

IN THE HIGH COURT OF AUSTRALIA  
SYDNEY REGISTRY

No. S197 of 2019

BETWEEN:

SHANE DOWLING  
Applicant

and

JANE DOE 1  
First Respondent

JANE DOE 2  
Second Respondent

JANE DOE 3  
Third Respondent

JANE DOE 4  
Fourth Respondent



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### AFFIDAVIT

I, Richard Michael Keegan, of Level 12, 60 Carrington Street, Sydney NSW 2000, solicitor, say on oath as follows:

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1. I am a solicitor employed by Addisons, solicitors for the respondents. Subject to the supervision of Martin O'Connor, who is the partner on the record, I have the day to day carriage of this matter. I am authorised to swear this affidavit on the respondents' behalf.
  2. I believe that the contents of this affidavit are true and correct.
  3. I have previously sworn an affidavit in this proceeding on 17 July 2019. I adopt the definitions used in that affidavit.
  4. I refer to row 38 of the table in paragraph 8 of my previous affidavit.
  5. The information in that row is not correct. Hoeben CJ at CL did not strike out Mr Dowling's application for dismissal for want of prosecution ("**Application**") on 17 May 2019. Instead the Application was stood over to the date of the final hearing in this Proceeding, namely 26 and 27 August 2019.
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SWORN by the deponent  
at Sydney in New South Wales  
on 23 July 2019.

10 Before me: *Tara Koh*

Address: Level 12, 60 Carrington Street,  
Sydney NSW 2000

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.
2. I have known the deponent for at least  
12 months.



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an Australian legal practitioner within the  
meaning of the Legal Profession Uniform  
Law (NSW)

