

NOTICE OF FILING

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Sia Lagos

Registrar

Important Information

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No. QUD 356 of 2025

Federal Court of Australia
District Registry: Queensland
Division: General

CHARLES WOOSUP AND OTHERS ON BEHALF OF THE ANKAMUTHI SEA CLAIM GROUP

Applicant

STATE MINISTER FOR THE STATE OF QUEENSLAND

Respondents

ANKAMUTHI APPLICANT'S CONCISE REPLY

Filed in compliance with order 6 made by Mortimer CJ on 3 June 2026

1. In this Concise Reply by the Ankamuthi Applicant, the Amended Ankamuthi Concise Statement of Facts Issues and Contentions filed on 2 April 2026 is referred to as **Ankamuthi CS**, the Gudang Yadhaykenu Concise Statement of Facts Issues and Contentions filed on 27 March 2026 is referred to as **GY CS** and the State of Queensland's Concise Statement of Facts Issues and Contentions filed on 1 July 2026 is referred to as **QSC**.
2. To the extent that any paragraphs of the GYSC or QSC are not addressed in this Reply it should not be assumed that the Ankamuthi Applicant is admitting those matters.

GYCS

3. In relation to the GY CS the Ankamuthi Applicant admits paragraphs [2] – [3], [5], [7], [9], [10], [11] – [17], [19], [38], [39], [40] and [41].
4. As to [6(a)] the Ankamuthi Applicant admits persons who are now Gudang Yadhaykenu claimants in the present proceedings were recognised as native title holders in *David on behalf of the Torres Strait Regional Seas Claim v State of Queensland* [2022] FCA 1430 also with Ankamuthi, Kaurareg, and Kulkalgal Kemer Kemer Meriam claimants, each recognised as native title holders with respect to discrete offshore areas marked on the maps in Schedule 7 of that determination.
5. As to [6(b)] the Ankamuthi Applicant admits persons who are now Gudang Yadhaykenu claimants in the present proceedings were recognised as native title holders in *Woosup on behalf of the Northern Cape York Group #1 v State of Queensland (No 3)* [2014] FCA 1148 as were the descendants of the ancestors of persons who identify as members of the Angkamuthi Seven Rivers group, the McDonnell Atampaya group as well as the Gudang/Yadhaigana (sic) group.

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6. As to [6(c)] the Ankamuthi Applicant admits persons who are now Gudang Yadhaykenu claimants in the present proceedings were recognised as native title holders in *Anderson on behalf of the Northern Cape York #3 Native Title Claim Group v State of Queensland* [2017] FCA 830 with the other descendants of the apical ancestors also described in the *Woosup* determination listed above at [5], being members of the Angkamuthi Seven Rivers group, the McDonnell Atampaya group as well as the Gudang/Yadhaigana (sic) group.
7. As to [8] the Ankamuthi Applicant admits Ankamuthi people were recognised as native title holders in *Woosup on behalf of the Ankamuthi People #1 v State of Queensland* [2017] FCA 831 but also on the same day over separate areas in *Woosup on behalf of the Ankamuthi People #1 v State of Queensland* [2017] FCA 832.
8. As to [18] the Ankamuthi Applicant admits that within the regional society there existed local groups who were regarded as the "owners" of particular tracts of country but does not admit that such tracts are often now referred to as "estates".
9. As to [20] the Ankamuthi Applicant does not admit that the owners of local estates were local groups whose members were recruited through patrification but says that recruitment to local groups was patrilineal.
10. The Ankamuthi Applicant does not admit [21] but says there are traditional laws and customs governing marine tenure within the regional society.
11. The Ankamuthi Applicant does not admit [22] but says that ownership of the seabed and the resources above it extended out from a group's ownership of the adjacent land.
12. The Ankamuthi Applicant denies [23] – [31], [35] – [37], [42] and [43].
13. The Ankamuthi Applicant does not admit [32] but says since effective sovereignty patrilineal recruitment to a group has undergone adaptation.
14. The Ankamuthi Applicant does not admit [33] because, on the basis of the material presently available it is uncertain of the truth of the statement.
15. The Ankamuthi Applicant does not admit [34] because the land in which the ancestors of the Ankamuthi people held native title rights and interests was not confined to the lower catchments of the west coast rivers of the region, commonly known as the Seven Rivers.

QCS

16. The Ankamuthi Applicant does not respond to [1] – [4], [10], [14] – [16].
17. In relation to the QSC the Ankamuthi Applicant agrees with the matters addressed in paragraphs [5] – [9]; [11] – [13].
18. In relation to [17] the Ankamuthi Applicant accepts that a distinction between native title rights and interests above the high water mark and below the high water mark is that exclusive possession cannot be recognised below the low water mark.



Susan Phillips
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Date: 10 July 2026