

**Statutory Declaration**  
**OATHS ACT 1900, NSW, EIGHTH SCHEDULE**

I, **GEOFFREY ERIC FARNSWORTH**, Solicitor of Level 65, 19 Martin Place Sydney NSW 2000, do solemnly and sincerely declare that:

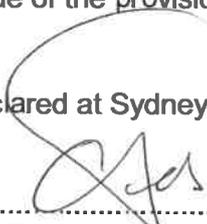
1. My name is Geoffrey Eric Farnsworth. I am a partner of the law firm Holding Redlich, having joined the firm in July 2014.
2. Prior to joining Holding Redlich, I was a Principal of the law firm Macpherson Kelley from August 2009 to June 2014. I have practised as a transport and commodities lawyer for over 25 years.
3. Over the last several years, I have been responsible for Holding Redlich's marketing initiative which seeks to promote the firm's legal services to South Korean companies with offices in Australia. These marketing efforts have been assisted by one of my contacts, Dr Christine Oh. Dr Oh is a Korean qualified lawyer by background whom I have known for several years.
4. In or about late August 2017, Dr Oh emailed me to ascertain if Holding Redlich would be interested in putting forward a proposal to undertake property-related legal work for Yuhu Group.
5. As at late August 2017, Yuhu Group was not a client of Holding Redlich and I did not know any employees of Yuhu Group.
6. On or our about 7 November 2017, I received an email from Dr Oh, forwarding an email from Mr Bob Shin, General Manager-Property at Yuhu Group. Mr Shin's email stated that Yuhu Group was seeking a fee proposal for legal work relating to Yuhu Group's project at Eastwood Shopping Centre in Sydney.
7. As I do not have any expertise in property development work, I referred Dr Oh's email to two of my partners in Holding Redlich's property and projects group, Cameron Sheather and Lindsay McGregor.
8. On 14 November 2017, I sent an email to Mr Shin, forwarding a proposal from Messrs Sheather and McGregor to provide legal services for Yuhu Group relating to the Eastwood project.
9. I subsequently received another enquiry from Mr Shin relating to a separate Yuhu Group project, *The Miller* in North Sydney.
10. On 2 February 2018, I received an email from Mr Shin, notifying me that Yuhu Group wished to instruct Holding Redlich in terminating the existing strata plan at *The Miller*.
11. To the best of my recollection and belief, Mr Shin's email dated 2 February 2018 was the first instruction that Holding Redlich received from Yuhu Group to undertake any legal work for the company.



- 12. I have met Mr Shin on 5 or 6 occasions. I have not met nor had any contact with Mr Huang Xiangmo.
- 13. I did not make any inquiries in relation to Yuhu Group, or Mr Huang Xiangmo, before referring the above matters. I was aware that Yuhu Group was a property development company, but otherwise did not know anyone at Yuhu Group at the time that Mr Shin asked for a fee proposal from Holding Redlich. I believe that a conflict check was performed on Yuhu Group to confirm that we did not act in any matters in which a potential conflict may arise, but this would not have extended to individuals associated with Yuhu Group.
- 14. I have caused a search of Holding Redlich’s financial records to be conducted. The search reveals that Holding Redlich’s first matter for Yuhu Group was opened in February 2018. Holding Redlich has since opened a further 7 matters for Yuhu Group and its related companies. Holding Redlich has billed about \$68,000 (including professional fees of about \$61,000) to date.
- 15. As part of my marketing efforts, I have managed Holding Redlich’s client relationship with Yuhu Group. I confirm that Mr Ian Robertson AO, who is the National Managing Partner of Holding Redlich, was not involved in Yuhu Group becoming a client of Holding Redlich and has not undertaken any work for Yuhu Group.

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 24 October 2019:

  
 .....  
 Geoffrey Eric Farnsworth

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.

 24 October 2019  
 .....  
 Signature of authorised witness and date