

NOTICE OF FILING

Details of Filing

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File Title: BCI MEDIA GROUP PTY LTD ACN 098 928 959 v CORELOGIC
AUSTRALIA PTY LTD ACN 149 251 267 & ORS
Registry: NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA

Registrar

Important Information

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

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

Form 59
Rule 29.02(1)

Affidavit

No. NSD 285 of 2021

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

BCI MEDIA GROUP PTY LTD (ACN 098 928 959)

Applicant

CORELOGIC AUSTRALIA PTY LTD (ACN 149 251 267) and others

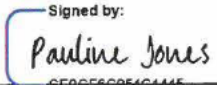
Respondents

Affidavit of: **Pauline Jones**
Address: 3 Graham Circuit, Yarrabilba, in the State of Queensland
Occupation: Retired
Date: 12 September 2025

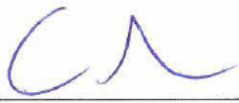
Document number	Details	Paragraph	Page
1	Affidavit of Pauline Jones sworn on 12 September 2025	[1]-[33]	1-6
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I Pauline Jones, of 3 Graham Circuit, Yarrabilba, in the State of Queensland, say on oath:

- I worked for Cordell from 13 May 1999 until the acquisition by CoreLogic in October 2015.
- I was re-employed by RP Data Pty Ltd from 16 October 2015 until I was retrenched, and subsequently retired, in March 2025.

Signed by:


 Deponent



 Solicitor

Filed on behalf of (name & role of party) The First to Fourth Respondents
 Prepared by (name of person/lawyer) Dale Cliff
 Law firm (if applicable) Mills Oakley
 Tel (07) 3228 0400 Tel (07) 3228 0400
 Email mwalford@millsoakley.com.au
 Address for service Level 23, 66 Eagle Street BRISBANE QLD 4000
 (include state and postcode)

3. In total I was employed as a researcher for Cordell for over 25 years.
4. I have had explained to me the circumstances leading to the commencement of these proceedings. I have not been involved personally in any of the conduct alleged against my former employer.
5. I can assist the court by explaining in detail the Cordell product and how the data contained therein was compiled.
6. Prior to the digital age powered by the internet the collection of construction industry data occurred in two ways:
 - (a) firstly, by physical searches of the various council and other government databases by personal attendance at the various offices (Cordell has staff in each of Brisbane Sydney Melbourne Adelaide and Perth who would conduct that work);
 - (b) secondly by phone calls to trusted partners of Cordell.
7. When I reference a trusted partner I do not do so in the legal sense of a formal partnership. Partners were people who worked or owned businesses in the constructions industry and able to voluntarily give us data points that we required for the Cordell Connect product. The types of businesses involved in this process were:
 - (a) architects
 - (b) engineers
 - (c) property developers
 - (d) sales agents
 - (e) builders
 - (f) landscapers
 - (g) various subcontractors
 - (h) draftsman
 - (i) quantity surveyors
 - (j) project managers
 - (k) superintendents
 - (l) environment consultants
 - (m) safety consultants
 - (n) town planners.

Signed by:

Pauline Jones

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Deponent

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8. The researchers' skill was their breadth of relationships and the speed in which it could collect data. Prior to the introduction of the internet, I would keep a rolodex on my desk containing names and phone numbers of number people employed in the construction industry. My process was to systematically go through my contacts to pick up new datapoints or to update datapoints. Often, I was able to collect data on more than one project at a time. Not every business was amenable to providing data to us. I can recall one architect who took the view that they were unwilling to release client details. That was however a rare occurrence, and it was normal for me to find a work around to collect the data from someone else or another place.
9. My process would almost always start with the architects or town planners. My experience was that architectural and town planner firms were usually willing to provide us with data regarding upcoming developments drawn or prepared by them.
10. They would provide us with the details of the builder and engineers on upcoming projects. We would then make phone calls to our contacts within those builders and engineers to ascertain further details about the project.
11. [REDACTED] That is by the time I commenced employment with Cordell there was already a significant body of data including partners within the construction industry who were generally amenable to sharing relevant contact details with us.
12. Over time my network would spread as contacts moved employment.
13. The Cordell brand was built on personal relationships with relevant participants in the building industry. We were seen as being conduits to a flourishing market for services and products in the building industry.
14. The Cordell product was a lead generation tool. It was not a replacement for official records relating to construction data. [REDACTED]
[REDACTED]
15. Cordell went to extensive lengths to verify the data we held. It was a sense of pride within the Cordell research team that our data was always verified and, in most cases, accurate. That depth of data and its accuracy always justified Cordell being considered a premium product.
16. My day would be spent working in the morning across segments in a systematic way by calling contacts and sourcing new information or verifying existing information. I would have a schedule of phone calls to make each day and I would compile the data as I went, verified it as necessary for uploading into Cordell.

Signed by:

Pauline Jones

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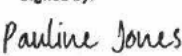
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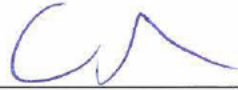
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17. The primary market for the Cordell product was suppliers of construction industry materials and subcontractors looking for work. Suppliers of building materials were always looking for opportunities to sell more product. They did that by contacting builders' representatives.
18. Similarly with subcontractors who were looking to offer their services on construction jobs.
19. Builders and developers on the other hand had no interest in advertising to the world their suppliers and subcontractors.
20. As the market for those materials and subcontractors change so does the need for the Cordell Connect product.
21. During my employment, it was emphasised by the sales team and senior management that the Cordell product was not merely a lead generation tool, but a platform for subscribers to grow their business and connect with leading providers across the major consultancy disciplines in the construction industry. I continued to hold this belief at the time of my retrenchment, as confirmed by my final communications with industry contacts and customers. At the time of my retrenchment, there was a decline in the need for a lead generation tool. That is so largely because the present state of the construction industry is that demand exceeds supply. Material suppliers cannot get product fast enough and they have been able to increase prices significantly since COVID due to market forces of demand. The same is the case for subcontractors. Demand for them exceeds supply and therefore the benefit of a lead generation tool is significantly diminished.
22. My recollection is that there were approximately 41 researchers across Australia when I first commenced with Cordell in 1999. Once data was available to be searched on the internet our processes changed somewhat in how we researched. While I still had significant time making phone calls to contacts the need to follow up others by phone was assisted by conducting a series of rudimentary internet searches first and by sending emails.
23. Many building companies, developers and others promote their developments on their own webpages.
24. One of the key advantages that Cordell always had over LeadManager was the depth of our relationships with data partners who could provide us with the relevant name of the architect or the builder who was actually responsible for the developments.

Signed by:

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25. My contacts repeatedly expressed frustration at being contacted about developments that they had no involvement with because LeadManager incorrectly recorded them as the contact. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
26. That is BCI did not have the depth of knowledge of the researchers within Cordell. Employees of BCI did not actually personally know any of the contacts. That is unsurprising given the majority of the LeadManager researchers were based offshore.
27. Researching is not a sophisticated exercise. It was in my case based on my personal relationships with partner contacts who I could rely upon over and over again to provide me with data relating to constructions projects.
28. There are no secrets about the data found on Cordell Connect. It is all publicly available if you know the right people to ask or where to look.
29. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
30. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] Most of the questions posed by the sales team back to the Cordell research team arose because the customer could not find a project in both platforms. In almost every case however the project was captured just with a different name or description. For example, a project on the corner of Smith and Jones Street was referenced as Jones street in LeadManager and Smith street in Cordell but they were the same project.
31. When these complaints arose a review of our data was conducted to find an explanation for the sales team. It was rare if ever that Cordell was missing a project. The issue was almost always explicable by the differences in description.
32. I have no recollection of Cordell ingesting or taking data from BCI. [REDACTED] each data point in the Cordell database has a research note showing where the datapoint was found or researched. At no point was I ever instructed to take a datapoint

Signed by:
Pauline Jones
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Deponent

[Signature]
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from LeadManager or to use a LeadManager project description to improve the data in Cordell.

33. Confidential Exhibit **PJ-1** is a bundle of documents comprising the following:
- (a) Cordell Connect research guide dated 9 May 2025;
 - (b) Minimum project dollar value limits by state and by category for 2021, 2024 and 2025;
 - (c) The "Cordell Phone Guide";
 - (d) Google Searching guide dated 25 July 2025;
 - (e) Jaguar Projects Data Entry Protocol dated June 2018;
 - (f) Queensland Planning Process Guide;
 - (g) "Questions to ask from stakeholders guide" dated 25 July 2025;
 - (h) "Quick Facts for New Researchers" guide;
 - (i) "Telephone Techniques" guide;
 - (j) "When to publish and what we publish" guide; and
 - (k) Example of research comments.

Sworn by the deponent)
 At Yarrabilba)
 on 12 September 2025)
 Before me: *Cellum James Aitken*)



Signed by: *Pauline Jones*
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 Signature of deponent

 Signature of witness

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

Signed by: *Pauline Jones*
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 Deponent