

FILED

02 JUL 2019

Form 20 (version 2)  
UCPR 18.1 and 18.3



FILED  
02 JUL 2019  
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### NOTICE OF MOTION

#### COURT DETAILS

Court	Supreme Court of New South Wales
#List	Equites
Registry	Sydney
Case number	2017/116771 -006-

#### TITLE OF PROCEEDINGS

[First] plaintiff	<b>Seven Network (Operations) Limited (ABN 65 025 845 262)</b>
#Second plaintiff #Number of plaintiffs (if more than two)	Seven West Media Limited (ABN 91053 480 845)

[First] defendant	<b>Shane Dowling</b>
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#### FILING DETAILS

Person seeking orders	Shane Dowling
#Filed in relation to	Application for contempt
#Legal representative	Self-represented
Contact name and telephone	Shane Dowling – Ph 0411 238 704

#### PERSON AFFECTED BY ORDERS SOUGHT

1. **Seven Network (Operations) Limited (ABN 65 025 845 262)**
2. Seven West Media Limited (ABN 91053 480 845)
3. Kerry Stokes
4. Bruce McWilliam
5. Tim Worner
6. Kieran Smark SC
7. Richard Keegan
8. Martin O'Connor
9. Alexander Latu

#### HEARING DETAILS

This motion is listed at [time, date and place to be inserted by the registry unless otherwise known (Court registry will leave blank if being dealt with in chambers.)].

9.30am on 31/7/19

[on separate page]

## **ORDERS SOUGHT**

- 1 A declaration that the plaintiffs and respondents are in contempt of court for breaching court orders issued on the 3<sup>rd</sup> of April 2019.
- 2 A declaration that the plaintiffs and respondents are in contempt of court for breaching court orders issued on the 28<sup>th</sup> of May 2019
- 3 A declaration that the plaintiffs and respondents are in contempt of court for attempting to pervert the course of justice.
- 4 A declaration that Keiren Smark SC in contempt of court for attempting to pervert the course of justice and breaching the barristers rules by lying and deceiving the court from the bar table on the 28<sup>th</sup> of May 2019.
- 5 A declaration that Alexander Latu is in contempt of court for breaching the solicitors rules and making a knowingly false statement (perjury) in his affidavit dated the 28<sup>th</sup> May 2019.
- 6 Orders for interrogatories and discovery be issued as per below:
- 7 Kerry Stokes, Bruce McWilliam and Tim Worner provide to the court their personal and work computers so they can be copied given the court has copied my computer on their behalf and given them a copy.
- 8 A copy of all communication including but not limited to all emails, letters, notes, file notes, text messages and documents etc in the possession of Seven Network (Operations) Limited (ABN 65 025 845 262) and/or Seven West Media Limited (ABN 91053 480 845) and/or its associated companies regarding the disputed website: sevenversusamber.com
- 9 A copy of all communication including but not limited to all emails, letters, notes, file notes, text messages and documents etc in the possession of Seven Network (Operations) Limited (ABN 65 025 845 262) and/or Seven West Media Limited (ABN 91053 480 845) and/or its associated companies regarding the ownership of the disputed website: sevenversusamber.com
- 10 A copy of all communication including but not limited to all emails, letters, notes, file notes, text messages and documents etc in the possession of Seven Network (Operations) Limited (ABN 65 025 845 262) and/or Seven West Media Limited (ABN 91053 480 845) and/or its associated companies regarding the fake Amber Harrison GoFundMe page set up by Addisons lawyers as reported by New Matilda

at: <https://newmatilda.com/2017/09/27/exclusive-channel-7s-lawyers-created-a-fake-gofundme-page-under-the-name-of-amber-harrison/>

- 11 A copy of all communication including but not limited to all emails, letters, notes, file notes, text messages and documents etc in the possession of Seven Network (Operations) Limited (ABN 65 025 845 262) and/or Seven West Media Limited (ABN 91053 480 845) and/or its associated companies regarding the website: <https://therealamberharrison.wordpress.com/>
- 12 A copy of all communication including but not limited to all emails, letters, notes, file notes, text messages and documents etc in the possession of Seven Network (Operations) Limited (ABN 65 025 845 262) and/or Seven West Media Limited (ABN 91053 480 845) and/or its associated companies regarding the “Dowling clause” in the Simon Mulvany deed of release.
- 13 A copy of all communication including but not limited to all emails, letters, notes, file notes, text messages and documents etc in the possession of Seven Network (Operations) Limited (ABN 65 025 845 262) and/or Seven West Media Limited (ABN 91053 480 845) and/or its associated companies regarding Justine Munsie writing the affidavit, dated the 14<sup>th</sup> of April 2014, for Kerry Stokes.
- 14 Kerry Stokes, Bruce McWilliam and Tim Worner be subpoenaed to give evidence under oath in the applicants Notice of Motion for contempt (Filed in 2017) against me.
- 15 Interrogatories for Kerry Stokes to answer under oath:
1. Do you or any of your companies own the website sevenversusamber.com?
  2. Do you or any of your companies own the website: <https://therealamberharrison.wordpress.com/?>
  3. Did you or any of your employees direct lawyers at Addisons to set up the fake Amber Harrison GoFundMe page?
- 16 That the plaintiffs and respondents pay my costs for this motion forthwith.
- 17 Such further or other order as the court thinks fit.

**SIGNATURE**

~~#Signature of legal representative~~

#Signature of or on behalf of  
person seeking orders if not  
legally represented



Capacity

Defendant

Date of signature

2/7/2019

**#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



[on separate page]

[Only include this section if a non-party is (a) seeking orders (ie an applicant), or (b) affected by orders sought (ie a respondent). Do not include the contact details for any person who is already a party to the proceedings.

"Person" includes a corporation. See Guide to preparing documents for further information about parties and non-parties in the proceedings]

## **#FURTHER DETAILS ABOUT APPLICANT**

### **Applicant**

[A person is an applicant only if not already a party to the proceedings.]

## **#FURTHER DETAILS ABOUT RESPONDENT[S]**

[A person is a respondent only if not already a party to the proceedings.]

### **Respondents**

Name	Kerry Stokes
Address	Media City 8 Central Avenue Eveleigh Sydney NSW 2015

Name	Bruce McWilliam
Address	Media City 8 Central Avenue Eveleigh Sydney NSW 2015

Name	Tim Woner
Address	Media City 8 Central Avenue Eveleigh Sydney 2015

Name	Richard Keegan
Address	Level 12 / 60 Carrington St Sydney NSW 2000

Name	Kieran Smark
Address	5 Wentworth Chambers 180 Phillip St Sydney 2000

Name Martin O'Connor  
Address Level 12 / 60  
Carrington St  
Sydney NSW 2000

Name Alexander Latu  
Address Level 12 / 60  
Carrington St  
Sydney NSW 2000

**“A”**

**Statement of Charge**

(Part 55 rule 7 of the Supreme Court Rules 1970)

**COURT DETAILS**

Court	Supreme Court of New South Wales
#List	Equities
Registry	Sydney
Case number	2017/116771

**TITLE OF PROCEEDINGS**

[First] plaintiff	<b>Seven Network (Operations) Limited (ABN 65 025 845 262)</b>
#Second plaintiff #Number of plaintiffs (if more than two)	Seven West Media Limited (ABN 91053 480 845)
[First] defendant	<b>Shane Dowling</b>

**FILING DETAILS**

Person seeking orders	Shane Dowling
#Filed in relation to	Application for contempt
#Legal representative	Self-represented
#Legal representative reference	Shane Dowling Ph: 0411 238 704
Contact name and telephone	shanedowling@outlook.com.au

**Charge**

1. In 2017 the applicants instituted proceedings against me.
2. In 2017 the applicants instituted proceeding for contempt against me alleging I breached court orders.
3. On the 3<sup>rd</sup> of April 2019 court orders were issued at the request of the applicants and they deliberately breached those court orders.
4. On the 28<sup>th</sup> of May 2019 the applicant's barrister and lawyers deliberately lied in the face of the court and via affidavit in relation to why they breached the court orders on the 3<sup>rd</sup> of April 2019.
- 4 On the 28<sup>th</sup> of May 2019 the applicants had court orders issued as they requested and they deliberately breached those court orders.

5. The applicants and their lawyers have a long history of abusing court orders, perjury, trying to destroy evidence and attempting to pervert the course of justice etc.

**SIGNATURE**

~~#Signature of legal representative~~

#Signature of or on behalf of person seeking orders if not legally represented

A handwritten signature in black ink, appearing to read 'R. Davis', written over a horizontal line.

Capacity

Defendant

Date of signature

2/7/19

**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