Form 20 (version 3) UCPR 18.1 and 18.3

NOTICE OF MOTION

FILED

COURT DETAILS

0 1 FEB 2017

Court

Supreme Court of New South Wales

Division

Common Law

List

Defamation

Registry

Sydney

Case number

2016/383575

TITLE OF PROCEEDINGS

First plaintiff

Jane Doe 1

Number of plaintiffs

2

Defendant

Shane Dowling

FILING DETAILS

Person seeking orders

Jane Doe 1 and Jane Doe 2, plaintiffs

Legal representative

Martin O'Connor, Addisons

Legal representative reference

RMK:MOC

Contact name and telephone

Richard Keegan, +61 8915 1075

Contact email

richard.keegan@addisonslawyers.com.au

PERSON AFFECTED BY ORDERS SOUGHT

Shane Dowling, the defendant

HEARING DETAILS

This motion is listed at 13 February 2017

9:30gm



ORDERS AND DECLARATIONS SOUGHT

- 1 An order pursuant to UCPR 14.28(1) that the defence filed on 17 January 2017 and be struck out on the basis that:
 - a. no reasonable defence is disclosed; and/or
 - b. the defence has a tendency to cause prejudice, embarrassment or delay in the proceeding.
- 2 Costs.
- 3 Such further order as the court thinks fit.

SIGNATURE

Signature of legal representative

D-

Capacity Solicitor for the plaintiffs

Date of signature 1 February 2017

NOTICE TO PERSON AFFECTED BY ORDERS SOUGHT

If you do not attend, the court may hear the motion and make orders, including orders for costs, in your absence.

REGISTRY ADDRESS

Street address Supreme Court of NSW, Law Courts Building, 184 Phillip

Street, Sydney

Postal address Supreme Court of NSW, GPO Box 3, Sydney NSW 2001

Telephone 1300 679 272