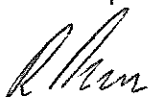


Statutory Declaration
OATHS ACT 1900, NSW, EIGHTH SCHEDULE

I, **ROBERT MARTIN PELIKAN**, IT Services Manager of Level 65, 19 Martin Place Sydney NSW 2000, do solemnly and sincerely declare that:

1. My name is Robert Martin Pelikan and I am employed by Holding Redlich.
2. I am employed in the position of Sydney IT Services Manager at Holding Redlich and have held that position since about October 2016.
3. In my role as IT Services Manager for Holding Redlich I am familiar with firm's IT and email systems, including the document management system, known as Filesite, which the firm uses.
4. The document management system the firm uses contains a record of saved emails sent and received by partners and staff of the firm over the period from at least 2003 (and in some cases earlier) to date. I am aware that the firm requires that all matter-related emails sent and received by partners and staff of the firm are to be saved onto the document management system.
5. On 16 September 2019 I carried out a review of the firm's document management system in order to determine whether any saved emails had been sent, whether as a copy (CC) to another person on an email chain, or otherwise, to Chris Willis in the period from 5 January 2015 to 8 November 2018.
6. In carrying out this search I used the words "Chris Willis" as well as the email address chris.willis [REDACTED]
7. The effect of the search that I carried out meant that any emails sent to or copied to Chris Willis in the period referred to above, and saved in the firm's document management system, would have been identified in the search and isolated.
8. The result of the search that I carried out discloses that one email was sent to Chris Willis by Holding Redlich, by way of a CC email, on 17 September 2016 at 11.50am. No other emails were disclosed in the search I carried out.
9. I have also carried out a review of the email mailbox of the National Managing Partner of Holding Redlich, Ian Robertson. This mailbox include emails sent and received by Mr Robertson, together with deleted emails, which may have otherwise have not been saved onto the firm's document management system.
10. In carrying out this search I used the words "Chris Willis" as well as the email address chris.willis [REDACTED] No emails were disclosed in Mr Robertson's email mailbox in the search I carried out.

and I make this solemn declaration conscientiously believing the same to be true, and by virtue of the provisions of the *Oaths Act 1900*.



Declared at Sydney, New South Wales on 16 September 2019:



.....
Robert Martin Pelikan

in the presence of an authorised witness, who states:

I, Kim Nguyen, a solicitor admitted to practice in NSW, certify the following matters concerning the making of this statutory declaration by the person who made it:

- 1 I saw the face of the person; and
- 2 I have known the person for at least 12 months.



16 September 2019

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Signature of authorised witness and date