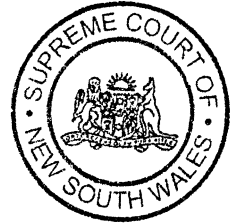


FILED

13 JAN 2021



(N.A.)

STATEMENT OF CLAIM

COURT DETAILS

Court	Supreme Court of NSW
Division	Common Law
List	General
Registry	Sydney
Case number	2021/10183

TITLE OF PROCEEDINGS

First plaintiff	Christopher John Dunne
Second plaintiff	Linda Margaret Waters
First defendant	Moin & Associates Pty Ltd ACN 098 920 971
Second defendant	Gregory Robert Moin

FILING DETAILS

Filed for	Christopher John Dunne and Linda Margaret Waters, plaintiffs
Legal representative	Peter Pardy, APJ Law
Legal representative reference	PCP:181123
Contact name and telephone	Peter Pardy – (02) 6776 4500
Contact email	ppardy@apjlaw.com.au

TYPE OF CLAIM

[Select type of claim from the list provided in section 6 of the Guide to preparing documents, available on the UCPR website at www.ucprforms.justice.nsw.gov.au or at any NSW court registry]

other - Judge (Common law)

RELIEF CLAIMED

- 1 Damages
- 2 Interest pursuant to s 100 of the *Civil Procedure Act 2005* (NSW)
- 3 Costs

This matter has been listed before the Court
on *4/3/2021*
at *9:00am*

Clerk of the Court

CP Dunne

Hill

PLEADINGS AND PARTICULARS

A The Plaintiff and Group Members

4 The First Plaintiff (**Mr Dunne**):

- a is a natural person;
- b is married to the Second Plaintiff (**Ms Waters**);
- c currently resides at the rural property "The Range", 1430 Enmore Road, Enmore NSW 2350 (**The Range**), which is near Armidale NSW, with Ms Waters;
- d is a grazier;
- e with Ms Waters, runs a mixed farming operation on The Range; and
- f from around May 2015 to January 2018 was a client of the First Defendant (**Moin & Associates**).

5 The Second Plaintiff (**Ms Waters**):

- a is a natural person;
- b is married to Mr Dunne;
- c currently resides at the Range with Mr Dunne;
- d is a grazier;
- e with Mr Waters, runs a mixed farming operation on The Range; and
- f from around May 2015 to January 2018 was a client of Moin & Associates.

B The Defendants

6 Moin & Associates:

- a is the First Defendant;
- b is a corporation able to sue and be sued in its corporate name;
- c in or around November 2001, became an incorporated legal practice;
- d from in or around November 2001 to in or around June 2018, provided legal services;
- e on 21 June 2005, obtained the business name Northern Star Conveyancing;
- f conducted conveyancing work under the business name Northern Star Conveyancing;

g from in or around June 2005 to on or around 30 January 2018, employed Sandra Henri Edmonds (**Mrs Edmonds**) as a licensed conveyancer.

7 The Second Defendant (**Mr Moin**):

- a is a natural person;
- b since 30 November 2001 has been the sole director of Moin & Associates;
- c from 30 November 2001 to date is the principal solicitor of Moin & Associates;
- d since 19 June 2018, has been a director of Moin Morris Schaefer Pty Ltd ACN 626 922 245 (**Moin Morris Schaefer**);
- e since in or around June 2018, has been the principal solicitor of Moin Morris Schaefer;
- f from in or around June 2005 to on or around 30 January 2018, supervised Mrs Edmonds; and
- g on or around 30 January 2018, terminated Mrs Edmonds' employment.

C Group Members

8 Mr Dunne and Ms Waters bring these proceedings pursuant to s 157 of the *Civil Procedure Act 2005* (NSW) on their own behalf and on behalf of the group members, being those persons who:

- a from time-to-time from June 2014 to October 2017, engaged Moin & Associates either directly or through its trading name Northern Star Conveyancing to provide legal services, including conveyancing work, and received legal services, including conveyancing work, from Moin & Associates; and
- b from June 2014 to October 2017, were invited by Mrs Edmonds, either directly or through an agent who made representations on behalf of Mrs Edmonds, to purchase shares in Base Suspension Pty Ltd ACN 114 800 734 (**Base Suspension**) by purchasing shares in DSJSE Pty Ltd ACN 600 083 789 (**DSJSE**); and
- c from June 2014 to October 2017, provided funds to DSJSE or Mrs Edmonds to purchase shares in Base Suspension; and
- d are listed on Schedule 1 to this Statement of Claim
(**Group Members**).

D Base Suspension, DSJSE and Mrs Edmonds

9 Mrs Edmonds:

- a from 26 July 2010 to 30 June 2019, was a licensed conveyancer;
- b from at least June 2014 to October 2017, was married to David Edmonds (**Mr Edmonds**);
- c from in or around June 2005 to on or around 30 January 2018, was employed by Moin & Associates as a licensed conveyancer;
- d was the sole director of DSJSE from 12 June 2014 to 23 January 2018;
- e held 12 ordinary shares in DSJSE from 12 June 2014 to 27 July 2015;
- f held 681 ordinary shares in DSJSE from 28 July 2015 to 8 February 2016;
- g held 2,495 ordinary shares in DSJSE from 9 February 2016 to 18 January 2017;
- h held 6,000 ordinary shares in DSJSE from 19 January 2017; and
- i caused the register of members for DSJSE to be changed on 28 May 2018.

Particulars

ASIC Document No 9EAA00679, Change to Company Details lodged on
8 May 2018 by Mrs Edmonds

10 Base Suspension:

- a was incorporated on 17 June 2005;
- b on 29 December 2016, changed its name to Base Air Management Ltd;
- c from 28 January 2011 to 28 December 2016, was known as Base Suspension;
- d develops suspension technology for trucks, trailers and buses;
- e from at least 17 June 2014, had a share structure of 90,671 ordinary shares.

11 DSJSE:

- a was incorporated on 12 June 2014;
- b from 12 June 2014 to 27 July 2015, had a share structure of 12 ordinary shares with each share being worth \$1;
- c from 28 July 2015 to 8 February 2016, had a share structure of 681 ordinary shares with each share being worth \$1;

d from 9 February 2016 to 18 January 2017, had a share structure of 2,495 ordinary shares with each share being worth \$1; and

e from 19 January 2017, had 6,000 ordinary shares with each share being worth \$1.

12 Before 17 June 2014, Mrs Edmonds and Mr Edmonds acquired 454 ordinary shares in Base Suspension (**Edmonds Base Shares**).

13 The Edmonds Base Shares formed part of an undilutable share base of Base Suspension that could only be sold if the relevant shareholder held at least 1% of shares or 907 shares.

Particulars

Investment Proposal – Base, 25 February 2013

14 On or about 17 June 2014, Mr and Mrs Edmonds transferred the Edmonds Base Shares to DSJSE.

Particulars

DSJSE paid \$45.45 for the 454 ordinary shares in Base Suspension

15 Between 17 June 2014 and 25 October 2016, DSJSE held 454 ordinary shares in Base Suspension.

16 On 26 October 2016, DSJSE acquired an additional 454 ordinary shares in Base Suspension from Lasmart Pty Ltd.

17 Since 26 October 2016, DSJSE has held 908 ordinary shares in Base Suspension.

E **Mrs Edmonds' fraudulent conduct**

18 From around June 2014 to October 2017, Mrs Edmonds purported to sell shares in Base Suspension to the Group Members (**Purported Base Shares**).

Particulars

Mrs Edmonds purported to effect the sale of shares in Base Suspension by selling shares in DSJSE which held shares in Base Suspension

19 In exchange for the Purported Base Shares, the Group Members paid to Mrs Edmonds or an account nominated by Mrs Edmonds for a total of \$1,552,338.00.

Particulars

See particulars at paragraph 30 below.

20 From around June 2014 to on or around October 2016, in the course of interactions with the Group Members about the sale of the Purported Base Shares, the following representations were made to the Group Members:

- a Mrs Edmonds was the sole director and shareholder in DSJSE;
- b DSJSE held shares in Base Suspension;
- c Base Suspension held intellectual property in an air suspension system for trucks which was being commercialised in North America;
- d the value of shares in Base Suspension was going to increase imminently in the short-term (**Base Shares Value Representation**);

Particulars

On or around 7 May 2015, Ms Edmonds told Mr Dunne and Ms Waters that the cost of one share was \$5,000 and that one share would be worth \$25,000 in around 18 months to two years' time.

- e one share in DSJSE was equivalent to one share in Base Suspension (**DSJSE Equivalence Representation**);
- f Mrs Edmonds was selling shares in Base Suspension owned by her, or was selling her shares in DSJSE itself holding shares in Base Suspension or was selling shares in Base Suspension on behalf of a third party (**Saleability Representation**);
- g Mrs Edmonds would complete all paperwork to transfer shares from DSJSE to each Group Member (**Paperwork Representation**); and
- h Mrs Edmonds would transfer shares from DSJSE to each Group Member after they paid for the Purported Base Shares (**Transfer Representation**).
- i in transferring money to Mrs Edmonds, a Group Member was acquiring a fixed number of Purported Base Shares (**Acquisition Representation**).

Particulars

The fixed number of Purported Base Shares was a fixed number shares in DSJSE and, by reason of the DSJSE Equivalence Representation, the same number of shares in Base Suspension.

21 The representations in paragraph 20 above were made by Mrs Edmonds to the Group Members, or by a third party on behalf of Mrs Edmonds to the Group Members.

Particulars

Linda Andrews was the third party who made the representations on behalf of Mrs Edmonds.

22 The representations in paragraph 20 above were express.

23 At the time of making the Base Shares Value Representation to Group Members, Mrs Edmonds knew that it was false.

24 At the time of making the DSJSE Equivalence Representation to Group Members, Mrs Edmonds knew that it was false.

Particulars

See paragraphs 11b-e and 14-15 above.

25 At the time of making the Saleability Representation to Group Members, Mrs Edmonds knew that it was false.

26 At the time of making the Transfer Representation to Group Members, Mrs Edmonds knew that it was false.

Particulars

When the Group Members transferred paid money to Mrs Edmonds or a third party nominated by her as set out in paragraph 19 above, Mrs Edmonds did not transfer shares from DSJSE to each Group Member.

On 28 May 2018, Ms Edmonds lodged a "Change to Company Details" form with ASIC, which changed the register of members to include, amongst others, the Group Members.

27 At the time of making the Paperwork Representation to Group Members, Mrs Edmonds knew that it was false.

Particulars

Mrs Edmonds failed to prepare share transfers from her to the Group Members of her issued share capital of DSJSE at all or at a value consistent with the Transfer Representation.

28 At the time of making the Acquisition Representation to Group Members, Mrs Edmonds knew that it was false.

29 At the time of making each of the representations referred to in paragraphs 21-28 (**Edmonds Misrepresentations**) to Group Members, Mrs Edmonds intended that each Group Member would rely on the Edmonds Misrepresentations to purchase

The Purported Base Shares by transferring money to Mrs Edmonds or a third party nominated by her.

- 30 The Group Members acted in reliance on the Edmonds Misrepresentations in transferring money to Mrs Edmonds to purchase the Purported Base Shares.

Particulars

Group Member	Bank transfer or cheque?	Purpose of transfer	Date of transfer / cheque	Amount of transfer / cheque	Account to which transferred / cheque payee
Dunne and L Waters	Cheque	35 Shares	10 May 2015	\$175,000.00	DJ & SH Edmonds
	Cheque	35 shares for \$105,000.00 and loan to Edmonds for \$105,000.00	22 August 2015	\$210,000.00	DJ & SH Edmonds
Ruurda	Cheque	20 Shares	23 June 2014	\$74,805.00	DJ & SH Edmonds
	Cheque	10 Shares	17 July 2014	\$37,402.50	DJ & SH Edmonds
Harmer	EFT	2 Shares	20 June 2014	\$7,480.50	Sandra Edmonds Community Mutual Account
	EFT	5 Shares	In or about August 2015	\$25,000.00	To be further particularised

D Waters	EFT	Part Payment 129 Shares being 20% of company	12 May 2015 to 18 May 2015	\$80,000.00	Edmonds Community Mutual Account
	Cash	Part payment of 129 Shares being 20% of company	21 May 2015	\$20,000.00	Sandra Edmonds
Parsons	EFT	20 Shares	21 March 2016 – 24 March 2016	\$200,000.00	Edmonds Community Mutual Account
Troost	EFT	6 Shares	27 June 2015 – 4 July 2015	\$30,000.00	Edmonds Community Mutual Account
Ross- Smith	EFT	10 Shares	14 May 2015	\$50,000.00	Account provided by Andrews
	EFT	20 Shares	19 August 2015	\$100,000.00	Account provided by Andrews
Alter	EFT	4 shares	7 April 2015	\$23,650.00	Edmonds nominated account
		10 shares	To be further particularised	\$40,000.00	Edmonds nominated account
Estate Talbert	EFT	12 Shares	19 March 2015	\$74,000.00	Edmonds nominated account

Andrews	Bank Transfer	10 shares	July 2015	\$50,000.00	Edmonds nominated account
	Bank transfer	6 shares	In or about July 2015	\$30,000.00	Edmonds nominated Account

- 31 Certain of the Group Members acted in reliance on the Edmonds Misrepresentations in transferring money to Mrs Edmonds or an account nominated by her to pay for alleged broker services and counsel fees relating to the sale of the Purported Base Shares.

Particulars

D Waters	EFT	Part Broker Fees	19 July 2016	\$25,000.00	Edmonds Community Mutual Account
		Part Broker Fees	20 July 2016	\$3,000.00	Edmonds Community Mutual Account
	EFT	Barrister fees	5 December 2016	\$10,000.00	Edmonds Community Mutual Account
Ruurda	Cheque	Loan	31 October 2016	\$20,000.00	DJ & SH Edmonds
Harmer	EFT	Broker fees	6 September 2017	\$69,000.00	Jon Rodden BSB: 033-047 Acct: 275694
	EFT	Broker fees	6 September 2017	\$20,000.00	Jon Rodden

					BSB: 033-047 Acct: 275694
	EFT	Broker fees	20 September 2017	\$79,000.00	Edmonds NAB Account
	EFT	Broker fees	27 September 2017	\$86,000.00	Edmonds NAB Account
	EFT	Broker fees	9 October 2017	\$13,000.00	Edmonds NAB account

Insert table with money transferred other than for purpose of acquiring shares. If we include money that was repaid, exclude this from the claim for damages.

- 32 In transferring the money referred to in paragraph 30 above and in reliance on the Edmonds Misrepresentations, the Group Members thought that they were acquiring Purported Base Shares.

Particulars

Group Member	Number of Purported Base Shares that Group Members thought they were purchasing
Dunne and Waters	70 Shares
Ruurda	30 Shares
Harmer	7 Shares
Waters	129 Shares being 20% of Company
Parsons	20 Shares
Troost	6 Shares
Ross-Smith	30 Shares
Alter	14 Shares
Estate Talbert	12 Shares
Andrews	16 Shares

- 33 By reason of paragraphs 18-31, Mrs Edmonds engaged in the tort of deceit against the Group Members (**Edmonds Fraud**).
- 34 By reason of paragraphs 18-30 above, the Group Members suffered loss and damage.

Particulars

The loss and damage suffered was:

- (a) the money transferred by Group Members to Mrs Edmonds or her nominated third party for the acquisition of the Purported Base Shares (see paragraph 30 above); and
- (b) other transfers by certain Group Members to Mrs Edmonds or her nominated third party for alleged payment of broker fees and counsel fees relating to the sale of the Purported Base Shares (see paragraph 30 above)

- 35 By reason of the Edmonds Misrepresentations including but not limited to the Base Shares Value Representation; DSJSE Equivalence Representation, Saleability Representation; Paperwork Representation; Transfer Representation; and the Acquisition Representation, Mrs Edmonds has been indicted Director of Public Prosecutions NSW on 40 charges pursuant to Section 192E of the *Crimes Act 1900* (NSW).

F **Moin & Associates is vicariously liable for Mrs Edmonds' fraudulent conduct**

- 36 Mrs Edmonds committed the Edmonds Fraud in the course of her employment with Moin & Associates.

Particulars

Mrs Edmonds' employment with Moin & Associates provided the occasion for the Edmonds Fraud because Mrs Edmonds:-

- (a) Mrs Edmonds was unsupervised by the Principal of the firm and in the scope of Mrs Edmonds' employment with Moin & Associates:-
- Made representations that she was:-
- i. A Solicitor;
 - ii. A partner of Moin & Associates ("**Position Misrepresentations**")
- (b) That the Position Misrepresentations and her employment created a position of power, trust and control;

(c) assigned Mrs Edmonds a role which placed her vis-à-vis with the class members;

(d) That Mrs Edmonds used her employment to provide the occasion for the Edmonds Fraud empowered by the Position Misrepresentation

(e) Mrs Edmonds used the Position Misrepresentations to provide legal services to the Group Members to credential the Edmonds Fraud.

37 By reason of paragraph 36 above, Moin & Associates was vicariously liable for the Edmonds Fraud committed by Mrs Edmonds.

38 By reason of paragraph 37 above, the Group Members claim the loss and damage at paragraph 34 above, interest in accordance with s 100 of the *Civil Procedure Act 2005* (NSW) and costs from Moin & Associates.

G Mr Moin is vicariously liable for Mrs Edmonds' fraudulent conduct

39 The Group Members repeat paragraph 36 above.

40 Mr Moin supervised Mrs Edmonds in the course of her matters with the Group Members.

Particulars

Legal Profession Uniform Law Australian Solicitors' Conduct Rules 2015 (NSW) r 37

41 By reason of paragraphs 7c, 7f, 39 and 40 above, Moin & Associates was vicariously liable for the Edmonds Fraud committed by Mrs Edmonds.

42 By reason of paragraph 41 above, the Group Members claim the loss and damage at paragraph 34 above, interest in accordance with s 100 of the *Civil Procedure Act 2005* (NSW) and costs from Moin & Associates.

H Common Questions

43 The questions of law or fact common to the claims of the First and Second Plaintiffs and each of the Group Members are:

a whether from around June 2014 to in or around June 2016, Mrs Edmonds or a third party on behalf of Mrs Edmonds made any or all of Edmonds Misrepresentations;

b if Mrs Edmonds made any or all of Edmonds Misrepresentations, or asked a third party to make any or all of the Edmonds Misrepresentations on her behalf, whether Mrs Edmonds knew that those representations were false at the time that they were made;

- c whether Mrs Edmonds engaged in the tort of deceit or fraud;
- d if Mrs Edmonds engaged in the tort of deceit or fraud, whether she did so in the course of her employment with Moin & Associates;
- e if Mrs Edmonds engaged in the tort of deceit or fraud, whether she did so under the supervision of Mr Moin;
- f if Mrs Edmonds engaged in the tort of deceit or fraud, whether Moin & Associates and / or Mr Moin is vicariously liable for her conduct;
- g whether Moin & Associates and / or Mr Moin are liable for the money paid by Group Members set out above at paragraph 30;
- h whether Moin & Associates and / or Mr Moin are liable for the money paid by Group Members for alleged payment of broker fees and counsel fees relating to the sale of the Purported Base Shares set out above at paragraph 30.

SIGNATURE OF LEGAL REPRESENTATIVE

I certify under clause 4 of Schedule 2 to the Legal Profession Uniform Law Application Act 2014 that there are reasonable grounds for believing on the basis of provable facts and a reasonably arguable view of the law that the claim for damages in these proceedings has reasonable prospects of success.

I have advised the plaintiffs that court fees may be payable during these proceedings. These fees may include a hearing allocation fee.

Signature



Capacity

Solicitor on the Record

Date of signature

18 December 2020

NOTICE TO DEFENDANT

If you do not file a defence within 28 days of being served with this statement of claim:

- **You will be in default in these proceedings.**
- **The court may enter judgment against you without any further notice to you.**

The judgment may be for the relief claimed in the statement of claim and for the plaintiff's costs of bringing these proceedings. The court may provide third parties with details of any default judgment entered against you.

HOW TO RESPOND

Please read this statement of claim very carefully. If you have any trouble understanding it or require assistance on how to respond to the claim you should get legal advice as soon as possible.

You can get further information about what you need to do to respond to the claim from:

- A legal practitioner.
- LawAccess NSW on 1300 888 529 or at www.lawaccess.nsw.gov.au.
- The court registry for limited procedural information.

You can respond in one of the following ways:

- 1 If you intend to dispute the claim or part of the claim**, by filing a defence and/or making a cross-claim.
- 2 If money is claimed, and you believe you owe the money claimed**, by:
 - Paying the plaintiff all of the money and interest claimed. If you file a notice of payment under UCPR 6.17 further proceedings against you will be stayed unless the court otherwise orders.
 - Filing an acknowledgement of the claim.
 - Applying to the court for further time to pay the claim.
- 3 If money is claimed, and you believe you owe part of the money claimed**, by:
 - Paying the plaintiff that part of the money that is claimed.
 - Filing a defence in relation to the part that you do not believe is owed.

Court forms are available on the UCPR website at www.ucprforms.justice.nsw.gov.au or at any NSW court registry.

REGISTRY ADDRESS

Street address 5 Moore Street ARMIDALE NSW 2350
Postal address PO Box 91 ARMIDALE NSW 2350
Telephone (02) 6775 4600



#AFFIDAVIT VERIFYING

Name Christopher John Dunne
 Address
 Occupation Farmer/Grazier
 Date

I affirm:

- 1 I am the first plaintiff.
- 2 I believe that the allegations of fact in the statement of claim are true.

AFFIRMED at ARMIDALE

Signature of deponent

C Dunne

Name of witness

JESSICA LEE URQUHART

Address of witness

Solicitor

Capacity of witness

Solicitor

Suite 14, 126-128 Beardy Street
ARMIDALE NSW 2350

And as a witness, I certify the following matters concerning the person who made this affidavit (the deponent):

- 1 ~~#I saw the face of the deponent. [OR, delete whichever option is inapplicable]~~
~~#I did not see the face of the deponent because the deponent was wearing a face covering, but I am satisfied that the deponent had a special justification for not removing the covering.*~~
- 2 ~~#I have known the deponent for at least 12 months. [OR, delete whichever option is inapplicable]~~
 #I have confirmed the deponent's identity using the following identification document:

NSW Driver Licence

Identification document relied on (may be original or certified copy) †

Signature of witness

J Lee

Note: The deponent and witness must sign each page of the affidavit. See UCPR 35.7B.

[* The only "special justification" for not removing a face covering is a legitimate medical reason (at April 2012).]

[† "Identification documents" include current driver licence, proof of age card, Medicare card, credit card, Centrelink pension card, Veterans Affairs entitlement card, student identity card, citizenship certificate, birth certificate, passport or see Oaths Regulation 2011.]

PARTY DETAILS**PARTIES TO THE PROCEEDINGS****Plaintiffs**

Christopher John Dunne **First Plaintiff**
 Linda Margaret Waters **Second Plaintiff**
 Daniel Alter **Third Plaintiff**
 Daniel Alter as the executor of the Estate of
 Patricia Mary Talbert **Fourth Plaintiff**
 Julianne Marie Parsons **Fifth Plaintiff**
 Brian Keith Parsons **Sixth Plaintiff**
 Dean Ross Waters **Seventh Plaintiff**
 Christopher Alan Ross-Smith **Eighth
 Plaintiff**
 Judith Alice Ross-Smith **Ninth Plaintiff**
 Paul Andrew Harmer **Tenth Plaintiff**
 David Leo Troost **Eleventh Plaintiff**
 Brian Townsend **Twelfth Plaintiff**
 Antonious Hendrikus Ruurda **Thirteenth
 Plaintiff**
 Denise Lesley Ruurda **Fourteenth Plaintiff**
 Linda Kay Andrews **Fifteenth Plaintiff**

Defendants

Moin & Associates Pty Ltd **First Defendant**
 Gregory Robert Moin **Second Plaintiff**

FURTHER DETAILS ABOUT PLAINTIFF[S]**First plaintiff**

Name	Christopher John Dunne
Address	'The Range' Melrose Road ENMORE VIA URALLA NSW 2358

Second plaintiff

Name	Linda Margaret Waters
Address	'The Range' Melrose Road ENMORE VIA URALLA NSW 2358

Third plaintiff

Name Daniel Alter
Address 13 Oak Tree Drive
ARMIDALE NSW 2350

Fourth plaintiff

Name Daniel Alter as the executor of the Estate of Patricia Mary Talbert
Address 13 Oak Tree Drive
ARMIDALE NSW 2350

Fifth plaintiff

Name Julianne Marie Parsons
Address 158 Markham Street
ARMIDALE NSW 2350

Sixth plaintiff

Name Brian Keith Parsons
Address 158 Markham Street
ARMIDALE NSW 2350

Seventh plaintiff

Name Dean Ross Waters
Address 6 Centennial Close
ARMIDALE NSW 2350

Eighth plaintiff

Name Christopher Alan Ross-Smith
Address PO Box 1078
MALENY QLD 4552

Ninth plaintiff

Name Judith Alice Ross-Smith

Address PO Box 1078
MALENY QLD 4552

Tenth plaintiff

Name Paul Andrew Harmer
Address 134 Hillside Road
AVOCA BEACH NSW 2251

Eleventh plaintiff

Name David Leo Troost
Address 315 Paddys Plain Road
DORRIGO NSW 2453

Twelfth plaintiff

Name Brian Townsend
Address 1315 Oreen Street
BELLBROOK NSW 2440

Thirteenth plaintiff

Name Antonious Hendrikus Ruurda
Address 41 Merinda Drive
PORT MACQUARIE NSW 2444

Fourteenth plaintiff

Name Denise Lesley Ruurda
Address 41 Merinda Drive
PORT MACQUARIE NSW 2444

Fifteenth plaintiff

Name Linda Kay Andrews

Address PO Box 1169
ARMIDALE NSW 2350

Legal representative for plaintiffs

Name Peter Cecil Pardy
Practising certificate number
Firm APJ Law
Address Suite 14 Hanna's Arcade
126-128 Beardy Street
ARMIDALE NSW 2350
DX address 6001 ARMIDALE
Telephone (02) 6776 4500
Fax (02) 6776 4533
Email ppardy@apjlaw.com.au
Electronic service address ppardy@apjlaw.com.au

DETAILS ABOUT DEFENDANT[S]

First defendant

Name Moin & Associates Pty Ltd
Address Pastoral Chambers
111 Faulkner Street
ARMIDALE NSW 2350

Second defendant

Name Gregory Robert Moin
Address 27 Ash Tree Drive
ARMIDALE NSW 2350

SCHEDULE 1

Christopher John Dunne

Linda Margaret Waters

Daniel Alter

The Estate of Patricia Mary Talbert

Julianne Marie Parsons

Brian Keith Parsons

Dean Ross Waters

Christopher Alan Ross-Smith

Judith Alice Ross-Smith

Paul Andrew Harmer

David Leo Troost

Brian Townsend

Antonious Hendrikus Ruurda

Denise Lesley Ruurda

Linda Kay Andrews