

## AFFIDAVIT OF SHANE FRANCIS DOWLING – 14 November 2014

### COURT DETAILS

Court	Supreme Court of New South Wales
Division	Common Law
List	Defamation
Registry	Sydney
Case number	2014/114469

### TITLE OF PROCEEDINGS

First plaintiff	<b>Justine Munsie</b>
Second plaintiff	Kerry Stokes
Defendant	<b>Shane Dowling</b>

### FILING DETAILS

Filed for	Shane Dowling - Defendant
Filed in relation to	Response to plaintiffs application for contempt and defamation proceedings
Legal representative	Self-represented
Contact name and telephone	Shane Dowling – 0411 238 704
Contact email	shanedowling@hotmail.com

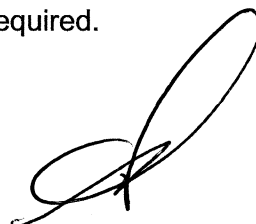
**AFFIDAVIT**

Name Shane Dowling  
 Address 5 / 68-70 Curlewis St Bondi Beach  
 Occupation Journalist  
 Date 14 November 2014

I affirm:

- 1 I am a journalist and publish the website Kangaroo Court of Australia.
- 2 Below are a number of Interrogatories and draft orders sought for Discovery. They are clearly needed to help determine the matter given the applicants claim against me. I file this affidavit as per PRACTICE NOTE SC CL 4 – Supreme Court Common Law Division – Defamation List
- 3 **Interrogatories** – Both Kerry Stokes and Justine Munsie are to provide answers the below questions separately
- 4 Are you aware of any payments that were made to Schapelle Corby this year by you, Channel 7 or any associated companies? If so how much was it?
- 5 Are you aware of any payments that were made on behalf of Schapelle Corby this year by you, Channel 7 or any associated companies? If so how much was it?
- 6 Are you aware of any payments that were made for accommodation and any other expenses on behalf of Schapelle Corby this year by you, Channel 7 or any associated companies?
- 7 Who organised the ex parte hearing with Justice Lucy McCallum and how was it organised? Who instructed the ex parte hearing to be organised with Lucy McCallum?
- 8 **Discovery** – Both Kerry Stokes and Justine Munsie to provide the below separately
- 9 Please supply all notes, file notes, diary notes, emails, receipts, invoices, letters and other relevant communication regarding any payment, negotiation or discussion of payment to Schapelle Corby.
- 10 I would expect follow-up Interrogatories and Discovery will be required.

*J Dowling*



AFFIRMED at WAVERLEY, NSW  
 Signature of deponent *[Signature]*  
 Name of witness \_\_\_\_\_  
 Address of witness \_\_\_\_\_  
 Capacity of witness [#Justice of the peace #Solicitor #Barrister #Commissioner for affidavits #Notary public]

KIM ANTHONY STAPLETON  
 Justice of the Peace Registration 151673  
 in and for the State of New South Wales, Australia  
 21/103 Majors Bay Rd  
 Concord, NSW 2137

And as a witness, I certify the following matters concerning the person who made this affidavit (the **deponent**):

- 1 #I saw the face of the deponent. [OR, delete whichever option is inapplicable]  
~~#I did not see the face of the deponent because the deponent was wearing a face covering, but I am satisfied that the deponent had a special justification for not removing the covering.\*~~
- 2 ~~#I have known the deponent for at least 12 months.~~ [OR, delete whichever option is inapplicable]  
 #I have confirmed the deponent's identity using the following identification document:

NSW DRIVER'S LIC  
 Identification document relied on (may be original or certified copy)<sup>†</sup>

Signature of witness *[Signature]* 14 Nov. 2014

Note: The deponent and witness must sign each page of the affidavit. See UCPR 35.7B.

[\* The only "special justification" for not removing a face covering is a legitimate medical reason (at April 2012).]  
 [† "Identification documents" include current driver licence, proof of age card, Medicare card, credit card, Centrelink pension card, Veterans Affairs entitlement card, student identity card, citizenship certificate, birth certificate, passport or see Oaths Regulation 2011 or JP Ruling 003 - Confirming identity for NSW statutory declarations and affidavits, footnote 3.]