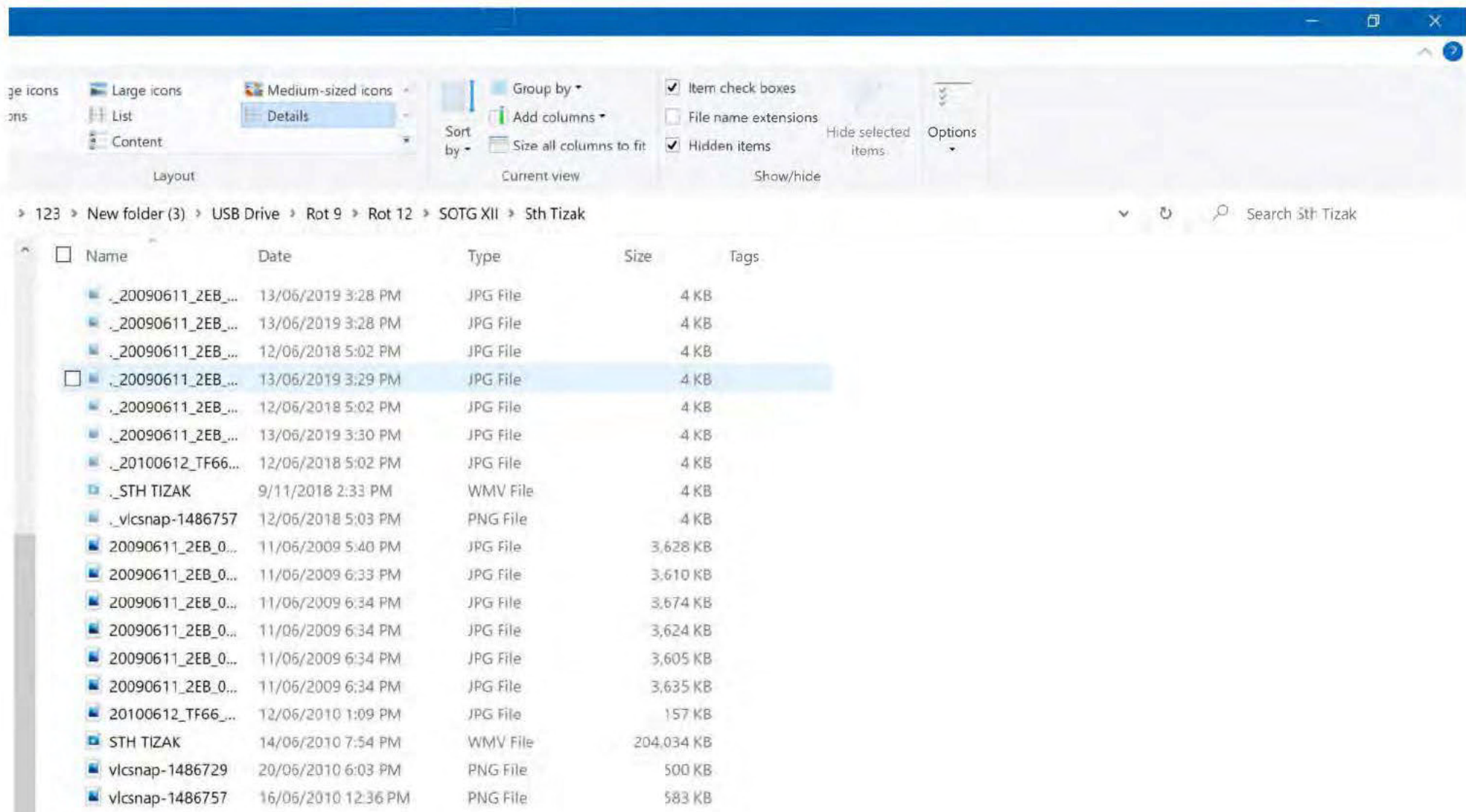
Hide selected items
Options

Layout
Current view
Show/hide

123 > New folder (3) > USB Drive > Rot 9 > Rot 12 > SOTG XII > Sth Adam Kan Kalay with 3sqn

Name	Date	Type	Size	Tags
_20100518_TF66...	9/11/2018 2:35 PM	JPG File	4 KB	
20100518_TF66_...	18/05/2010 4:04 AM	JPG File	4,261 KB	WHO; Force ...
20100518_TF66_...	18/05/2010 4:20 AM	JPG File	5,030 KB	WHO; Force ...
20100608_TF66_...	8/06/2010 10:56 AM	JPG File	4,612 KB	WHO; SOTG ...





File Explorer ribbon: Icons (Large icons, Medium-sized icons, List, Content), Layout, Group by, Add columns, Sort by, Size all columns to fit, Current view, Show/hide, Item check boxes, File name extensions, Hidden items, Hide selected items, Options.

Path: > 123 > New folder (3) > USB Drive > Rot 9 > Rot 12 > SOTG XII > TAI Wildcard

Name	Date	Type	Size	Tags
._DSC00052	12/06/2018 5:03 PM	JPG File	4 KB	
._DSC00053	9/11/2018 2:31 PM	JPG File	4 KB	
._TAI Wildcard W...	12/06/2018 5:03 PM	JPG File	4 KB	
DSC00052	5/06/2010 6:07 AM	JPG File	3,650 KB	
DSC00053	5/06/2010 6:08 AM	JPG File	1,417 KB	
DSC00054	5/06/2010 6:09 AM	JPG File	1,251 KB	
DSC00068	5/06/2010 7:02 AM	JPG File	3,699 KB	
DSC00069	5/06/2010 7:02 AM	JPG File	3,718 KB	
DSC00070	5/06/2010 7:02 AM	JPG File	3,664 KB	
DSC00071	5/06/2010 7:03 AM	JPG File	3,723 KB	
DSC00072	5/06/2010 7:03 AM	JPG File	3,707 KB	
DSC00073	5/06/2010 7:03 AM	JPG File	3,749 KB	
DSC00074	5/06/2010 7:03 AM	JPG File	3,681 KB	
TAI Wildcard Wes...	5/06/2010 7:02 AM	JPG File	4,870 KB	

Play

VIDEO

Video Tools

Large icons

Medium-sized icons

Details

Group by

Add columns

Sort by

Size all columns to fit

Item check boxes

File name extensions

Hidden items

Hide selected items

Options

Layout

Current view

Show/hide

123

New folder (3)

USB Drive

Rot 9

Rot 12

SOTG XII

VIDEO

Search VIDEO

Name	Date	Type	Size	Length
20100305_S-ISAF_HERON-61064_OBJ-capture_01	9/11/2018 2:41 PM	WMV File	4 KB	
20100305_S-ISAF_HERON-61064_OBJ-capture_05	9/11/2018 2:42 PM	WMV File	4 KB	
20100412_S-ISAF LIMDIS_Heron_OBJ Fitcal	9/11/2018 2:41 PM	M1V Video File (V...	4 KB	
20100514-ScanEagle-OnTarget	9/11/2018 2:40 PM	WMV File	4 KB	
E1_0001	9/11/2018 2:38 PM	WMV File	4 KB	
NY_OEF_HAWG53_A3653_HEXT_TGP	9/11/2018 2:40 PM	ASF Video File (VLC)	4 KB	
NY_OEF_HAWG54_A3653_30MM_CLIP1	9/11/2018 2:40 PM	WMV File	4 KB	
REL_SECRET_REL_ISAF_20100421_OP_MAHFUZ_PANAZAY_1xAGM114P_ON_5xEF(WITHOUT A...	9/11/2018 2:35 PM	WMV File	4 KB	
STH TIZAK	9/11/2018 2:38 PM	WMV File	4 KB	
20100305_S-ISAF_HERON-61064_OBJ-capture_01	5/03/2010 8:59 PM	WMV File	3,658 KB	00:02:23
20100305_S-ISAF_HERON-61064_OBJ-capture_02	5/03/2010 9:28 PM	WMV File	3,223 KB	00:02:05
20100305_S-ISAF_HERON-61064_OBJ-capture_03	5/03/2010 9:50 PM	WMV File	2,865 KB	00:01:52
20100305_S-ISAF_HERON-61064_OBJ-capture_04	5/03/2010 10:00 PM	WMV File	2,971 KB	00:01:55
20100305_S-ISAF_HERON-61064_OBJ-capture_05	5/03/2010 10:15 PM	WMV File	2,731 KB	00:01:46
20100402_S_FVEY LIMDIS_Heron_Arrival and Squirter tracking	6/04/2010 6:01 PM	AVI File	1,654,511 ...	00:07:49
20100402_S_FVEY LIMDIS_Heron_Car intercept	4/04/2010 9:38 AM	WMV File	41,967 KB	00:06:30
20100412_S-ISAF LIMDIS_Heron_OBJ Fitcal	5/05/2010 4:32 AM	M1V Video File (V...	377,120 KB	00:30:17
20100514-ScanEagle-OnTarget	17/06/2010 12:28 PM	WMV File	16,641 KB	00:03:30
20100531_2E22_5300286	30/05/2010 9:32 AM	AVI File	15,566 KB	00:00:45
E1_0001	18/06/2010 3:54 PM	WMV File	106,533 KB	00:06:14
NY_OEF_HAWG53_A3653_HEXT_TGP	17/05/2010 9:47 PM	ASF Video File (VLC)	6,952 KB	00:00:19
NY_OEF_HAWG54_A3653_30MM_CLIP1	17/05/2010 9:57 PM	WMV File	5,319 KB	00:00:25
REL_SECRET_REL_ISAF_20100421_OP_MAHFUZ_PANAZAY_1xAGM114P_ON_5xEF(WITHOUT AU...	21/04/2010 11:03 PM	WMV File	7,645 KB	00:01:30
STH TIZAK	14/06/2010 4:24 PM	WMV File	204,034 KB	00:02:59

138

72

871

Manage

Photos from

Picture Tools

Large icons

Medium-sized icons

Details

Group by

Add columns

Size all columns to fit

Item check boxes

File name extensions

Hidden items

Hide selected items

Options

Layout

Current view

Show/hide

123

New folder (3)

USB Drive

Photos from

Search Photos from Tim

Name	Date	Type	Size	Tags
._DSCN0349	12/06/2018 5:47 PM	JPG File	4 KB	
._DSCN0349_2	12/06/2018 5:47 PM	JPG File	4 KB	
._DSCN0350	12/06/2018 5:47 PM	JPG File	4 KB	
._DSCN0354	13/06/2019 3:24 PM	JPG File	4 KB	
._DSCN0355	13/06/2019 3:25 PM	JPG File	4 KB	
._DSCN0356	13/06/2019 3:25 PM	JPG File	4 KB	
._DSCN0357	9/11/2018 11:37 AM	JPG File	4 KB	
._DSCN0358	9/11/2018 11:37 AM	JPG File	4 KB	
._DSCN0359	9/11/2018 11:37 AM	JPG File	4 KB	
._DSCN0360	12/06/2018 5:47 PM	JPG File	4 KB	
._DSCN0361	12/06/2018 5:47 PM	JPG File	4 KB	
._DSCN0362	12/06/2018 5:47 PM	JPG File	4 KB	
._DSCN0363	12/06/2018 5:47 PM	JPG File	4 KB	
._DSCN0364	9/11/2018 11:37 AM	JPG File	4 KB	
._DSCN0365	13/06/2019 3:21 PM	JPG File	4 KB	
._DSCN0372	12/06/2018 5:47 PM	JPG File	4 KB	
._DSCN0373	9/11/2018 11:36 AM	JPG File	4 KB	
._DSCN0551	13/08/2018 7:24 PM	JPG File	4 KB	
._DSCN0553	9/11/2018 2:19 PM	JPG File	4 KB	
._DSCN0555	9/11/2018 2:18 PM	JPG File	4 KB	
._DSCN0557	9/11/2018 2:19 PM	JPG File	4 KB	
._DSCN0558	13/08/2018 7:24 PM	JPG File	4 KB	
._DSCN0561	13/06/2019 3:22 PM	JPG File	4 KB	
._DSCN0562	9/11/2018 11:36 AM	JPG File	4 KB	
._DSCN0563	13/06/2019 3:22 PM	JPG File	4 KB	
._DSCN0568	13/06/2019 3:22 PM	JPG File	4 KB	
._DSCN0569	13/06/2019 3:23 PM	JPG File	4 KB	
._DSCN0578	14/11/2018 3:04 PM	JPG File	4 KB	
._DSCN0581	14/11/2018 3:04 PM	JPG File	4 KB	

139

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872

ManageAfghan 2009

Picture Tools

ge icons
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Large icons

Medium-sized icons

List

Content

Group by

Add columns

Size all columns to fit

Sort by

Item check boxes

File name extensions

Hidden items

Hide selected items

Options

LayoutCurrent viewShow/hide

123TOSHIBAAfghan 2009

Search Afghan 2009

Name	Date	Type	Size	Tags
._DSC0502	22/06/2018 2:52 PM	JPG File	4 KB	
._DSC0619	13/06/2018 12:08 PM	JPG File	4 KB	
._20090308_TF66...	13/06/2018 12:08 PM	JPG File	4 KB	
._20090308_TF66...	13/06/2018 12:08 PM	JPG File	4 KB	
._20090308_TF66...	13/06/2018 12:08 PM	JPG File	4 KB	
._20090402_TF66...	13/06/2018 12:08 PM	JPG File	4 KB	
._20090402_TF66...	13/06/2018 12:08 PM	JPG File	4 KB	
._20090402_TF66...	13/06/2018 12:08 PM	JPG File	4 KB	
._20090419_TF66...	9/11/2018 11:23 AM	JPG File	4 KB	
._20090419_TF66...	13/06/2018 12:08 PM	JPG File	4 KB	
._20090419_TF66...	13/06/2018 12:08 PM	JPG File	4 KB	
._20090419_TF66...	13/06/2018 12:08 PM	JPG File	4 KB	
._20090419_TF66...	13/06/2018 12:08 PM	JPG File	4 KB	
._20090425_TF66...	9/11/2018 11:24 AM	JPG File	4 KB	
._20090507_2K9...	13/06/2018 12:09 PM	JPG File	4 KB	
._20090507_2K9...	13/06/2018 12:09 PM	JPG File	4 KB	
._20090511_TF66...	9/11/2018 11:23 AM	JPG File	4 KB	
._DSC_0455	13/06/2018 12:09 PM	JPG File	4 KB	
._DSC_0456	13/06/2018 12:09 PM	JPG File	4 KB	
._DSC_0465	13/06/2018 12:09 PM	JPG File	4 KB	
._DSC_0472	8/07/2018 8:53 PM	JPG File	4 KB	
._DSC_0483	22/06/2018 2:53 PM	JPG File	4 KB	
._DSC_0484	13/06/2018 12:09 PM	JPG File	4 KB	
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._DSC_0504	13/06/2018 12:09 PM	JPG File	4 KB	
._DSC_0509	13/06/2018 12:09 PM	JPG File	4 KB	
._DSC_0517	13/06/2018 12:09 PM	JPG File	4 KB	
._DSC_0529	13/06/2018 12:09 PM	JPG File	4 KB	
._DSC_0530	13/06/2018 12:09 PM	JPG File	4 KB	
._DSC_0536	13/06/2018 12:09 PM	JPG File	4 KB	

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873

Icons: Large icons Medium-sized icons
List Details
Content

Group by
Add columns
Size all columns to fit

☒ Item check boxes
☐ File name extensions
☒ Hidden items

Sort by
Hide selected items
Options

Layout Current view Show/hide

123 > TOSHIBA > Afghan 2010

Search Afghan 2010

Name	Date	Type	Size	Tags
._SOTG_2027	13/06/2018 11:31 AM	JPG File	4 KB	
._21-26 Gizab 012	13/06/2018 11:32 AM	JPG File	4 KB	
._20090611_2EB...	22/06/2018 3:09 PM	JPG File	4 KB	
._20100327_TF66...	13/06/2018 11:31 AM	JPG File	4 KB	
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._20100419_TF66...	13/06/2018 11:32 AM	JPG File	4 KB	
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._20100424_909...	9/11/2018 11:26 AM	JPG File	4 KB	
._20100424_909...	13/06/2018 11:32 AM	JPG File	4 KB	
._20100424_909...	13/06/2018 11:32 AM	JPG File	4 KB	
._20100424_909...	13/06/2018 11:32 AM	JPG File	4 KB	
._20100425_909...	13/06/2018 11:32 AM	JPG File	4 KB	
._20100425_909...	13/06/2018 11:32 AM	JPG File	4 KB	
._20100425_909...	22/06/2018 3:09 PM	JPG File	4 KB	
._20100425_909...	13/06/2018 11:32 AM	JPG File	4 KB	
._20100426_909...	13/06/2018 11:32 AM	JPG File	4 KB	
._20100426_909...	13/06/2018 11:32 AM	JPG File	4 KB	
._20100426_909...	13/06/2018 11:32 AM	JPG File	4 KB	
._20100426_909...	13/06/2018 11:32 AM	JPG File	4 KB	
._20100608_TF66...	13/06/2018 11:33 AM	JPG File	4 KB	
._20100612_TF66...	13/06/2018 11:33 AM	JPG File	4 KB	
._Bachi Langar 009	13/06/2018 11:32 AM	JPG File	4 KB	
._Bachi Langar 011	13/06/2018 11:32 AM	JPG File	4 KB	
._Chenartu Disru...	13/06/2018 11:33 AM	JPG File	4 KB	
._DSC00315	13/06/2018 11:33 AM	JPG File	4 KB	
._DSC00664	13/06/2018 11:31 AM	JPG File	4 KB	
._DSC00671	13/06/2018 11:31 AM	JPG File	4 KB	
._DSC00672	13/06/2018 11:31 AM	JPG File	4 KB	
._DSC00675	13/06/2018 11:31 AM	JPG File	4 KB	

Manage

Afghan 2012

Picture Tools

Large icons

Medium-sized icons

List

Content

Group by

Add columns

Sort by

Size all columns to fit

Item check boxes

File name extensions

Hidden items

Hide selected items

Options

Layout

Current view

Show/hide

123

TOSHIBA

Afghan 2012

Search Afghan 2012

Name	Date	Type	Size	Tags
._20120711_238...	17/07/2018 2:45 PM	JPG File	4 KB	
._20120711_441...	13/06/2019 3:19 PM	JPG File	4 KB	
._20120920_445...	13/06/2019 3:19 PM	JPG File	4 KB	
._20120925_465...	14/11/2018 3:00 PM	JPG File	4 KB	
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._20121015_385...	9/11/2018 3:33 PM	JPG File	4 KB	
._20121015_385...	14/11/2018 3:00 PM	JPG File	4 KB	
._20121015_385...	22/06/2018 3:02 PM	JPG File	4 KB	
._20121015_385...	22/06/2018 3:01 PM	JPG File	4 KB	
._20121015_385...	22/06/2018 3:00 PM	JPG File	4 KB	
._20121015_385...	13/06/2018 9:20 AM	JPG File	4 KB	
._20121015_385...	22/06/2018 3:00 PM	JPG File	4 KB	
._20121015_385...	17/07/2018 2:35 PM	JPG File	4 KB	
._20121015_385...	22/06/2018 3:01 PM	JPG File	4 KB	
._20121015_385...	22/06/2018 3:00 PM	JPG File	4 KB	
._20121015_385...	9/11/2018 3:32 PM	JPG File	4 KB	
._DSCN0106	13/06/2019 3:18 PM	JPG File	4 KB	
._DSCN0147	13/06/2018 9:16 AM	JPG File	4 KB	
._DSCN0148	13/06/2018 9:16 AM	JPG File	4 KB	
._DSCN0149	17/07/2018 2:36 PM	JPG File	4 KB	
._DSCN0152	13/06/2018 9:16 AM	JPG File	4 KB	
._DSCN0158	13/06/2018 9:16 AM	JPG File	4 KB	
._DSCN0159	13/06/2018 9:16 AM	JPG File	4 KB	
._DSCN0160	22/06/2018 2:59 PM	JPG File	4 KB	
._DSCN0173	13/06/2018 9:16 AM	JPG File	4 KB	
._DSCN0174	13/06/2018 9:16 AM	JPG File	4 KB	
._DSCN0175	13/06/2018 9:16 AM	JPG File	4 KB	
._DSCN0178	13/06/2018 9:16 AM	JPG File	4 KB	

ManageTOSHIBA

Picture Tools

Large iconsMedium-sized iconsDetailsContent

Group byAdd columnsSort bySize all columns to fit

☒ Item check boxes☐ File name extensions☒ Hidden items

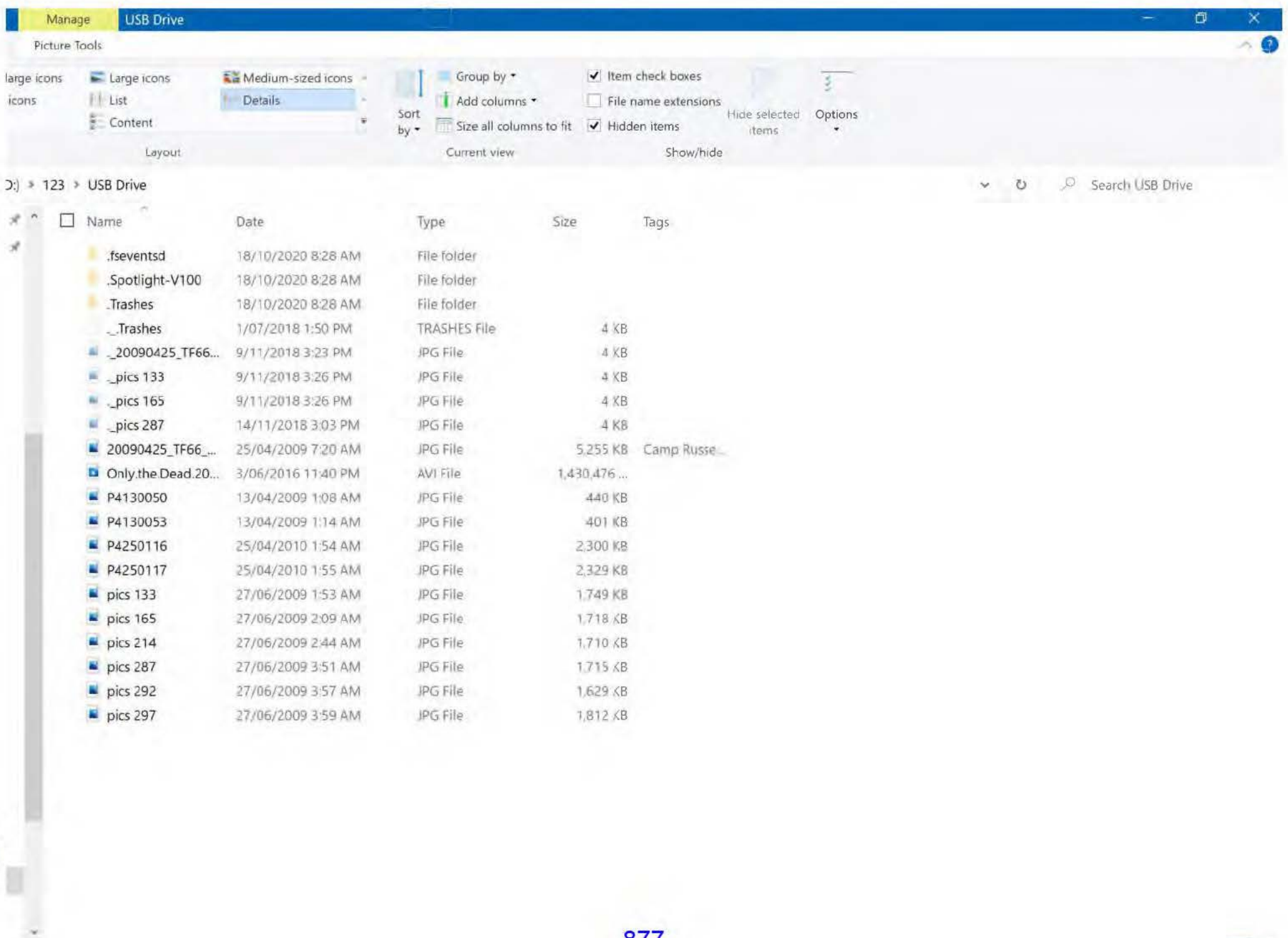
Hide selected itemsOptions

LayoutCurrent viewShow/hide

123TOSHIBA

Search TOSHIBA

Name	Date	Type	Size	Tags
.Spotlight-V100	18/10/2020 8:28 AM	File folder		
.Trashes	18/10/2020 8:29 AM	File folder		
Afghan 2009	18/10/2020 8:29 AM	File folder		
Afghan 2010	18/10/2020 8:29 AM	File folder		
Afghan 2012	18/10/2020 8:28 AM	File folder		
..Afghan 2012	13/06/2018 8:57 AM	File	4 KB	
..pics 178	17/07/2018 2:34 PM	JPG File	4 KB	
..pics 218	17/07/2018 2:34 PM	JPG File	4 KB	
..pics 310	17/07/2018 2:34 PM	JPG File	4 KB	
..pics 323	17/07/2018 2:34 PM	JPG File	4 KB	
..Stilleto Quiz Ni...	9/11/2018 11:21 AM	JPG File	4 KB	
pics 178	27/06/2009 2:12 AM	JPG File	1,736 KB	
pics 217	27/06/2009 2:45 AM	JPG File	1,705 KB	
pics 218	27/06/2009 2:45 AM	JPG File	1,717 KB	
pics 221	27/06/2009 3:00 AM	JPG File	1,715 KB	
pics 310	27/06/2009 2:00 AM	JPG File	381 KB	
pics 323	27/06/2009 2:14 AM	JPG File	421 KB	
Stilleto Quiz Nig...	1/06/2009 12:14 AM	JPG File	260 KB	



large icons

Large icons

Medium-sized icons

icons

List

Content

Layout

Group by

Add columns

Sort by

Size all columns to fit

Current view

☒ Item check boxes

☐ File name extensions

☒ Hidden items

Hide selected items

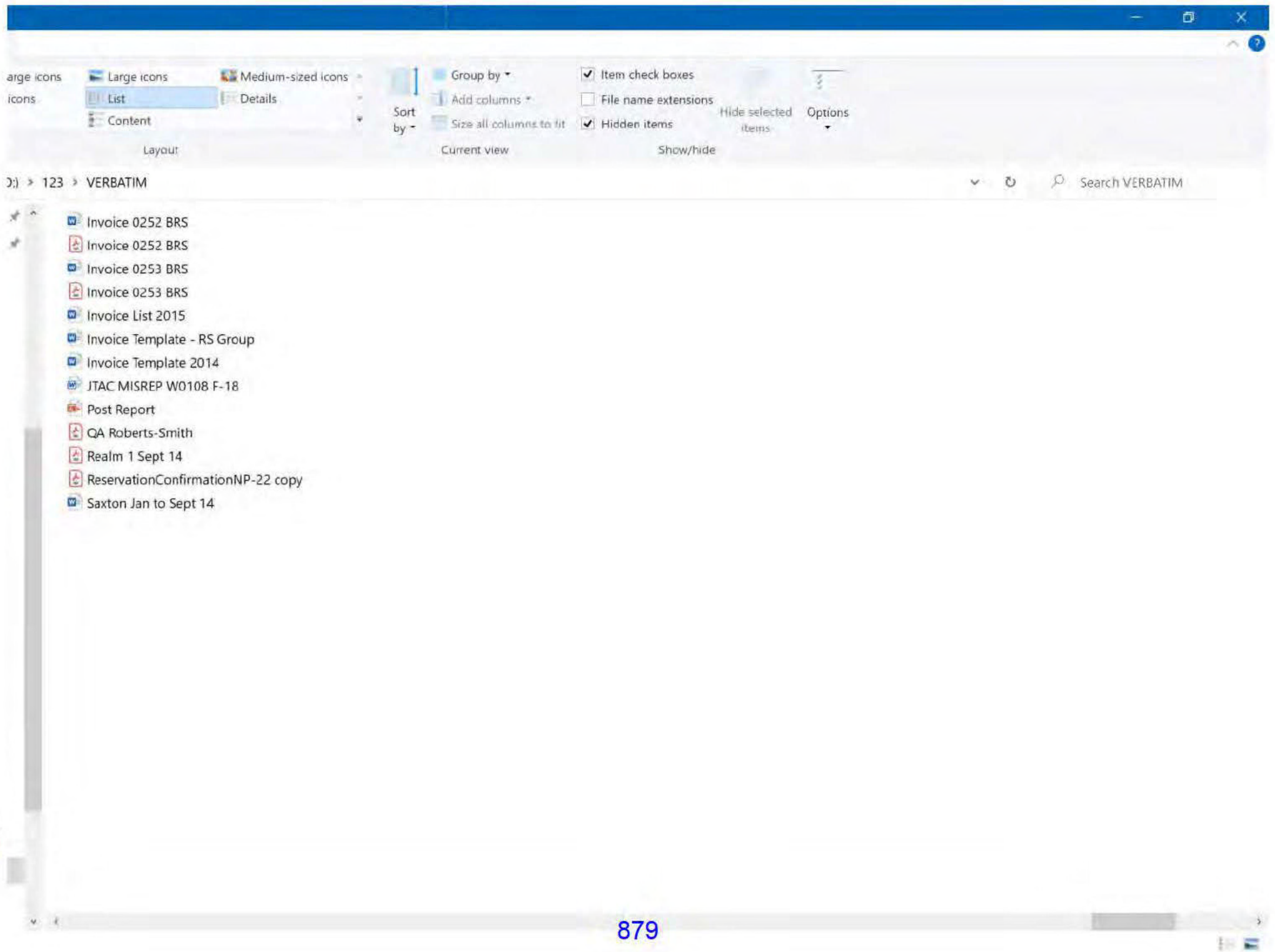
Options

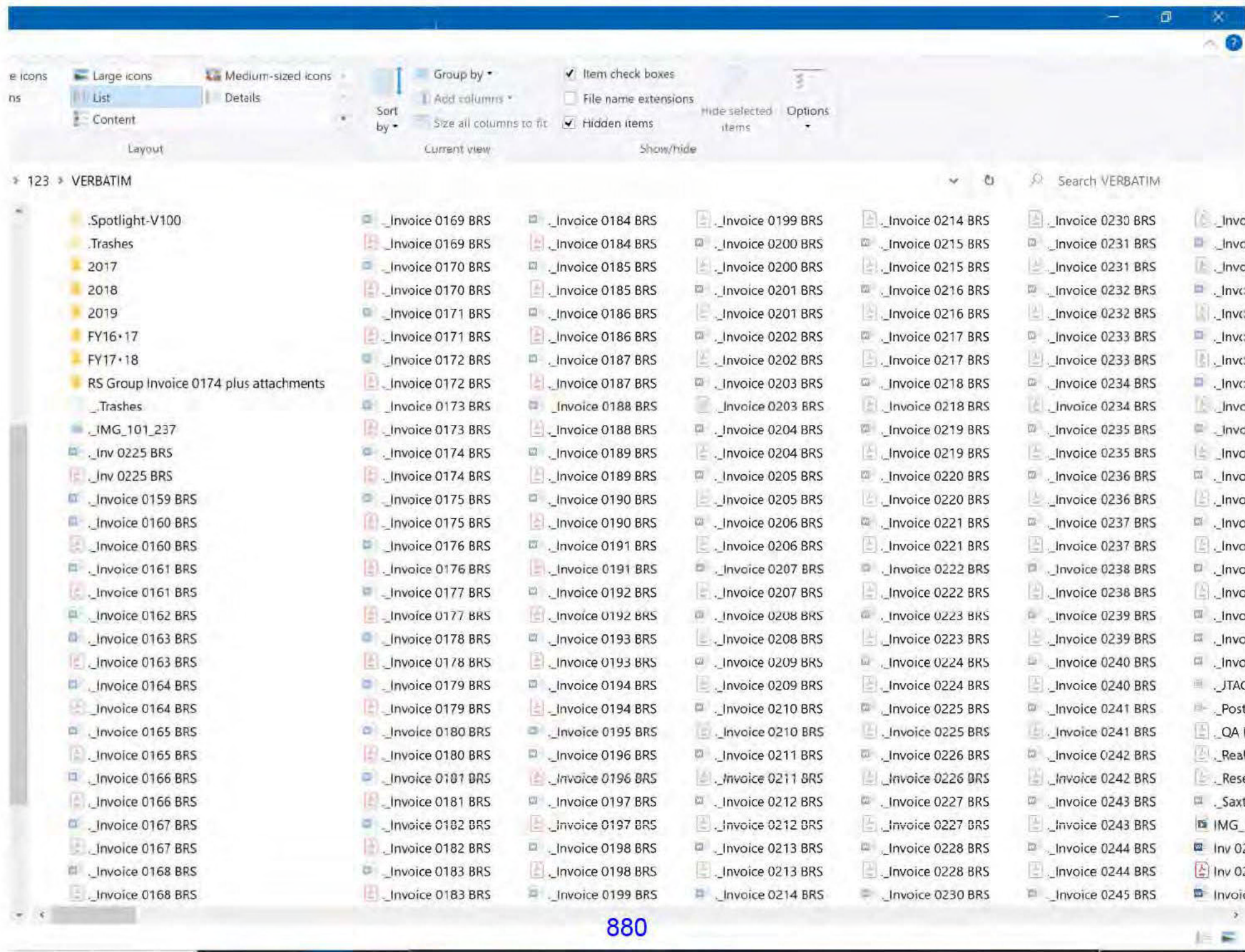
Show/hide

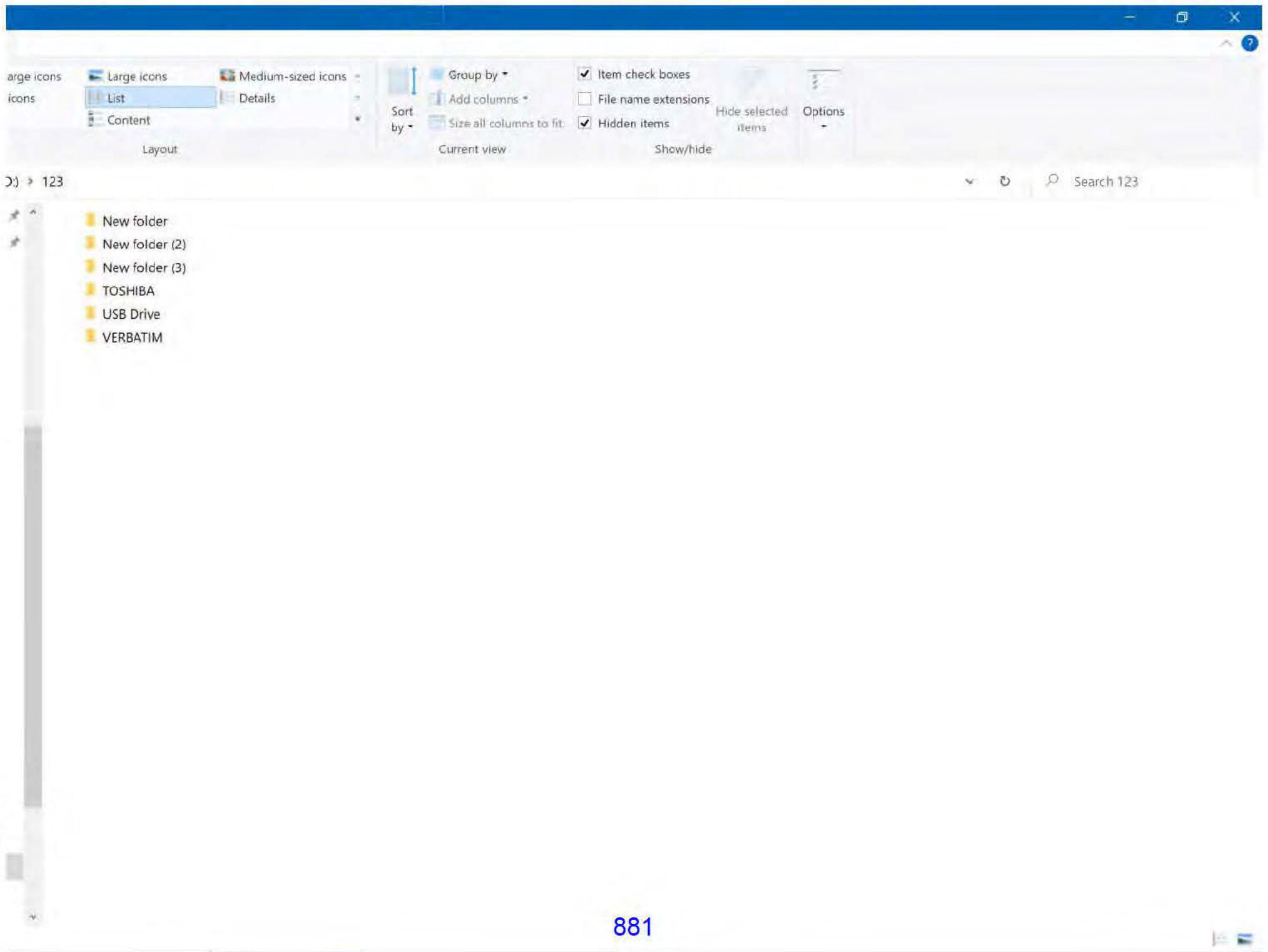
D:) 123 VERBATIM

Search VERBATIM

Invoice 0245 BRS	Invoice 0160 BRS	Invoice 0175 BRS	Invoice 0190 BRS	Invoice 0206 BRS	Invoice 0221 BRS	Invoice 0237 BRS
Invoice 0246 BRS	Invoice 0160 BRS	Invoice 0176 BRS	Invoice 0191 BRS	Invoice 0206 BRS	Invoice 0221 BRS	Invoice 0237 BRS
Invoice 0246 BRS	Invoice 0161 BRS	Invoice 0176 BRS	Invoice 0191 BRS	Invoice 0207 BRS	Invoice 0222 BRS	Invoice 0238 BRS
Invoice 0247 BRS	Invoice 0161 BRS	Invoice 0177 BRS	Invoice 0192 BRS	Invoice 0207 BRS	Invoice 0222 BRS	Invoice 0238 BRS
Invoice 0247 BRS	Invoice 0162 BRS	Invoice 0177 BRS	Invoice 0192 BRS	Invoice 0208 BRS	Invoice 0223 BRS	Invoice 0239 BRS
Invoice 0248 BRS	Invoice 0163 BRS	Invoice 0178 BRS	Invoice 0193 BRS	Invoice 0208 BRS	Invoice 0223 BRS	Invoice 0239 BRS
Invoice 0248 BRS	Invoice 0163 BRS	Invoice 0178 BRS	Invoice 0193 BRS	Invoice 0209 BRS	Invoice 0224 BRS	Invoice 0240 BRS
Invoice 0249 BRS	Invoice 0164 BRS	Invoice 0179 BRS	Invoice 0194 BRS	Invoice 0209 BRS	Invoice 0224 BRS	Invoice 0240 BRS
Invoice 0249 BRS	Invoice 0164 BRS	Invoice 0179 BRS	Invoice 0194 BRS	Invoice 0210 BRS	Invoice 0225 BRS	Invoice 0241 BRS
Invoice 0250 BRS	Invoice 0165 BRS	Invoice 0180 BRS	Invoice 0195 BRS	Invoice 0210 BRS	Invoice 0225 BRS	Invoice 0241 BRS
Invoice 0250 BRS	Invoice 0165 BRS	Invoice 0180 BRS	Invoice 0196 BRS	Invoice 0211 BRS	Invoice 0226 BRS	Invoice 0242 BRS
Invoice 0251 BRS	Invoice 0166 BRS	Invoice 0181 BRS	Invoice 0196 BRS	Invoice 0211 BRS	Invoice 0226 BRS	Invoice 0242 BRS
Invoice 0251 BRS	Invoice 0166 BRS	Invoice 0181 BRS	Invoice 0197 BRS	Invoice 0212 BRS	Invoice 0227 BRS	Invoice 0243 BRS
Invoice 0252 BRS	Invoice 0167 BRS	Invoice 0182 BRS	Invoice 0197 BRS	Invoice 0212 BRS	Invoice 0227 BRS	Invoice 0243 BRS
Invoice 0252 BRS	Invoice 0167 BRS	Invoice 0182 BRS	Invoice 0198 BRS	Invoice 0213 BRS	Invoice 0228 BRS	Invoice 0244 BRS
Invoice 0253 BRS	Invoice 0168 BRS	Invoice 0183 BRS	Invoice 0198 BRS	Invoice 0213 BRS	Invoice 0228 BRS	Invoice 0244 BRS
Invoice 0253 BRS	Invoice 0168 BRS	Invoice 0183 BRS	Invoice 0199 BRS	Invoice 0214 BRS	Invoice 0230 BRS	Invoice 0245 BRS
Invoice List 2015	Invoice 0169 BRS	Invoice 0184 BRS	Invoice 0199 BRS	Invoice 0214 BRS	Invoice 0230 BRS	Invoice 0245 BRS
Invoice Template - RS Group	Invoice 0169 BRS	Invoice 0184 BRS	Invoice 0200 BRS	Invoice 0215 BRS	Invoice 0231 BRS	Invoice 0246 BRS
Invoice Template 2014	Invoice 0170 BRS	Invoice 0185 BRS	Invoice 0200 BRS	Invoice 0215 BRS	Invoice 0231 BRS	Invoice 0246 BRS
JTAC MISREP W0108 F-18	Invoice 0170 BRS	Invoice 0185 BRS	Invoice 0201 BRS	Invoice 0216 BRS	Invoice 0232 BRS	Invoice 0247 BRS
Post Report	Invoice 0171 BRS	Invoice 0186 BRS	Invoice 0201 BRS	Invoice 0216 BRS	Invoice 0232 BRS	Invoice 0247 BRS
QA Roberts-Smith	Invoice 0171 BRS	Invoice 0186 BRS	Invoice 0202 BRS	Invoice 0217 BRS	Invoice 0233 BRS	Invoice 0248 BRS
Realm 1 Sept 14	Invoice 0172 BRS	Invoice 0187 BRS	Invoice 0202 BRS	Invoice 0217 BRS	Invoice 0233 BRS	Invoice 0248 BRS
ReservationConfirmationNP-22 copy	Invoice 0172 BRS	Invoice 0187 BRS	Invoice 0203 BRS	Invoice 0218 BRS	Invoice 0234 BRS	Invoice 0249 BRS
Saxton Jan to Sept 14	Invoice 0173 BRS	Invoice 0188 BRS	Invoice 0203 BRS	Invoice 0218 BRS	Invoice 0234 BRS	Invoice 0249 BRS
IMG_101_237	Invoice 0173 BRS	Invoice 0188 BRS	Invoice 0204 BRS	Invoice 0219 BRS	Invoice 0235 BRS	Invoice 0250 BRS
Inv 0225 BRS	Invoice 0174 BRS	Invoice 0189 BRS	Invoice 0204 BRS	Invoice 0219 BRS	Invoice 0235 BRS	Invoice 0250 BRS
Inv 0225 BRS	Invoice 0174 BRS	Invoice 0189 BRS	Invoice 0205 BRS	Invoice 0220 BRS	Invoice 0236 BRS	Invoice 0251 BRS
Invoice 0159 BRS	Invoice 0175 BRS	Invoice 0190 BRS	Invoice 0205 BRS	Invoice 0220 BRS	Invoice 0236 BRS	Invoice 0251 BRS







MinterEllison

12 April 2021

BY EMAIL Mark.O'Brien@markobrienlegal.com.au

Mark O'Brien
Principal
Mark O'Brien Legal
Level 19
68 Pitt Street
SYDNEY NSW 2000

Dear Mr O'Brien

**Ben Roberts-Smith v Fairfax Media Publications & Ors
Federal Court Proceeding numbers NSD 1485, 1486 and 1487 of 2018**

We refer to the Court's order made on 7 April 2021 concerning the service of outlines of evidence of Emma Roberts and Danielle Scott (referred to in the orders as Emma Roberts-Smith and Danielle Scott-Flanders).

We **enclose** outlines of evidence for Emma Roberts and Danielle Scott. We acknowledge that the anticipated evidence at paragraphs 4(c) to (e) of the outline of Ms Roberts and paragraphs 9-12, 14-15 and 17-35 of the outline of Ms Scott extends beyond the leave granted by the Court on 7 April 2021. Could you please confirm that you do not oppose the Respondents relying on the outlines in this form or, if you do, identify the basis of your opposition. When the matter is next before the Court we will seek an order extending the leave to this anticipated evidence.

You will note from the outline of Ms Roberts that we are unable to provide further detail in relation to the anticipated evidence of Ms Roberts due to a confidentiality agreement between your client and Ms Roberts. If your client requires further detail in relation to Ms Roberts' anticipated evidence we invite your client to confirm that the confidentiality agreement does not operate to prevent Ms Roberts conferring with us for the purpose of discussing the evidence she will give at trial.

As will be evident from the outlines of evidence, it has come to our clients' attention that your client buried a lunch box containing six USB sticks in the backyard of the home he shared with his former wife. Our client has been provided with a copy of the material that was contained on those USBs and has instructed us that the USBs contain apparently relevant and discoverable material. So much is clear from the file names of the documents which can be seen on Attachment L to the outline of evidence of Ms Scott.

Our clients have notified the Australian Federal Police that they are in possession of copies of the USBs and intend to fully cooperate with law enforcement authorities in respect of this material. The Respondents are also attending to preparing a supplementary list of documents giving discovery of the attachments to Ms Scott's outlines and will provide this as soon as possible.

The circumstances described in the outline of evidence of Ms Scott, and discussed above, gives rise to a serious concern about your client's compliance with his discovery obligations, and whether he has engaged in a deliberate attempt to conceal relevant evidence in these proceedings. We have written to you on several occasions about your client's compliance with his discovery obligations.

Our clients reserve their rights in relation to these matters, but invite your client to immediately:

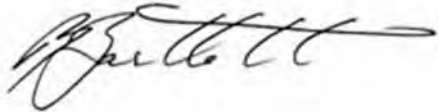


- file and serve an updated List of Documents, which should specifically describe any documents that were once, but are no longer in his possession, and the circumstances about why those documents are no longer in the Applicant's possession;
- produce to the Respondents any further relevant or discoverable material; and
- provide any explanation he is able to provide so that we may take it into account in determining the Respondents' next steps in relation to this matter.

For the avoidance of doubt, the Applicant should preserve each of the six USB sticks (and any copies of those USB sticks and their contents) and any communications between him and other witnesses in relation to the USBs and their contents.

Yours faithfully

MinterEllison



Contact: Dean Levitan T: +61 3 8608 2152
Dean.Levitan@minterellison.com
Partner: Peter Bartlett T: +61 3 8608 2677
OUR REF: PLB 1183220

NOTICE OF FILING AND HEARING

This document was lodged electronically in the FEDERAL COURT OF AUSTRALIA (FCA) on 27/04/2021 1:03:22 PM AEST and has been accepted for filing under the Court's Rules. Filing and hearing details follow and important additional information about these are set out below.

Filing and Hearing Details

Document Lodged:	Interlocutory Application - Form 35 - Rule 17.01(1)(a)
File Number:	NSD1485/2018
File Title:	BEN ROBERTS-SMITH v FAIRFAX MEDIA PUBLICATIONS PTY LTD (ACN 003 357 720) & ORS
Registry:	NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA
Reason for Listing:	To Be Advised
Time and date for hearing:	To Be Advised
Place:	To Be Advised



Sia Lagos

Dated: 27/04/2021 2:32:14 PM AEST

Registrar

Important Information

As required by the Court's Rules, 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 Reason for Listing shown above is descriptive and does not limit the issues that might be dealt with, or the orders that might be made, at the hearing.

The date and time of lodgment also shown above are the date and time that the document was received by the Court. Under the Court's Rules the date of filing of the document is the day it was lodged (if that is a business day for the Registry which accepts it and the document was received by 4.30 pm local time at that Registry) or otherwise the next working day for that Registry.



Further Amended Interlocutory application

No. NSD1485, 1486 and 1487 of 2018

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

Ben Roberts-Smith

Applicant

Fairfax Media Publications Pty Limited and Ors

Respondents

To the Applicant

The Respondents apply for the interlocutory orders set out in this application.

The Court will hear this application, or make orders for the conduct of the proceeding, at the time and place stated below. If you or your lawyer do not attend, then the Court may make orders in your absence.

Time and date for hearing:

Place: Law Courts Building, Queens Square, Phillip Street Sydney NSW 2000

The Court ordered that the time for serving this application be abridged to [Registry will insert date, if applicable]

Date:

Signed by an officer acting with the authority
of the District Registrar

Filed on behalf of	Fairfax Media Publications Pty Limited, Nick McKenzie, Chris Masters and David Wroe, Respondents
Prepared by	Peter Bartlett
Law firm	MinterEllison
Tel +61 3 8608 2037	Fax +61 3 8608 1088
Email	Peter.Bartlett@minterellison.com
Address for service	447 Collins Street Melbourne VIC 3000

[Form approved 01/08/2011]



Interlocutory orders sought

1. The Respondents be granted leave to issue a Subpoena to Give Evidence at the trial to each of the following persons:
 - (a) Person 24;
 - (b) Person 31;
 - (c) Person 40;
 - (d) Person 41;
 - (e) Person 42;
 - (f) Person 43;
 - (g) Person 56;
 - (h) Person 69;
 - (i) Person 70;
 - (j) Emma Roberts~~Smith~~;
 - (k) Danielle Scott~~Flanders~~;
 - (l) John McLeod.
2. The respondents be granted leave to amend their Defence to include particulars in the document entitled "SECRET — Confidential —Additional truth particulars" to be served in accordance with the s38B orders made on 5 March 2021.
3. The Respondents be granted leave to file and serve an Outline of Evidence for Person 18.
4. The Respondents be granted leave to file and serve an Outline of Evidence for John McLeod.
5. The Respondents be granted leave to file and serve an Outline of Evidence for Emma Roberts in the form served on 12 April 2021.
6. The Respondents be granted leave to file and serve an Outline of Evidence for Danielle Scott in the form served on 12 April 2021.
7. Such further or other order as the Court thinks fit.

Service on the Applicant

It is intended to serve this application on the Applicant and on the Commonwealth of Australia.



Date: 20 April 2021

A handwritten signature in black ink, which appears to be "Peter Bartlett", is written over a horizontal line.

Signed by Peter Bartlett
Lawyer for the Respondents



Federal Court of Australia

District Registry: New South Wales

Division: General

No: NSD1485/2018

BEN ROBERTS-SMITH

Applicant

FAIRFAX MEDIA PUBLICATIONS PTY LTD (ACN 003 357 720) and others named in
the schedule

Respondent

ORDER

JUDGE: JUSTICE BESANKO

DATE OF ORDER: 29 April 2021

WHERE MADE: Sydney

THE COURT ORDERS THAT:

1. The respondents be granted leave to access, uplift and copy the documents produced in response to the Notice to produce issued by the respondents and dated 28 April 2021.
2. The applicant's application to cross-examine Mr Peter Llewellyn Bartlett be refused.
3. The respondents file the outlines of evidence of Ms Emma Roberts and Ms Danielle Scott, as they are annexed to the affidavit of Mr Bartlett sworn on 22 April 2021, within 7 days.
4. The respondents file and serve an outline of evidence of Mr John McLeod by 5:00 pm on Monday, 3 May 2021.
5. The applicant indicate within 48 hours, by letter to the respondents copied to chambers, whether he objects to the respondents relying on the outline of evidence referred to in order 4, above.
6. Consideration of the Amended Interlocutory application filed on 7 April 2021 be stood over insofar as it concerns the outline of evidence referred to in order 4, above.
7. The applicant have leave to file submissions with respect to a suppression order over the Outline of evidence of Person 18, limited to 3 pages, by 5:00 pm on Friday, 30 April 2021.



8. The respondents have leave, if so advised, to file responding submissions, limited to 2 pages, by 5:00 pm on Monday, 3 May 2021.
9. Decision on the order of evidence at trial issue be reserved.

Date that entry is stamped: 3 May 2021

Sia Lagos
Registrar



Schedule

No: NSD1485/2018

Federal Court of Australia

District Registry: New South Wales

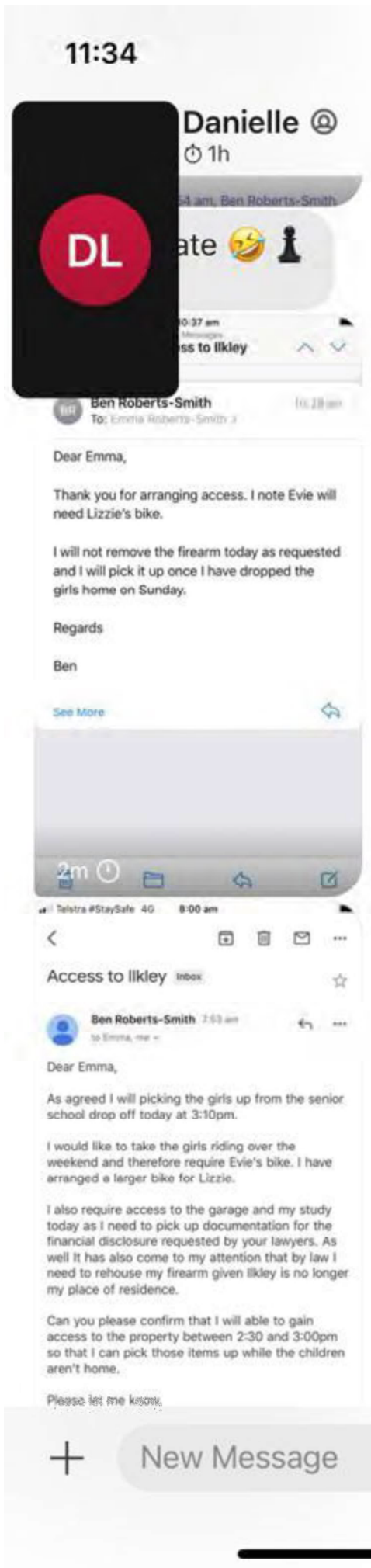
Division: General

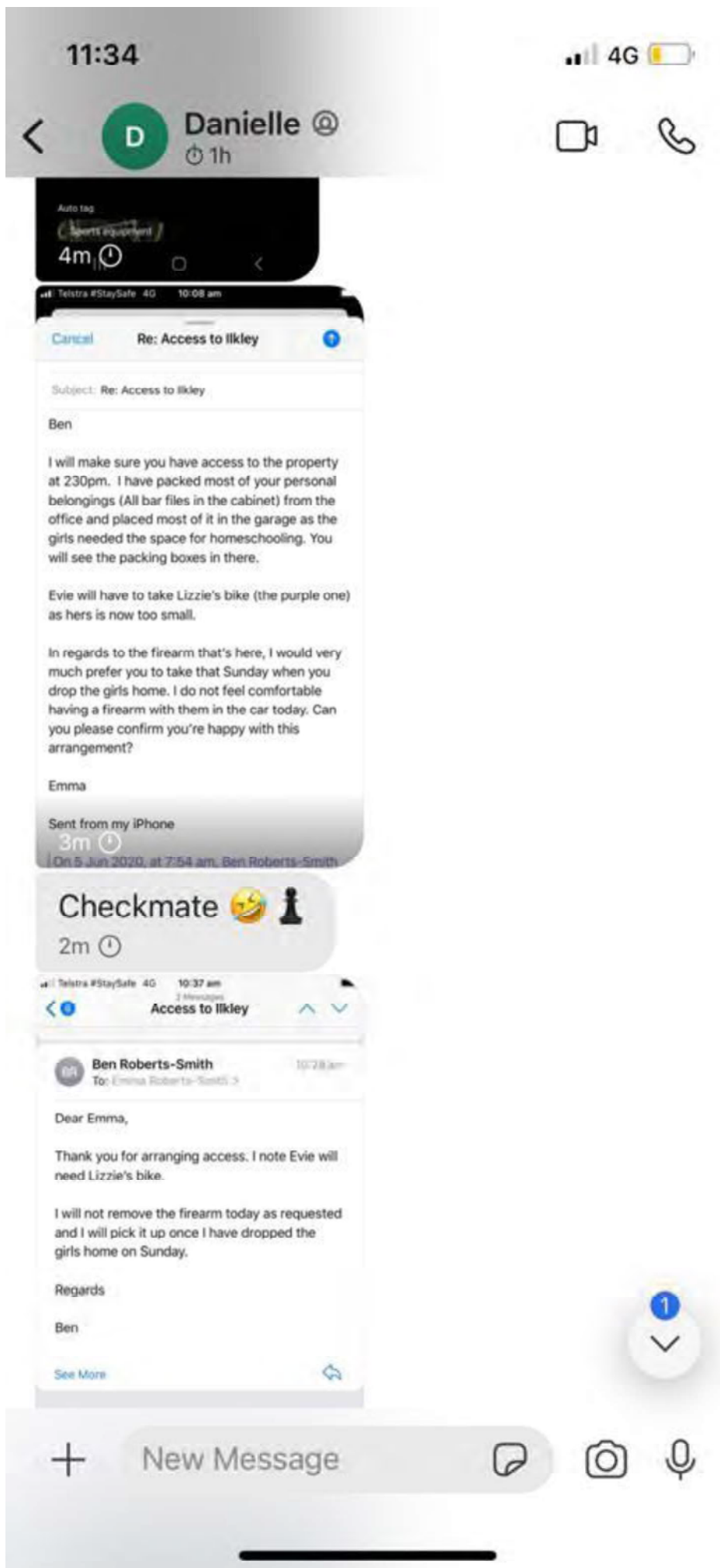
Second Respondent NICK MCKENZIE

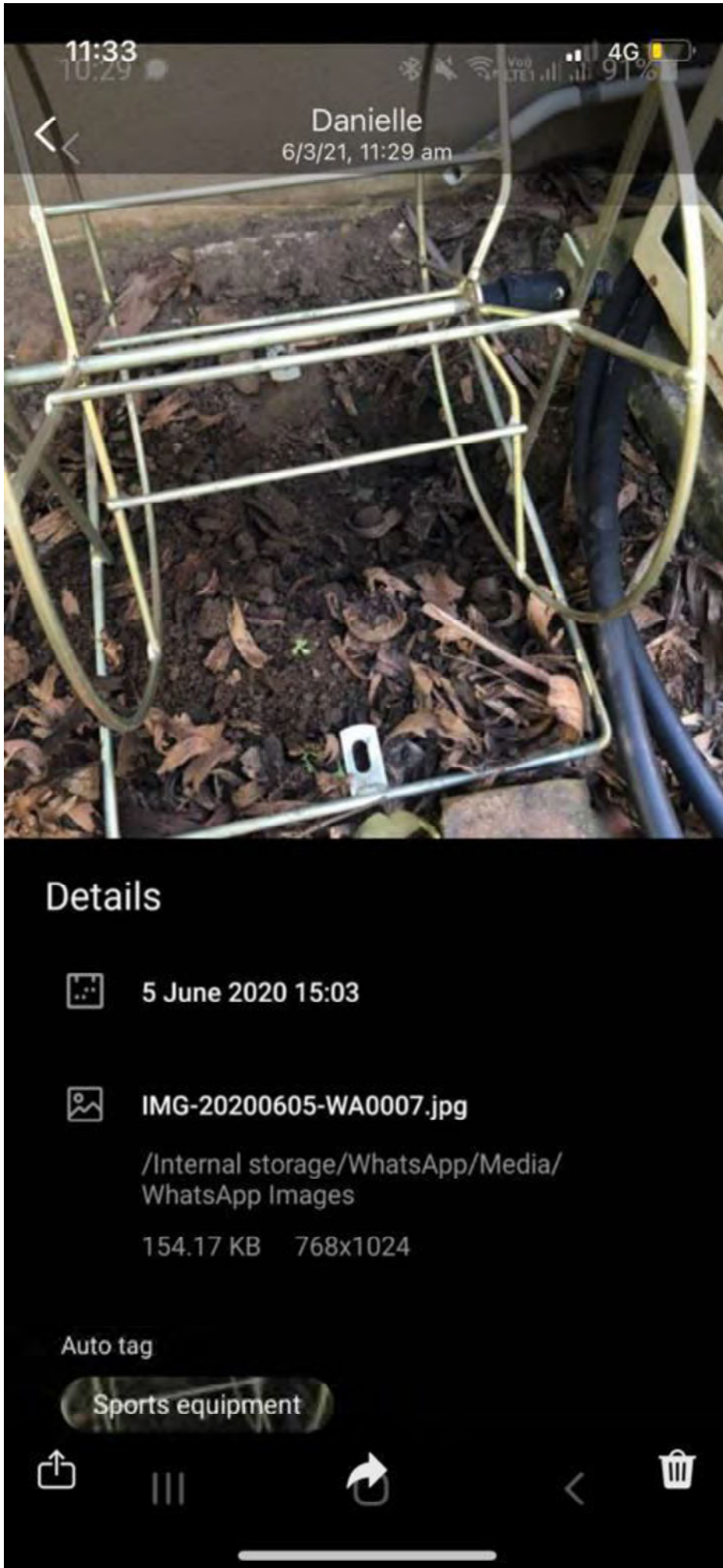
Third Respondent CHRIS MASTERS

Fourth Respondent DAVID WROE









11:33

4G



Danielle @

1h



New Messages



Details

5 June 2020 15:03

IMG-20200605-WA0067.jpg

/Internal storage/WhatsApp/Media/
WhatsApp Images

154.17 KB 768x1024

Auto tag

WhatsApp Images

4m



Cancel

Re: Access to ilkley

Subject: Re: Access to ilkley

Ben

I will make sure you have access to the property at 230pm. I have packed most of your personal belongings (All bar files in the cabinet) from the office and placed most of it in the garage as the girls needed the space for homeschooling. You will see the packing boxes in there.

Evie will have to take Lizzie's bike (the purple one) as hers is now too small.

In regards to the firearm that's here, I would very much prefer you to take that Sunday when you drop the girls home. I do not feel comfortable having a firearm with them in the car today. Can you please confirm you're happy with this arrangement?

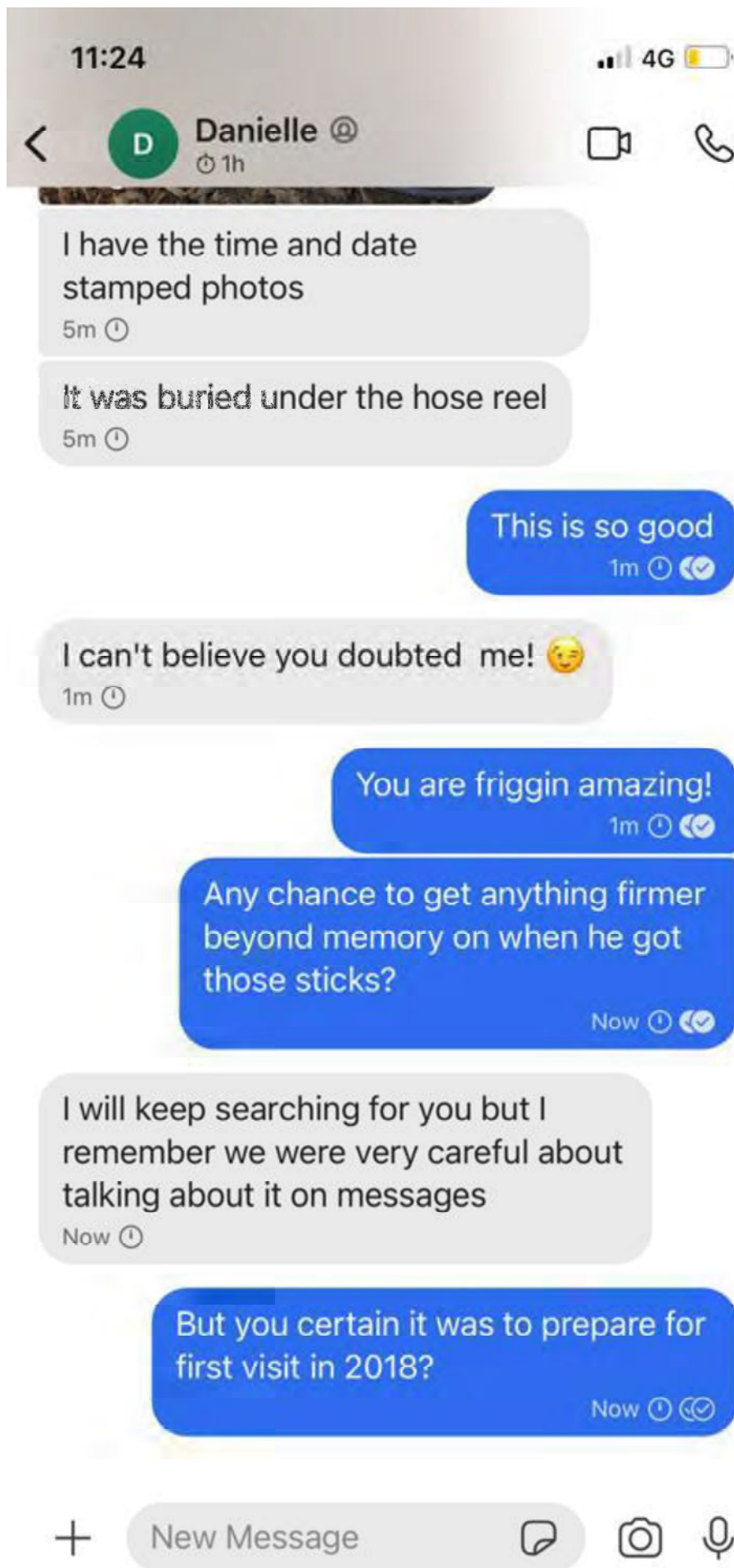
Emma



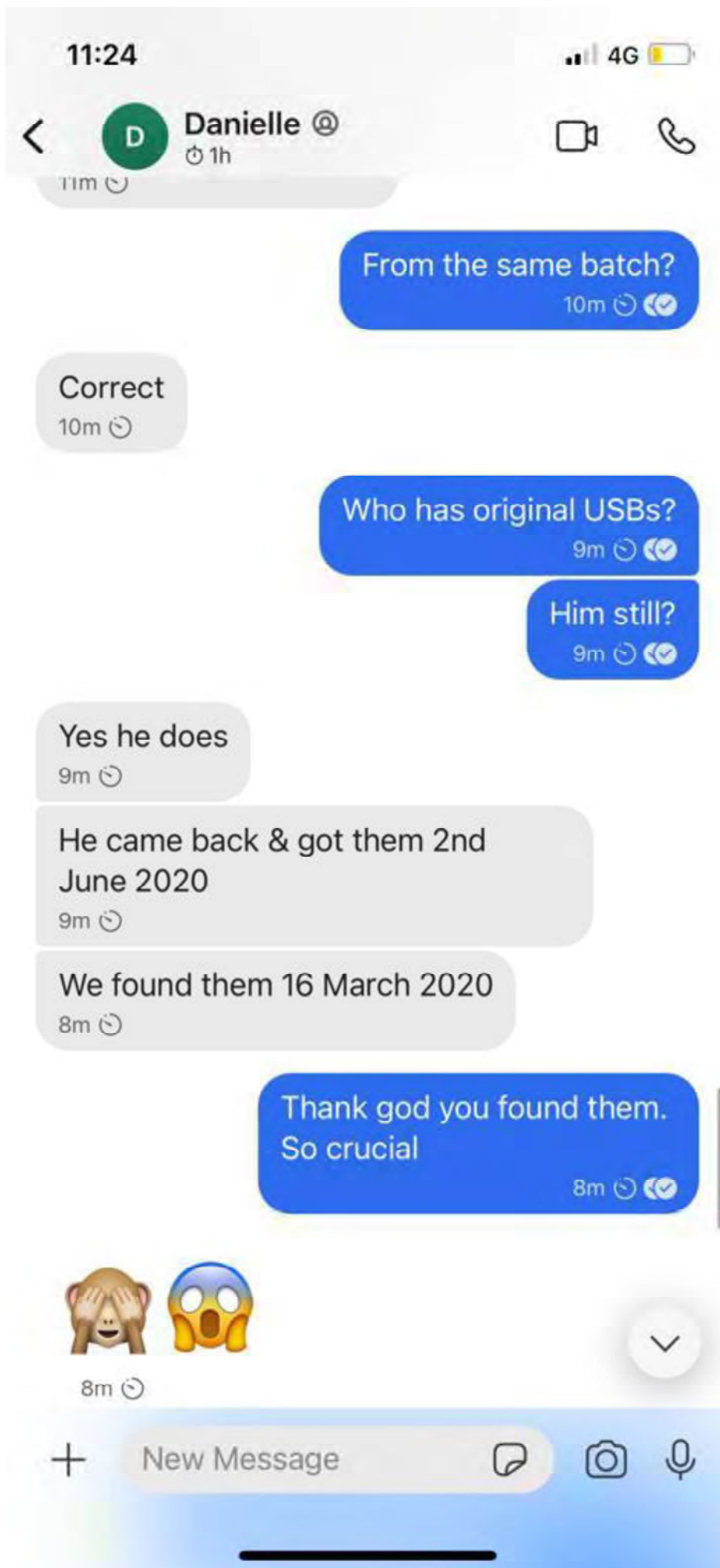
New Message



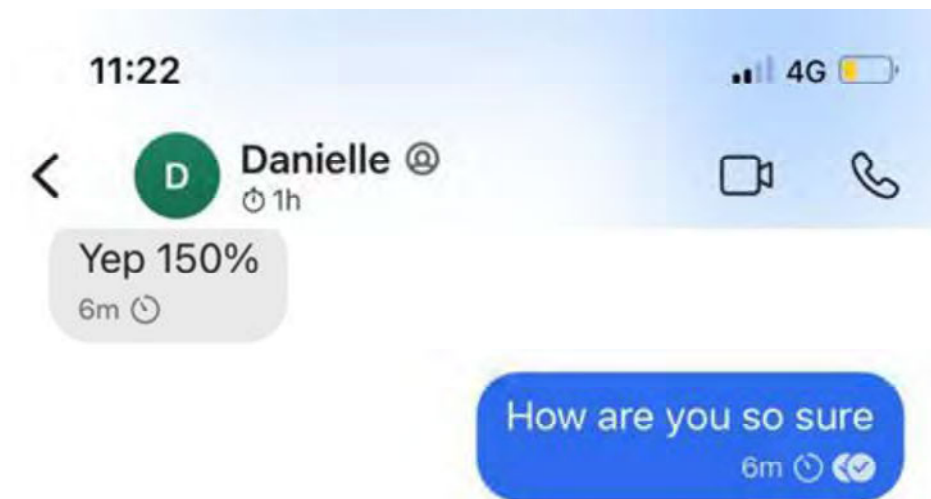












New Messages



I have the time and date
stamped photos

3m ⌚

It was buried under the hose reel

3m ⌚



New Message



11:19

4G

Done 6 April 2018 - SMS from P17 to...



From: Ben Roberts-Smith <b.robertssmith@me.com>
Date: 17 August 2018 at 1:58:46 pm AEST
To: Emma Roberts-Smith <emma@rsgroupaustralia.com>

Telstra 4G

18:28

63%

< Chats

Jenny Hosey

... typing



No. It most certainly is not blackmail. I'm not asking for or expecting anything from you.

17/8/18

Please don't waste your time with intimidation or payback either. The benefit of seeing what you were capable of a few weeks back & knowing the threats you've made to me since is that I immediately put in place "insurance" in the event that anything should happen to me or my family. I know you will blame me but I hope you'll also remember that we're in this position because of what we've BOTH done.

18/8/18

What I did today wasn't planned & it's not something I ever thought I would do but I believe I made the right decision. I know you're angry but I did it for your own good. Some day I hope you'll see that & be thankful. If you love Emma & genuinely want to fix your marriage then it needed to come out. She deserves the truth & she was never going to get it from you. You've been lying to everybody & it's time to stop. To quote your message to me from this morning - I know you will be ok & you will work though it. Your marriage is strong &

Subject: Copy

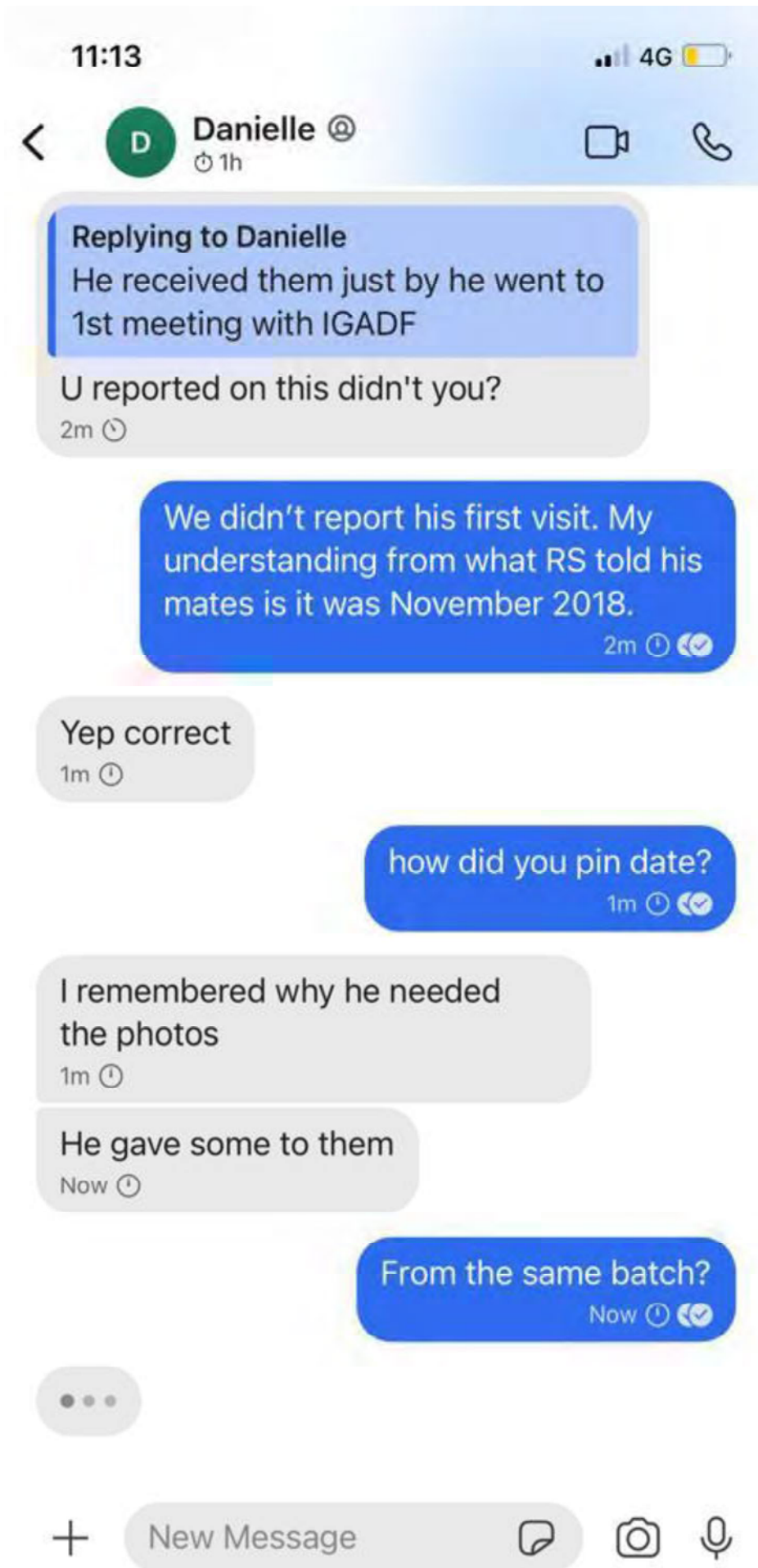


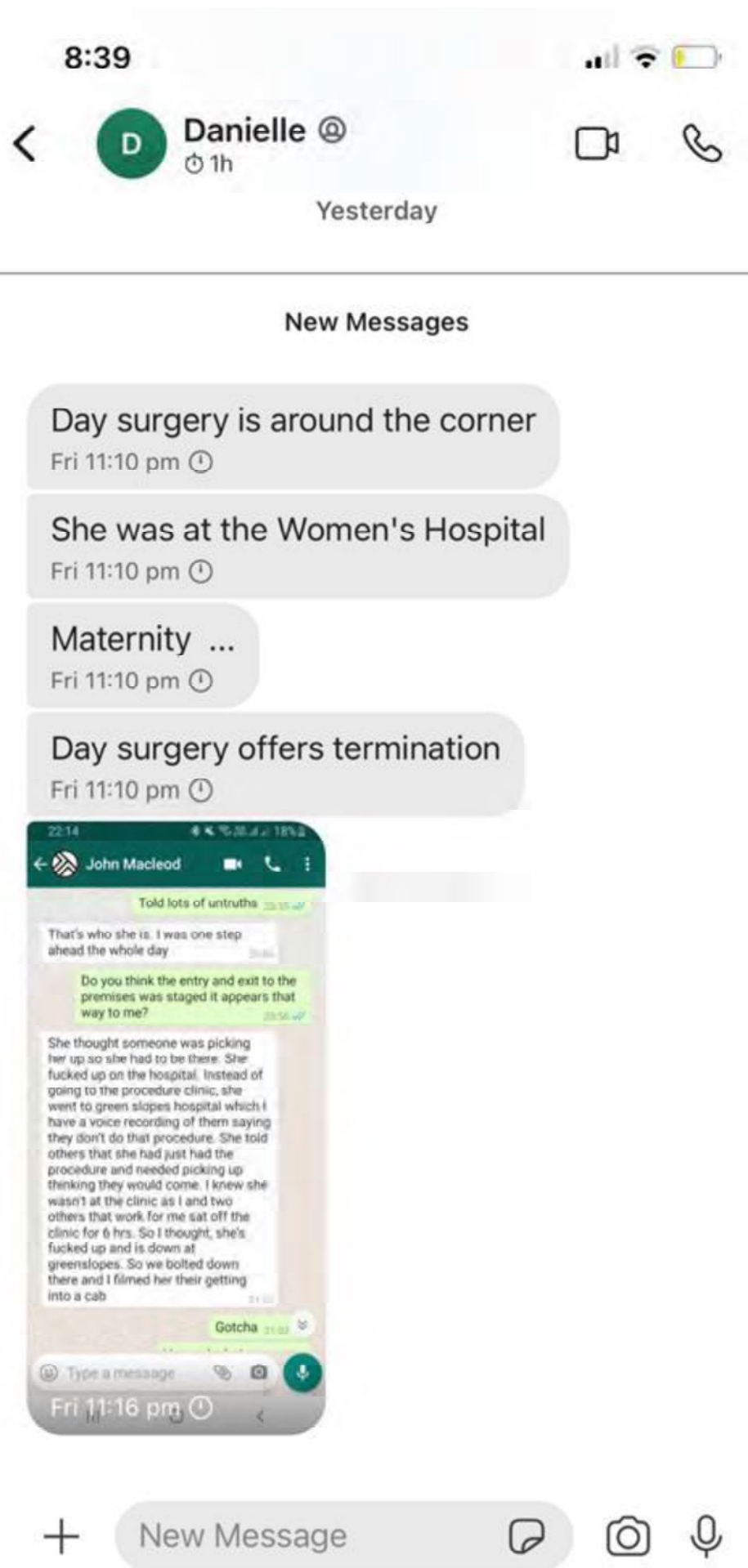
Attachment

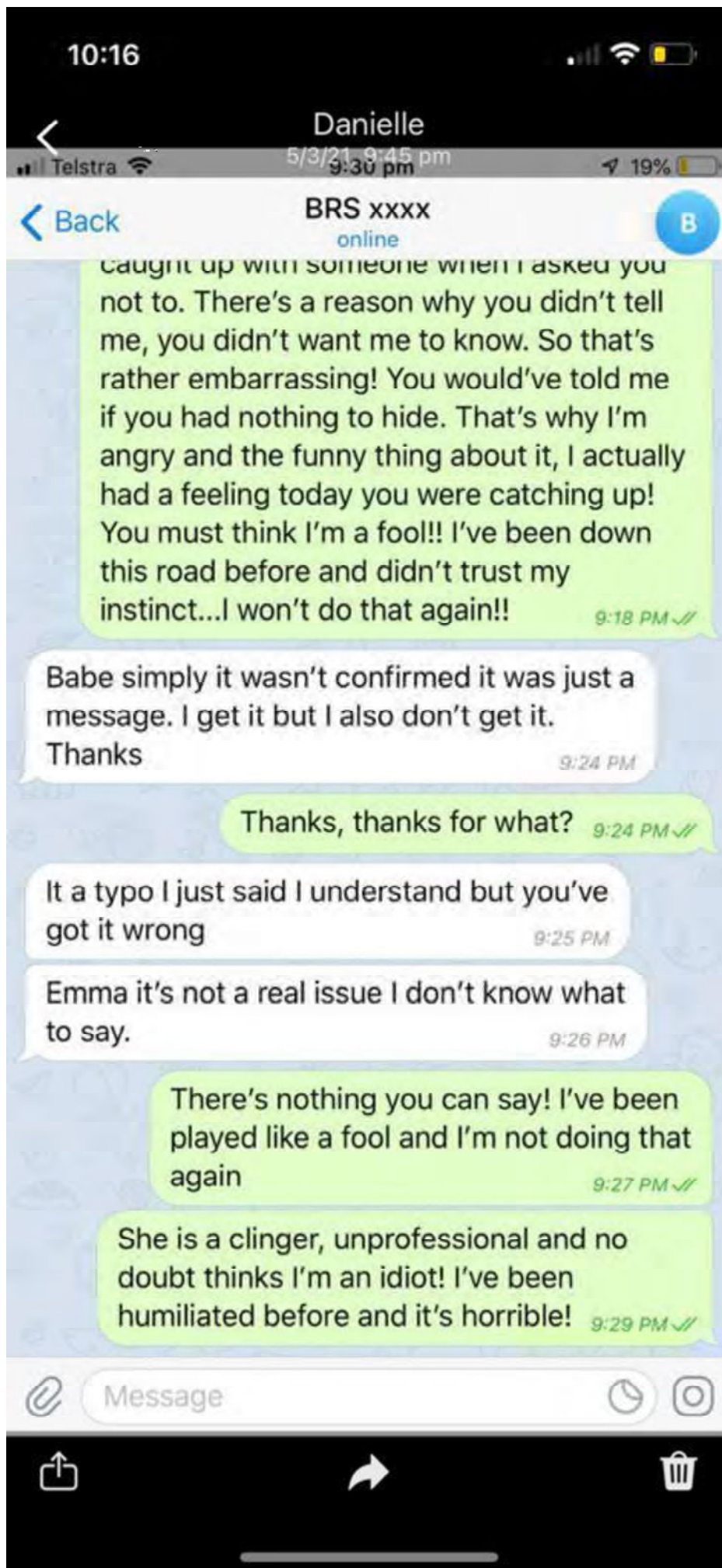




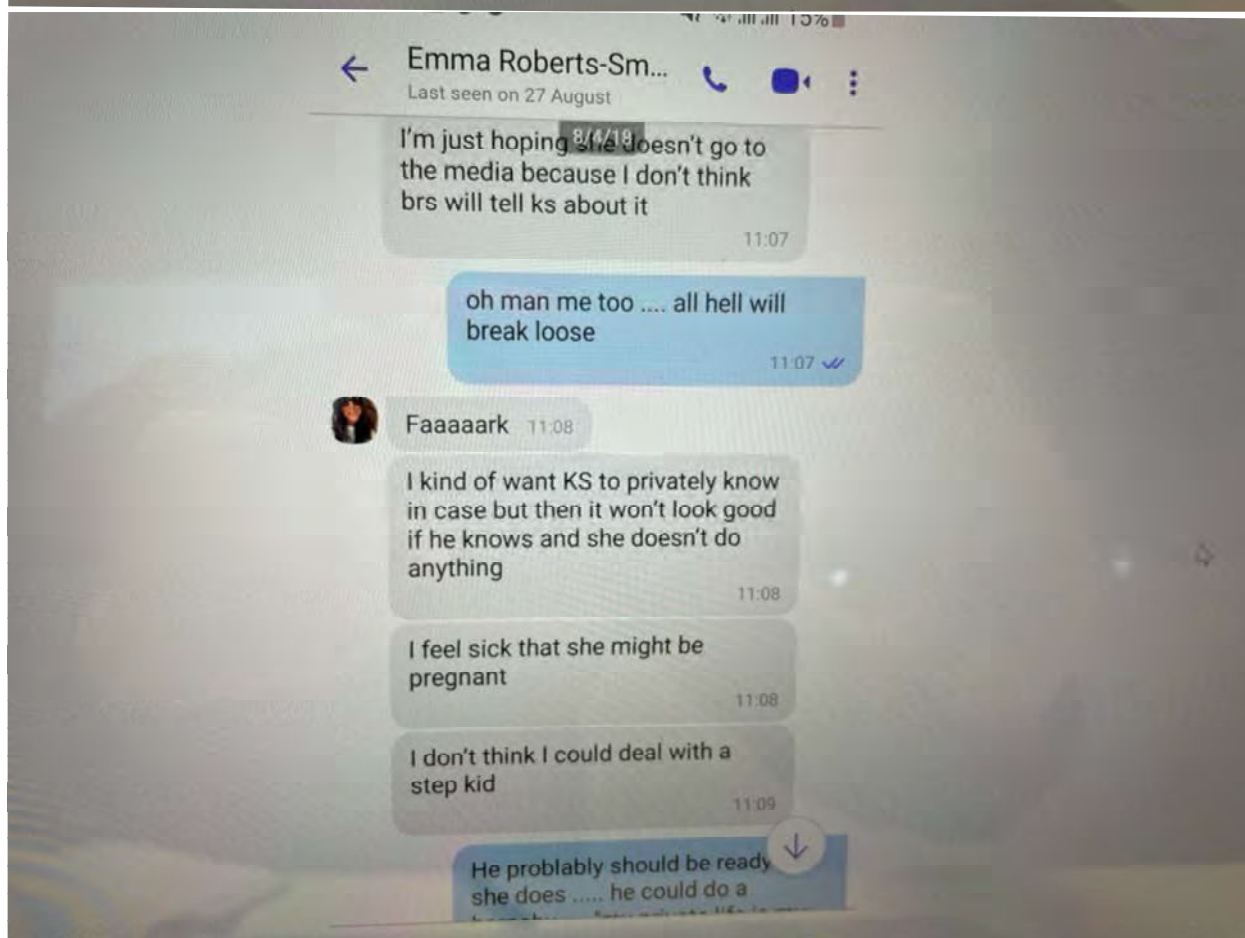
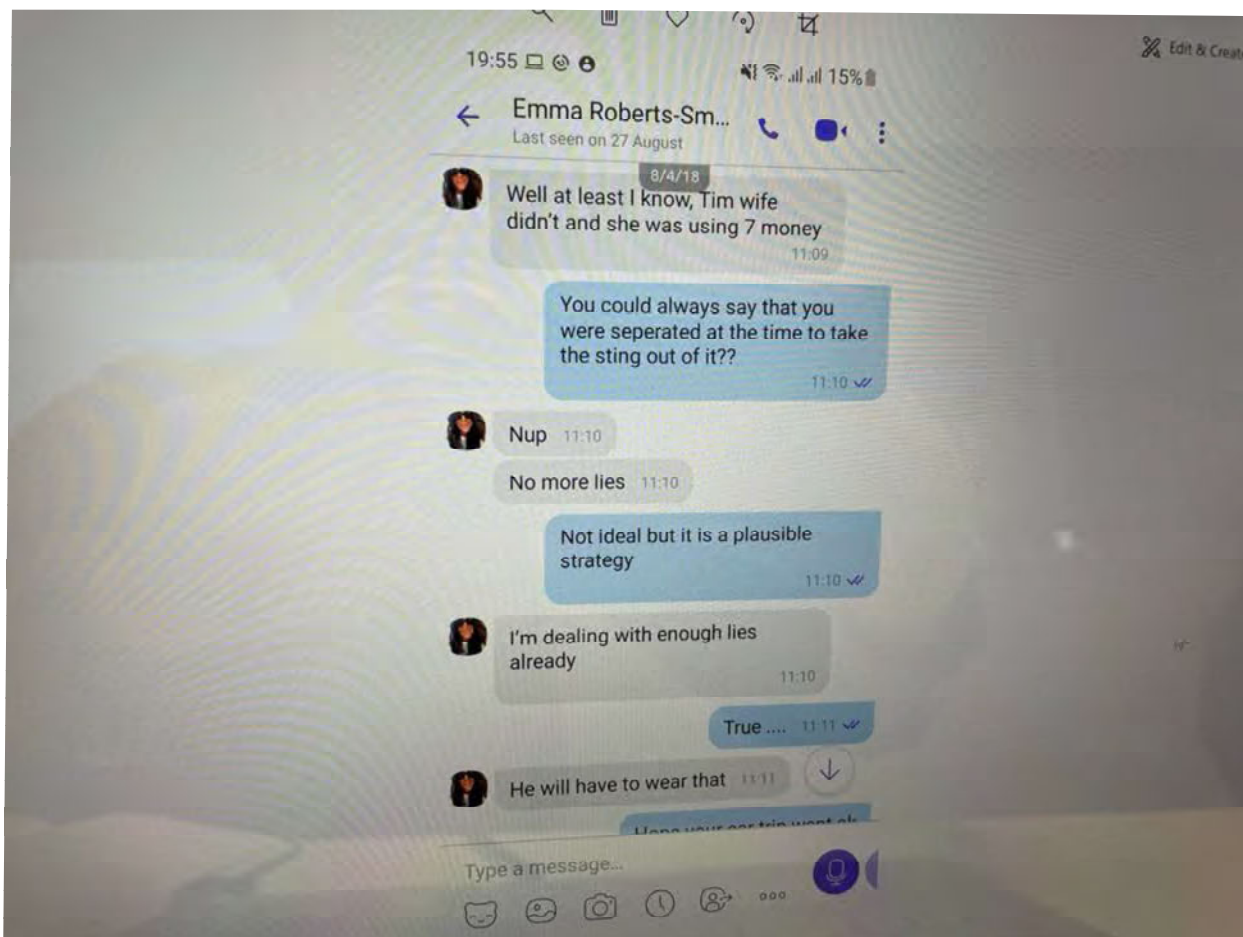


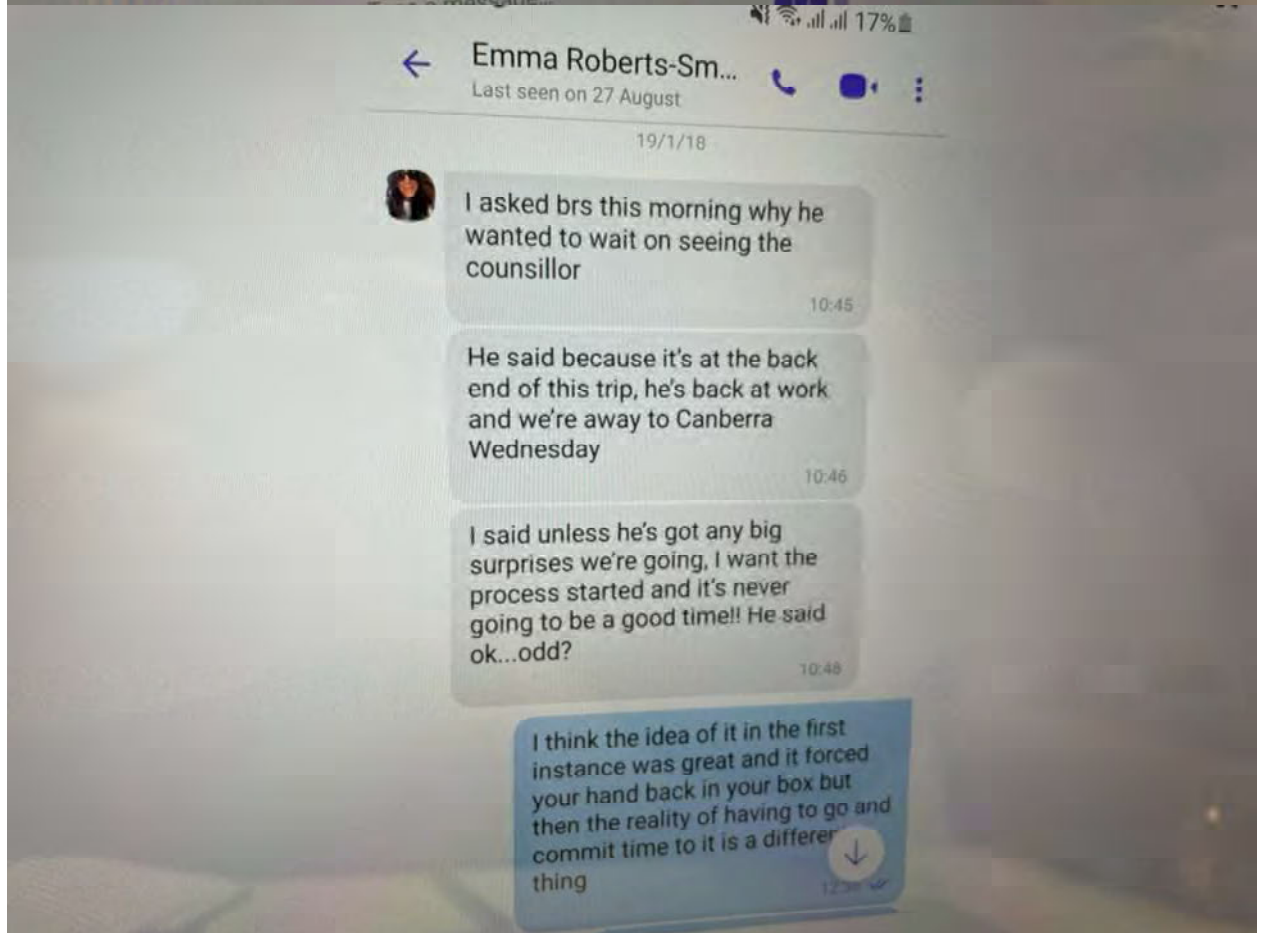
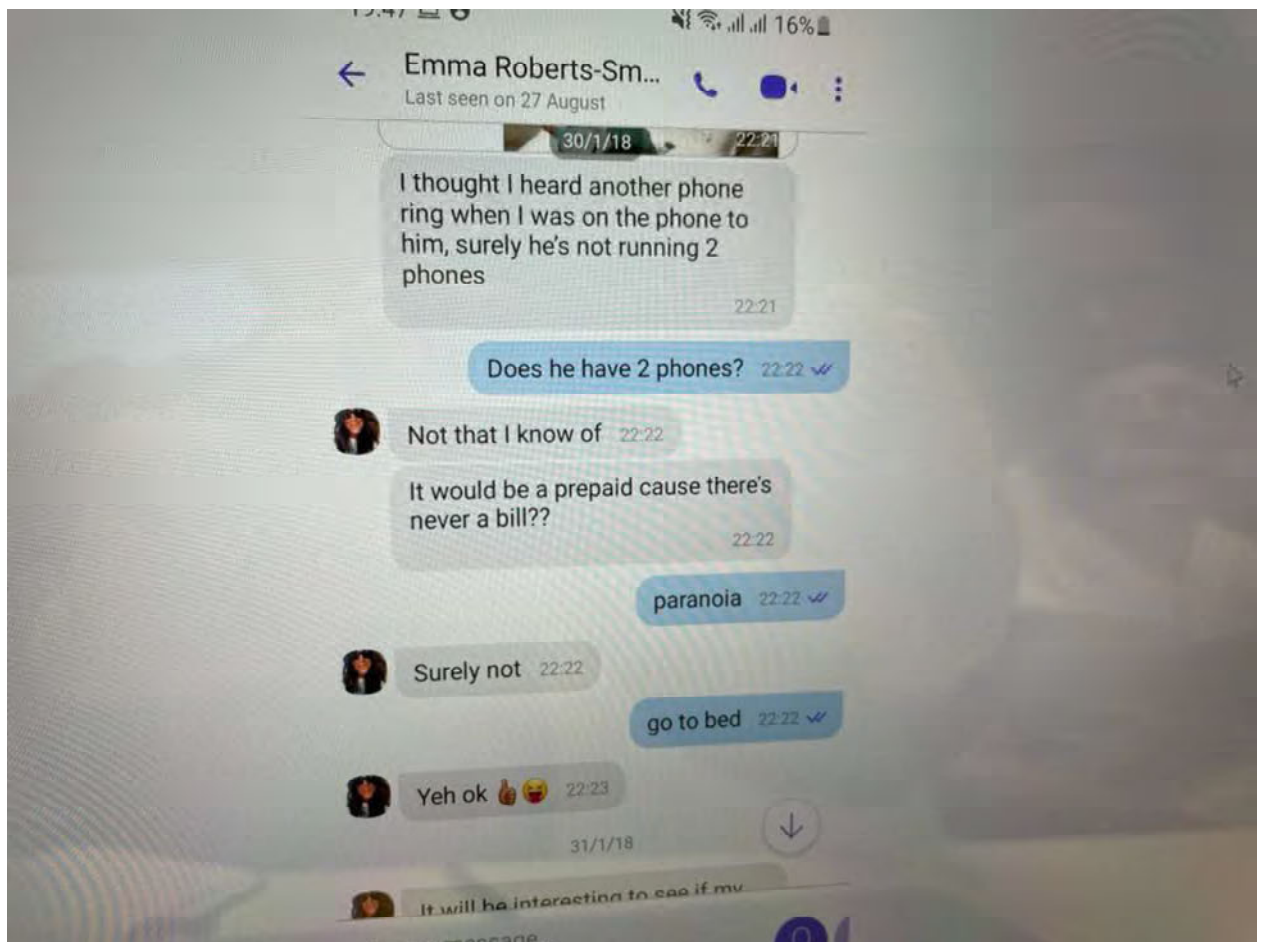


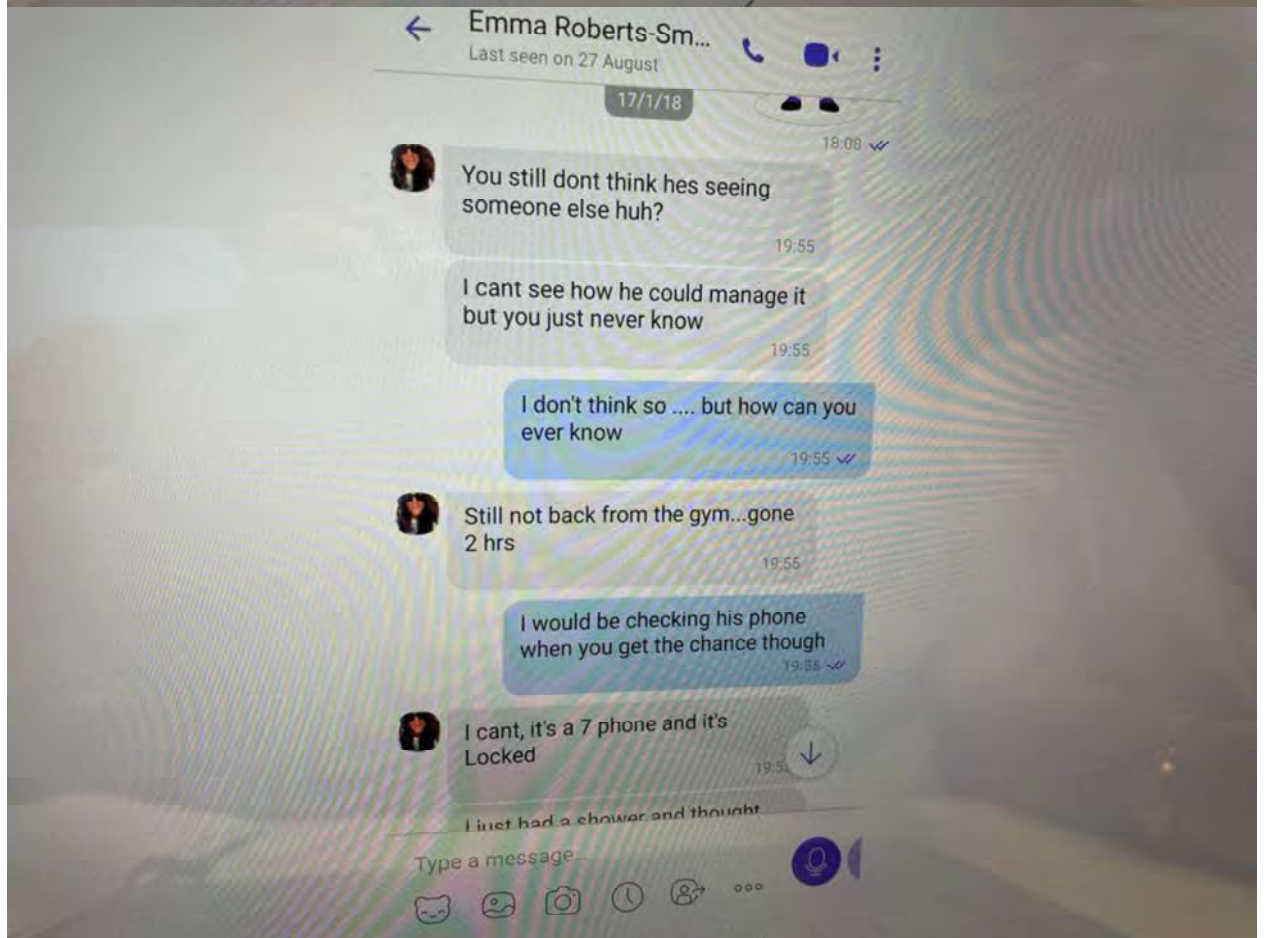
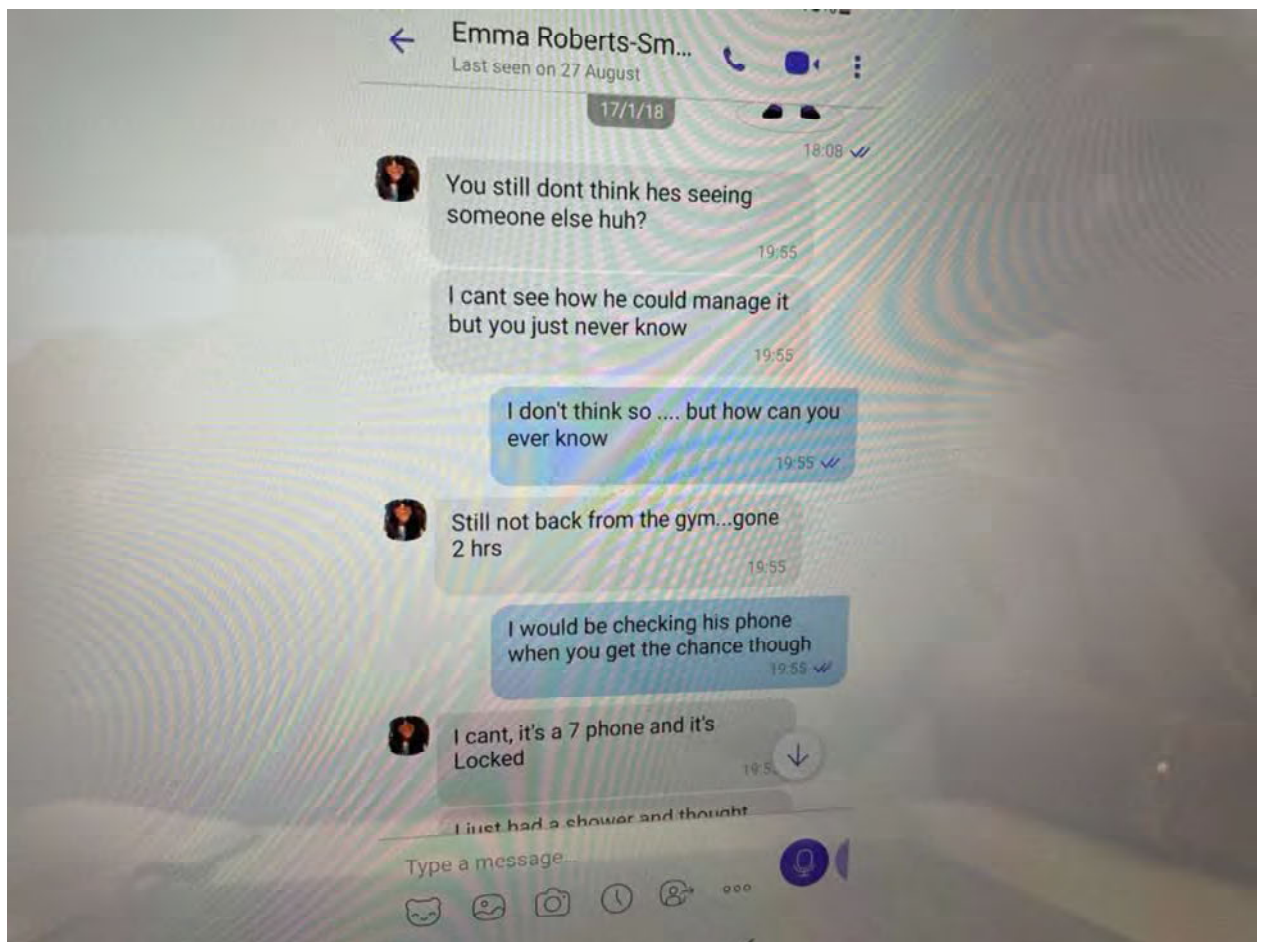


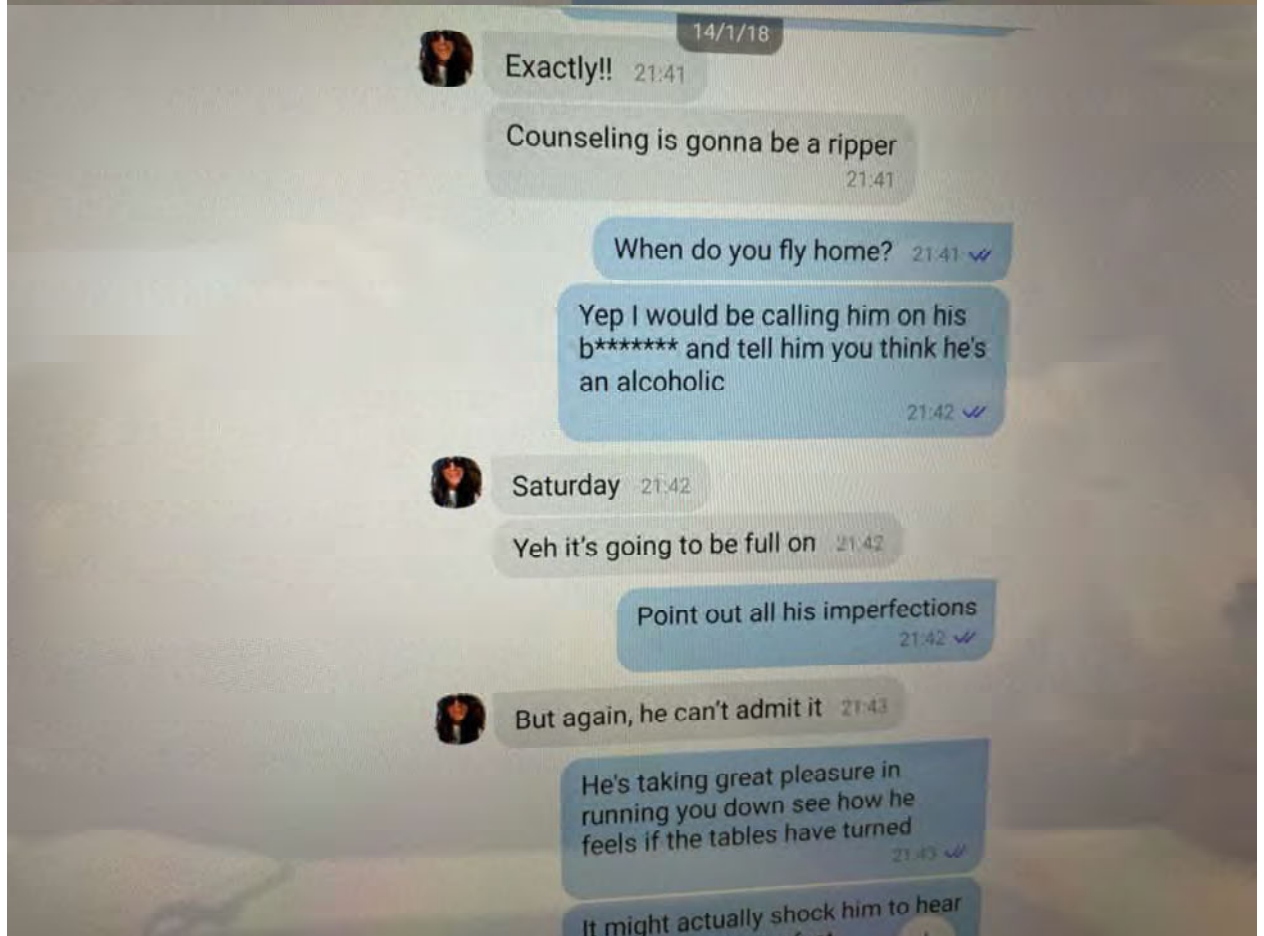
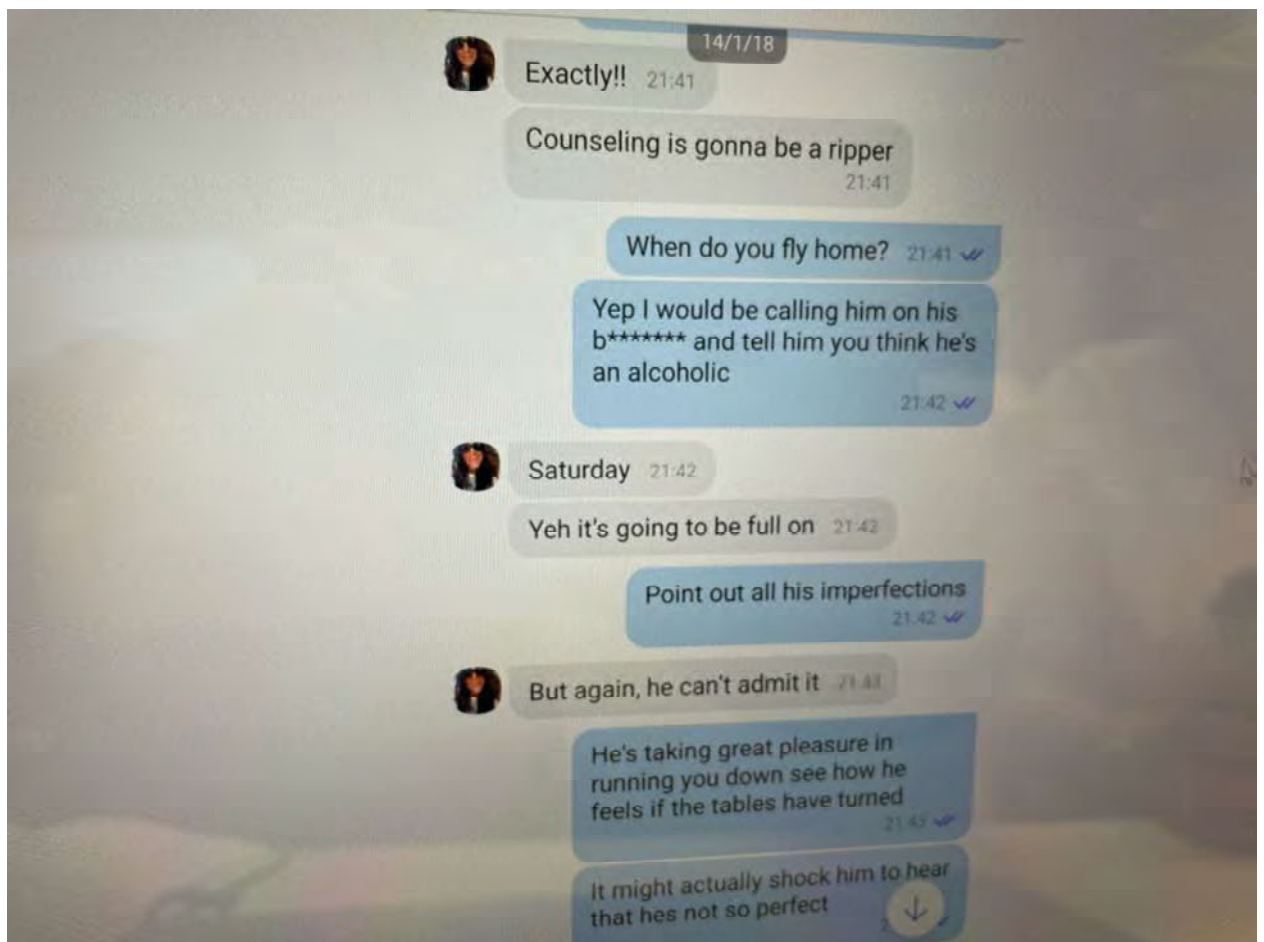


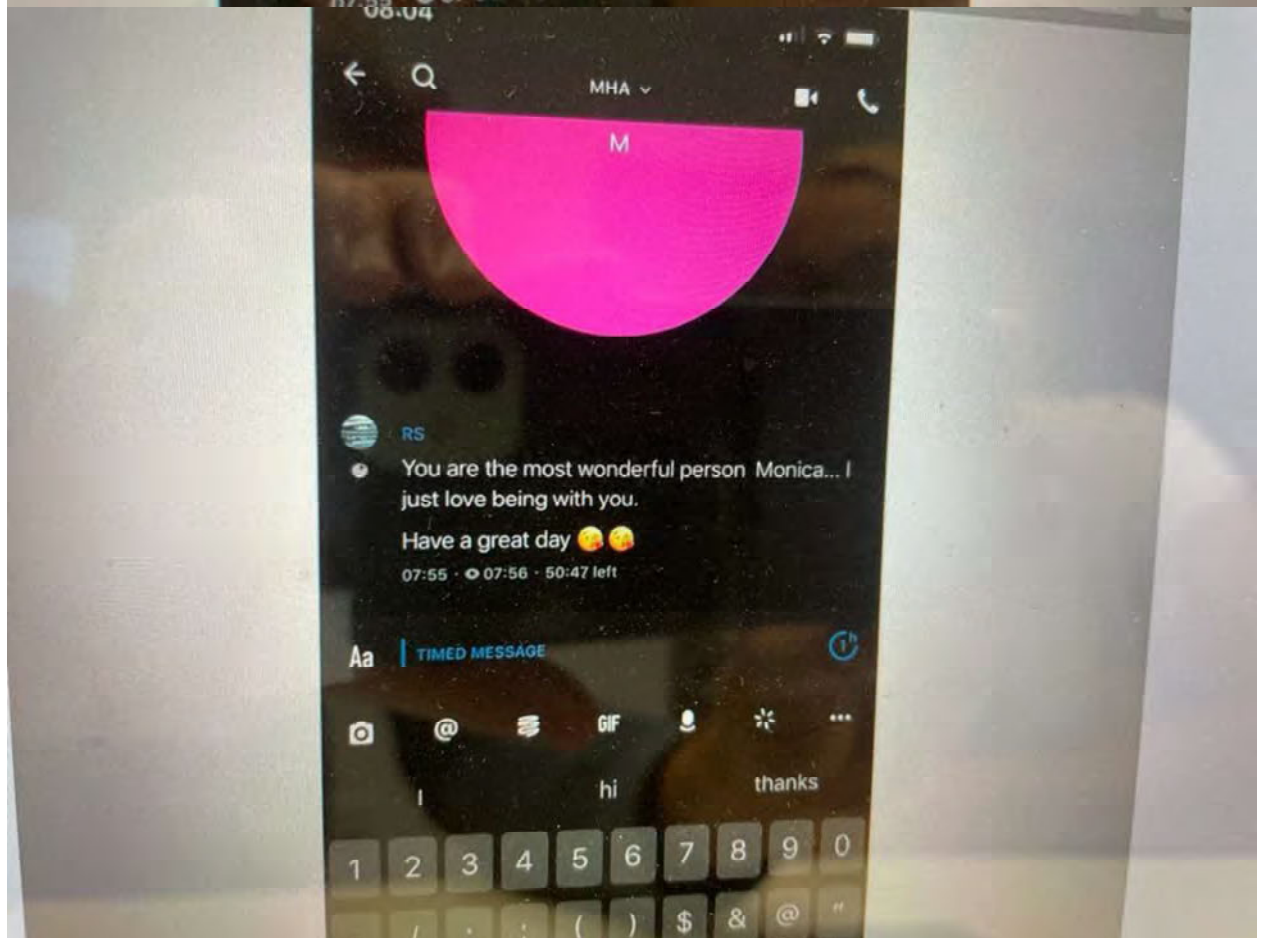
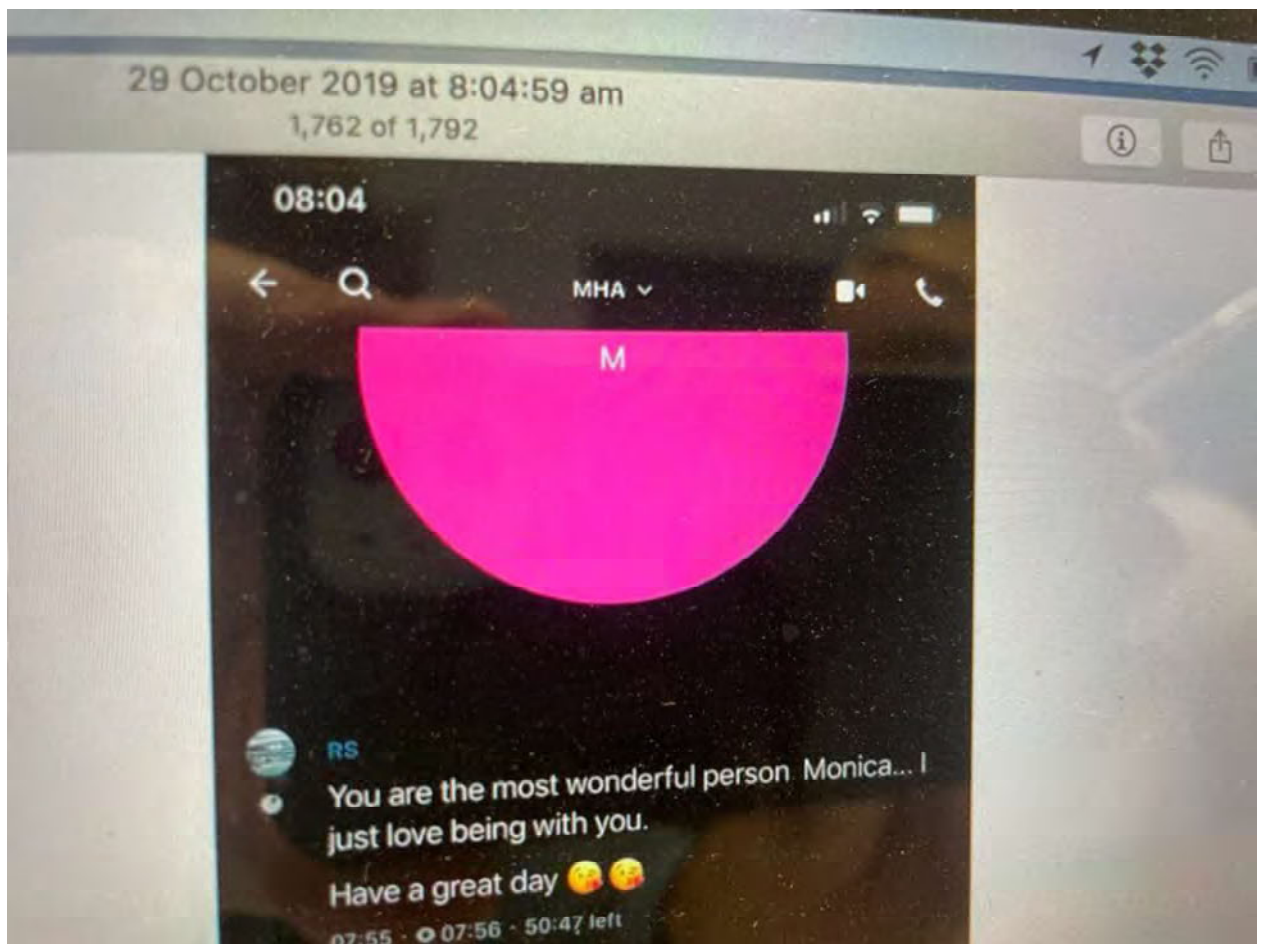


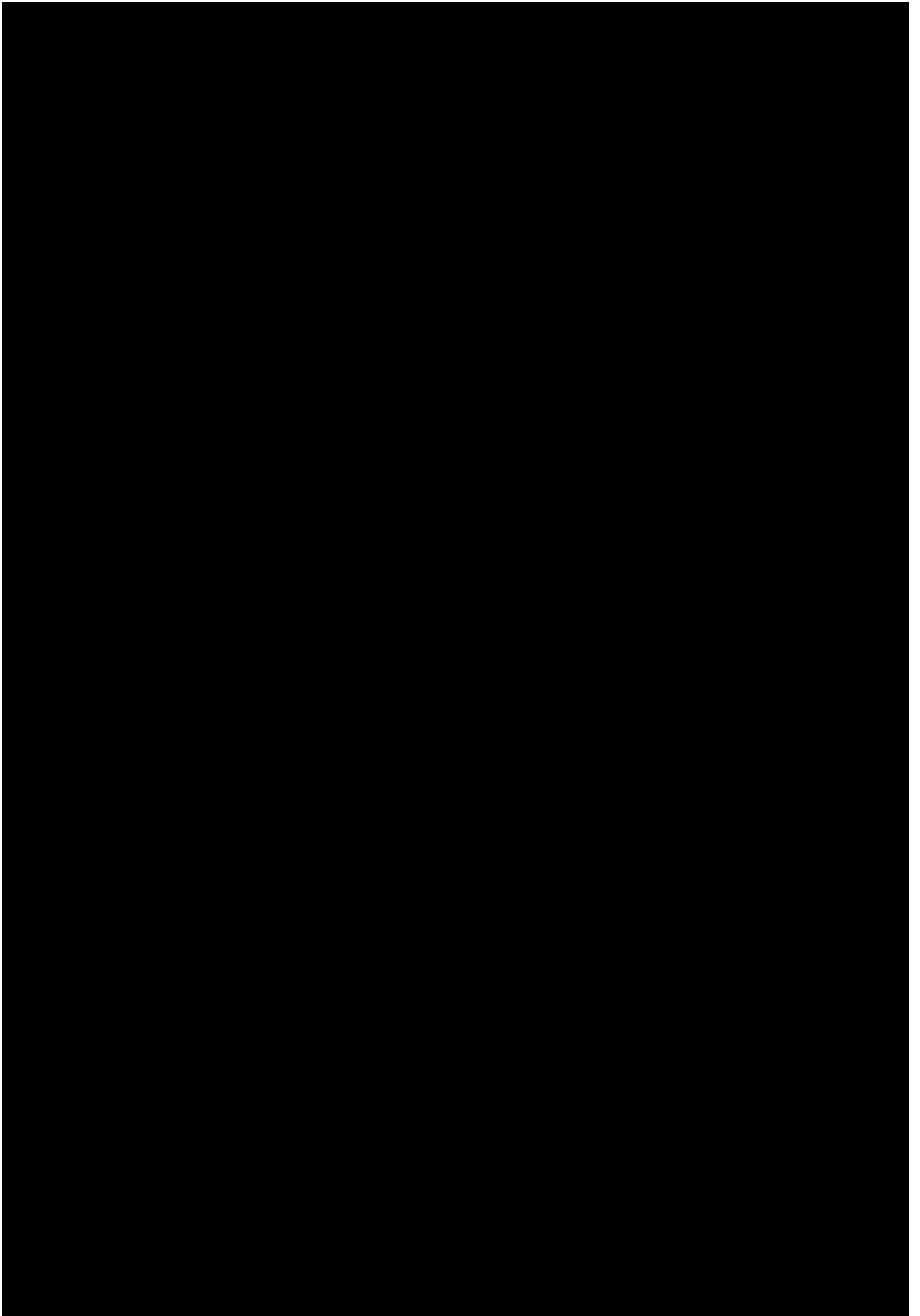


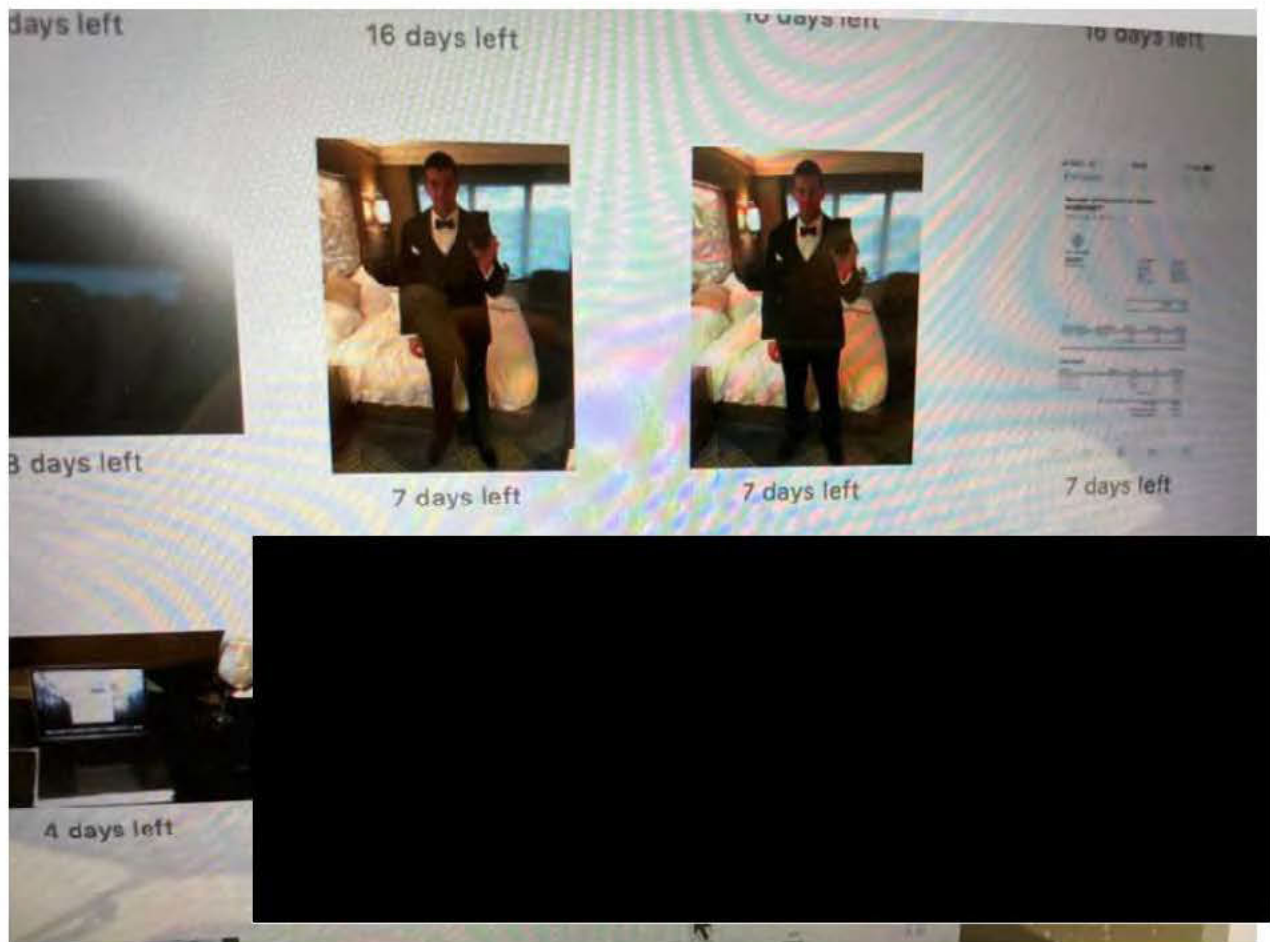


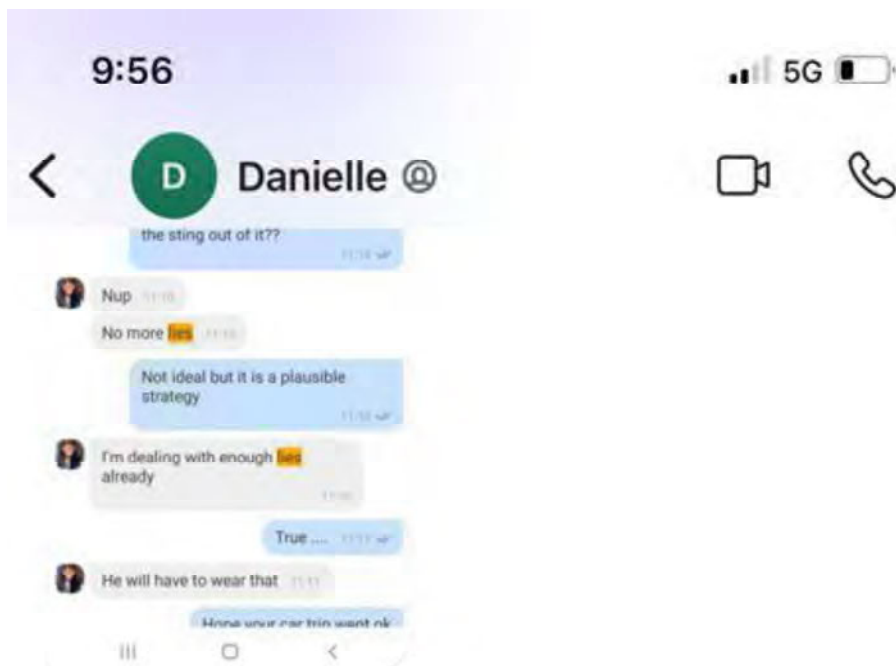












Her turning up at the house!

3m

Wow

3m

Have a look at the date on the last of messages

3m

It confirms it

2m

It was after that he threatened her she would lose everything including the kids unless she lies

1m

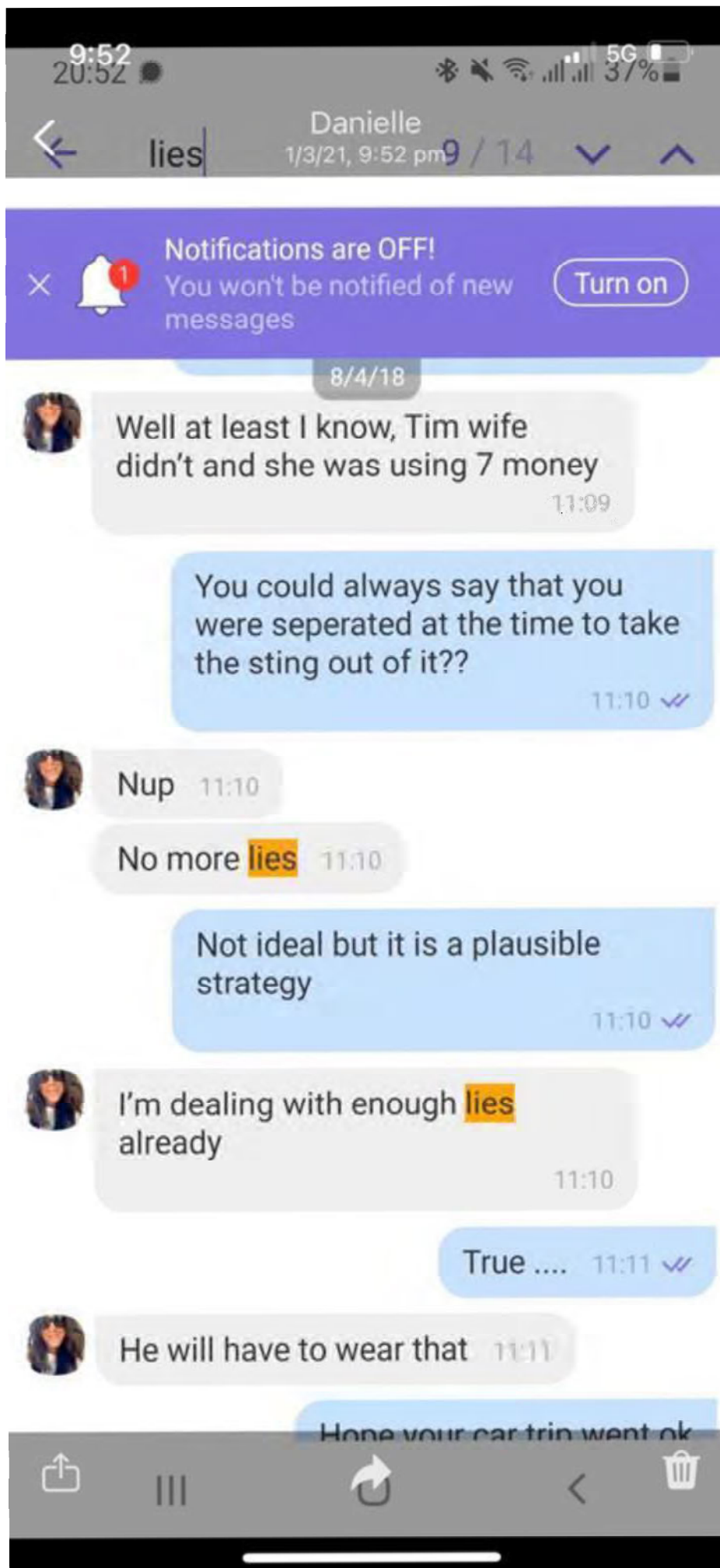
What a horrible man

Now

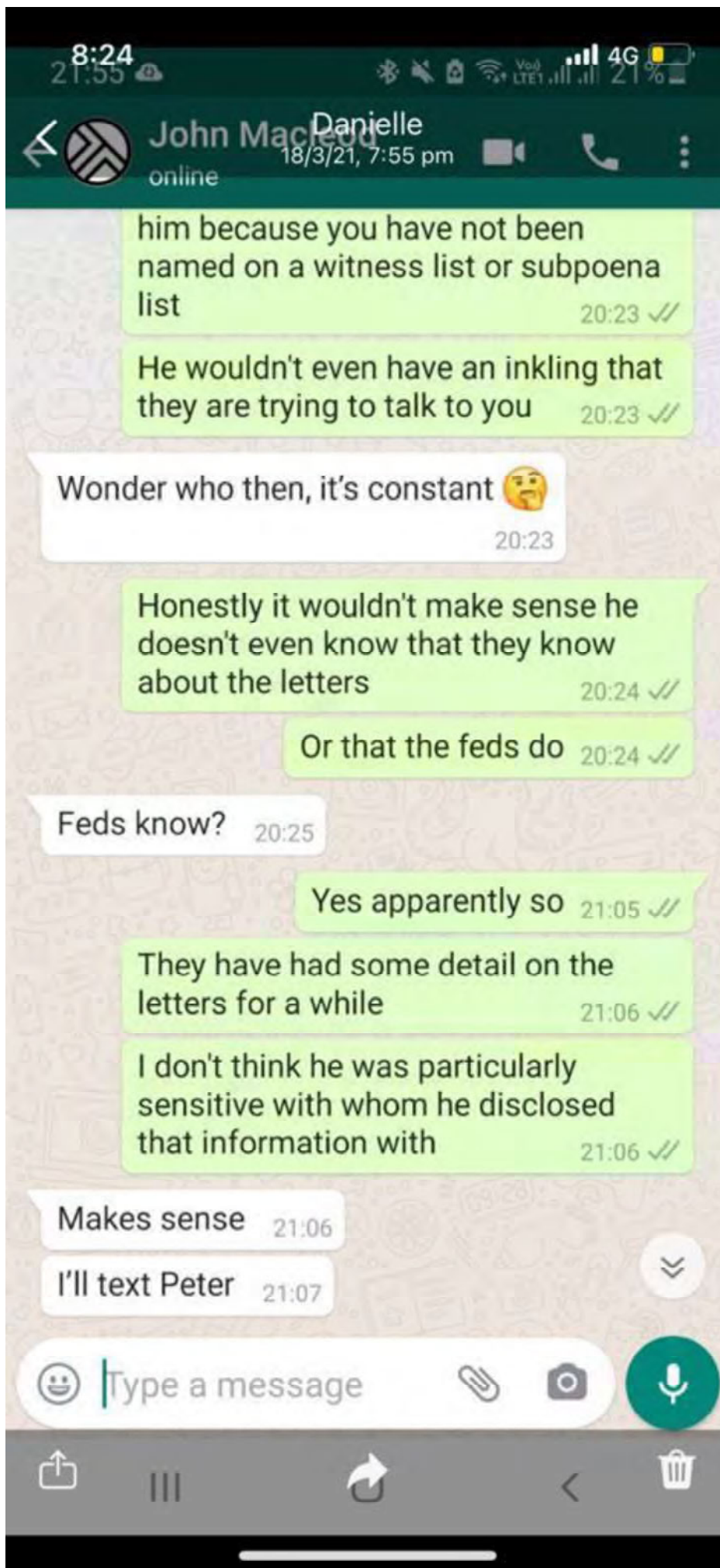


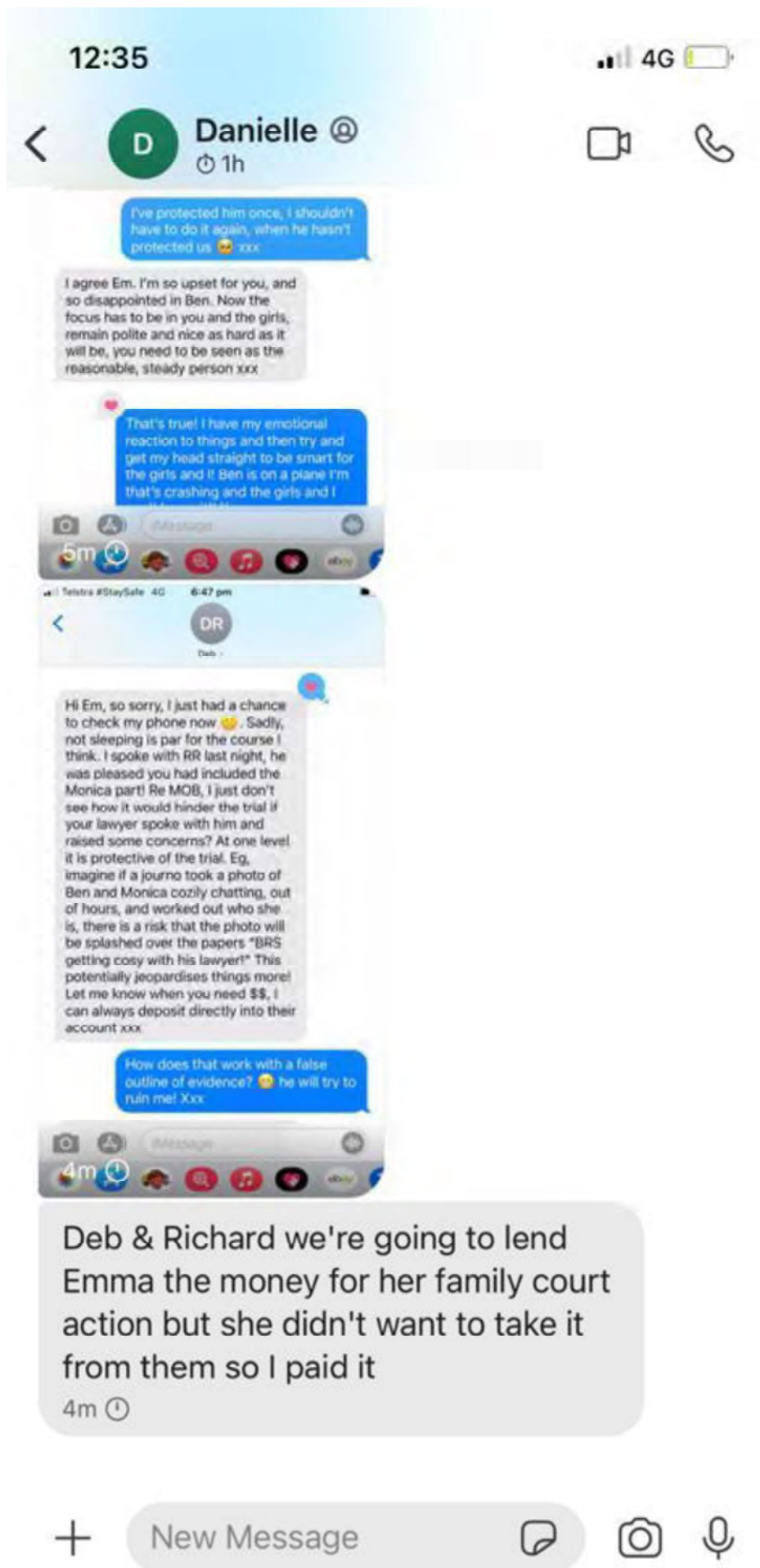
New Message

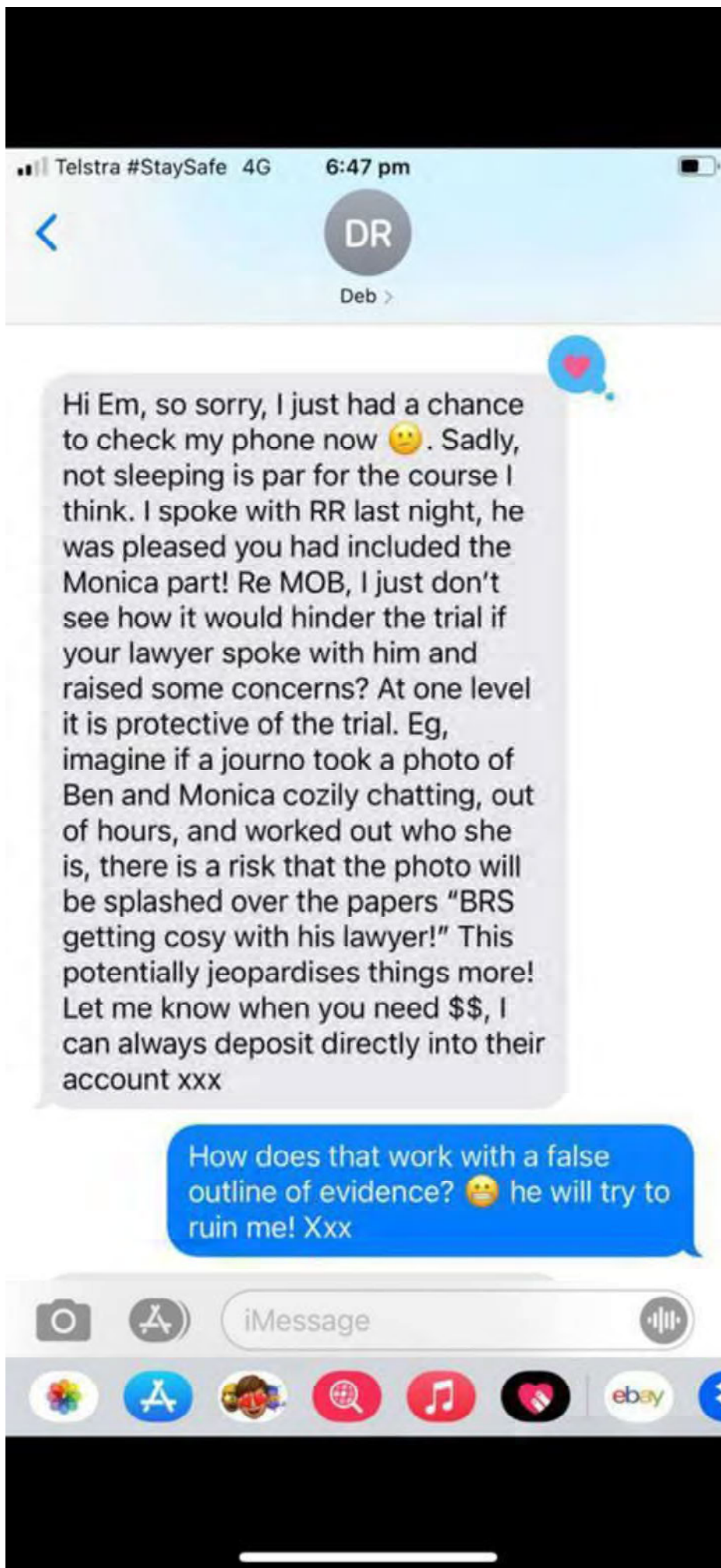


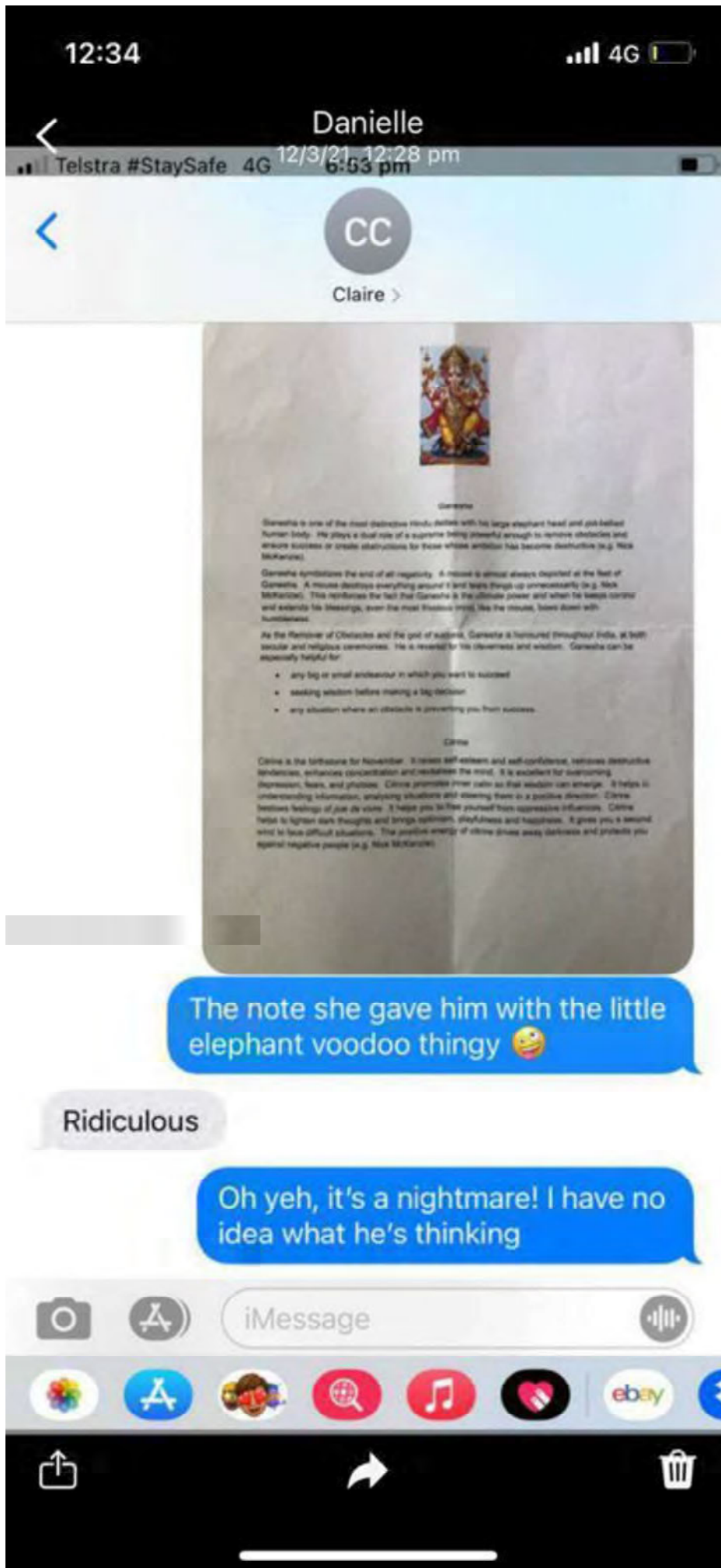










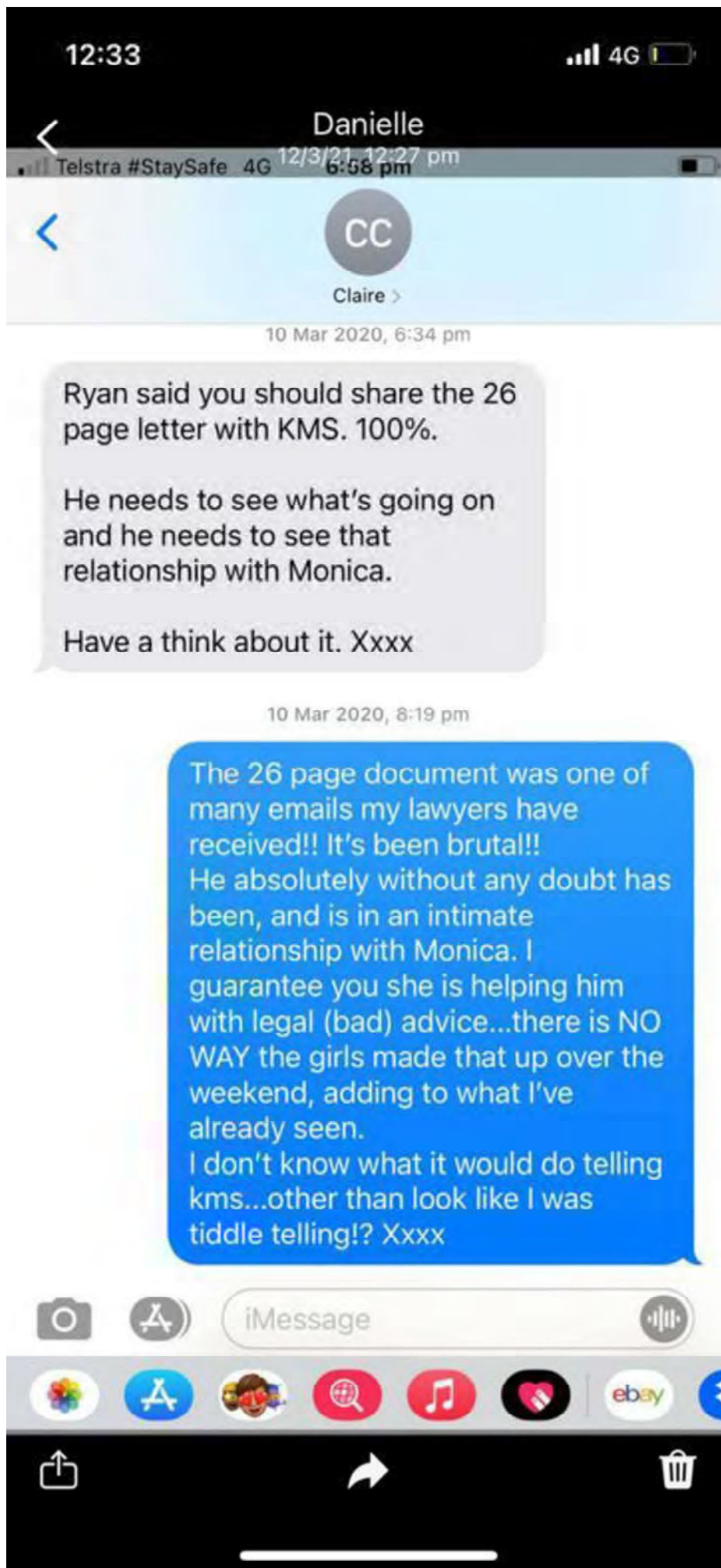


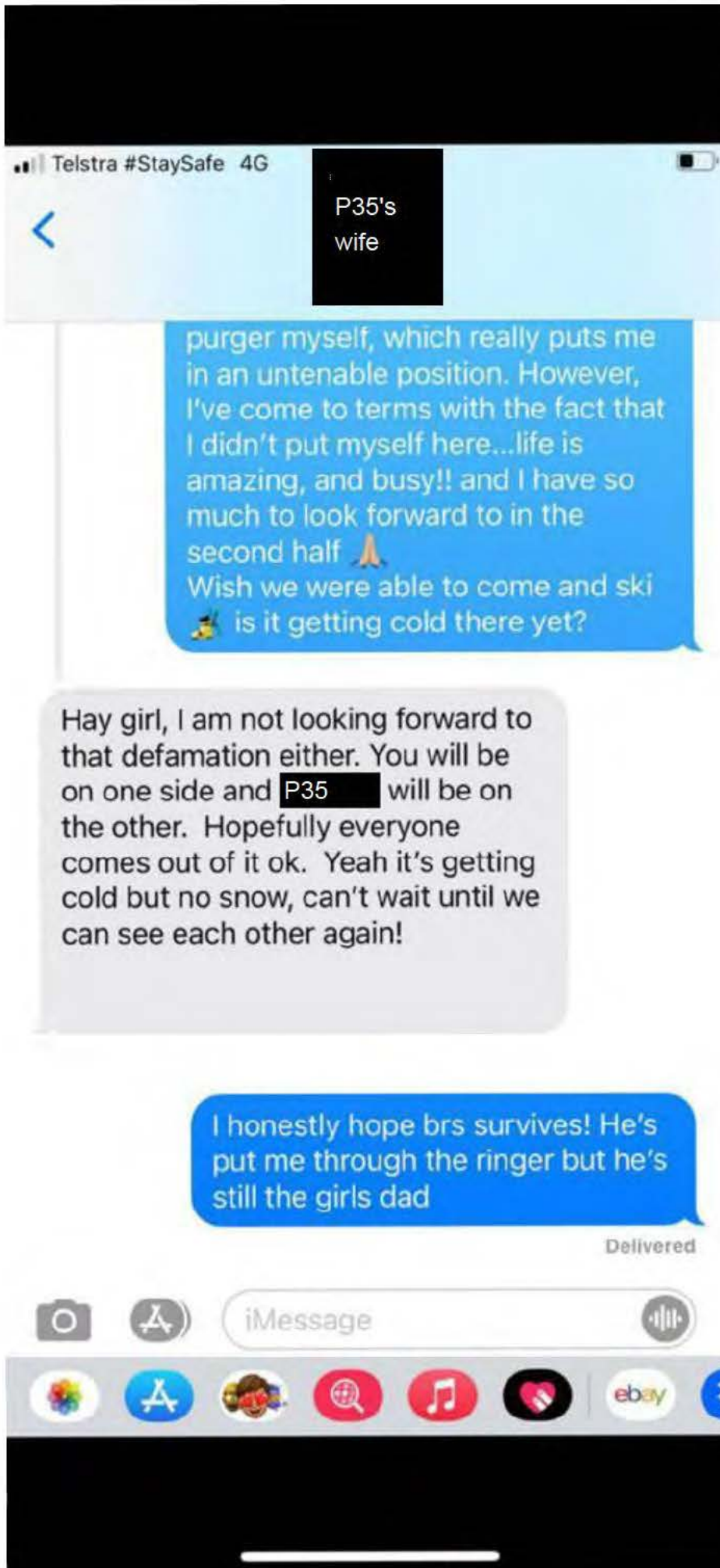
The note she gave him with the little elephant voodoo thingy 🤪

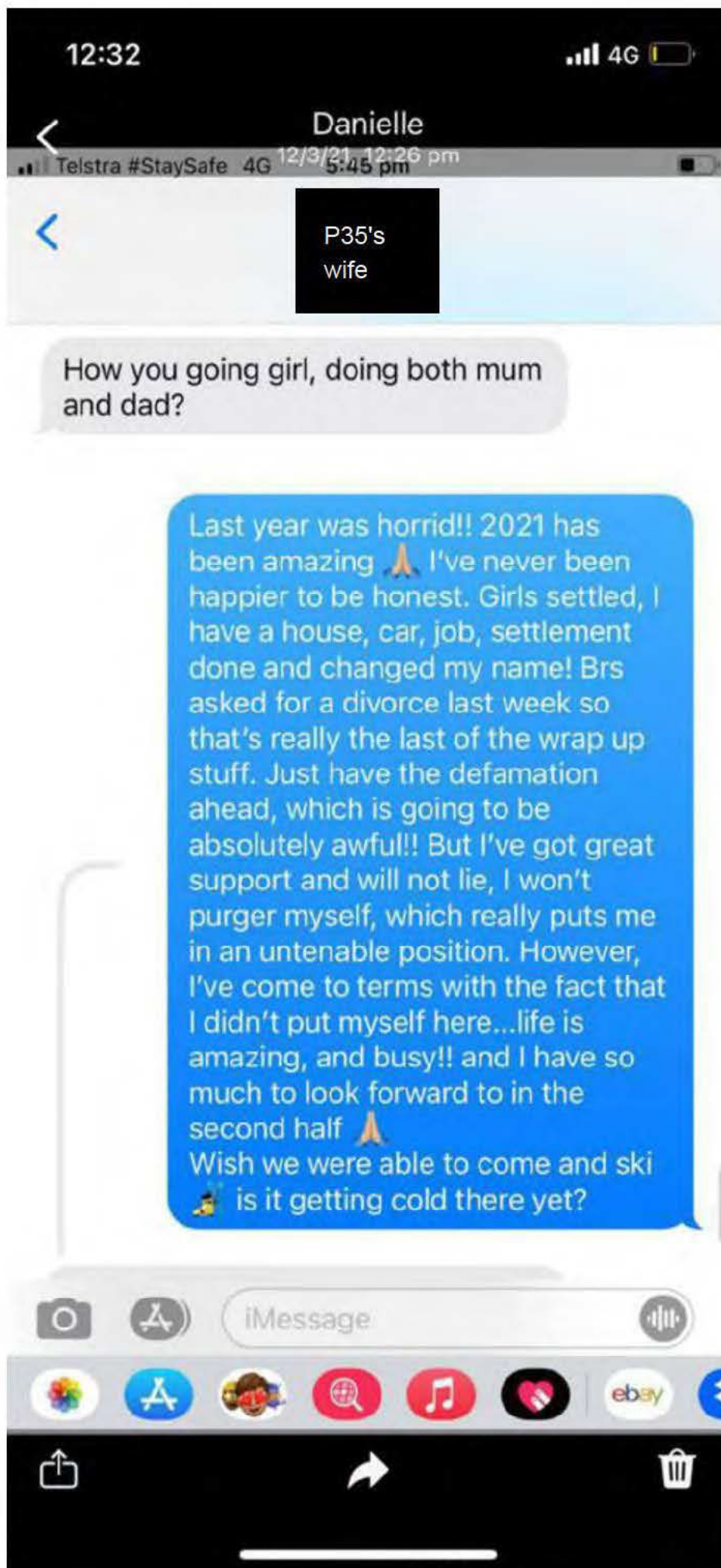
Ridiculous

Oh yeh, it's a nightmare! I have no idea what he's thinking



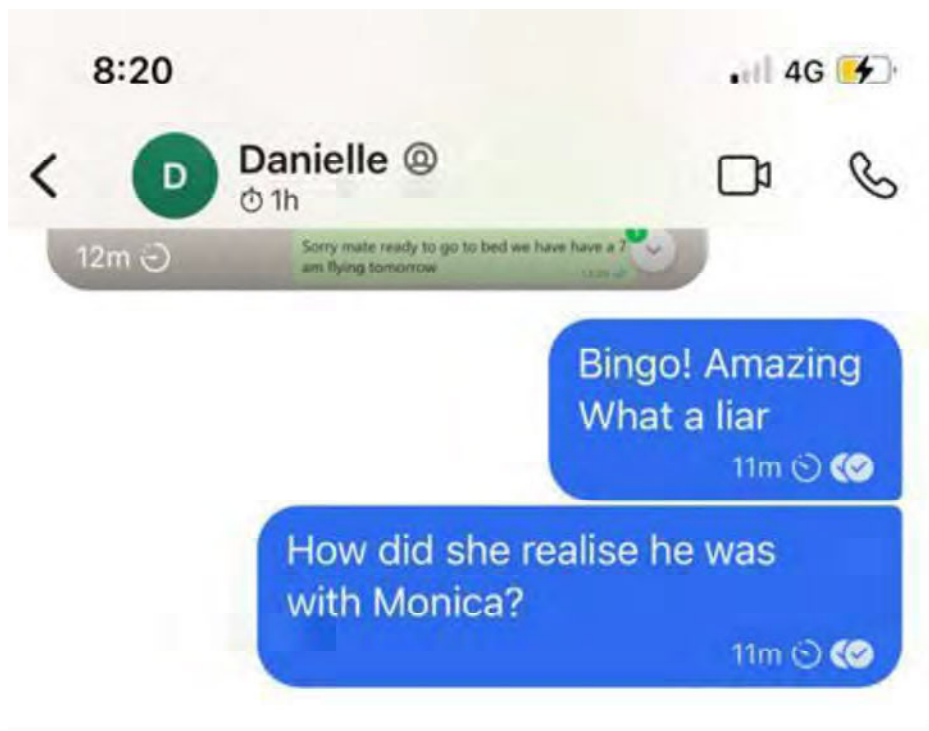




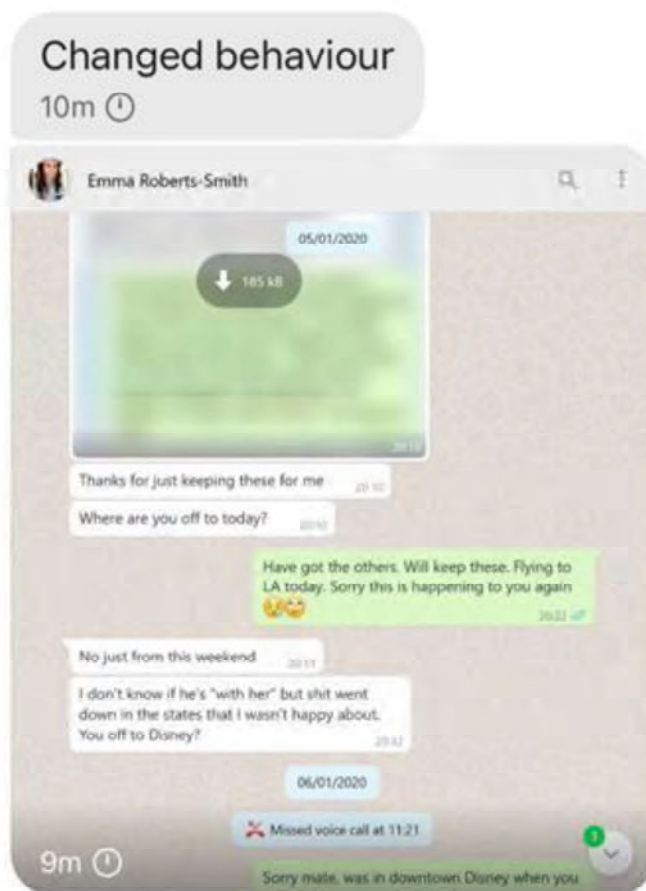


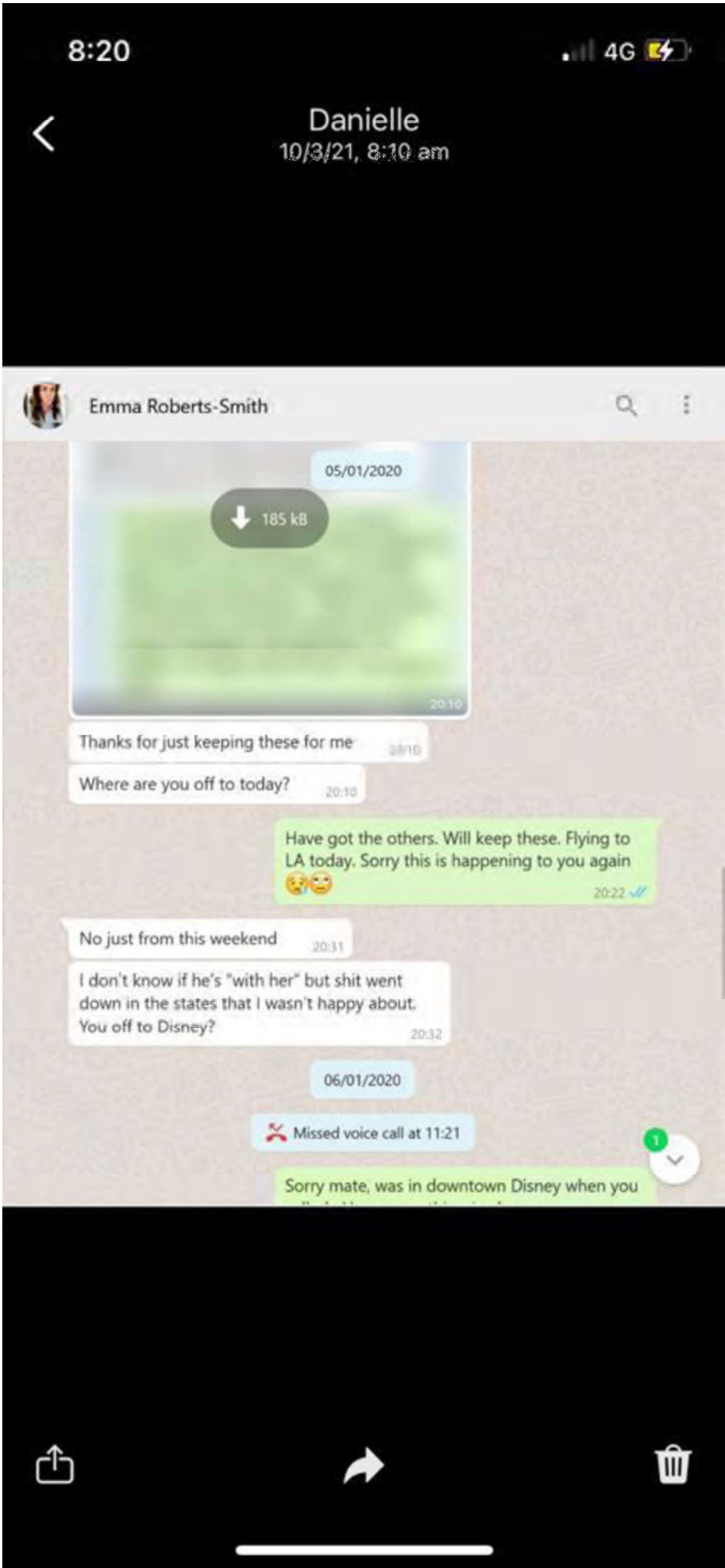
How you going girl, doing both mum and dad?

Last year was horrid!! 2021 has been amazing 🙏 I've never been happier to be honest. Girls settled, I have a house, car, job, settlement done and changed my name! Brs asked for a divorce last week so that's really the last of the wrap up stuff. Just have the defamation ahead, which is going to be absolutely awful!! But I've got great support and will not lie, I won't purger myself, which really puts me in an untenable position. However, I've come to terms with the fact that I didn't put myself here...life is amazing, and busy!! and I have so much to look forward to in the second half 🙏 Wish we were able to come and ski 🏂 is it getting cold there yet?



New Messages





8:06

4G



Danielle
10/3/21, 8:04 am

The following order #4700117728 has been processed and the Points have been deducted from your Velocity Frequent Flyer account.

Your order number is: **#4700117728** (placed on 30 March 2020 1:04:59 PM AEDT)

Contact details

BENJAMIN ROBERTS-SMITH
U 1305 9 Christie St
SOUTH BRISBANE, QLD, 4101
Australia
T: 0467774635

Delivery address

BENJAMIN ROBERTS-SMITH
206/50 MacLeay Street
Elizabeth Bay, New South Wales, 2011
Australia
T: 0467774635

Item	SKU	Qty	Points	Pay
Apple - AirPods with Charging Case - White	MV7NZZAA	1	46,891 Points	
Partner contact details: twinkl@monobase.com				
Grand total			46,891 Points	

Have you ordered a gift card?

If you have ordered a physical gift card you will receive it from the merchant within 14 working days.

Have you ordered a physical product?

If you have ordered a physical product you will soon receive it from the merchant. Please check the time it takes for each merchant to process orders.



6:19

4G



Danielle @

1h



I remember now he was really nervous about the coffee dates and thought the AFP was coming

1h

So that is when he buried?

38m

Why bury the invoices?

38m

Or is that because he put other things on that particular USB?

38m

Yeah I think so ...

30m

I have never looked into it however I wouldn't be surprised if he over inflated his income for the claim against you for loss of earnings

29m

It would probably be worth somebody having a look through those invoices and totally manually

29m

I will do it myself.

Now



New Message





5:39



<  **Danielle** @
🕒 1h



It looks like that is when he has
copied the RS group invoices onto the
stick and buried it

39m 🕒

I think that was in response to an
AFP story

39m 🕒



Bingo!

27m 🕒

I remember now he was really
nervous about the coffee dates and
thought the AFP was coming

26m 🕒



New Message



5:39



Danielle @

1h



New Messages

Have a look at what stories you ran around the 27th of July 2019

40m ⓘ

It looks like that is when he has copied the RS group invoices onto the stick and buried it

39m ⓘ

I think that was in response to an AFP story

39m ⓘ



Bingo!



New Message





13:11

67%



Search

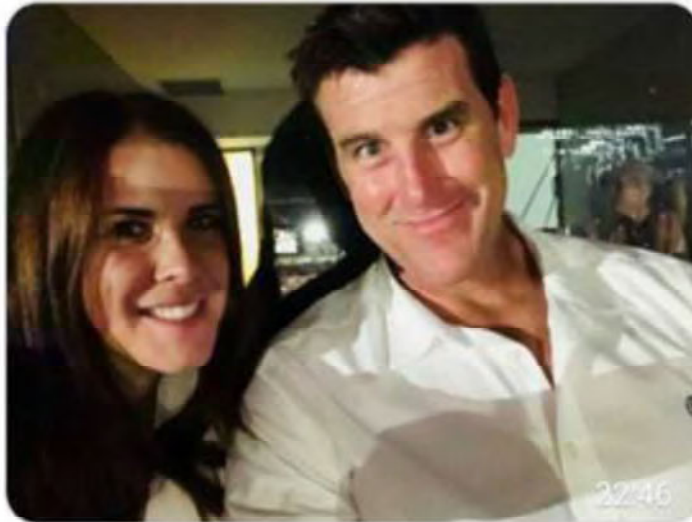
1 / 3



6/11/18

He's been like a zombie for about a week

22:46



22:46

7/11/18

Oh that's not good mate. Sounds like he doesn't have a lot of head space left

6:12 ✓✓



Nope! Bring on Xmas 9:04

Yes 😊 I but he still gotta visit the **inq** beforehand

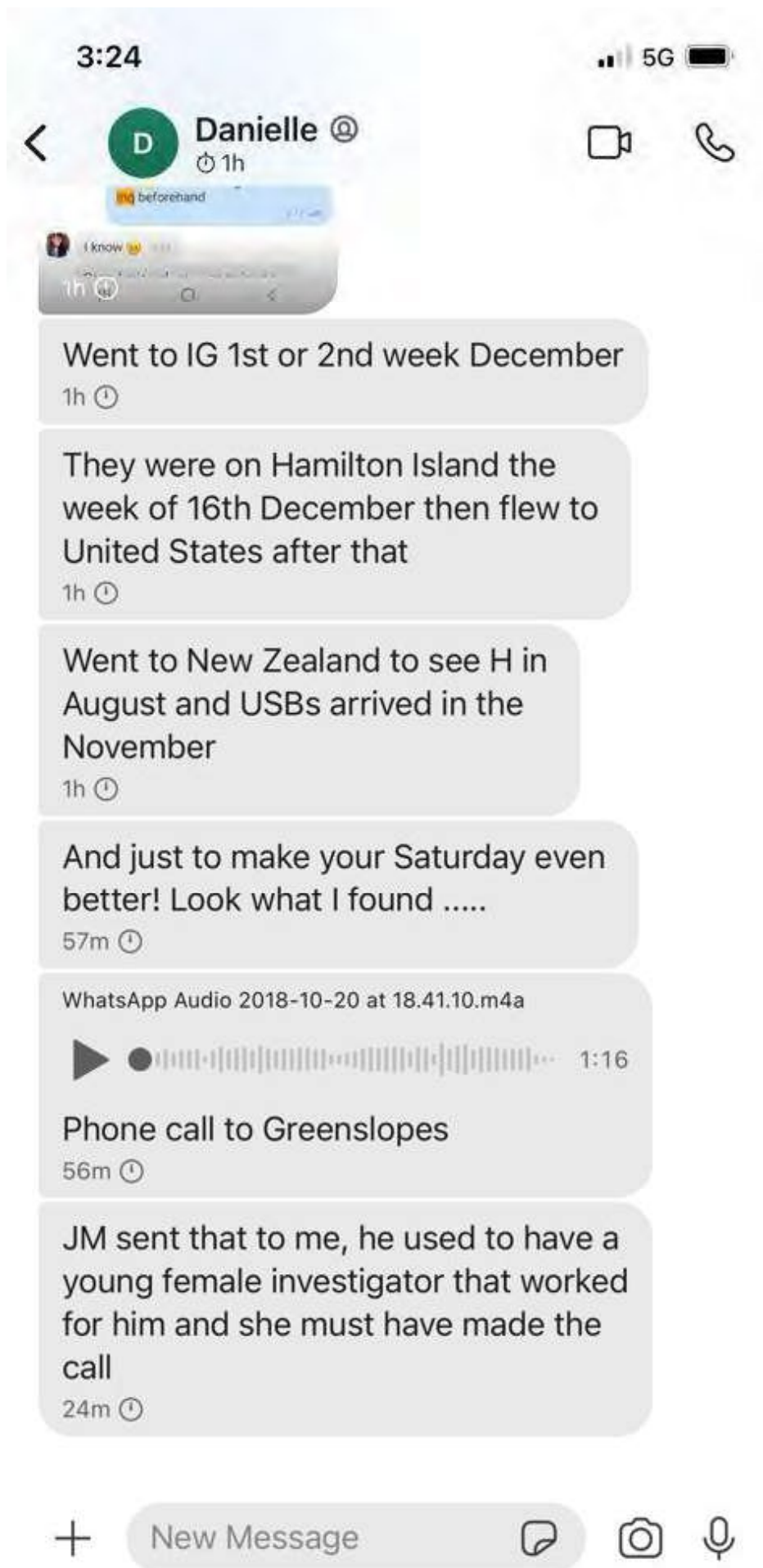
9:17 ✓✓



I know 😞 9:54

Can't believe you're trying to





3:24

5G



New Messages



Went to IG 1st or 2nd week December

1h

They were on Hamilton Island the week of 16th December then flew to United States after that

1h

Went to New Zealand to see H in August and USBs arrived in the November

1h

And just to make your Saturday even



New Message



2



12:10

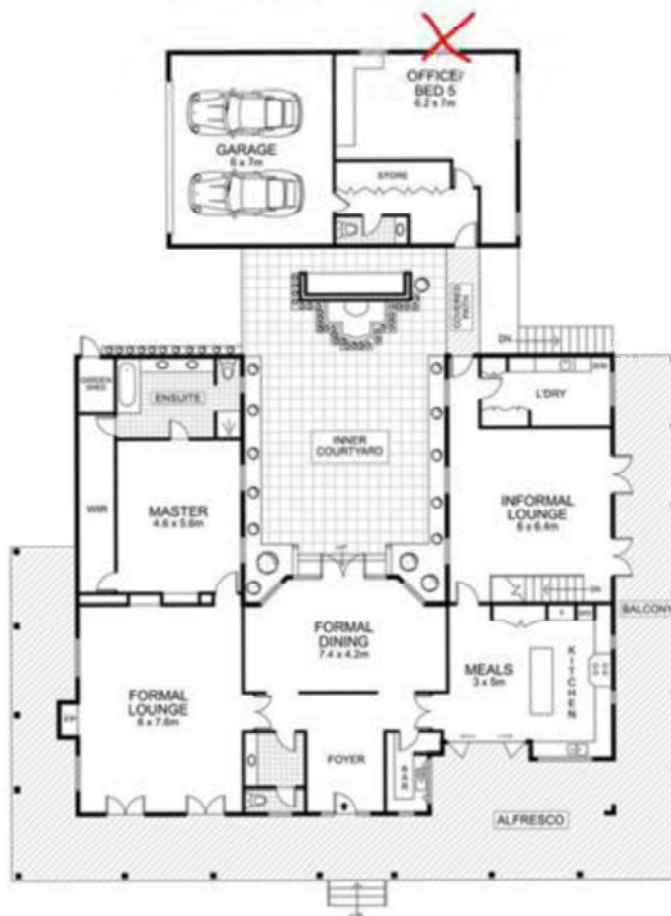
4G



Danielle
6/3/21, 11:58 am



NOT IN POSITION



561 ILKLEY ROAD

ILKLEY

INTERNAL AREA : 403 SQM
GARAGE AREA : 42 SQM
EXTERNAL AREA : 188 SQM
TOTAL AREA : 633 SQM

This floor plan is conceptual only. It is provided for illustrative purposes only and should not be relied upon. We make no guarantee as to the accuracy of this plan. All interested parties should make and rely on their own enquiries in determining the accuracy of the information contained in this floor plan.





From: Nick McKenzie
Sent: Friday 12 March 2021 09:21:10 AM
To: Dean Levitan; Peter Bartlett
Subject: Messages and Intell- prepared for RS litigation

Legally privileged - prepared for litigation- factual analysis.
Hi Dean and Peter

GENERAL (no content from USB or other sources)

- D provided USBs to the federal police in around November 2020.
- In June 2020, RS wrote to ERS by email "Access to Ilkley" saying he needed to come to property to pick up certain items, including his gun.
- Using the pretence of picking up other items, he arrived at the house. He dug them up on 2 or 5 June 2020 (need to check date) and removed them from his house. It is unknown where they were taken. On the 5 June 2020, ERS photographed the site where the USBs were buried. It was under a garden hose holder.
- On 5 June 2020, ERS wrote to D: "maybe he is going to Sydney and knew he had to get the lunch box. Before we sold." D: "yeah most likely". "Who knows what that dodgy cunt thinks." Having seen some of the files, ERS by this stage knew it contained photos and financial records. ERS wrote to D: "I'm still laughing. I don't think it's Rs Group financials... he could get that info from the mutt.... it's got to be the photos. Or he thinks I'm unpredictable. Do I stay poker face?? I think he doesn't think I'm smart enough to go and dig for it."

- ERS also has evidence that RS put a drill through a laptop.

MEETING WITH [REDACTED] AND MONICA ALLEN

- ERS has knowledge that BRS met with [REDACTED] and Monica on December 4 2019 to pass to him documents to help [REDACTED] prepare for his IGADF interview. Must discuss with ERS.

MEETING WITH BRS AND [REDACTED]

- ERS has information that BRS met with [REDACTED] at beach in Perth and spoke to him in the water to ensure he was not wearing a wire. Must discuss with ERS.

LETTERS SENT TO [REDACTED]

- 2 letters were [REDACTED] anonymously In June 2018. The second letter was sent after it was reported in the media that the first letter had been sent and the ADF had called in the AFP to investigate.
- At the time that these letters were sent, RS feared that [REDACTED] would be a witness against him in respect of war crimes matters before the IGADF, AFP and also in connections to matters that RS was intending to sue us over. It is important to note that by early 2018, we had been given legal threats by RS that he would sue us if we reported war crimes issues.
- D has stated that John Mcleod on behalf of RS sent a letter to Perth. JM disclosed to ERS and D at a cafe in Brisbane in February 2020 that he was given the letter and told to send it. JM disclosed that he drove a couple of hours away from RS address to do this. D recalls it was two hours north. However, ERS recalls that it might have been northern NSW.
- ERS has disclosed that BRS told her he also sent a letter to Perth. He purchased the stamps from several different outlets. He printed out the letter at the Channel 7 Maroochydore office. He drove to the Northlakes Post Office to send it.
- It is clearly of interest to our case that [REDACTED] has been threatened by BRS via this means.

- We need to subpoena AFP and Aus Post for relevant materials.

EMAILS SENT TO AFP AND MEDIA TO EFFECT RAID ON [REDACTED]

- In October 2017, a person using a fake email account sent a number of emails to AFP and/or politicians and media alleging that [REDACTED] had unlawfully possessed weapons and was at risk of shooting dead innocent persons in a massacre in Perth. This prompted a WA police raid of [REDACTED]'s home. No weapons were located. The complaint was false. It is an offence to make a false complaint to the AFP.

- The person who sent the emails was Nathan Richter, a QLD photographer. He disclosed that did so on behalf of a person close to an SASR member, namely BRS.

- John McLeod is an associate of Nathan Richter. ERS understands that McLeod introduced BRS to Richter who then sent the emails on behalf of BRS,

- If it can be shown that BRS used suspect means to lodge a false police complaint to intimidate [REDACTED], it would aid our case in multiple ways and also involve a possible criminal offence.

COVER UP OF PERSON 17 AFFAIR- LIE- THREATS TO LIE- ASSAULT OF P17- PREGNANCY- VIDEO SURVEILLANCE- EMAILS FROM BRS TO D ABOUT WRITING THE DK EMAILS- NEW EVIDENCE PROVIDED BY SOURCES

- D has message sent by ERS to D that states that, by 14/1/2018, ERS was seeking counselling and had disclosed that BRS was an alcoholic. ERS by this stage suspected an affair but did not know for sure. On the 17/1/18 ERS asked D "you still don't think he's seeing someone else huh? I cant see how he could manage it but you just never know." Other messages show that ERS was pushing BRS for counselling and that he had said "bad shit" to her. (see messages in January 2018).

- 30/1/18 ERS suspects that BRS has two phones. Message to D: "I thought I heard another phone ring when I was on the phone to him, surely he's not running 2 phones." We know separately from Person 17 that BRS did have multiple burner phones.

-Evidence shows that RS asked ERS to lie to the media and in court proceedings that she was separated from RS at the time of affair with P17 [REDACTED]. (see family court affidavit)

- P17 [REDACTED] arrived at ERS house and revealed affair on 6 April 2018.

- on 8/4/18 - Post the discovery, ERS states in message to D that "well at least i Know, Tim wife didn't and she was using 7 money" in reference to Tim Worner Channel 7 affair. In this message strand, D suggests that ERS could "always say that you were separated at the time to take the sting out of it." ERS replies: "Nup. No more lies.... I'm dealing with enough lies already... he will have to wear that."

- on 8/4/18, after P17 [REDACTED] visit, ERS wrote to D: "I kind of want KS to privately know in case but then it wont look good if he knows and she doesn't do anything. I feel sick that she might be pregnant. I don't think I could deal with a step kid."

- ERS writes to D "I happened to ask if she ever flew with him places and he said last year yes, that hurt again. I said I need to know where my husband was for six months, because he wasn't with me. he's told me how badly he's fucked up and how he's ruined what we had." Messages also mention how he is trying to repair relationship.

- 22 APRIL 2018, BRS writes to dscott@bigpond.com, subject is "gmail", and the email is signed "regards BRS". But in the email, BRS has composed the email that "Danielle Kennedy" would send P17 [REDACTED]. So this shows that RS did write the DK emails. "P17 [REDACTED], My

name is danielle Kennedy and I represent Mr and Mrs Roberst-Smith... [see file to see text]... Danielle."

- 24 April 2018, BRS again emails dscott@bigpond, sujet is "2nd letter". "Hi Dan, as discussed; P17, Danielle Kennedy." Happy for you to amend if required. BRS."

-on 26/4/18 - messages show the affair was discovered by ERS when ERS and RS were actually together. Messages to D from ERS states that ERS was shocked to discover affair : (messages 26/4/18: "I honestly don't think anything else can shock me", "I'd imagine personally I've had the worst of it actually finding out"; "But that's the reality of having an affair with a profile.")

- D has disclosed that E was warned by RS to lie about affair or else she would lose kids, lose everything. (This needs to be checked with ERS.)

- D has photos discovered in BRS trash can of 17 in bed with icepack on her head. I believe these have been discovered.

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MESSAGES FROM KERRY STOKES TO BRS AND ERS

- D has this message from KS to ERS and BRS sent Dec 18, 2019. "Ben glad you guys are there and teh snow is good. Don't worry about any of the rubbish back home. They are on the run !! Stay safe and Happy. Kerry."

- D has message from ERS to KS. Appears this may be after discover of Monica affair. "Hi Kerry, I was wondering if there was a convenient time I could please call you in confidence? It's not urgent. Emma."

MULTIPLE PHONES- FAILURE TO DISCOVER PHONE RECORDS- EXISTENCE OF PHONES

- We know from DRS that as he was preparing to launch litigation/after he launched litigation against us, he purchased four phones in Danielle's name or her husband's name to communicate to persons without trace.

Nick

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Investigative Journalist

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From: Nick McKenzie
Sent: Monday 22 March 2021 11:47:12 AM
To: Dean Levitan; Peter Bartlett
Subject: Over view of USB -prepared for RS litigation

Legally privileged - prepared for litigation- factual analysis.

Hi Dean,

Here is my factual analysis. Draft.

Nick

RECEIVING MULTIPLE USBs- BURYING USBs IN BACK YARD- IGADF
OBLIGATIONS- AFP ISSUES- DISCOVERY ISSUES- DRILLING A LAPTOP

- D is adamant (150 % sure) that RS sought USBs from his SASR mates prior to his first visit to IGADF in around Early Dec 2018. D says that RS was sweating on the arrival of these USBs. Once he got them, he selected certain images to pass to the IGADF.
- RS provided only 17 images to IGADF. The IGADF process involves persons most likely stating on oath that the documents/images they have provided subject to order represents the total in their possession.
- D believes that RS buried the USBs in mid 2019 fearing they would be discovered if the AFP raided his house. (It was around the 27th of July when he copied the financial files onto the USB, on 31 July MOB sent RS an email about the Mick Keelty issue and that authorities wish to speak to him about misconduct involving a senior AFP officer).
- USBs were buried in a lunchbox. ERS was aware he had buried something but thought it was money or something else. It was buried under garden house holder behind the office/BED 5.
- On 16 March 2020, ERS and D dug them up and copied them. They then returned them to the lunch box and buried it again.
- D provided the USBs to the federal police in around November 2020.
- In June 2020, RS wrote to ERS by email "Access to Ilkley" saying he needed to come to property to pick up certain items, including his gun.
- Using the pretence of picking up other items, he arrived at the house. He dug them up on 2 or 5 June 2020 (need to check date) and removed them from his house. It is unknown where they were taken. On the 5 June 2020, ERS photographed the site where the USBs were buried. It was under a garden hose holder.
- On 5 June 2020, ERS wrote to D: "maybe he is going to Sydney and knew he had to get the lunch box. Before we sold." D: "yeah most likely". "Who knows what that dodgy cunt thinks." Having seen some of the files, ERS by this stage knew it contained photos and financial records. ERS wrote to D: "I'm still laughing. I don't think it's Rs Group financials... he could get that info from the mutt.... it's got to be the photos. Or he thinks I'm unpredictable. Do I stay poker face?? I think he doesn't think I'm smart enough to go and dig for it."
- There was 5 USBs in the lunchbox.
- Early analysis of the USBs suggests the below images, documents, etc are relevant to our case. Those underlined should have been disclosed.
- They contain a variety of operational photos from Rotation 9 (2019), Rotation 12 (2010), and Rotation 18 (2012).
- "New folder"- "USB Drive"This folder also contains dozens of photos of persons drinking the boot at the Fat Lady's Arms in 2009. They include persons named in our case. They include BRS posing with the boot.

-Toshiba USB: - 2009- contains several images of Whiskey 108 operation. P4120015, P4120014, P4120016. The metadata of these photos shows they were taken on 12/4/009. However, the metadata of at least on the these pics shows that they were modified on 13/6/2018.

-Toshiba: - "New folder"- "USB Drive" 2010- has two photos of the generator room operation. P5140202, 203. Dated 14.05.2010.

-Toshiba- 2012- contains 2 picks of Person 93 bleeding incident 11 October 2012 (586, 584), two pics of Sola incident 31 August 2012 P3810176, P8310180, 3 Pics of Tezac 2, 20 Sep 2012 PSCNO374, IMG0021, IMG0018) 12 October Chenartu (P14 incident) DSCN0474, 478, IMG0554, PA120330, 335. 20 October Operation (P66 Incident) video DSCN0764, DSCN0510, DSC0511, 512.

- VERBATIM USB Contains the video of P17 being surveilled by ex cop John McLeod on BRS orders. Metadata dated 3/6/2018.

- VERBATIM USB Contains two Defence Department (likely classified) reports ON WHISKEY 108 OPERATION IN 2009. JTACT MISRERW0108 F-18. This was altered on 6/7/19. The second W108 file is the Post Operation Report. It was altered 7/7/2019.

- USB New Folder (3). "Photos from [REDACTED]": This USB contains NO365 Pic of Tezac 2 Operation. It also contains multiple pics of piss up with the Boot in 2012 at fat Lady's Arms.

- Photos from [REDACTED] critically contain a photo of a dead insurgent from Tezac 2 incident with SASR coins placed on his eyes, This is a likely war crime. It is unlawful to interfere with a corpse this way. The photos suggest that it was RS patrol that took this photo. It appears to be P4 foot in the photo (was he doing the SSE and had the camera?). We need to find a way to exploit RS having this photo. This requires further discussion.

- USB New Folder (3). "Rot 9". This contains a number of pictures of the Whiskey 108 operation 12.4.2009.

- The USBs and the burying of them raise several serious legal issues for RS. It appears to be not only a calculated effort to avoid disclosure in our case, but to place evidence in our case in a manner designed to pervert the course of justice, destroy evidence. By burying it under the ground, it may be tantamount to destruction. It also is likely that RS may have lied on oath to the IGADF about the documents he provided or withheld from IGADF inquiry. Furthermore, he appears to have lied in his interrogatories about the P17 video, which was clearly in his possession.

- It is an offence to communicate or possess Commonwealth files, including classified files. ie. Former Cwth official Roger Uren was charged by AFP with possessing Cwth documents and convicted. Other ex Cwth officials have also been convicted over similar offences.

- files held by D reveal that BRS was sent Cwth (Defence Department) files on W108 operation. These include a JTAC report (a defence briefing created by the air attack specialist attached to SASR) detailing the bombing of W108. The also include a POST OPERATION REPORT, a typical report produced after an SASR operation. Both documents are the property of the C'wth. They are also almost certainly classified. It is likely an offence to possess them and transmit them.

- D has evidence of files showing that P5 likely sent RS a Commonwealth document that contained a briefing of W108 operation. This appears to have been sent via encrypted means (the service VIBER). The author of the file is US based ex patrol commander (and witness in our case). 3/7/19 is when it was created, according to metadata. A few hours later on the same day it was modified by BRS. On the 3/7/19 it was emailed by BRS to Person 29.

- a second file "W108 copy" appears to have been created by RS on 16/1/2020. The file was created and modified on this day.
- The above conduct needs also to be viewed in addition to his threatening of witnesses (Letters issues) and decision to lie in court documents and instruct ERS to lie in respect of the question of separation.
- ERS also has evidence that RS put a drill through a laptop.

MEETING WITH [REDACTED] AND MONICA ALLEN

- ERS has knowledge that BRS met with [REDACTED] and Monica on December 4 2019 to pass to him documents to help [REDACTED] prepare for his IGADF interview. Must discuss with ERS.

MEETING WITH BRS AND [REDACTED]

- ERS has information that BRS met with [REDACTED] at beach in Perth and spoke to him in the water to ensure he was not wearing a wire. Must discuss with ERS.

LETTERS SENT TO [REDACTED]

- 2 letters were [REDACTED] anonymously In June 2018. The second letter was sent after it was reported in the media that the first letter had been sent and the ADF had called in the AFP to investigate.
- At the time that these letters were sent, RS feared that [REDACTED] would be a witness against him in respect of war crimes matters before the IGADF, AFP and also in connections to matters that RS was intending to sue us over. It is important to note that by early 2018, we had been given legal threats by RS that he would sue us if we reported war crimes issues.
- D has stated that John Mcleod on behalf of RS sent a letter to Perth. JM disclosed to ERS and D at a cafe in Brisbane in February 2020 that he was given the letter and told to send it. JM disclosed that he drove a couple of hours away from RS address to do this. D recalls it was two hours north. However, ERS recalls that it might have been northern NSW.
- ERS has disclosed that BRS told her he also sent a letter to Perth. He purchased the stamps from several different outlets. He printed out the letter at the Channel 7 Maroochydore office. He drove to the Northlakes Post Office to send it.
- It is clearly of interest to our case that P1 [REDACTED] has been threatened by BRS via this means.
- We need to subpoena AFP and Aus Post for relevant materials.

EMAILS SENT TO AFP AND MEDIA TO EFFECT RAID ON [REDACTED]

- In October 2017, a person using a fake email account sent a number of emails to AFP and/or politicians and media alleging tha [REDACTED] had unlawfully possessed weapons and was at risk of shooting dead innocent persons in a massacre in Perth. This prompted a WA police raid of [REDACTED]'s home. No weapons were located. The complaint was false. It is an offence to make a false complaint to the AFP.
- The person who sent the emails was Nathan Richter, a QLD photographer. He disclosed that did so on behalf of a person close to an SASR member, namely BRS.
- John McLeod is an associate of Nathan Richter. ERS understands that Mcleod introduced BRS to Richter who then sent the emails on behalf of BRS.
- If it can be shown that BRS used suspect means to lodge a false police complaint to intimidate [REDACTED], it would aid our case in multiple ways and also involve a possible criminal offence.

COVER UP OF PERSON 17 AFFAIR- LIE- THREATS TO LIE- ASSAULT OF P17- PREGNANCY- VIDEO SURVEILLANCE- EMAILS FROM BRS TO D ABOUT WRITING THE DK EMAILS- NEW EVIDENCE PROVIDED BY SOURCES

- D has message sent by ERS to D that states that, by 14/1/2018, ERS was seeking counselling and had disclosed that BRS was an alcoholic. ERS by this stage suspected an affair but did not know for sure. On the 17/1/18 ERS asked D "you still don't think he's seeing someone else huh? I cant see how he could manage it but you just never know." Other messages show that ERS was pushing BRS for counselling and that he had said "bad shit" to her. (see messages in January 2018).

- 30/1/18 ERS suspects that BRS has two phones. Message to D: "I thought I heard another phone ring when I was on the phone to him, surely he's not running 2 phones." We know separately from Person 17 that BRS did have multiple burner phones.

- Evidence shows that RS asked ERS to lie to the media and in court proceedings that she was separated from RS at the time of affair with P17 . (see family court affidavit)

- P17 arrived at ERS house and revealed affair on 6 April 2018.

- on 8/4/18 - Post the discovery, ERS states in message to D that "well at least i Know, Tim wife didn't and she was using 7 money" in reference to Tim Worner Channel 7 affair. In this message strand, D suggests that ERS could "always say that you were separated at the time to take the sting out of it." ERS replies: "Nup. No more lies.... I'm dealing with enough lies already... he will have to wear that."

- on 8/4/18, after P17 visit, ERS wrote to D: "I kind of want KS to privately know in case but then it wont look good if he knows and she doesn't do anything. I feel sick that she might be pregnant. I don't think I could deal with a step kid."

- ERS writes to D "I happened to ask if she ever flew with him places and he said last year yes, that hurt again. I said I need to know where my husband was for six months, because he wasn't with me. he's told me how badly he's fucked up and how he's ruined what we had." Messages also mention how he is trying to repair relationship.

- 22 APRIL 2018, BRS writes to dscott@bigpond.com, subject is "gmail", and the email is signed "regards BRS". But in the email, BRS has composed the email that "Danielle Kennedy" would send P17 . So this shows that RS did write the DK emails. "P17 , My name is danielle Kennedy and I represent Mr and Mrs Roberst-Smith... [see file to see text]... Danielle."

- 24 April 2018, BRS again emails dscott@bigpond, subje is "2nd letter". "Hi Dan, as discussed; P17 Danielle Kennedy." Happy for you to amend if required. BRS."

- on 26/4/18 - messages show the affair was discovered by ERS when ERS and RS were actually together. Messages to D from ERS states that ERS was shocked to discover affair : (messages 26/4/18: "I honestly don't think anything else can shock me", "I'd imagine personally I've had the worst of it actually finding out"; "But that's the reality of having an affair with a profile.")

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I won't do that again." BRS: "Emma it's not a real issue I don't know what to say."
"There's nothing you can say! I've been played like a fool and I'm not doing that again. She is a clinger, unprofessional and no doubt thinks I'm an idiot! I've been doing humiliated before and it's horrible!"

- Monica writes to ERS seeking proof of the separation. "i don't know what they will subpoena from you, but if I was them, I would ask you for all documents evidencing or referring to: the separation- when it started and when it ended; - living arrangements during the separation; who you told you were separated; your knowledge of person 17 and when you found out about her. If or when you get subpoenaed, we will have an "independent barrister" act on your behalf in relation to the subpoena to make any objections you may have the right to make as a subpoenaed party and we will represent Ben re any objections he may wish to make as a party to the proceedings. Anyway, don't worry about that for now. Counsel would just like to see a couple of examples. unflattering is fine. It lends weight to the fact you guys were estranged."

- Monica writes to ERS: "Hi Em, we met with Matthew Richardson this morning about the various categories for discovery and interrogatories to be answered by Ben. I mentioned that while Ben deletes everything, I understand that you had a couple of messages that evidence that:

- you were separated; and - that at some point you became aware of [picture of bunny, ie bunny boiler], so while we don't have evidence to produce from Ben, we will have when they issue a subpoena to you. Matthew said he would like an example of what you have- just so we know what we have to use in the future. So just a couple of examples of any messages would be great. It is not urgent."

MESSAGES FROM KERRY STOKES TO BRS AND ERS

- D has this message from KS to ERS and BRS sent Dec 18, 2019. "Ben glad you guys are there and the snow is good. Don't worry about any of the rubbish back home. They are on the run !! Stay safe and Happy. Kerry."

- D has message from ERS to KS. Appears this may be after discover of Monica affair. "Hi Kerry, I was wondering if there was a convenient time I could please call you in confidence? It's not urgent. Emma."

MULTIPLE PHONES- FAILURE TO DISCOVER PHONE RECORDS- EXISTENCE OF PHONES

- We know from DRS that as he was preparing to launch litigation/after he launched litigation against us, he purchased four phones in Danielle's name or her husband's name to communicate to persons without trace.

Nick

On Wed, 10 Mar 2021 at 09:29, Nick McKenzie <nmckenzie@theage.com.au> wrote:

Legally privileged- prepared for RS litigation

[REDACTED]



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