

## NOTICE OF FILING AND HEARING

### Filing and Hearing Details

Document Lodged: Interlocutory Application (Human Rights Div 2.4 Exemption) - Form 35 - Rule 17.01(1)(a)  
Court of Filing: FEDERAL COURT OF AUSTRALIA (FCA)  
Date of Lodgment: 19/03/2026 9:24:11 AM AEDT  
Date Accepted for Filing: 19/03/2026 3:05:19 PM AEDT  
File Number: VID404/2025  
File Title: ALON CASSUTO v MARY KOSTAKIDIS  
Registry: VICTORIA REGISTRY - FEDERAL COURT OF AUSTRALIA  
Reason for Listing: Interlocutory Hearing  
Time and date for hearing: 11/05/2026, 9:00 AM  
Place: Court Room Not Assigned, Roma Mitchell Commonwealth Law Courts  
Building Level 5, 3 Angas Street, Adelaide; Remote, Owen Dixon  
Commonwealth Law Courts Building Level 7, 305 William Street, Melbourne



*Sia Lagos*

Registrar

### Important Information

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

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



Form 35  
Rules 17.01(1); 20.12; 20.13; 20.14; 20.15

## Interlocutory application for discovery

No. VID404 of 2025

Federal Court of Australia  
District Registry: Victoria  
Division: General

**ALON CASSUTO**

Applicant

**MARY KOSTAKIDIS**

Respondent

To the Respondent

The Applicant applies 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:** [Registry will insert time and date]  
**Place:** [address of Court]

The Court ordered that the time for serving this application be abridged to

Date:

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

Filed on behalf of (name & role of party) Alon Cassuto, Applicant  
Prepared by (name of person/lawyer) Raphael Leibler and Leon Zwier  
Law firm (if applicable) Arnold Bloch Leibler  
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(include state and postcode)



### **Interlocutory orders sought**

1. An order pursuant to Rule 20.15 of the Federal Court Rules 2011 that the Respondent provide non-standard discovery of the documents set out in Appendix A to this Application within 21 days of the order.
2. In the alternative, an order pursuant to Rule 20.14 of the Federal Court Rules 2011 that the Respondent provide standard discovery within 21 days of the order.
3. Documents produced in accordance with the orders above may be produced in electronic format.
4. The parties are not required to agree to or produce discovery in accordance with a discovery plan.
5. The parties have liberty to apply.

### **Service on the Respondent**

It is intended to serve this application on the Respondent.

Date: 19 March 2026

Two handwritten signatures in cursive script, one for Leon Zwier and one for Raphael Leibler.

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Signed by Leon Zwier and Raphael Leibler  
Lawyers for the Applicant



## APPENDIX A

- 1 A platform-generated archive of all user data from the X account '@marykostakidis', including all posts/tweets, replies, reposts/retweets, threaded posts, likes and interactions, profile information, direct messages, media files, and associated metadata (including any deleted, edited, or archived content) extracted using the "Your X Data" feature.
- 2 Drafts of the Posts.
- 3 Documents recording communications relating to the Posts.
- 4 Documents recording or referring to the purposes for which the Applicant published the Posts.
- 5 Documents created in the Relevant Period recording statements made by the Respondent referring to Israel, Israelis, the Jewish people, Jewish organisations, Zionists or Zionism, the Holocaust, Hezbollah, Hassan Nasrallah, Hamas or Yahya Al-Sinwar (including derivations or abbreviations of any of the above terms).
- 6 Documents evidencing any agreement, acknowledgment, membership, accreditation, or other acceptance by the Respondent of any Australian or international professional code of ethics, code of practice, editorial standard, or professional guideline applicable to journalists in the Relevant Period.
- 7 Any document recording or referring to a contract, arrangement or understanding between the Respondent and a third party in relation to her activism or activity on social media.

Where:

**Relevant Period** means 1 January 2023 to 16 March 2026.

**Posts** means 4 January Post and 13 January Post (as defined in the Applicant's Further Amended Statement of Claim).