

## NOTICE OF FILING

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8721 AND STATE OF WESTERN AUSTRALIA & ORS  
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*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.

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# Affidavit of Martin John Hall

WAD 37 of 2022

Federal Court of Australia

District Registry: Western Australia

Division: General

**YINDJIBARNDI NGURRA ABORIGINAL CORPORATION RNTBC**

Applicant

**STATE OF WESTERN AUSTRALIA & ORS**

Respondents

Affidavit of: **Martin John Hall**

Address: c/o Level 7, 64 Castlereagh Street, Sydney NSW 2000

Occupation: Valuer

Date: 4 April 2024

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1	Affidavit of Martin John Hall affirmed 4 April 2024.	1 – 4	1 - 2

I, Martin John Hall, c/o Level 7, Castlereagh Street, Sydney NSW 2000, valuer, do solemnly and sincerely declare as follows:

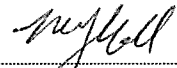
### Introduction

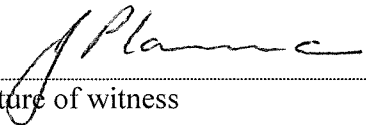
1. I am a Director at Lonergan Edwards & Associates Limited, a valuation firm. Wayne Richard Lonergan (another director of Lonergan Edwards & Associates Limited) and I were engaged by Allen & Overy, the solicitors for the second to sixth Respondents in these proceedings, to provide an expert valuation report in relation to the compensation sought by the applicant in these proceedings. We prepared a report dated 5 March 2024.

**Preparation of the expert report**

- 2. Mr Lonergan and I are the authors of our report of 5 March 2024. The opinions expressed in the report are my own, based upon my specialised knowledge arising from my training, study or experience. I am informed by Mr Lonergan, and verily believe, that the opinions expressed in the report are also his own, based upon his specialised knowledge arising from his training, study or experience. That is, we both separately hold the opinions that we have expressed in our report of 5 March 2024.
- 3. The details of our training, study and experience are set out in our curriculum vitae, which is Appendix A to our report of 5 March 2024.
- 4. In preparing our report of 5 March 2024, I was the lead or primary author. I was responsible for much of its preparation. Mr Lonergan and I would frequently review and discuss our report. This process of review and discussion allowed us to clarify our understanding of the circumstances of this case and agree on the best way to express our opinions given those circumstances. This process did not cause me to compromise my own views or opinions on the questions on which Mr Lonergan and I were asked to opine. Rather, this approach allowed me to test and refine the appropriate wording to express my opinions. The opinions set out in our report are my own, and were also separately held by Mr Lonergan. As mentioned in paragraph 8 of our report, I was informed and verily believe that the Court wanted only one of Mr Lonergan or me to give expert evidence, to avoid “two people against one”.

Affirmed by Martin John Hall )  
at Sydney in the State of New South Wales )  
on 4 April 2024 )  
Before me: )

  
Signature of deponent

  
Signature of witness

Justice of the peace in NSW

**171099**  
**Julie Anne Planinic**  
**Justice of the Peace**  
**4 Ridgemark Place**  
**Bella Vista NSW 2153**