

## NOTICE OF FILING

This document was lodged electronically in the FEDERAL COURT OF AUSTRALIA (FCA) on 3/08/2018 2:44:55 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:	NSD2179/2017
File Title:	GEOFFREY ROY RUSH v NATIONWIDE NEWS PTY LIMITED & ANOR
Registry:	NEW SOUTH WALES REGISTRY - FEDERAL COURT OF AUSTRALIA



A handwritten signature in black ink, which appears to read "Warwick Soden".

Dated: 3/08/2018 3:53:52 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 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.



Form 59  
Rule 29.02

## Affidavit of Nicholas Pullen

NSD2179 of 2017

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

**Geoffrey Roy Rush**  
Applicant

**Nationwide News Pty Limited & Anor**  
Respondents

Affidavit of: **Nicholas William Grant Pullen**  
Address: Level 26, 530 Collins Street, Melbourne Vic 3000  
Occupation: Lawyer, HWL Ebsworth Lawyers  
Date: 2 August 2018

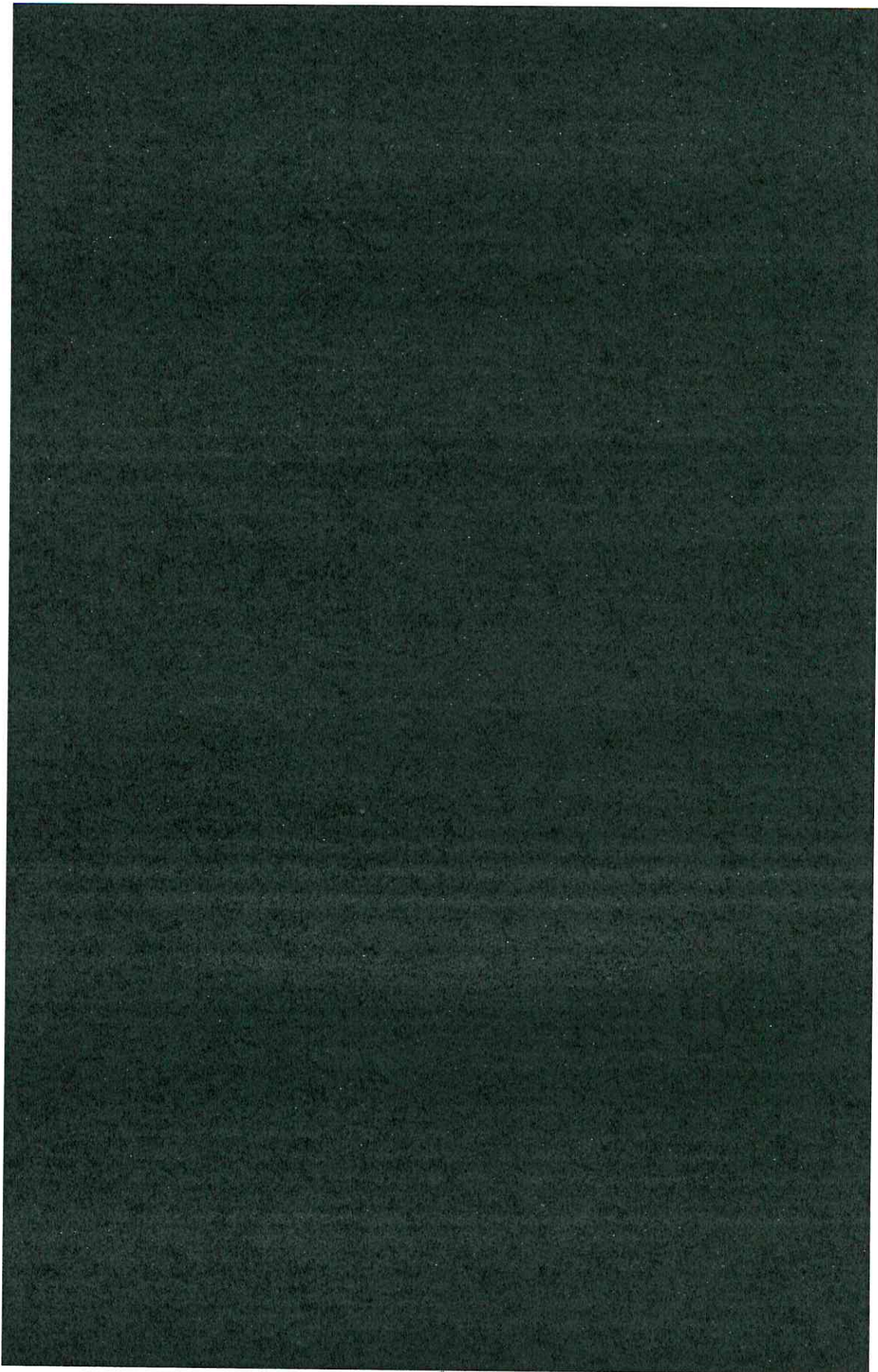
### Contents

Document Number	Details	Paragraph	Page
1	Affidavit of Nicholas William Grant Pullen sworn on 2 August 2018	1-40	1-10
2	Exhibit "NP-1"	-	1-29

I, Nicholas William Grant Pullen, say on oath:

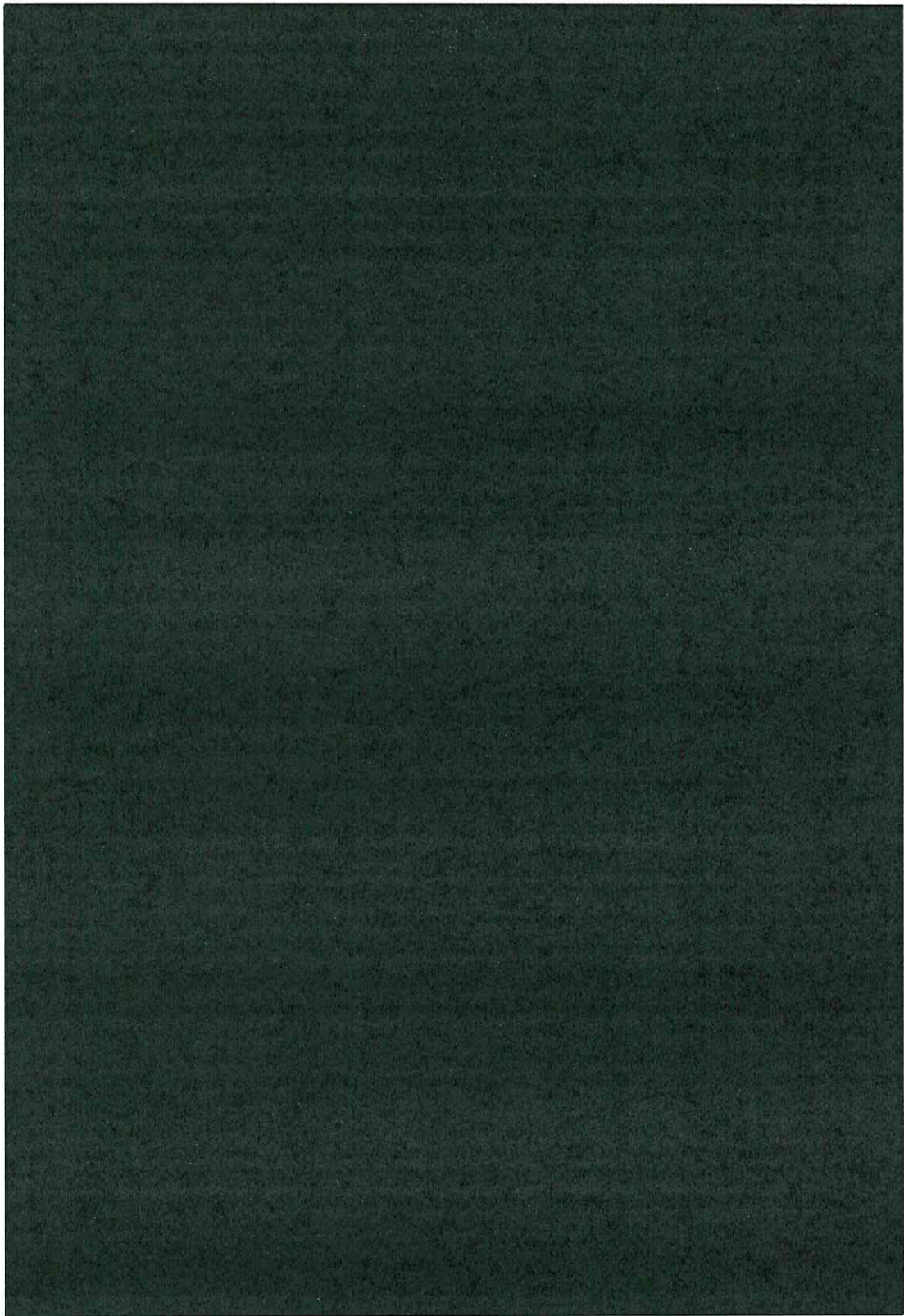


Prepared on behalf of:	The Applicant		
Prepared by:	Nicholas Pullen		
Name of law firm:	HWL Ebsworth Lawyers		
Address for service:	Level 26, 530 Collins Street, Melbourne, Victoria, 3000		
Email:	npullen@hwle.com.au	DX	564, Melbourne

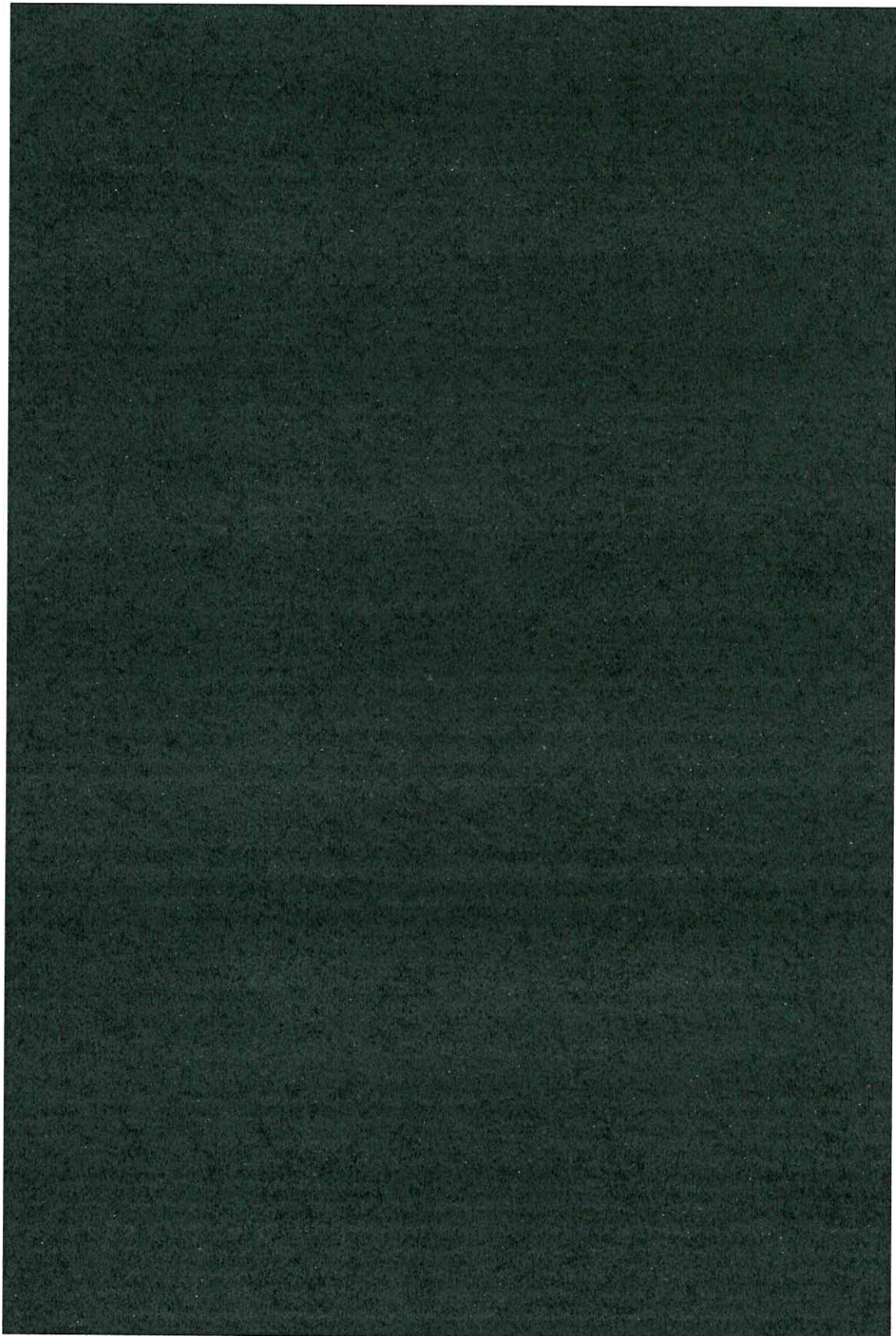


A handwritten signature in black ink, consisting of stylized cursive letters, is located at the bottom right of the page, partially overlapping the redacted area and the page number.



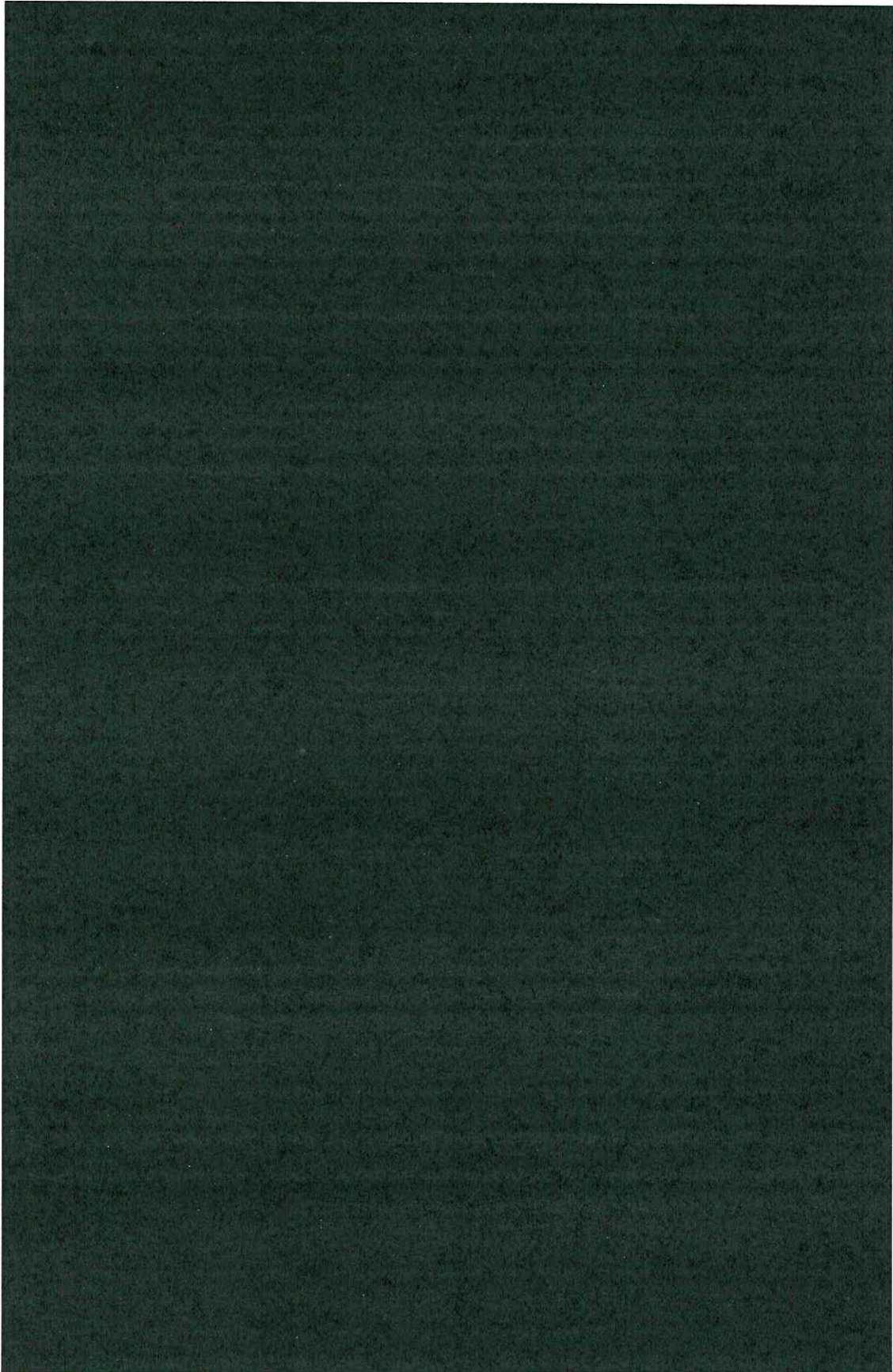


*[Handwritten signature]*

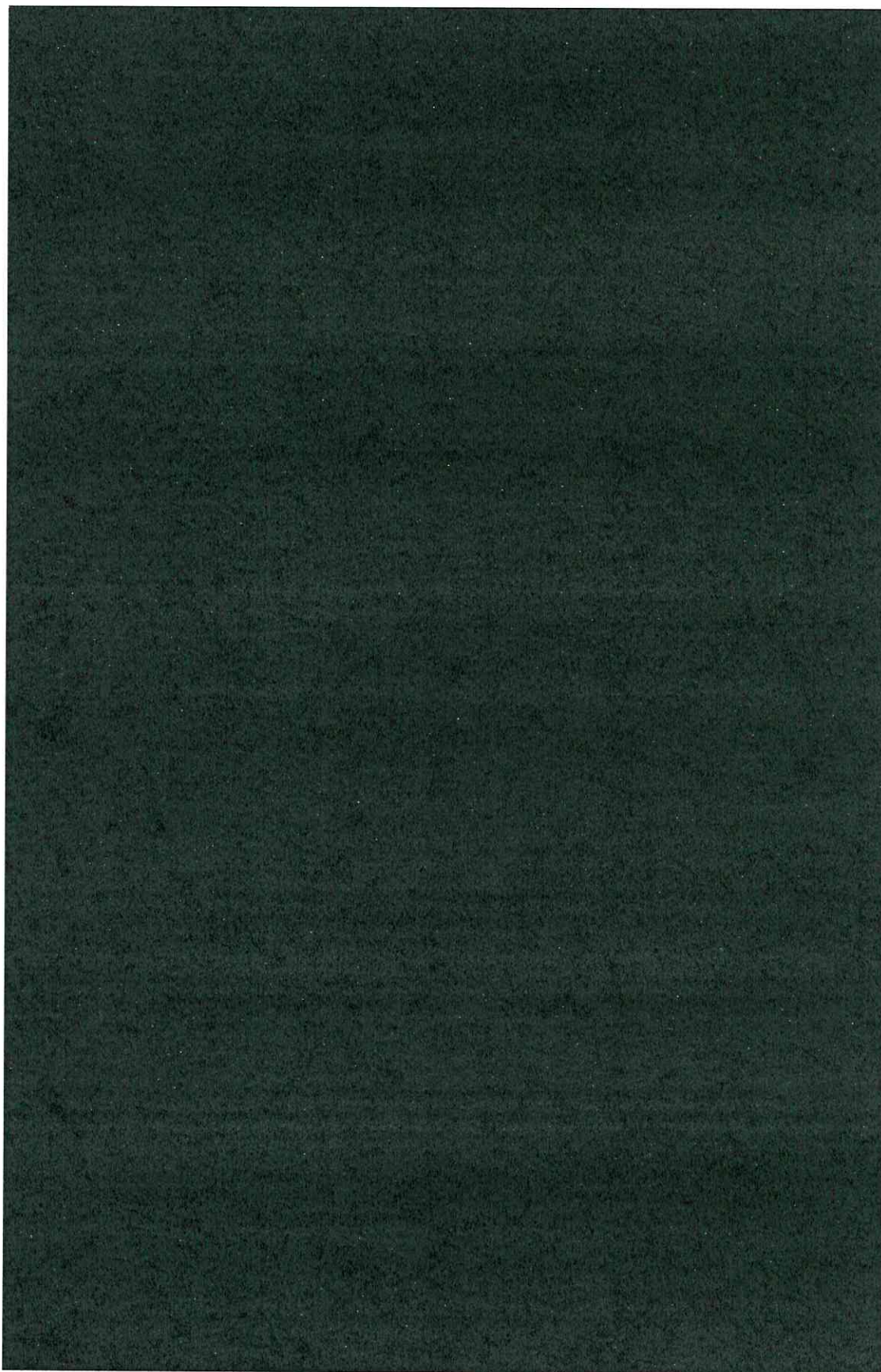


*[Handwritten signature]*



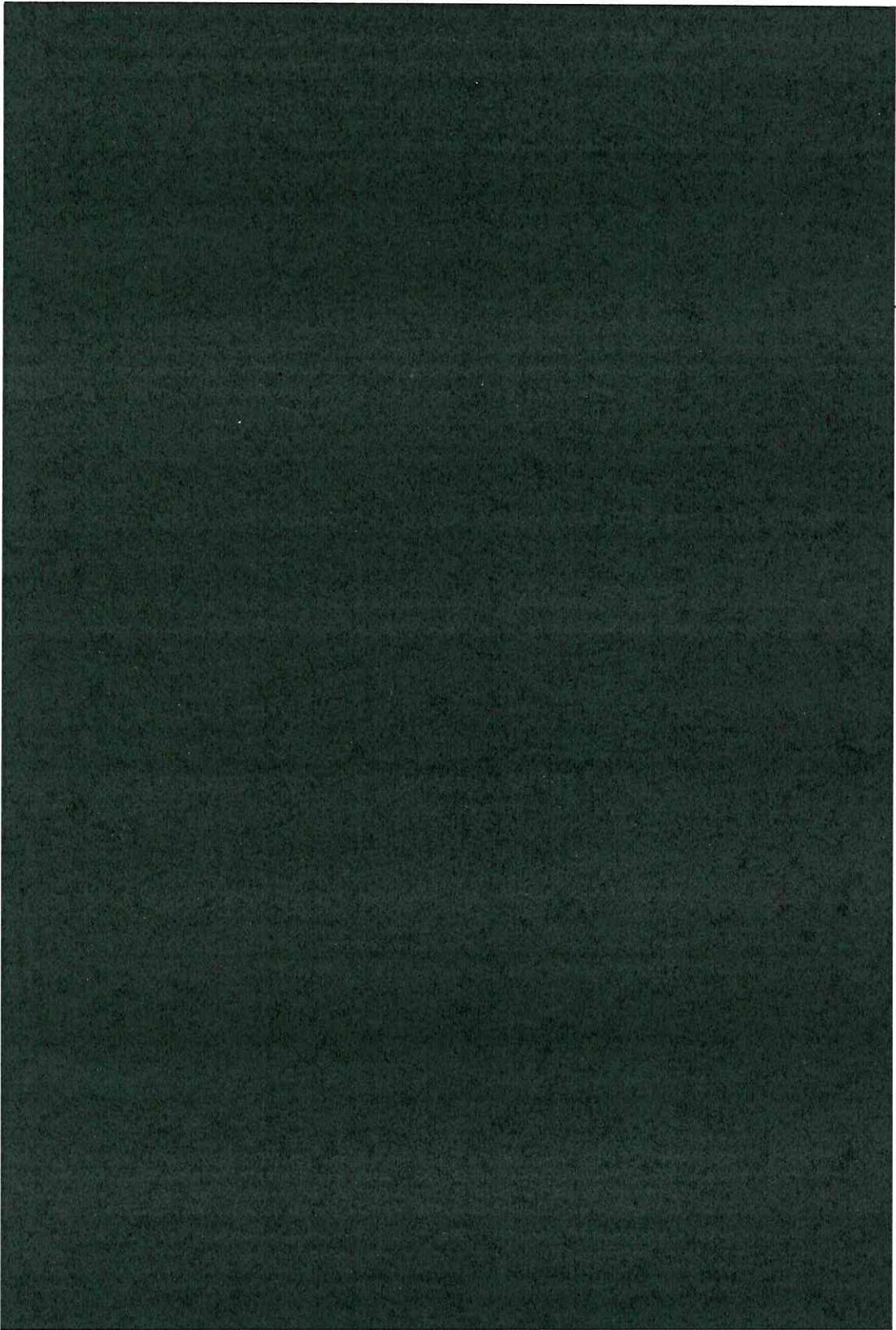


*Handwritten signature*



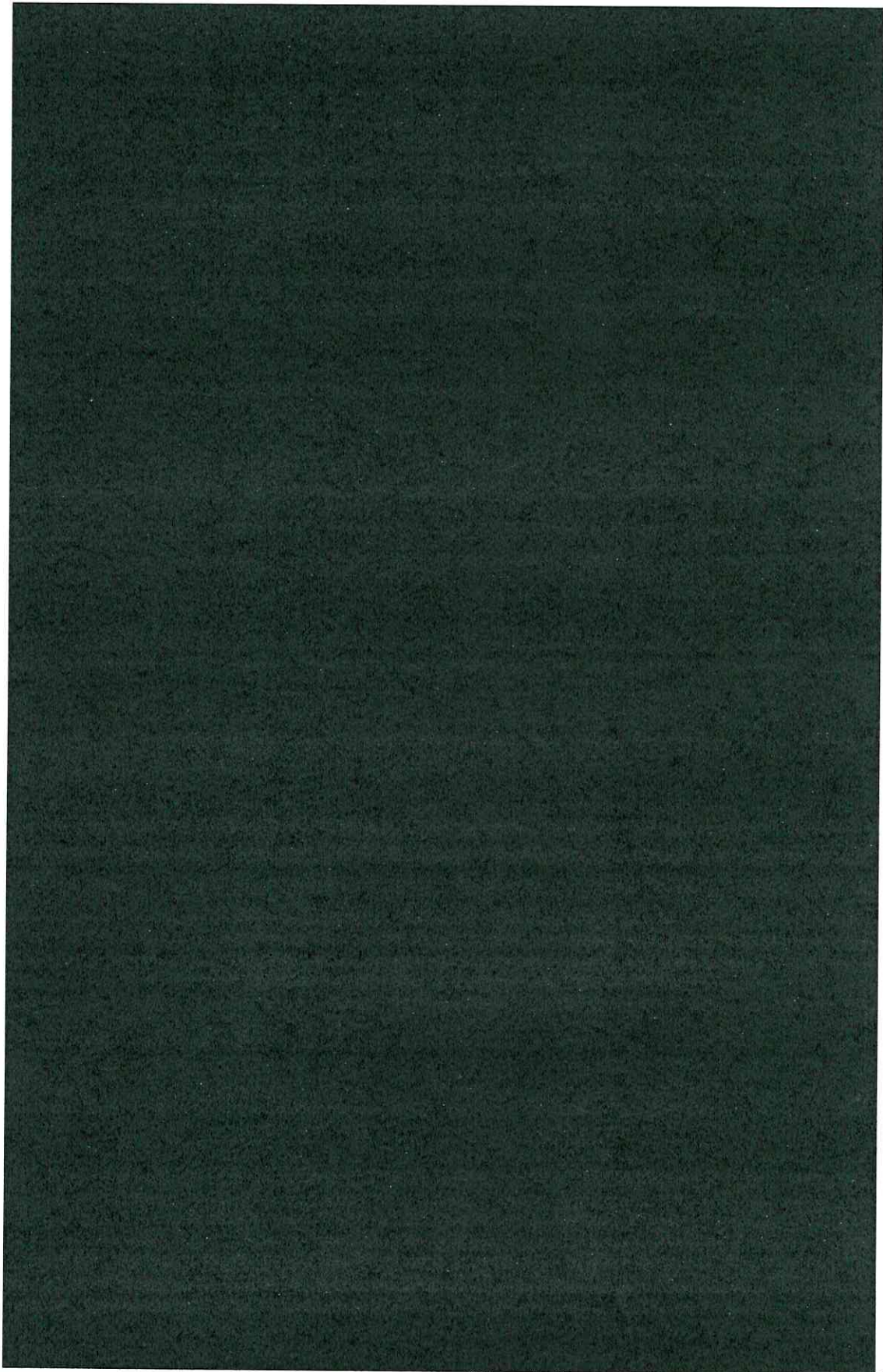
*[Handwritten signature]*

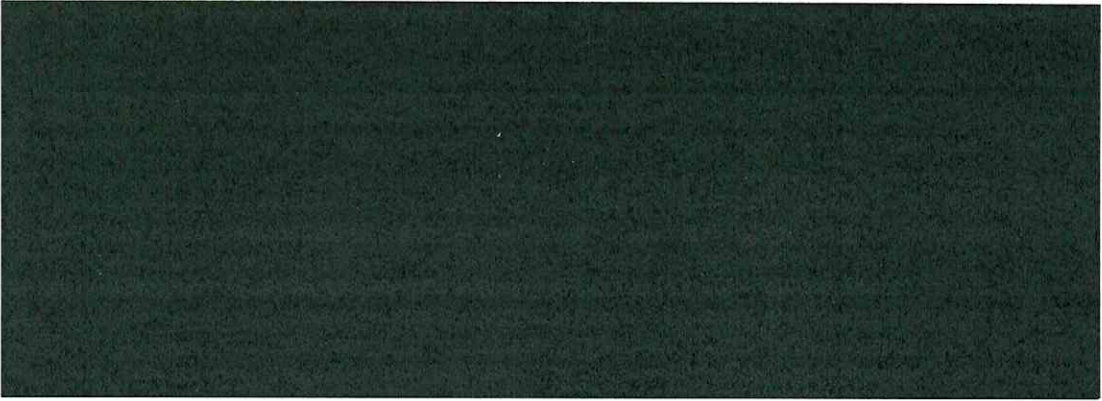




*He* *Verhellen*






- 
37. Since that previous affidavit was sworn, the Applicant has continued to find himself associated in Australia and internationally with the "#MeToo" movement which involves allegations of sexual impropriety and misconduct against colleagues in the entertainment industry. He continues to suffer negative publicity, and will continue to do so until such time as his reputation can be vindicated.
38. In addition, the Applicant's condition remains largely the same. He continues to suffer from the emotional and physical turmoil referred to at paragraph 5 of my previous affidavit - as a result of the matters complained of and the continuing coverage of those matters by the Respondents and others throughout the world.
39. The Applicant has still not been able to work since the publications. He has, for example, in early July 2018 had to withdraw from the Melbourne Theatre Company's production of *Twelfth Night* which is to commence in November 2018. At pages 28 to 29 of Exhibit NP-1 is an article which was published by the ABC in relation to the Applicant's withdrawal from *Twelfth Night*. The article contains the following extracts from a statement provided on behalf of the Applicant:


*Due to my current circumstances and medical advice, I must withdraw from the upcoming project of Twelfth Night.*

*I do so with the greatest regret. I know that I would not be able to provide the necessary creative spirit and the professional stamina required for the project.*






Sworn / Affirmed by the deponent  
at (place) MELBOURNE  
on (date) 02/08/2018

  
\_\_\_\_\_  
Signature of deponent

Before me:

  
\_\_\_\_\_  
Signature of witness

Full name of witness: ..... **Scott La Rocca**  
Level 26, 530 Collins Street,  
Melbourne VIC 3000  
Qualification of witness: ..... An Australian Legal Practitioner  
within the meaning of the  
Legal Profession Uniform Law (Victoria)

333-441-1100  
333-441-1101  
333-441-1102  
333-441-1103  
333-441-1104  
333-441-1105