

IN THE SUPREME COURT OF WESTERN AUSTRALIA

COR 35 OF 2010

IN THE MATTER OF GREAT SOUTHERN MANAGERS AUSTRALIA LIMITED (ACN 083 825 405) (IN LIQUIDATION)

**GREAT SOUTHERN MANAGERS AUSTRALIA LIMITED (ACN 083 825 405) (IN LIQUIDATION) IN ITS CAPACITY AS RESPONSIBLE ENTITY OF THE MANAGED INVESTMENT SCHEMES LISTED IN SCHEDULE 1 TO THE APPLICATION DATED 7 APRIL 2010**

First Plaintiff

**GREAT SOUTHERN OLIVES COMPANY LIMITED (ACN 121 381 208) (IN LIQUIDATION)**

Second Plaintiff

**GREAT SOUTHERN OLIVE HOLDINGS PTY LIMITED (ACN 111 092 374) (IN LIQUIDATION)**

Third Plaintiff

**ANDREW JOHN SAKER**

Fourth Plaintiff

**MARTIN BRUCE JONES**

Fifth Plaintiff

**DARREN GORDON WEAVER**

Sixth Plaintiff

**JAMES HENRY STEWART**

Seventh Plaintiff

**JAMES GERARD THACKRAY**

First Defendant

**ANTHONY GREGORY MCGRATH**

Second Defendant

**COLIN MCINTOSH NICOL**

Third Defendant

**THE GROWERS LISTED IN SCHEDULE 8 OF THE MINUTE OF AMENDED ORIGINATING PROCESS ANNEXED AS A TO THE PLAINTIFFS' INTERLOCUTORY PROCESS DATED 10 MAY 2010**

Fourth Defendants

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**AFFIDAVIT OF NATALIE CLAIRE COLLINS  
SWORN 11 MAY 2010  
AND ATTACHMENTS NCC-27 TO NCC-39**

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Date of Document: 11 May 2010  
Date of Filing: May 2010  
Filed on behalf of: The Plaintiffs  
Prepared by  
**Middletons**  
Level 2  
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WEST PERTH WA 6005

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I, **NATALIE CLAIRE COLLINS** care of Level 2, 6 Kings Park Road, West Perth in the State of Western Australia, Solicitor, being duly sworn make oath and say as follows:

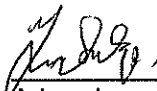
1. I am a solicitor in the employ of Middletons (Perth) Pty Ltd and am duly authorised to make this affidavit.
2. Subject to the supervision of my principals, I have the day to day conduct of this matter.
3. I swear this affidavit in relation to orders sought in the plaintiff's originating process dated 10 March 2010 and in the plaintiff's application dated 7 April 2010 and in opposition to the fourth defendant's application dated 6 May 2010.
4. Except where otherwise stated, I swear this affidavit from my personal knowledge. Where I swear this affidavit from facts outside of my personal knowledge, I am informed by the source stated and truly believe those facts to be true.
5. Now produced and shown to me and marked **NCC-27** is a true copy of a letter from Clarendon Lawyers to Middletons dated 19 April 2010.
6. Now produced and shown to me and marked **NCC-28** is a true copy of a letter from Middletons to Clarendon Lawyers dated 23 April 2010.
7. Now produced and shown to me and marked **NCC-29** is a true copy of a letter from Clarendon Lawyers to Middletons dated 27 April 2010.
8. Now produced and shown to me and marked **NCC-30** is a true copy of a letter from Middletons to Clarendon Lawyers dated 27 April 2010.
9. Now produced and shown to me and marked **NCC-31** is a true copy of an email that I received from Mark Bland of Clarendon Lawyers dated 28 April 2010 in response to an email that I sent to Mark Bland earlier that day.
10. Now produced and shown to me and marked **NCC-32** is a true copy of a letter from Clarendon Lawyers to Middletons dated 28 April 2010.
11. Now produced and shown to me and marked **NCC-33** is a true copy of an email and attachment that I received from Celia Armstrong of Clarendon Lawyers dated 3 May 2010 in response to an email that I sent to Celia Armstrong earlier that day.



- 12. Now produced and shown to me and marked **NCC-34** is a true copy of a letter from Clarendon Lawyers to Middletons dated 3 May 2010.
- 13. Now produced and shown to me and marked **NCC-35** is a true copy of an email that I received from Celia Armstrong of Clarendon Lawyers dated 6 May 2010 in response to an email that I sent to Celia Armstrong earlier that day.
- 14. Now produced and shown to me and marked **NCC-36** is a true copy of a letter from Middletons to Clarendon Lawyers dated 9 May 2010.
- 15. Now produced and shown to me and marked **NCC-37** is a true copy of a letter from Clarendon Lawyers to Middletons dated 10 May 2010.
- 16. Now produced and shown to me and marked **NCC-38** is a true copy of a letter from Middletons to Clarendon Lawyers dated 10 May 2010.
- 17. Now produced and shown to me and marked **NCC-39** is a true copy of a letter from Clarendon Lawyers to Middletons dated 11 May 2010.

SWORN by **NATALIE CLAIRE COLLINS** at )  
 West Perth in the State of Western Australia )  
 this 11<sup>th</sup> day of May 2010 before me: )



 Su SZE TING  
 A legal practitioner who has held a practice certificate for at least 2 years and who holds a current practice certificate