

BETWEEN:

Shane Dowling
Applicant

and

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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, Shane Dowling, of 1/78b Ocean St Bondi NSW, Journalist, affirm as follows:

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1. I write this affidavit as information has come to hand that makes it obvious that the lawyer for the respondents, Richard Keegan, has deliberately and knowing lied to the High Court of Australia in his response filed on the 17th of July 2019 on behalf of the respondents in an attempt to pervert the course of justice.
2. In Mr Keegan's response at paragraph (3) says: In any event, the application for removal is premature, in that: (a) the filing of evidence is yet to be concluded.
3. In the NSW Supreme Court on Friday the 26th of July 2019 the barrister acting for the respondents, Sandy Dawson SC, made it clear that they would not be filing any further evidence.
- 40 4. Given that the Jane Doe's have only filed hearsay evidence by Richard Keegan, which is in admissible at final hearing, means they will be showing up to the final hearing with no evidence as they did in the Munsie v Dowling matter.
5. This means that Richard deliberately lied to the High Court of Australia when he wrote in his submissions that "the filing of evidence is yet to be concluded" when he was trying to support his argument that "the application for removal is premature". It's been shown to be the lies by Mr Keegan.
6. I wrote the below email to Mr Keegan, Mr Dawson and other lawyers who have been working on the matter in relation to the above as per below:

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Shane Dowling
1/78b Ocean St Bondi NSW 2026

Telephone: 0411238704

shanedowling@outlook.com.au
Ref: Shane Dowling

Shane Dowling JP
145713

Shane Dowling

From: SHANE DOWLING <shanedowling@hotmail.com>
Sent: 27 July 2019 11:39
To: Richard Keegan <richard.keegan@addisonslawyers.com.au>;
Alexander Latu <alexander.latu@addisonslawyers.com.au>; Sandy
Dawson <sandy.dawson@banco.net.au>; Martin O'Connor
<Martin.OConnor@addisonslawyers.com.au>;
ryan.stokes@acequity.com.au
Cc: Kieran Smark <smark@smark.com.au>; tworner@seven.com.au
Subject: Jane Doe & Ors v Dowling

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Dear Mr Keegan

Can you explain why you lied to the High Court of Australia in your
submissions filed on they 17th of July 2019 when you said at paragraph 3
that "the filing of evidence has yet to be concluded" when:

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1. There are no court orders for any filing of evidence or further filing of
evidence even though there is no evidence before the court supporting your
clients claim except hearsay evidence by you, filed years ago, which is in
admissible at final hearing?

2. Yesterday, Friday the 26th of July 2019, when the matter was in
court, at my request, there were no orders issued for the filing of evidence?

3. Yesterday, you nor your barrister Sandy Dawson SC, sought to have
any further evidence filed?

4. Yesterday Sandy Dawson SC made it clear he had no intention to
file any further evidence in the matter?

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5. Yesterday Sandy Dawson SC played stupid in court and pretended
he knew nothing about what you wrote in the submissions to the High Court
of Australia, especially paragraph 3?

6. Why did Sandy Dawson SC, yesterday in court, at one point try to
contradict me when I pointed out that he had not signed off on the
submissions to the High Court of Australia but you had signed off on the
submissions?

Please reply ASAP so I can advise the High Court of Australia.

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Regards

Shane Dowling
Kangaroo Court of Australia
Ph 0411 238 704

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7. I have not had a response to the above email.
8. I believe the High Court of Australia should charge Mr Keegan with criminal
contempt as Mr Keegan, Mr Dawson and the other lawyers have a long
history of lying to the court, abusing processes and deny opposing parties
natural justice which is outlined in a unanimous decision in the Court of
Appeal judgment Capilano Honey v Dowling which involved the same

Shane Dowling JP 145713

Shane Dowling

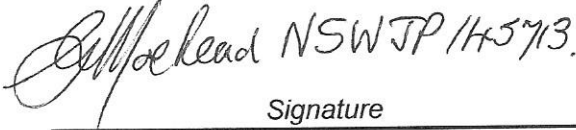
lawyers and myself. The Court of Appeal judgment details are: Capilano Honey Ltd v Dowling (No 2) [2018] NSWCA 217 (3 October 2018)

9. The judge hearing the matter on Friday (26-7-19) Justice Desmond Fagan denied me natural justice numerous times and made it clear I would be denied natural justice at the final hearing.

AFFIRMED by the deponent
at Sydney in NSW
on 29/7/19.

Supreme Court of NSW

Before me:

 NSWJP 145713.

Signature

[name and qualification of
witness administering oath or affirmation]



Signature of deponent

10 *[delete if inapplicable]

GAVIN DOUGLAS MOEHEAD
Justice of the Peace Registration 145713
in and for the State of New South Wales, Australia