

IN THE SUPREME COURT OF VICTORIA AT MELBOURNE
COMMON LAW DIVISION
MAJOR TORTS LIST

No.9575 of 2004

BETWEEN

GUNNS LIMITED & ORS

Plaintiffs

- and -

ALEXANDER MARR & ORS

Defendants

**SECOND AND SIXTH DEFENDANTS' REQUEST FOR FURTHER AND
BETTER PARTICULARS OF THE STATEMENT OF CLAIM (VERSION 3)**

Date of document: 14 September 2005

Filed on behalf of: The Second and Sixth Defendants

MAURICE BLACKBURN CASHMAN
Lawyers
Level 10, 456 Lonsdale Street
MELBOURNE VIC, 3000

Tel: 9605 2700
DX: 466 Melbourne
Solicitor Code: 564
Ref: KF/1/69981/01

Pursuant to the order of the Court made on 17 August 2005, the Second and Sixth and Defendants request the following further and better particulars of the Statement of Claim (Version 3) dated 15 August 2005.

For the purpose of this request –

Where you are asked to give or state the “*facts*” in support of an allegation or by reason of which an allegation is made, you are required to state, including reference to all relevant persons, dates, periods of time, places, account and documents, each and every act, fact, matter, circumstance or thing by reason of which such allegation is made.

Where you are asked to give or state the “*usual particulars*” of any allegation, you are required to identify, including reference to all relevant persons, dates, periods of time, places, account and documents, each and every act, fact, matter, circumstance or thing by reason of which or by reference to which such allegation is made.

1. **As to paragraph 4 –**

Give the usual particulars of the allegation that the First Defendant –

- (a) has been a “*member*” of the Sixth Defendant;
- (b) has been an “*employee*” of the Sixth Defendant;
- (c) has held the position of “*Campaign Director (or National Campaign Director)*” of the Sixth Defendant;
- (d) has been a “*member*” of the Management Committee of the Sixth Defendant and an “*officer*” of the Sixth Defendant;
- (e) has been a “*member*” of the Management Committee of the Wilderness Society (Tasmania) Incorporated and held the offices referred to therein.

2. **As to paragraph 5 –**

Give the usual particulars of the allegation that the Second Defendant –

- (a) has been a “*member*” of the Sixth Defendant;
- (b) has been an “*employee*” of the Sixth Defendant or the Wilderness Society (Tasmania) Incorporated;
- (c) has held the position of “*Campaign Director or Tasmanian Campaign Director*” of the Sixth Defendant;
- (d) has been a “*member*” of the Management Committee of the Wilderness Society (Tasmania) Incorporated and held “*offices*” (identifying same) referred to therein.

3. **As to paragraph 6 –**

Give the usual particulars of the allegations that the Third Defendant –

- (a) has been a “*member*” of the Sixth Defendant;
- (b) has been an “*employee*” of the Sixth Defendant;
- (c) has been the “*Chief Executive Officer*” of the Sixth Defendant.

4. **As to paragraph 7 –**

Give the usual particulars of the allegation that the Fourth Defendant –

- (a) has been a “*member*” of the Sixth Defendant;
- (b) has been an “*employee*” of the Sixth Defendant;
- (c) has held the position of the “*Corporate Campaigner*” of the Sixth Defendant.

5. **As to paragraph 8 –**

Give the usual particulars of the allegation that the Fifth Defendant –

- (a) has been a “*member*” of the Sixth Defendant;
- (b) has been an “*employee*” of the Sixth Defendant;
- (c) has been the “*Audio Visual Producer*” for the Sixth Defendant.

6. **As to paragraph 10 –**

Give the usual particulars of the allegation that the Eighth Defendant –

- (a) has been a “*member*” of the Sixth Defendant;
- (b) has been an “*employee*” of the Sixth Defendant;
- (c) has been a “*Tasmanian Community Campaigner*” for the Sixth Defendant.

7. **As to paragraph 11 –**

Give the usual particulars of the allegation that the Ninth Defendant has been a “*member*” of the Sixth Defendant.

8. **As to paragraph 12 –**

Give the usual particulars of the allegation that the Tenth Defendant –

(a) has been a “*member*” of the Sixth Defendant;

(b) has held “*various offices*” (identifying same) in the Sixth Defendant “*including Director and Public Officer*”;

9. **As to paragraph 13 –**

Give the usual particulars of the allegation that the Eleventh Defendant has been a “*member*” of the Sixth Defendant.

10. **As to paragraph 14 –**

Give the usual particulars of the allegation that the Twelfth Defendant has been a “*member*” of the Sixth Defendant.

11. **As to paragraph 15 –**

Give the usual particulars of the allegation that the Thirteenth Defendant –

(a) has been a “*member*” of the Sixth Defendant;

(b) has been an “*employee*” of the Sixth Defendant or the Wilderness Society Newcastle Branch Inc;

(c) has been a “*Community Campaigner*” for the Sixth Defendant or the Wilderness Society Newcastle Branch Inc.

12. **As to paragraph 17 –**

Give the usual particulars of the allegation that the Fifteenth Defendant has been a “*member*” of the Sixth Defendant.

13. **As to paragraph 18 –**

Give the usual particulars of the allegation that the Sixteenth Defendant has been a “*member*” of the Sixth Defendant.

14. **As to paragraph 24 –**

(a) Specify and identify the –

(i) incorporated bodies;

(ii) unincorporated associations –

alleged to comprise the “*Wilderness Society Group*” referred to therein.

(b) Identify and describe the –

(i) purposes;

(ii) objectives –

of the corporate bodies (identifying same) and unincorporated associations (identifying same) referred to therein.

(c) Identify and describe the “*Wilderness Society Campaign Centres*” referred to in the particulars thereto.

15. **As to paragraph 25 –**

(a) Specify and identify the “*other members*” of the Wilderness Society Group who the Wilderness Society is alleged to lead, coordinate, direct and control as alleged therein.

(b) Give the usual particulars of the allegation that the Sixth Defendant “*leads, co-ordinates, directs and controls*” the “*other members*” referred to therein.

(c) Give the usual particulars of the allegation that the “*other members*” referred to therein “*act as agents*” for the Sixth Defendant.

- (d) Identify and describe the “*national campaign activities*” referred to therein.
16. **As to paragraph 26 –**
- (a) Give the usual particulars of the “*membership*” within the Wilderness Society Group referred to therein.
 - (b) Give the usual particulars of the “*informal*” treating of membership referred to therein.
17. **As to paragraph 27 –**
- (a) Identify and describe the Sixth Defendant’s “*activities*” referred to therein.
 - (b) Give the usual particulars of the “*performance*” of the activities referred to therein by the “*volunteers*” referred to therein.
 - (c) Specify and identify the “*volunteers*” referred to therein.
18. **As to paragraph 28 –**
- (a) Give the usual particulars of the Sixth Defendant’s “*policy and practice*” referred to therein.
 - (b) Identify and describe the “*direct action*” which the Sixth Defendant is alleged to have offered volunteers (identifying same) a choice of “*planning and conducting*”.
 - (c) Give the usual particular of such “*offer*” by the Sixth Defendant.
 - (d) Give the usual particulars of such “*planning and conducting*” as alleged therein.
 - (e) Give the usual particulars of the agreements referred to in paragraph 28(c) therein.
 - (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.

- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

19. **As to paragraph 29 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant “*adopted and implemented*” the policies (identifying same) referred to therein.
- (b) Identify and describe the “*national campaign activities*” referred to therein.
- (c) Give the usual particulars of the Sixth Defendant’s “*carrying out*” of the national campaign activities referred to therein.
- (d) Specify and identify the “*groups*” alleged to have been established by the Sixth Defendant as alleged in paragraph 28(a) therein.
- (e) Identify the person, persons, entity or entities alleged to comprise the “*groups*” referred to in paragraph 28(a) therein
- (f) Give the usual particulars of the allegation that the Sixth Defendant “*established*” the “*groups*” referred to therein.
- (g) Specify and identify the “*established groups*” referred to in paragraph 28 (b) therein.
- (h) Give the usual particulars of the alleged “*encouragement, support and funding*” provided to the “*established groups*” (identifying same) referred to in paragraph 28(b) therein.
- (i) Give the usual particulars of the allegation that the Sixth Defendant provided “*encouragement, support and funding*” to the “*established groups*” (identifying same) referred to in paragraph 28(b) therein.
- (j) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.

- (k) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

20. **As to paragraph 30 –**

- (a) Identify the person, persons, entity or entities alleged to comprise –
- (i) The Sydney Tarkine Action Group;
 - (ii) The Melbourne Tarkine Action Group;
 - (iii) The South Australian Tarkine Action Group;
 - (iv) Gunns Ethical Shareholders.
- (b) Give the usual particulars of the allegation that the Sixth Defendant “*established*” –
- (i) The Seventeenth Defendant;
 - (ii) The Twentieth Defendant;
 - (iii) The Sydney Tarkine Action Group;
 - (iv) The Melbourne Tarkine Action Group;
 - (v) The South Australian Tarkine Action Group;
 - (vi) Gunns Ethical Shareholders.
- (c) Identify and describe the “*campaigns*” alleged to have been conducted on behalf of the Sixth Defendant by –
- (i) The Seventeenth Defendant;
 - (ii) The Twentieth Defendant;
 - (iii) The Sydney Tarkine Action Group;
 - (iv) The Melbourne Tarkine Action Group;

(v) The South Australian Tarkine Action Group;

(vi) Gunns Ethical Shareholders –

as alleged therein.

(d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.

(e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

21. **As to paragraph 36**

(a) Give the usual particulars of the establishment of the “*For Forests Group*”.

(b) Give the usual particulars of the allegations that the Sixth Defendant “*established*” the For Forests Group as alleged therein

(c) Identify and describe the “*funding, resources and support*” referred to therein.

(d) Give the usual particulars of the allegation that the “*funding, resources and support*” referred to therein was “*received*” from the Sixth Defendant.

(e) Identify and describe that “*campaign*” referred to therein.

(f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.

(g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

Triabunna 2003*The Triabunna 2003 Claims***22. As to paragraph 42–**

- (a) Give the usual particulars of the participation by the Sixth Defendant in the –
 - (i) making of;
 - (ii) conduct of –the conspiracy and combination referred to therein.
- (b) Identify and describe the “*unlawful means*” referred to therein.
- (c) Identify and describe the “*injury*” intended by the Sixth Defendant to have been caused to the First Plaintiff.
- (d) Give the usual particulars and state the substance of the “*discussions*” referred to in the particular (a) thereto.
- (e) Identify the participants in each of the “*discussions*” referred to in particular (a) thereto.
- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*discussions*” referred to in particulars (a) thereto.
- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in the “*discussions*” referred to in particular (a) thereto.
- (h) Give the usual particulars and state the substance of the “*meetings*” referred to in the particular (a) thereto.
- (i) Identify the participants in each of the “*meetings*” referred to in the particular (a) thereto.

- (j) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*meetings*” referred to in particular (a) thereto.
- (k) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in the “*meetings*” referred to in particular (a) thereto.
- (l) Give the usual particulars and state the substance of the “*agreement*” referred to in particular (a) thereto.
- (m) Identify and describe the “*activities*” referred to in the particular (a) thereto.
- (n) Specify and identify each of the “*nature, timing and results*” referred to in particular (a).
- (o) Give the usual particulars of the participation in the making of the agreement referred to in particular (c)(i) thereto by the Sixth Defendant.
- (p) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.
- (q) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such agreement.
- (r) Give the usual particulars of the allegation that the Sixth Defendant knew of each of the Triabunna 2003 Employees’ Contracts as alleged in particular (c)(ii) thereto.

23. **As to paragraph 43 –**

- (a) Give the usual particulars and state the substance of the “*three meetings*” referred to therein.

- (b) Identify the participants in each of the “*three meetings*” referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*three meetings*” referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in the “*meetings*” referred to therein.
- (e) Give the usual particulars of the agreement referred to therein.
- (f) Specify and identify the “*equipment*” referred to in paragraph 43(c).
- (g) Specify and identify the “*steps*” referred to in paragraph 43(g).

24. **As to paragraph 44–**

- (a) Give the usual particulars of the acts of interference by the Sixth Defendant referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in each such act of interference.
- (d) Give the usual particulars of the allegation that the Sixth Defendant intended to injure the First Plaintiff’s trade or business.
- (e) Identify and describe the “*trade and business*” referred to therein.
- (f) Identify and describe the “*unlawful means*” referred to therein.
- (g) Identify and describe the “*injury*” intended by the Sixth Defendant to have been caused to the First Plaintiff.

- (h) Give the usual particulars and state the substance of the agreement referred to in particular (a)(i) thereto.

25. **As to paragraph 45 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant knew of each of the contracts referred to therein.
- (b) Give the usual particulars of the means by which the Sixth Defendant could have ascertained the existence of the contracts referred to therein.
- (c) Give the usual particulars by reference to which it is alleged that the Sixth Defendant was recklessly indifferent to ascertaining the existence of the contracts referred to therein.

26. **As to paragraph 46 –**

- (a) Give the usual particulars of the acts of interference by the Sixth Defendant referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in each such act of interference.
- (d) Give the usual particulars of the allegation that the Sixth Defendant intended to injure the First Plaintiff.
- (e) Identify and describe the “*unlawful means*” referred to therein.
- (f) Identify and describe the “*injury*” intended by the Sixth Defendant to have been caused to the First Plaintiff.

The Triabunna 2003 Overt Acts

27. **As to paragraph 47 –**

- (a) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (b) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) Give the usual particulars of the allegation that the “acts” referred to therein were done “*in furtherance of the Triabunna 2003 Conspiracy*”.

28. **As to paragraph 48 –**

- (a) Give the usual particulars of and describe the “*training workshop*” referred to therein.
- (b) Give the usual particulars of the allegation that the Sixth Defendant conducted the “*training workshop*” referred to therein.
- (c) Give the usual particulars of the allegation that the Sixth Defendant “*encouraged*” the “*protestors*” referred to therein.
- (d) Specify and identify the “*protestors*” referred to therein.
- (e) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (f) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

29. **As to paragraph 51 –**

- (a) Give the usual particulars and state the substance of the “*meeting*” referred to therein.
- (b) Identify the participants in the “*meeting*” referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in the “*meeting*” referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in the “*meeting*” referred to therein.
- (e) Give the usual particulars and state the substance of the “*decisions*” referred to therein.

30. **As to paragraph 52 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant “*provided or organised for others to provide*” the items referred to therein.
- (b) Give the usual particulars of the allegation that the Sixth Defendant did the acts referred to therein to “*aid and enable*” the persons referred to therein to engage in the acts referred to therein.
- (c) Give the usual particulars and state the substance of the “*trespasses, lock ons and associated activities*” referred to therein.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

31. **As to paragraph 84 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant “*further publicised*” the acts referred to therein.
- (b) Give the usual particulars of the allegation that the Sixth Defendant “*supported and encouraged the actions*” referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (e) Give the usual particulars and state the substance of the “*statements to the media*” referred to in the particulars thereof.
- (f) Identify and describe the “*media release*” and state the substance of that release referred to in the particulars thereof.

*Interference with the Triabunna 2003 Employees’ Contracted and trade and business*32. **As to paragraph 86 –**

- (a) Give the usual particulars of the alleged interference with the performance of the Triabunna 2003 Employees’ Contracts referred to therein.
- (b) Specify and describe how the “*presence*” referred to therein interfered with the performance of the Triabunna 2004 Employees’ Contracts.
- (c) Give the usual particulars of the searching referred to in paragraph 86(d) therein.

33. **As to paragraph 87 –**

- (a) Give the usual particulars of the alleged interference with the trade and business referred to therein.

- (b) Specify and describe how the “*presence*” referred to therein interfered with the trade and business of the First Plaintiff.
- (c) Give the usual particulars of the searching referred to in paragraph 87(d) therein.

Loss and damage arising from the Triabunna 2003 claims

34. **As to paragraph 88 –**

- (a) Specify the manner in which the sum of damages claimed in respect to each such item of loss and damage is calculated.
- (b) State the facts comprising the “*trouble and inconvenience*” referred to in the particular (k) thereto
- (c) Specify the manner in which the sum of damages claimed in respect to “*trouble and inconvenience*” is calculated.

35. **As to paragraph 94 –**

- (a) Give the usual particulars of the allegation that each of the “*overt acts*” referred to therein was done by the Sixth Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such overt act.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such overt act.
- (d) Give the usual particulars of the allegation that the Sixth Defendant intended to injure the First Plaintiff in its trade and business.
- (e) State the usual particulars and substance of the planning of the overt acts alleged in particular (a) thereto.
- (f) Give the usual particulars of the allegation that Sixth Defendant so planned and met as alleged in particular (a) thereto.

- (g) Identify and describe the “*media release*” and state the substance of that release.
- (h) Identify which the of the Triabunna 2003 Defendants and Triabunna 2003 Conspirators are alleged to have expressed pleasure at the economic damage referred to in particular (c) and state the substance of what they are alleged to have expressed.
- (i) Specify and identify “*the said Defendants*” referred to in particular (c) thereto.
- (j) Give the usual particulars of the allegation that the Eighth Defendant made the statement referred to in particular (c) for and on behalf of the Sixth Defendant.
- (k) State the facts comprising the authorisation by reference to which it is alleged that the Eighth Defendant spoke on behalf of the Sixth Defendant.
- (l) Give the usual particulars of the allegation that the Sixth Defendant was recklessly and selfishly indifferent was referred to in particular (d) thereto.
- (m) Specify and describe the “*dangers*” referred to in particular (d) thereto.

Joint, several and vicarious liability

36. **As to paragraph 95 –**

- (a) Give the usual particulars of the allegation that the acts referred to therein were done by or on behalf of the Sixth Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same)

comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

37. **As to paragraph 96 –**

- (a) Give the usual particulars of the allegation that each of the “*overt acts*” referred to therein was done by the person or persons acting in concert with the Sixth Defendant.
- (b) Give the usual particulars of the doing of the “*overt acts*” referred to therein by the Sixth Defendant.

38. **As to paragraph 98 –**

- (a) Give the usual particulars of and state the substance of the alleged “*common purpose and design*” referred to therein.
- (b) Give the usual particulars by which the common purpose and design may be “*inferred from the nature, location, timing and results of the acts done and the persons involved*” as alleged in particular (a) thereto.
- (c) Give the usual particulars of and state the substance of the “*common understanding*” referred to in particular (c) thereto.
- (d) Give the usual particulars of the allegation that the Sixth Defendant was “*well familiar*” with the acts referred to in particular (c) thereto.
- (e) Give the usual particulars of the determination by the Sixth Defendant upon the “*course of action*” referred to in particular (c) thereto.
- (f) Give the usual particulars of the alleged “*course of action*” determined by the Sixth Defendant referred to in particular (c) thereto.
- (g) Give the usual particulars of the “*acts to be done*” referred to in particular (c) thereto.

39. As to paragraph 99 –

- (a) Give the usual particulars of the allegation that the persons and each of them did the acts referred to therein as “agents” for the Sixth Defendant.
- (b) Give the usual particulars of the allegation that the Eighth Defendant was employed by the Sixth Defendant as alleged therein.
- (c) Describe and give the usual particulars of the “*scope of employment*” of the Eighth Defendant referred to in particular (a) thereto.
- (d) Give the usual particulars of the allegation that the Eighth Defendant “*acted within the scope of her employment*” referred to in particular (a) thereto.
- (e) Give the usual particulars of the allegation that the Sixth Defendant “*engaged*” the persons referred to in particular (b).
- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in engaging the persons referred to in particular (b) thereto.
- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in engaging the persons referred to in particular (b) thereto.
- (h) Give the usual particulars of the allegation that the persons referred in particular (b) “*acted as volunteers*” for the Sixth Defendant.
- (i) Give the usual particulars of the allegation that “*volunteers*” referred to therein did so with the “*authority*” of the Sixth Defendant as referred to in particulars (b) thereto.

The Lucaston Action*The Lucaston Claims*40. **Under paragraph 138 –**

- (a) Give the usual particulars of the participation by the Sixth Defendant in the –
 - (i) making of;
 - (ii) conduct of –the conspiracy and combination referred to therein.
- (b) Identify and describe the “*unlawful means*” referred to therein.
- (c) Identify and describe the “*injury*” intended by the Sixth Defendant to have been caused to the First Plaintiff.
- (d) Give the usual particulars and state the substance of the “*discussions*” referred to in particular (a) thereto.
- (e) Identify the participants in each of the “*discussions*” referred to in particular (a) thereto.
- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*discussions*” referred to in particular (a) thereto.
- (g) Specify and identify each of the “*nature, timing and results*” referred to in particular (a).
- (h) Give the usual particulars of the making of the agreement referred to in particular (c)(i) thereto.
- (i) Give the usual particulars of the participation in the making of the agreement referred to in particular (c)(i) thereto by the Sixth Defendant.

- (j) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.
- (k) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such agreement.
- (l) Give the usual particulars of the allegation that the Sixth Defendant knew of each of the Lucaston Contracts as alleged in particular (c)(ii) thereto.

41. **As to paragraph 139–**

- (a) Give the usual particulars of the acts of interference by the Sixth Defendant referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in each such act of interference.
- (d) Give the usual particulars of the allegation that the Sixth Defendant intended to injure the First Plaintiff's trade or business.
- (e) Identify and describe the "*trade and business*" referred to therein.
- (f) Identify and describe the "*unlawful means*" referred to therein.
- (g) Identify and describe the "*injury*" intended by the Sixth Defendant to have been caused to the First Plaintiff.
- (h) Give the usual particulars of the making of the agreement referred to in particular (c)(i) thereto.

- (i) Give the usual particulars of the participation in the making of the agreement referred to in particular (c)(i) thereto by the Sixth Defendant.
- (j) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.
- (k) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such agreement.
- (l) Give the usual particulars of the allegation that the Sixth Defendant knew of each of the Lucaston Contracts as alleged in particular (c)(ii) thereto.

42. **As to paragraph 140 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant knew of each of the contracts referred to in the particulars thereto.
- (b) Give the usual particulars of the means by which the Sixth Defendant could have ascertained the existence of the contracts as alleged in particular (b) thereto.
- (c) Give the usual particulars by reference to which it is alleged that the Sixth Defendant was recklessly indifferent to ascertaining the existence of the contracts as alleged in particular (c) thereto.

43. **As to paragraph 141 –**

- (a) Give the usual particulars of the acts of interference by the Sixth Defendant referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same)

comprised or acted on behalf of the Sixth Defendant in each such act of interference.

- (d) Give the usual particulars of the allegation that the Sixth Defendant intended to injure the First Plaintiff.
- (e) Identify and describe the “*unlawful means*” referred to therein.
- (f) Identify and describe the “*injury*” intended by the Sixth Defendant to have been caused to the First Plaintiff.

44. **As to paragraph 142 –**

- (a) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (b) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) Give the usual particulars of the allegation that the “*acts*” referred to therein were done “*in furtherance of the Lucaston Conspiracy*”.

45. **As to paragraph 144 –**

- (a) Give the usual particulars and state the substance of the “*two meetings*” referred to therein.
- (b) Give the usual particulars of the allegation that Sixth Defendant “*conducted*” the meetings referred to therein.
- (c) State the address of the premises referred to therein.
- (d) Specify and identify the attendees at each of the two meetings referred to therein.
- (e) Give the usual particulars and state the substance of the “*discussions*” referred to therein.

- (f) Give the usual particulars and state the substance of the “*decisions*” referred to therein.

46. **As to paragraph 149 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant “*provided or organised for others to provide*” the audio visual equipment, cameras, banners, tents, camping equipment, wrecked motor vehicle lock on devices and other equipment referred to therein.
- (b) Give the usual particulars of the allegation that the Sixth Defendant did the acts referred to therein to “*to carry out*” the Lucaston overt acts.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (e) Specify and identify the “*other equipment*” referred to therein.

47. **As to paragraph 188 –**

- (a) State the address of the offices of Sixth Defendant referred to therein.
- (b) Give the usual particulars and state the substance of the meetings referred to therein.
- (c) Give the usual particulars of the alleged styling of the meetings as “*Campaign meetings*” as referred to in the particulars therein.
- (d) Give the usual particulars of the making of the agreement referred to therein.

48. **As to paragraph 189 –**

- (a) Give the usual particulars and state the substance of the “*training workshop*” referred to therein .

- (b) Give the usual particulars in support of the allegation that such training workshop was conducted by the Sixth Defendant.
- (c) Give the usual particulars of the encouragement referred to therein.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

49. **As to paragraph 190 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant “*provided (or organised for others to provide)*” cameras, banners, mobile telephones, lock – on devices and other facilities and equipment referred to therein.
- (b) Identify the “*other facilities and equipment*” referred to therein.
- (c) Give the usual particulars of the allegation that the Sixth Defendant did the acts referred to therein to “*aid and enable*” the persons referred to therein to engage in the acts referred to therein.
- (d) Give the usual particulars and state the substance of the “*trespass, lock on and associated activities*” referred to therein.
- (e) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (f) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

Interference with the Lucaston Contracts and trade and business

50. **As to paragraph 203–**

- (a) Give the usual particulars of the injury in the trade and business of the First Plaintiff.
- (b) Identify and describe the “*trade and business*” referred to therein.

51. **As to paragraph 204 –**

Give the usual particulars of the alleged –

- (i) hindrance;
- (ii) prevention –

of the performance of each of the Lucaston Contracts as referred to therein.

Loss and damage arising from the Lucaston claims

52. **As to paragraph 205 –**

- (a) Specify the manner in which the sum of damages claimed in respect to each such item of loss and damage is calculated.
- (b) State the facts comprising the “*trouble and inconvenience*” referred to in the particulars thereto.
- (c) Specify the facts by reference to which the sum of damages claimed in respect to “*trouble and inconvenience*” is calculated.
- (d) Specify the manner in which the sum of damages claimed in respect to “*trouble and inconvenience*” is calculated.

53. **As to paragraph 211 –**

- (a) Specify and identify the “*acts*” alleged to have been done by the Sixth Defendant.
- (b) Give the usual particulars of the doing of each such act by the Sixth Defendant.

- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act.
- (e) Give the usual particulars of the allegation that the Sixth Defendant intended to injure the First Plaintiff in its trade and business.
- (f) Identify and describe the “*trade and business*” referred to therein.
- (g) Give the usual particulars and state the substance of the “planning” alleged in particular (1) thereto.
- (h) Give the usual particulars of the allegation that the Sixth Defendant “*organised, auspiced and co-ordinated*” the Lucaston overt acts as alleged in particular (2) thereto.
- (i) Identify and describe the “*support, assistance, encouragement, training, facilities and funds*” alleged to have been provided directly or indirectly by the Sixth Defendant alleged in particular (2) thereto.
- (j) Give the usual particulars of the direct and/or indirect providing by the Sixth Defendant as referred to in particular (2) thereto.
- (k) Give the usual particulars of the making of each such statement and claim by the Sixth Defendant as referred to in particular (5) thereto.
- (l) Give the usual particulars of the Sixth Defendant engaging in the acts referred to in particulars 6(i) to (vi) (inclusive) and 7.

Joint, Several and Vicarious Liability

54. **As to paragraph 213 –**

- (a) Give the usual particulars of the allegation that the acts referred to therein were done by or on behalf of the Sixth Defendant.

- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) Give the usual particulars of the allegation that the acts referred to therein were done “*in furtherance of the Lucaston Conspiracy.*”

55. **As to paragraph 214 –**

- (a) Give the usual particulars of the allegation that each of the “*overt acts*” referred to therein was done by the person or persons acting in concert with the Sixth Defendant.
- (b) Give the usual particulars of the doing of the “*overt acts*” referred to therein by the Sixth Defendant.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

56. **As to paragraph 216–**

- (a) Give the usual particulars of and state the substance of the alleged “*common purpose and design*” referred to therein.
- (b) Give the usual particulars by which the common purpose and design may be “*inferred from the nature, location, timing and results of the acts done and the persons involved*” as alleged in particular (a) thereto.
- (c) Give the usual particulars of and state the substance of the “*common understanding*” referred to in particular (c) thereto.
- (d) Give the usual particulars of the allegation that the Sixth Defendant was “*well familiar*” with the acts referred to in particular (c) thereto.

- (e) Give the usual particulars of the alleged “*course of action*” determined by the Sixth Defendant referred to in particular (c) thereto.
- (f) Give the usual particulars of the determination by the Sixth Defendant upon the courses of action referred to in particular (c) thereto.
- (g) Give the usual particulars of the “*acts to be done*” referred to in particular (c) thereto.

57. **As to paragraph 217 –**

- (a) Give the usual particulars of the allegation that the persons and each of them did the acts referred to therein as “*agents*” for the Sixth Defendant.
- (b) Give the usual particulars of the allegation that the Eighth Defendant was employed by the Sixth Defendant as alleged in particular (a) thereto.
- (c) Describe and give the usual particulars of the “*scope of employment*” of the Eighth Defendant referred to in particular (a) thereto.
- (d) Give the usual particulars of the allegation that the Eighth Defendant “*acted within the scope of her employment*” referred to in particular (a) thereto.
- (e) Give the usual particulars of the allegation that the Sixth Defendant “*engaged*” the persons referred to in particular (b).
- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in engaging the persons referred to in particulars (b) thereto.
- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in engaging the persons referred to in particular (b) thereto.

- (h) Give the usual particulars of the allegation that the persons referred in particular (b) “*acted as volunteers*” for the Sixth Defendant.
- (i) Give the usual particulars of the allegation that “*volunteers*” referred to therein did so with the “*authority*” of the Sixth Defendant as referred to in particulars (b) thereto.
- (j) Give the usual particulars of the allegations that the Tenth and Eleventh Defendants;
 - (i) were members of the Sixth Defendant;
 - (ii) had been “*asked to act on behalf of the Sixth Defendant*”;
 - (iii) acted “*within the scope of their membership*”; and
 - (iv) acted “*in accordance with those requests*”.as alleged in particular (c) thereto.
- (k) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in asking the Tenth and Eleventh Defendant to act on its behalf as alleged in particular (c) thereto.
- (l) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in asking the Tenth and Eleventh Defendant to act on its behalf as alleged in particular (c) thereto.
- (m) Give the usual particulars of the allegations that the Sixth Defendant “*established*” the Seventeenth Defendant to “*plan and conduct protests*” as alleged in particular (d) thereto.
- (n) Identify and describe the “*encouragement, resources and funding*” referred to in particular (d) thereto.

- (o) Give the usual particulars of the allegation that the Sixth Defendant provided the “*encouragement, resources and funding*” referred to in particular (d) thereto.
- (p) Give the usual particulars of and state the substance of the planning and conduct of the protests referred to in particulars (d) thereto.
- (q) Identify, describe and give the usual particulars of the “*directions*” given by the Sixth Defendant as alleged in particulars (d) thereto.
- (r) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to in particular (d) thereto.
- (s) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to in particular (d) thereto.

The Styx Action

The Styx Contracts

58. As to paragraph 246 –

- (a) Identify and describe the area or areas within the Styx 4A coupe as to which the First Plaintiff directed T & H Investments to harvest timber.
- (b) Identify and describe the time period within which such timber in such area or areas was to be harvested by T & H Investments.
- (c) State the substance of the oral direction referred to in the particulars.

59. As to paragraph 252 –

- (a) Identify and describe the “*work*” allocated as referred to therein.
- (b) Identify and describe the period within which the “*allocated work*” was to be conducted.

- (c) State the substance of the oral allocation referred to in the particulars thereto.

60. **As to paragraph 257 –**

- (a) Identify and describe the area or areas within the Styx 4A coupe as to which the First Plaintiff directed Hazell Bros to harvest timber.
- (b) Identify and describe the period within which such timber was to be harvested.
- (c) State the substance of the direction referred to in the particulars thereto.

The Styx Claims

61. **As to paragraph 260–**

- (a) Give the usual particulars of the participation by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –
 - in the –
 - A. making of;
 - B. conduct of –

the conspiracy and combination referred to therein.
- (b) Identify and describe the “*unlawful means*” referred to therein.
- (c) Identify and describe the injury intended by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –
 - to have been caused to: -
 - A. the First Plaintiff,

B. the Second and Third Plaintiffs.

- (d) Give the usual particulars and state the substance of the “*discussions*” referred to in the particular (a) thereto.
- (e) Identify the participants in each of the “*discussions*” referred to in the particular (a) thereto.
- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*discussions*” referred to in particular (a) thereto
- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in the “*discussions*” referred to in particular (a) thereto.
- (h) Give the usual particulars and state the substance of the “*meetings*” referred to in the particular (a) thereto.
- (i) Identify the participants in each of the “*meetings*” referred to in the particular (a) thereto.
- (j) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*meetings*” referred to in particular (a) thereto.
- (k) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in the “*meetings*” referred to in particular (a) thereto.
- (l) Give the usual particulars of and state the substance of the “*agreement*” referred to in particular (a) thereto.
- (m) Identify and describe the “*activities*” referred to in the particular (a) thereto.

- (n) Specify and identify each of the “*nature, timing and results*” referred to in particular (a).
- (o) Give the usual particulars of the participation in the making of the agreement referred to in particular (c)(i) thereto by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (p) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.
- (q) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such agreement.
- (r) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

knew of each of the Styx Contracts as alleged in particular (c)(ii) thereto.

62. **As to paragraph 261 –**

- (a) Give the usual particulars and state the substance of the “*meetings*” referred to therein.
- (b) Identify the participants in each of the “*meetings*” referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*meetings*” referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same)

comprised or acted on behalf of the Sixth Defendant in the “*meetings*” referred to therein.

- (e) Give the usual particulars of the agreement referred to therein.
- (f) Specify and describe the equipment referred to in paragraph 261(c) therein.

63. **As to paragraph 262 –**

- (a) Give the usual particulars of the acts of interference by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant–

referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in each such act of interference.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

intended to injure the First Plaintiff in its trade and business.
- (e) Identify and describe the “*trade and business*” referred to therein.
- (f) Identify and describe the “*unlawful means*” referred to therein.
- (g) Identify and describe the “*injury*” intended by the
 - (i) the Sixth Defendant;

- (ii) the Second Defendant –

to have been caused to the First Plaintiff.
- (h) Give the usual particulars of the participation in the making of the agreement referred to in particular (c)(i) thereto by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (i) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.
- (j) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such agreement.
- (k) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

knew of each of the Styx Contracts as alleged in particular (c)(ii) thereto.

64. **As to paragraph 263 –**

- (a) Give the usual particulars of the acts of interference by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.

- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in each such act of interference.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

intended to injure the trade and business of the Second and Third Plaintiffs.
- (e) Identify and describe the “*trade and business*” referred to therein.
- (f) Identify and describe the “*unlawful means*” referred to therein.
- (g) Identify and describe the “*injury*” intended by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

to have been caused to the Second and Third Plaintiffs.
- (h) Give the usual particulars of the participation in the making of the agreement referred to in particular (c)(i) thereto by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (i) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.
- (j) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such agreement.

- (k) Give the usual particulars of the allegation that –
- (i) the Sixth Defendant;
 - (ii) the Second Defendant.

knew of each of the T & H Investments Harvesting Contracts as alleged in particular (c)(ii) thereto.

65. **As to paragraph 264 –**

- (a) Give the usual particulars of the allegation that –
- (i) the Sixth Defendant;
 - (ii) the Second Defendant –

knew of each of the contracts referred to therein.

- (b) Give the usual particulars of the means by which the Sixth Defendant could have ascertained the existence of the contracts referred to therein.

- (c) Give the usual particulars by reference to which it is alleged that –

- (i) the Sixth Defendant;
- (ii) the Second Defendant –

were recklessly indifferent to ascertaining the existence of the contracts referred to therein.

66. **As to paragraph 265 –**

- (a) Give the usual particulars of the acts of interference by –
- (i) the Sixth Defendant;
 - (ii) the Second Defendant –

referred to therein.

- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in each such act of interference.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

intended to injure the First Plaintiff.
- (e) Identify and describe the “*unlawful means*” referred to therein.
- (f) Identify and describe the injury intended by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

to have been caused to the First Plaintiff.

67. **As to paragraph 266 –**

- (a) Give the usual particulars of the acts of interference by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same)

comprised or acted on behalf of the Sixth Defendant in each such act of interference.

- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –intended to injure the Second and Third Plaintiffs.
- (e) Identify and describe the “*unlawful means*” referred to therein.
- (f) Identify and describe the “*injury*” intended by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –to have been caused to the Second and Third Plaintiffs.

68. **As to paragraph 267 –**

- (a) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –did the “*acts they are alleged to have done*” .
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) Give the usual particulars of the allegation that the “*acts*” referred to therein were done “*in furtherance of the Styx Conspiracy*”.

69. **As to paragraph 268 –**

- (a) Give the usual particulars and state the substance of the meetings referred to therein.
- (b) Identify the participants in the meetings referred to therein.
- (a) Give the usual particulars in support of the allegation that such meetings, were “*conducted*” by the Sixth Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

70. **As to paragraph 269 –**

- (a) Give the usual particulars of the allegation that –
 - (i) the Sixth;
 - (ii) the Second;“*developed and adopted*” the alleged campaign strategy.
- (b) Identify and describe the “*direct actions*” referred to therein.

71. **As to paragraph 270 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant –
 - (i) established;
 - (ii) organised;
 - (iii) provided funding
 - (iv) provided resources –

to the groups referred to therein.

- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) Identify, describe and state the person, persons or entities alleged to comprise –
 - (i) the Melbourne Tarkine Action Group;
 - (ii) the Sydney Tarkine Action Alliance;
 - (iii) the Newcastle Tassie Action Group;
 - (iv) the South Australian Tarkine Action Group.

72. As to paragraph 271 –

- (a) Give the usual particulars and state the substance of the “*meetings*” referred to therein.
- (b) Identify the participants in such meetings.
- (c) Give the usual particulars in support of the allegation that the Sixth Defendant held such meetings.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.

73. As to paragraph 273 –

- (a) Give the usual particulars of the allegation that–
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant;

“*endorsed*” the strategy referred to therein

(b) Give the usual particulars of the allegation that –

- (i) the Sixth Defendant;
- (ii) the Second Defendant;

“*decided*” the matters referred to therein.

(c) Identify and describe the “*protest actions*” referred to in paragraph 273(a) therein.

(d) Identify and describe the “*further direct actions*” referred to in paragraph 273(a) therein.

(e) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.

(f) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

(g) Specify and identify the “*protestors*” referred to therein.

74. **As to paragraph 274 –**

(a) Give the usual particulars and state the substance of the “*meetings*” referred to therein.

(b) Identify the participants in such meetings.

(c) Identify the “*employees*” of the Sixth Defendant referred to therein.

(d) Give the usual particulars in support of the allegation that the Sixth Defendant held such meetings.

(e) Give the usual particulars of the encouragement referred to therein.

- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (h) Identify and describe the “*protest actions*” referred to therein.

75. As to paragraph 275 –

- (a) State the dates in the period “[f]rom early September 2003 to March 2004” in which the “*meetings*” referred to therein were held.
- (b) Give the usual particulars and state the substance of the “*meetings*” referred to therein.
- (c) Identify the “*employees*” of the Sixth Defendant referred to therein.
- (d) Give the usual particulars in support of the allegation that the Sixth Defendant held such meetings.
- (e) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (f) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (g) Give the usual particulars of the encouragement referred to therein.
- (h) Identify and describe the “*protest actions*” referred to therein.

76. As to paragraph 276 –

- (a) Give the usual particulars and state the substance of the “*training workshop*” referred to therein.

- (b) Give the usual particulars in support of the allegation that such training workshop was conducted by the Sixth Defendant.
- (c) Specify and identify the “*protestors*” referred to therein.
- (d) Give the usual particulars of the encouragement referred to therein.
- (e) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (f) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (g) Identify and describe the “*protest actions*” referred to therein.

77. **As to paragraph 277 –**

- (a) State the dates in the period between “*October 2003 to March 2004*” in which the “*meetings*” referred to therein were held.
- (b) Give the usual particulars and state the substance of the “*meetings*” referred to therein.
- (c) Identify the “*employees*” of the Sixth Defendant referred to therein.
- (d) Give the usual particulars in support of the allegation that the Sixth Defendant held such meetings.
- (e) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (f) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (g) Give the usual particulars of the encouragement referred to therein.

- (h) Specify and identify the “*protestors*” referred to therein.
- (i) Identify and describe the “*protest actions*” referred to therein.

78. **As to paragraph 278 –**

- (a) Give the usual particulars and state the substance of the “*meeting*” referred to therein.
- (b) Give the usual particulars in support of the allegation that the Sixth Defendant conducted such meetings.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (e) Identify and describe the “*protest campaigns*” referred to therein.
- (f) Identify and describe the “*campaigns and protests*” referred to in paragraph 278(b).
- (g) Give the usual particulars of the allegation that the Sixth Defendant “*determined*” the matters referred to in paragraph 278(b).

79. **As to paragraph 279 –**

- (a) Give the usual particulars and state the substance of the “*meeting*” referred to therein.
- (b) Give the usual particulars in support of the allegation that the Sixth Defendant conducted such a meeting.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.

- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (e) Give the usual particulars of the encouragement referred to therein.
- (f) Identify and describe the “*protest actions*” referred to therein.

80. **As to paragraph 280 –**

- (a) Give the usual particulars and state the substance of the “*meeting*” referred to therein.
- (b) Give the usual particulars in support of the allegation that the Sixth Defendant conducted such a meeting.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (e) Give the usual particulars of the encouragement referred to therein.
- (f) Identify and describe the “*protest actions*” referred to therein.

81. **As to paragraph 281 –**

- (a) Give the usual particulars of the allegation that the Second Defendant –
 - (i) set up;
 - (ii) equipped;
 - (iii) built –the protest camp referred to therein.

82. **As to paragraph 282 –**

- (a) Give the usual particulars of the allegation that the Second Defendant –
 - (i) provided; or
 - (ii) organised to provide;the items referred to therein.

83. **As to paragraph 284 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant –
 - (i) “*obtained and used*” satellite phones;
 - (ii) “*used*” laptops, satellite unit, cameras and the audio recording devices;as alleged therein.
- (b) Identify and describe the “*interviews to the media*” and state the substance of the interviews .
- (c) Identify and describe the material posted onto the internet and state the substance of that material.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

84. **As to paragraph 285 –**

- (a) Give the usual particulars of the making of the agreement referred to therein.

- (b) Give the usual particulars of the participation in the making of the agreement referred to therein by the Sixth Defendant.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.
- (d) Give the usual particulars of the “*training*” referred to therein.
- (e) Give the usual particulars in support of the allegation that such training was provided by the Sixth Defendant.
- (f) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such agreement.
- (g) Give the usual particulars of the publication by the Sixth Defendant of the statement referred to in the particulars thereto.
- (h) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in publishing the statement referred to in the particulars thereto.
- (i) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in publishing the statement referred to in the particulars thereto.

85. **As to paragraph 286 –**

- (a) Give the usual particulars of the allegation that the Second Defendant –
 - (i) erected a structure;
 - (ii) erected signs;as referred to therein.

86. **As to paragraph 287 –**

- (a) Give the usual particulars of the “*support and encouragement*” referred to therein.
- (b) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

provided the support and encouragement referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

87. **As to paragraph 288 –**

- (a) Give the usual particulars and state the substance of the “*discussions*” referred to therein.
- (b) Give the usual particulars of the making of the agreement referred to therein.
- (c) Give the usual particulars of the participation in the making of the agreement referred to therein by the Second Defendant;
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making the agreement.
- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making the agreement.

- (f) Identify and describe the “*protest*” referred to in paragraph 288(a).

88. **As to paragraph 289 –**

- (a) Give the usual particulars and state the substance of the meetings referred to therein.
- (b) Give the usual particulars in support of the allegation that such meetings (specifying same) were conducted by the Sixth Defendant.
- (c) Give the usual particulars of the encouragement referred to therein.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

89. **As to paragraph 290 –**

- (a) Give the usual particulars of the allegation that –
 - (i) the Second Defendant;
 - (ii) the Sixth Defendantprovided or organised to provide the items referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

90. **As to paragraph 297 –**

- (a) State the substance of the directions referred to therein.

- (b) Give the usual particulars of the directions alleged to have been given by the Second Defendant referred to therein.

91. **As to paragraph 301 –**

State the facts comprising the publication of the certificate to the public.

Interference with the Styx Contracts and trade and business

92. **As to paragraph 306 –**

- (a) Give the usual particulars of the allegation that –

- (i) the First Plaintiff;
- (ii) the Second and Third Plaintiffs;
- (iii) Smith & Sons;
- (iv) Hazell Bros.

were not able to perform each of the Styx Contracts.

- (b) Give the usual particulars of the allegation that –

- (i) the First Plaintiff;
- (ii) the Second and Third Plaintiffs;
- (iii) Smith & Sons;
- (iv) Hazell Bros

were hindered in the performance of each of the Styx Contracts as referred to therein.

93. **As to paragraph 307–**

- (a) Give the usual particulars of the “injury” in the trade and business of –

- (i) the First Plaintiff;
- (ii) the Second and Third Plaintiffs.

- (b) Identify and describe the “*trade and business*” referred to therein of –
 - (i) the First Plaintiff;
 - (ii) the Second and Third Plaintiffs.

Loss and damage arising from the Styx Claims

94. **As to paragraph 308 –**

- (a) State the facts comprising the “*trouble and inconvenience*” referred to in the particulars thereto.
- (b) Specify the facts by reference to which the sum of damages claimed in respect to “*trouble and inconvenience*” is calculated.
- (c) Specify the manner in which the sum of damages claimed in respect to “*trouble and inconvenience*” is calculated.

95. **As to paragraph 310 –**

- (a) State the facts comprising the “*trouble and inconvenience*” referred to in the particulars thereto.
- (b) Specify the facts by reference to which the sum of damages claimed in respect to “*trouble and inconvenience*” is calculated.
- (c) Specify the manner in which the sum of damages claimed in respect to “*trouble and inconvenience*” is calculated.

96. **As to paragraph 320 –**

- (a) Specify the acts alleged to have been done by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (b) Give the usual particulars of the allegation that the “*acts*” referred to therein were done by –
 - (i) the Sixth Defendant;

- (ii) the Second Defendant.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant doing each such act.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act.
- (e) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant
 - (ii) the Second Defendant.intended that the First Plaintiff be injured in its trade and business.
- (f) Identify and describe the “*trade and business*” referred to therein.

97. **As to paragraph 321 –**

- (a) Specify the acts alleged to have been done by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (b) Give the usual particulars of the allegation that each of the “*acts*” referred to therein were done by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant doing each such act.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same)

comprised or acted on behalf of the Sixth Defendant in doing each such act.

- (e) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant
 - (ii) the Second Defendant.

intended that the Second and Third Plaintiffs be injured in its trade and business.

- (f) Identify and describe the “*trade and business*” referred to therein.

Joint, Several and Vicarious Liability

98. As to paragraph 322 –

- (a) Give the usual particulars of the allegation that the “*overt acts*” referred to therein were done by or on behalf of –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

99. As to paragraph 323 –

- (a) Give the usual particulars of the allegation that each of the “*overt acts*” referred to therein was done by the person or persons acting in concert with –
 - (i) the Sixth Defendant;

- (ii) the Second Defendant.
- (b) Give the usual particulars of the doing of the “*overt acts*” referred to therein by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.

100. **As to paragraph 325–**

- (a) Give the usual particulars of and state the substance of the alleged “*common purpose and design*” referred to therein.
- (b) Give the usual particulars by which the common purpose and design may be “*inferred from the nature, location, timing and results of the acts done and the persons involved*” as alleged in particular (a) thereto.
- (c) Give the usual particulars of and state the substance of the “*common understanding*” referred to in particular (c) thereto.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.

were “*well familiar*” with the acts referred to in particular (c) thereto.
- (e) Give the usual particulars of the alleged “*course of action*” determined by the Sixth Defendant referred to in particular (c) thereto.
- (f) Give the usual particulars of the “*acts to be done*” referred to in particular (c) thereto.

101. **As to paragraph 326 –**

- (a) Give the usual particulars of the allegation that the persons and each of them did the acts referred to therein as “*agents*” for the Sixth Defendant.

- (b) Give the usual particulars of the allegation that –
- (i) First Defendant;
 - (ii) Second Defendant;
 - (iii) Third Defendant;
 - (iv) Fourth Defendant;
 - (v) Fifth Defendant;
 - (vi) Thirteenth Defendant -
- were employees of the Sixth Defendant as alleged in particular (a) thereto.
- (c) Describe and give the usual particulars of the “*scope of employment*” of–
- (i) First Defendant;
 - (ii) Second Defendant;
 - (iii) Third Defendant;
 - (iv) Fourth Defendant;
 - (v) Fifth Defendant;
 - (vi) Thirteenth Defendant -
- referred to in particular (a) thereto.
- (d) Give the usual particulars of the allegation that the –
- (i) First Defendant;
 - (ii) Second Defendant;
 - (iii) Third Defendant;
 - (iv) Fourth Defendant;

(v) Fifth Defendant;

(vi) Thirteenth Defendant;

“acted within the scope of their employment” referred to in particular (a) thereto.

(e) Give the usual particulars of the allegation that the Sixth Defendant *“engaged”* the persons referred to in particular (b).

(f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in engaging the persons referred to in particular (b) thereto.

(g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in engaging the persons referred to in particular (b) thereto.

(h) Give the usual particulars of the allegation that the persons referred in particular (b) *“acted as volunteers”* for the Sixth Defendant.

(i) Give the usual particulars of the allegation that *“volunteers”* referred to therein did so with the *“authority”* of the Sixth Defendant as referred to in particulars (b) thereto.

(j) Give the usual particulars of the allegations that the Tenth Defendant;

(i) was a member of the Sixth Defendant;

(ii) had been *“asked to act on behalf of the Sixth Defendant”*;

(iii) acted *“ within the scope of his membership”*;

(iv) acted *“in accordance with that request”*-

as alleged in particular (c) thereto.

- (k) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in asking the Tenth Defendant to act on its behalf as alleged in particular (c) thereto.
- (l) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in asking the Tenth Defendant to act on its behalf as alleged in particular (c) thereto.

The Triabunna 2004 Action

The Triabunna 2004 Claims

102. **As to paragraph 334–**

- (a) Give the usual particulars of the participation by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –
 - in the –
 - A. making of;
 - B. conduct of –

the conspiracy and combination referred to therein.
- (b) Identify and describe the “*unlawful means*” referred to therein.
- (c) Identify and describe the injury intended by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

to have been caused to the First Plaintiff.

- (d) Give the usual particulars and state the substance of the “*discussions*” referred to in the particular (a) thereto.
- (e) Identify the participants in each of the “*discussions*” referred to in the particular (a) thereto.
- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*discussions*” referred to in particular (a) thereto
- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in the “*discussions*” referred to in particular (a) thereto.
- (h) Give the usual particulars and state the substance of the “*meetings*” referred to in the particular (a) thereto.
- (i) Identify the participants in each of the “*meetings*” referred to in the particular (a) thereto.
- (j) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*meetings*” referred to in particular (a) thereto.
- (k) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in the “*meetings*” referred to in particular (a) thereto.
- (l) Give the usual particulars of and state the substance of the agreement referred to in particular (a) thereto.
- (m) Identify and describe the “*activities*” referred to in the particular (a) thereto.
- (n) Specify and identify each of the “*nature, timing and results*” referred to in particular (a).

- (o) Give the usual particulars of the participation in the making of the agreement referred to in particular (c)(i) thereto by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (p) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.
- (q) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such agreement.
- (r) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.

knew of each of the Triabunna 2004 Employees' Contracts as alleged in particular (c)(ii) thereto.

103. **As to paragraph 335 –**

- (a) Identify the dates of the “*meetings*” alleged therein to have occurred in November to February 2003 .
- (b) Give the usual particulars and state the substance of the “*meetings*” referred to therein.
- (c) Identify the participants in each of the “*meetings*” referred to therein.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*meetings*” referred to therein.
- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same)

comprised or acted on behalf of the Sixth Defendant in the “*meetings*” referred to therein.

- (f) Give the usual particulars of the agreement referred to therein.
- (g) Identify and describe the “*protest*” referred to therein.

104. **As to paragraph 336 –**

- (a) Give the usual particulars of the acts of interference by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in each such act of interference.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

intended to injure the First Plaintiff in its trade and business.
- (e) Identify and describe the “*trade and business*” referred to therein.
- (f) Identify and describe the “*unlawful means*” referred to therein.
- (g) Identify and describe the “*injury*” intended by the
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

to have been caused to the First Plaintiff.

- (h) Give the usual particulars of the participation in the making of the agreement referred to in particular (c)(i) thereto by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (i) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.
- (j) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such agreement.
- (k) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

knew of the Triabunna Mill 2004 Employees' Contracts as alleged in particular (c)(ii) thereto.

105. **As to paragraph 337 –**

- (a) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

knew of each of the contracts referred to therein.
- (b) Give the usual particulars of the means by which the Sixth Defendant could have ascertained the existence of the contracts referred to therein.

- (c) Give the usual particulars by reference to which it is alleged that the Sixth Defendant was recklessly indifferent to ascertaining the existence of the contracts referred to therein.

106. **As to paragraph 338 –**

- (a) Give the usual particulars of the acts of interference by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –
referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in each such act of interference.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –
intended to injure the First Plaintiff.
- (e) Identify and describe the “*unlawful means*” referred to therein.
- (f) Identify and describe the “*injury*” intended by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –
to have been caused to the First Plaintiff.

Triabunna 2004 Overt Acts107. **As to paragraph 339 –**

(a) Give the usual particulars of the allegation that –

- (i) the Sixth Defendant;
- (ii) the Second Defendant –

did each of “*the acts they are alleged to have done set out in paragraphs 340 to 372 (“the Triabunna 2004 overt acts”)*”.

(b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.

(c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

(d) Give the usual particulars of the allegation that the “*acts*” referred to therein were done “*in furtherance of the Triabunna 2004 Conspiracy*”.

108. **As to paragraph 340 –**

(a) Give the usual particulars and state the substance of the “*discussions*” referred to therein.

(b) Give the usual particulars and state the substance of the “*decisions*” referred to therein.

109. **As to paragraph 341 –**

(a) Give the usual particulars of the making of the agreement referred to therein.

(b) Give the usual particulars of the participation in the making of the agreement referred to therein by the Sixth Defendant.

- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such agreement.
- (e) Give the usual particulars of the training referred to therein.
- (f) Give the usual particulars of the provision of such training by the Sixth Defendant.
- (g) Give the usual particulars of the publication of the statement by the Sixth Defendant as referred to in the particulars thereto.
- (h) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in publishing the statement referred to in the particulars thereto.
- (i) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in publishing the statement referred to in the particulars thereto.

110. **As to paragraph 342 –**

- (a) Give the usual particulars of the encouragement referred to therein.
- (b) Give the usual particulars of the allegation that the Sixth Defendant “*encouraged protestors*” as alleged therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein

111. **As to paragraph 343 –**

- (a) Identify and state the substance of the “*request*” referred to therein.
- (b) Give the usual particulars of the “*request*” referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such “*request*” referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such “*request*” referred to therein
- (e) Give the usual particulars of the allegation that Greenpeace Australia Pacific acted on behalf of the Sixth Defendant.

112. **As to paragraph 345 –**

- (a) Give the usual particulars of and describe the “*training workshop*” referred to therein.
- (b) Give the usual particulars of the allegation that the Sixth Defendant conducted the “*training workshop*” referred to therein.
- (c) Give the usual particulars of the allegation that the Sixth Defendant “*provided protestors*” with training in media skills, lock ons, police liaison, facilitation and communication and other necessary skills (identifying same).
- (d) Specify and identify the “*protestors*” referred to therein.
- (e) Give the usual particulars of the allegation that the Sixth Defendant “*encouraged*” the “*protestors*” referred to therein.
- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.

- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

113. **As to paragraph 346 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant did the acts referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

114. **As to paragraph 347 –**

- (a) Give the usual particulars of the provision by the Sixth Defendant of the “*facilities*” and “*equipment*” referred to therein.
- (b) Identify and describe the “*facilities*” and “*equipment*” referred to therein.
- (c) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

“*provided or organised for others to provide*” the items referred to therein.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant
 - (ii) the Second Defendant –

provided or organised to provide the said items to “*aid and enable*” the persons referred to therein to engage in the acts alleged.

- (e) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (f) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

115. **As to paragraph 348 –**

- (a) Give the usual particulars of the allegation that Greenpeace did the act referred to therein “*on behalf*” of the Sixth Defendant.
- (b) Give the usual particulars and state the substance of the document written to the Environment Minister of Japan referred to therein.

116. **As to paragraph 349 –**

- (a) Give the usual particulars of the allegation that Greenpeace did the act referred to therein “*on behalf*” of the Sixth Defendant.
- (b) Give the usual particulars and state the substance of the material published on the website referred to therein.

117. **As to paragraph 358 –**

Give the usual particulars of the allegation that the acts there referred to interfered with the First Plaintiff’s “*possession*” of the boom and tower.

118. **As to paragraph 359 –**

Give the usual particulars of the allegation that the acts there referred to interfered with the First Plaintiff’s “*possession*” of the tower.

119. **As to paragraph 360 –**

Give the usual particulars of the allegation that the acts there referred to interfered with the First Plaintiff's "*possession*" of the tower.

120. **As to paragraph 365 –**

- (a) Identify and describe the photographs alleged to have been published by the Sixth Defendant referred to therein.
- (b) Give the usual particulars of the publication and distribution by the Sixth Defendant as alleged therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in publishing and distributing the photographs referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in publishing and distributing the photographs referred to therein.

121. **As to paragraph 369 –**

Give the usual particulars of the allegation that Rebecca Hubbard "*stated words*" to the effect set out therein.

122. **As to paragraph 372 –**

- (a) State the facts in support of the allegation that Tammy Jo Sutton was an employee of the Sixth Defendant as alleged therein.
- (b) Identify and describe the statement allegedly published as referred to therein.
- (c) Give the usual particulars of the allegation that the Sixth Defendant published the statement referred to therein.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in publishing the statement referred to therein.

- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in publishing the statement referred to therein.

Interference with the Triabunna 2004 Employees' Contracts and Trade and Business

123. **As to paragraph 374 –**

- (a) Give the usual particulars of the allegation that –

- (i) Adrian Hobden;
- (ii) Graeme Castle;
- (iii) Bill Parker;
- (iv) Nicholas Gallagher;
- (v) Greg Thorpe;

were not able to perform the contracts referred to therein.

- (b) Give the usual particulars of the allegation that –

- (i) Adrian Hobden;
- (ii) Graeme Castle;
- (iii) Bill Parker;
- (iv) Nicholas Gallagher;
- (v) Greg Thorpe;

were hindered in the performance of contracts referred to therein.

- (c) Give the usual particulars in support of the allegation that the presences referred to therein prevented or hindered performance of the Triabunna 2004 employees' contracts.

- (d) Give the usual particulars in support of the allegation that the presences referred to therein prevented or hindered performance of the Triabunna 2004 employees' contracts.
- (e) Give the usual particulars of the searching referred to therein.

124. **As to paragraph 375 –**

- (a) Give the usual particulars of the alleged interference with the performance of the trade and business referred to therein.
- (b) Give the usual particulars of the allegation that the presences referred to therein interfered with the trade and business of the First Plaintiff.
- (c) Give the usual particulars of the searching referred to therein.

Loss and damage arising from the Triabunna 2004 claims

125. **As to paragraph 376 –**

- (a) Specify the manner in which the sum of damages claimed in respect to each such item of loss and damage is calculated.
- (b) State the facts comprising the “*trouble and inconvenience*” referred to in particular (d) thereto.
- (c) Specify the manner in which the sum of damages claimed in respect to “*trouble and inconvenience*” is calculated.

126. **As to paragraph 382 –**

- (a) Give the usual particulars of the “*overt acts*” done by –
 - (i) the Sixth Defendant –
 - (ii) the Second Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such overt act.

- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such overt act.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant;intended to injure the First Plaintiff in its trade and business.

Joint, several and vicarious liability

127. As to paragraph 383 –

- (a) Give the usual particulars of the allegation that the “*overt acts*” referred to therein were done by or on behalf of –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

128. As to paragraph 384 –

- (a) Give the usual particulars of the allegation that each of the “*overt acts*” referred to therein was done by the person or persons acting in concert with –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.

- (b) Give the usual particulars of the doing of the “*overt acts*” referred to therein by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.

129. **As to paragraph 386–**

- (a) Give the usual particulars of and state the substance of the alleged “*common purpose and design*” referred to therein.
- (b) Give the usual particulars by which the common purpose and design may be “*inferred from the nature, location, timing and results of the acts done and the persons involved*” as alleged in particular (a) thereto.
- (c) Give the usual particulars of and state the substance of the “*common understanding*” referred to in particular (c) thereto.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –were “*well familiar*” with the acts referred to in particular (c) thereto.
- (e) Give the usual particulars of the alleged “*course of action*” determined by the Sixth Defendant referred to in particular (c) thereto.
- (f) Give the usual particulars of the determination by the Sixth Defendant as referred to therein.
- (g) Give the usual particulars of the “*acts to be done*” referred to in particular (c) thereto.

130. **As to paragraph 387 –**

- (a) Give the usual particulars of the allegation that the persons referred to and each of them did the acts referred to therein as “*agents*” for the Sixth Defendant.

- (b) Give the usual particulars of the allegation that –
- (i) First Defendant;
 - (ii) Second Defendant;
 - (iii) Thirteenth Defendant;
- were employees of the Sixth Defendant as alleged in particular (a) thereto.
- (c) Describe and give the usual particulars of the “*scope of employment*” of the –
- (i) First Defendant;
 - (ii) Second Defendant;
 - (iii) Thirteenth Defendant –
- referred to in particular (a) thereto.
- (d) Give the usual particulars of the allegation that the –
- (i) First Defendant;
 - (ii) Second Defendant;
 - (iii) Thirteenth Defendant;
- “*acted within the scope of their employment*” referred to in particular (a) thereto.
- (e) Give the usual particulars of the allegation that the Sixth Defendant “*engaged*” the persons referred to in particular (b).
- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in engaging the persons referred to in particular (b) thereto.
- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same)

comprised or acted on behalf of the Sixth Defendant in engaging the persons referred to in particular (b) thereto.

- (h) Give the usual particulars of the allegation that the persons referred in particular (b) “*acted as volunteers*” for the Sixth Defendant.
- (i) Give the usual particulars of the allegation that “*volunteers*” referred to therein did so with the “*authority*” of the Sixth Defendant as referred to in particulars (b) thereto.
- (j) Give the usual particulars of the allegations that the Tenth Defendant;
 - (i) was a member of the Sixth Defendant;
 - (ii) had been “*asked to act on behalf of the Sixth Defendant*”;
 - (iii) acted “*within the scope of his membership*”;
 - (iv) acted “*in accordance with that request*” -
 as alleged in particular (c) thereto.
- (k) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in asking the Tenth Defendant to act on its behalf as alleged in particular (c) thereto.
- (l) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in asking the Tenth Defendant to act on its behalf as alleged in particular (c) thereto.

The other Triabunna 2004 claims

131. **As to paragraph 391 –**

Give the usual particulars of the alleged interference with the performance of the trade and business referred to therein.

The Hampshire Action*The Hampshire Claims*132. **As to paragraph 425 –**

- (a) Give the usual particulars of the participation by the Sixth Defendant in the –
 - (i) making of;
 - (ii) conduct of –the conspiracy and combination referred to therein.
- (b) Identify and describe the “*unlawful means*” referred to therein.
- (c) Identify and describe the injury intended by the Sixth Defendant to have been caused to the First Plaintiff,
- (d) Give the usual particulars and state the substance of the “*discussions*” referred to in the particular (a) thereto.
- (e) Identify the participants in each of the “*discussions*” referred to in the particular (a) thereto.
- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*discussions*” referred to in particular (a) thereto
- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in the “*discussions*” referred to in particular (a) thereto.
- (h) Give the usual particulars and state the substance of the “*meetings*” referred to in the particular (a) thereto.
- (i) Identify the participants in each of the “*meetings*” referred to in the particular (a) thereto.

- (j) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*meetings*” referred to in particular (a) thereto.
- (k) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in the “*meetings*” referred to in particular (a) thereto.
- (l) Give the usual particulars of and state the substance of the “*agreement*” referred to in particular (a) thereto.
- (m) Identify and describe the “*activities*” referred to in the particular (a) thereto.
- (n) Specify and identify each of the “*nature, timing and results*” referred to in particular (a).
- (o) Give the usual particulars of the participation in the making of the agreement referred to in particular (c)(i) thereto by the Sixth Defendant;
- (p) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.
- (q) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such agreement.
- (r) Give the usual particulars of the allegation that the Sixth Defendant knew of each of the Hampshire Contracts as alleged in particular (c)(ii) thereto.

133. **As to paragraph 426 –**

- (a) Identify the dates of the “*meetings*” alleged therein to have occurred in November to February 2003 .

- (b) Give the usual particulars and state the substance of the “*meetings*” referred to therein.
- (c) Identify the participants in each of the “*meetings*” referred to therein.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*meetings*” referred to therein.
- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in the “*meetings*” referred to therein.
- (f) Give the usual particulars of the agreement referred to therein.

134. **As to paragraph 427 –**

- (a) Give the usual particulars of the acts of interference by the Sixth Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in each such act of interference.
- (d) Give the usual particulars of the allegation that the Sixth Defendant intended to injure the First Plaintiff in its trade and business.
- (e) Identify and describe the “*trade and business*” referred to therein.
- (f) Identify and describe the “*unlawful means*” referred to therein.
- (g) Identify and describe the “*injury*” intended by the Sixth Defendant to have been caused to the First Plaintiff.

- (h) Give the usual particulars of the participation in the making of the agreement referred to in particular (c)(i) thereto by the Sixth Defendant;
- (i) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.
- (j) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such agreement.
- (k) Give the usual particulars of the allegation that the Sixth Defendant knew of the Hampshire Contracts as alleged in particular (c)(ii) thereto.

135. **As to paragraph 428 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant knew of each of the contracts referred to therein.
- (b) Give the usual particulars of the means by which the Sixth Defendant could have ascertained the existence of the contracts referred to therein.
- (c) Give the usual particulars by reference to which it is alleged that the Sixth Defendant was recklessly indifferent to ascertaining the existence of the contracts referred to therein.

136. **As to paragraph 429 –**

- (a) Give the usual particulars of the acts of interference by the Sixth Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in each such act of interference.

- (d) Give the usual particulars of the allegation that the Sixth Defendant; intended to injure the First Plaintiff.
- (e) Identify and describe the “*unlawful means*” referred to therein.
- (f) Identify and describe the “*injury*” intended by the Sixth Defendant to have been caused to the First Plaintiff.

The Hampshire Overt Acts

137. **As to paragraph 430 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant did “*the acts they are alleged to have done set out in paragraphs 431 to 450 (“the Hampshire 2004 acts”)*”.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) Give the usual particulars of the allegation that the “*acts*” referred to therein were done “*in furtherance of the Hampshire Conspiracy*”.

138. **As to paragraph 431 –**

- (a) Give the usual particulars of and describe the “*training workshop*” referred to therein.
- (b) Give the usual particulars of the allegation that the Sixth Defendant conducted the “*training workshop*” referred to therein.
- (c) Specify and identify the “*protestors*” referred to therein.
- (d) Give the usual particulars of the allegation that the Sixth Defendant “*provided protestors*” with training in media skills, lock ons, police

liaison, facilitation and communication and other necessary skills (identifying same).

- (e) Give the usual particulars of the allegation that the Sixth Defendant “*encouraged*” the “*protestors*” referred to therein.
- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

139. **As to paragraph 432 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant sought funds as alleged therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in seeking funds as alleged therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in seeking funds as alleged therein.
- (d) Identify the “*request ... in writing*” referred to in the particulars thereto.

140. **As to paragraph 433 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant “*provided (or organised for others to provide)*” the items referred to therein.
- (b) Give the usual particulars of the allegation that the Sixth Defendant provided or organised to provide the said items to “*aid and enable*” the persons referred to therein to engage in the acts alleged.

- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

141. **As to paragraph 438 –**

Give the usual particulars of the allegation that the acts there referred to interfered with the First Plaintiff's "*possession*" of the North Crane.

142. **As to paragraph 449 –**

- (a) Give the usual particulars of the allegation that Rahima Hayes acted as alleged "*on behalf of*" the Sixth Defendant.
- (b) State the facts comprising the authorisation by reference to which it is alleged that Rahima Hayes spoke on behalf of the Sixth Defendant.
- (c) Identify, give the usual particulars of and state the substance of each of the "*statements to the media*" referred to therein.
- (d) Identify and describe the "*media release*" and state the substance of that release.
- (e) Give the usual particulars of the "*publication*" of the media release.

143. **As to paragraph 450 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant "*republished the media release*" as alleged therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same)

comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

144. **As to paragraph 452 –**

(a) Give the usual particulars of the allegation that –

- (i) Grant Purton;
- (ii) Rob King;
- (iii) Chris Hardstaff;
- (iv) Brian Good;
- (v) Skilled Engineering Pty Ltd;
- (vi) Statewide Engineering Pty Ltd;
- (vii) Alba Services -

were not able to perform the contracts referred to therein.

(b) Give the usual particulars of the allegation that –

- (i) Grant Purton;
- (ii) Rob King;
- (iii) Chris Hardstaff;
- (iv) Brian Good;
- (v) Skilled Engineering Pty :td
- (vi) Statewide Engineering Pty Ltd
- (vii) Alba Services;

were hindered in the performance of the contracts referred to therein.

- (c) Give the usual particulars of the allegation that the presences referred to therein prevented or hindered performance of the contracts referred to therein.

145. **As to paragraph 454 –**

Give the usual particulars of the allegation that the Camdale cartage truck did not have “*free, safe and unimpeded egress*” as alleged therein.

146. **As to paragraph 455 –**

Give the usual particulars of the alleged –

- (i) hindrance;
- (ii) prevention;
- (iii) interference –

of the performance of the varied Camdale Contract referred to therein.

Loss and damage arising from the Hampshire claims

147. **As to paragraph 457 –**

- (a) Specify the manner in which the sum of damages claimed in respect of each such item of loss and damage is calculated.
- (b) State the facts comprising the “*trouble and inconvenience*” referred to in particular (d) thereto
- (c) Specify the manner in which the sum of damages claimed in respect to “*trouble and inconvenience*” is calculated.

148. **As to paragraph 463 –**

- (a) Give the usual particulars of the “*overt acts*” done by the Sixth Defendant.

- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such overt act.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such overt act.
- (d) Give the usual particulars of the allegation that the Sixth Defendant intended to injure the First Plaintiff in its trade and business.
- (e) Give the usual particulars of the planning referred to in particular (a) thereto.
- (f) Give the usual particulars of the refining and adapting referred to in particular (a) thereto.
- (g) Give the usual particulars of the organising, auspicing and coordinating by the Sixth Defendant referred to in particular (b) thereto.
- (h) Give the usual particulars of the providing of support, assistance, encouragement, training, facilities and funds by the Sixth Defendant referred to in particular (b) thereto.
- (i) Give the usual particulars of the allegation that the Sixth Defendant was recklessly and selfishly indifferent as referred to in particular (g) thereto.
- (j) Specify and identify the “*dangers*” referred to in particular (g).
- (k) Specify and identify the “*inconvenience*” referred to in particular (g).

Joint, several and vicarious liability relating to Hampshire

149. **As to paragraph 464 –**

- (a) Give the usual particulars of the “*overt acts*” done by or on behalf of the Sixth Defendant.

- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

150. **As to paragraph 465 –**

- (a) Give the usual particulars of the allegation that each of the “*overt acts*” referred to therein was done by the person or persons acting in concert with the Sixth Defendant.
- (b) Give the usual particulars of the doing of the “*overt acts*” referred to therein by the Sixth Defendant.

151. **As to paragraph 467–**

- (a) Give the usual particulars of and state the substance of the alleged “*common purpose and design*” referred to therein.
- (b) Give the usual particulars by which the common purpose and design may be “*inferred from the nature, location, timing and results of the acts done and the persons involved*” as alleged in particular (a) thereto.
- (c) Give the usual particulars of and state the substance of the “*common understanding*” referred to in particular (c) thereto.
- (d) Give the usual particulars of the allegation that the Sixth Defendant was “*well familiar*” with the acts referred to in particular (c) thereto.
- (e) Give the usual particulars of the alleged “*course of action*” determined by the Sixth Defendant referred to in particular (c) thereto.
- (f) Give the usual particulars of the determination by the Sixth Defendant upon such “*course of action*”.

- (g) Give the usual particulars of the “*acts to be done*” referred to in particular (c) thereto.

152. **As to paragraph 468 –**

- (a) Give the usual particulars of the allegation that the persons and each of them did the acts referred to therein as “*agents*” for the Sixth Defendant.

- (b) Give the usual particulars of the allegation that –

- (i) Fifth Defendant;

- (ii) Eighth Defendant –

were employees of the Sixth Defendant as alleged in particular (a) thereto.

- (c) Describe and give the usual particulars of the “*scope of employment*” of the –

- (i) Fifth Defendant;

- (ii) Eighth Defendant –

referred to in particular (a) thereto.

- (d) Give the usual particulars of the allegation that the –

- (i) Fifth Defendant;

- (ii) Eighth Defendant –

“*acted within the scope of their employment*” referred to in particular (a) thereto.

- (e) Give the usual particulars of the allegation that the Sixth Defendant “*engaged*” the persons referred to in particular (b).

- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in engaging the persons referred to in particular (b) thereto.
- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in engaging the persons referred to in particular (b) thereto.
- (h) Give the usual particulars of the allegation that the persons referred in particular (b) “*acted as volunteers*” for the Sixth Defendant.
- (i) Give the usual particulars of the allegation that “*volunteers*” referred to therein did so with the “*authority*” of the Sixth Defendant as referred to in particulars (b) thereto.
- (j) Give the usual particulars of the allegations that the Sixth Defendant “*established*” the Seventeenth Defendant to “*plan and conduct protests*” as alleged in particular (c) thereto.
- (k) Identify and describe the “*encouragement, resources and funding*” referred to in particular (c) thereto.
- (l) Give the usual particulars of the allegation that the Sixth Defendant provided the “*encouragement, resources and funding*” referred to in particular (c) thereto.
- (m) Give the usual particulars of and state the substance of the planning and conduct of the protests referred to in particular (c) thereto.
- (n) Identify and describe the “*directions*” given by the Sixth Defendant as alleged in particular (c) thereto.
- (o) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to in particular (c) thereto.
- (p) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same)

comprised or acted on behalf of the Sixth Defendant in doing each such act referred to in particular (c) thereto.

The Burnie Woodchip Pile Action

153. **As to paragraph 488–**

Give the usual particulars of the allegation that the Sixth Defendant knew the matters referred to therein.

154. **As to paragraph 489 –**

- (a) Give the usual particulars of the participation by the Sixth Defendant in the –
 - (i) making of;
 - (ii) conduct of –the conspiracy and combination referred to therein.
- (b) Identify and describe the “*unlawful means*” referred to therein.
- (c) Identify and describe the injury intended by the Sixth Defendant to have been caused to the First Plaintiff.
- (d) Give the usual particulars and state the substance of the “*discussions*” referred to in the particular (a) thereto.
- (e) Identify the participants in each of the “*discussions*” referred to in the particular (a) thereto.
- (f) Give the usual particulars of the agreement referred to in particular (a) thereto.
- (g) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*discussions*” referred to in the particular (a) thereto.
- (h) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same)

comprised or acted on behalf of the Sixth Defendant in doing each such act.

- (i) Identify and describe the “*nature, timing, location and results*” referred to in particular (a).

155. **As to paragraph 490 –**

- (a) Specify and identify the overt acts referred to therein and alleged to have been done by the Sixth Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) Give the usual particulars of the allegation that the “*acts*” referred to therein were done “*in furtherance of the Burnie Conspiracy*”.

156. **As to paragraph 495 –**

- (a) Identify and describe the injury to the trade and business of the First Plaintiff referred to therein.
- (b) State the facts by reference to which the “*professional consultants*” costs were incurred as referred to in the particulars thereto.
- (c) State the dates on which such testing was conducted.
- (d) Identify the manner in which the claim in respect to fees for testing is to be calculated.
- (e) State the facts comprising the “*trouble and inconvenience*” referred to in particulars thereto
- (f) State the manner in which the sum of damages claimed in respect of “*trouble and inconvenience*” is calculated.

157. **As to paragraph 496 –**

- (a) Give the usual particulars of the allegation that the “acts” referred to therein were done by the Sixth Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act.
- (d) Give the usual particulars of the allegation that the Sixth Defendant intended to injure the First Plaintiff.

Joint, Several and Vicarious Liability in relation to the Burnie Woodchip Pile

158. **As to paragraph 498 –**

- (a) Give the usual particulars of the allegation that each of the “*Burnie Overt Acts*” referred to therein were done by the person or persons alleged (identifying same) on behalf of the Sixth Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) Give the usual particulars of the allegation that each of the “*Burnie Overt Acts*” referred to therein were done “*in furtherance of the conspiracy*”.

159. **As to paragraph 499 –**

- (a) Give the usual particulars of the allegation that each of the “*Burnie Overt Acts*” referred to therein was done by the person or persons acting in concert with the Sixth Defendant.
- (b) Give the usual particulars of the doing of the “*overt acts*” referred to therein by the Sixth Defendant.

160. **As to paragraph 501–**

- (a) Give the usual particulars of and state the substance of the alleged “*common purpose and design*” referred to therein.
- (b) Give the usual particulars by which the common purpose and design may be “*inferred from the nature of the acts, the location at which they were done, the timing at which they were done, the persons involved and the effects of the acts*” as alleged in particular (a) thereto.
- (c) Give the usual particulars of and state the substance of the “*common understanding*” referred to in particular (c) thereto.
- (d) Give the usual particulars of the allegation that the Sixth Defendant was “*well familiar*” with the acts referred to in particular (c) thereto.
- (e) Give the usual particulars of the alleged “*course of action*” determined by the Sixth Defendant referred to in particular (c) thereto.
- (f) Give the usual particulars of the determination by the Sixth Defendant upon a course of action as referred to in particular (c) thereto.
- (g) Give the usual particulars of the “*acts to be done*” referred to in particular (c) thereto.

161. **As to paragraph 502 –**

- (a) Give the usual particulars of the allegation that the person or persons alleged (identifying same) did the acts referred to therein as “*agent*” for the Sixth Defendant.

- (b) Give the usual particulars of the allegation that the Sixth Defendant “*established, funded and supported*” the members of the “*For Forests Group*” in particular (a) thereto.
- (c) Identify and describe the “resources and funding” referred to in particulars (a) thereto.
- (d) Give the usual particulars of the provision by the Sixth Defendant of the “resources and funding” as alleged in particular (a) thereto.
- (e) Give the usual particulars of the allegation that the Twentieth Defendant “*acts as a campaigner*” for the Sixth Defendant as alleged in particular (a) thereto.
- (f) Identify and describe the “*campaign activities*” of the Twentieth Defendant referred to in particular (a) thereto.
- (g) Give the usual particulars of the allegation that the Sixth Defendant “*co-ordinates and directs*” the said “*campaign activities*”.
- (h) Give the usual particulars of the allegation that the persons referred in particular (b) “*acted as volunteers*” for the Sixth Defendant.
- (i) Give the usual particulars of the allegation that “*volunteers*” referred to therein did so with the “*authority*” of the Sixth Defendant as referred to in particulars (b) thereto.
- (j) Identify the “*officers or employees*” referred to in particular (c) thereto.
- (k) Give the usual particulars of the Sixth Defendant’s co-ordination and direction referred to in particular (c) thereto.
- (l) Give the usual particulars of the Sixth Defendant’s encouragement and support referred to in particular (c) thereto.
- (m) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each act referred to in the particulars thereto.

- (n) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each referred to in the particulars thereto.

Then Banksia Awards Action

162. **As to paragraph 504 –**

State the sum of the “*entry fee*” referred to therein.

163. **As to paragraph 505 –**

- (a) Identify and describe the “*material*” referred to therein.
- (b) Give the usual particulars in support of the allegation that such material was submitted in the course of the First Plaintiff’s trade and business.
- (c) State the sum of the entry fee referred to therein.

164. **As to paragraph 511 –**

- (a) Give the usual particulars of the participation by –
- (i) the Sixth Defendant
- (ii) the Second Defendant –
- in the –
- A making of;
- B conduct of –
- the conspiracy and combination referred to therein.
- (b) Identify and describe the “*unlawful means*” referred to therein.
- (c) Identify and describe the “*injury*” intended by –
- (i) the Sixth Defendant;

- (ii) the Second Defendant –

to have been caused to the First Plaintiff.
- (d) Give the usual particulars and state the substance of the “*discussions*” referred to in the particular (a) thereto.
- (e) Identify the participants in each of the “*discussions*” referred to in the particular (a) thereto.
- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*discussions*” referred to in the particular (a) thereto.
- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in each such discussion.
- (h) Identify and describe the “*criticism and denigration campaign*”, “*campaign of threats*” and “*other pressure*” referred to in the particular (a) thereto.
- (i) Specify and describe the “*nature, timing and results*” referred to in particular (a).
- (j) Give the usual particulars of the participation in the making of the agreement referred to in particular (c)(i) thereto by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (k) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.
- (l) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same)

comprised or acted on behalf of the Sixth Defendant in making such agreement.

(m) Give the usual particulars of the allegation that –

(i) the Sixth Defendant;

(ii) the Second Defendant –

knew of the Banksia Awards Agreement as alleged in particular (c)(ii).

165. **As to paragraph 512 –**

Give the usual particulars of the –

(i) persuading;

(ii) inducing;

(iii) procuring –

by –

A the Sixth Defendant;

B the Second Defendant –

as referred to therein.

166. **As to paragraph 513 –**

(a) Give the usual particulars of the acts of interference by –

(i) the Sixth Defendant;

(ii) the Second Defendant –

referred to therein.

(b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.

- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in each such act of interference.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –
intended to cause injury to the First Plaintiff’s trade or business.
- (e) Identify and describe the “*trade and business*” referred to therein.
- (f) Identify and describe the “*unlawful means*” referred to therein.
- (g) Identify and describe the “*injury*” intended by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –
to have been caused to the First Plaintiff.

167. As to paragraph 514 –

Give the usual particulars of the allegation that –

- (i) the Sixth Defendant;
- (ii) the Second Defendant –
knew of the contract referred to in the particulars thereto.

168. As to paragraph 515 –

- (a) Give the usual particulars of the acts of interference by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

referred to therein.

- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in each such act of interference.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –
intended to injure the First Plaintiff.
- (e) Identify and describe the “*unlawful means*” referred to therein.
- (f) Identify and describe the “*injury*” intended by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –
to have been caused to the First Plaintiff.

169. **As to paragraph 516 (a) –**

- (a) Identify and describe the “*material*” referred to therein.
- (b) Give the usual particulars of the sending of such material by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (c) Specify and identify the defamatory imputations alleged to arise from such material.

- (d) Specify and identify the manner in which the material is alleged to have “*criticised* [and] *denigrated*” the First Plaintiff.

170. **As to paragraph 516 (b) –**

- (a) Give the usual particulars of the alleged encouragement by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (b) Identify and describe the “*material*” referred to therein.
- (c) Specify and identify the “*protestors*” and “*groups*” referred to therein.
- (d) Give the usual particulars in support of the allegation of “*purpose*” made therein.

171. **As to paragraph 516 (c) –**

- (a) Give the usual particulars and state the substance of the alleged denigration referred to therein.
- (b) Give the usual particulars in support of the allegation that such denigration was undertaken by the Sixth Defendant for the purposes of injuring the business of the First Plaintiff and putting pressure upon the Banksia Environment Foundation.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

172. **As to paragraph 516 (d) –**

- (a) Give the usual particulars of the allegation that the –
 - (i) the Sixth Defendant;

(ii) the Second Defendant –

“*contacted*” the Banksia Environment Foundation and “*stated*” the matters referred to therein.

- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

173. **As to paragraph 517 (e) –**

(a) Give the usual particulars of the allegation that the –

- (i) the Sixth Defendant;
- (ii) the Second Defendant –

“*contacted*” the Banksia Environment Foundation and “*stated*” the matters referred to therein.

- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) Identify and describe the means of “*contact*” referred to therein.

174. **As to paragraph 519 –**

- (a) Give the usual particulars of the determination by the judges of the Banksia Award.

- (b) Specify and identify the “*material*” said to have been relied upon by the judges as referred to therein.
- (c) Give the usual particulars in the support of the allegation that such judges relied upon such material.

175. **As to paragraph 521 –**

- (a) Identify and describe the “*material*” submitted by the Sixth Defendant.
- (b) Give the usual particulars of the allegation that the judges took into account material submitted by the Sixth Defendant.
- (c) Specify and identify the “*other persons*” referred to therein.

176. **As to paragraph 524 –**

- (a) Give the usual particulars of the “*injury*” in the trade and business of the First Plaintiff.
- (b) Identify and describe the “*trade and business*” referred to therein.

177. **As to paragraph 525–**

Give the usual particulars of the alleged interference of the performance of the Agreement referred to therein.

178. **As to paragraph 526 –**

Specify the manner and facts by reference to which the sum of damages claimed in respect of “*standing and prestige*” is calculated.

179. **As to paragraph 532 –**

- (a) Give the usual particulars of the inducing to breach the Agreement.
- (b) Specify the manner and facts by reference to which the sum of damages claimed in respect to “*standing and prestige*” is calculated.

180. **As to paragraph 534 –**

- (a) Give the usual particulars of the allegation that the “*Banksia Overt Acts*” referred to therein were done by –
 - (i) the Sixth Defendant –
 - (ii) the Second Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –intended to injure the First Plaintiff in its trade and business.
- (e) State the usual particulars and substance of the planning of the “*well-planned action*” alleged in the particulars thereto.
- (f) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant;were involved in the planning of the “*well-planned action*” referred to in the particulars thereto.
- (g) Give the usual particulars of the “*media campaign*” referred to in the particulars thereto.
- (h) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;

(ii) the Second Defendant –

expressed their pleasure, as referred to in the particulars thereto.

Joint, Several and Vicarious Liability

181. **As to paragraph 536 –**

(a) Give the usual particulars of the allegation that the “*overt acts*” referred to therein were done by or on behalf of –

(i) the Sixth Defendant;

(ii) the Second Defendant.

(b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.

(c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

182. **As to paragraph 537 –**

(a) Give the usual particulars of the allegation that each of the “*overt acts*” referred to therein was done by the person or persons acting in concert with –

(i) the Sixth Defendant;

(ii) the Second Defendant.

(b) Give the usual particulars of the doing of the “*overt acts*” referred to therein by –

(i) the Sixth Defendant;

(ii) the Second Defendant.

183. **As to paragraph 539 –**

- (a) Give the usual particulars of and state the substance of the alleged “*common purpose and design*” referred to therein.
- (b) Give the usual particulars by which the common purpose and design may be “*inferred from the nature of the acts, the location at which they were done, the timing at which they were done, the persons involved and the effects of the acts*” as alleged in particular (a) thereto.
- (c) Give the usual particulars of and state the substance of the “*common understanding*” referred to in particular (b) thereto.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –were “*well familiar*” with the acts referred to in particular (b) thereto.
- (e) Give the usual particulars of the alleged “*course of action*” determined by the Sixth Defendant referred to in particular (b) thereto.
- (f) Give the usual particulars of the determination by the Sixth Defendant upon the “*course of action*” referred to in particular (b) thereto.
- (g) Give the usual particulars of the “*acts to be done*” referred to in particular (b) thereto.

184. **As to paragraph 540 –**

- (a) Give the usual particulars of the allegation that the persons and each of them did the acts referred to therein as “*agents*” for the Sixth Defendant.
- (b) Give the usual particulars of the allegation that –
 - (i) First Defendant;
 - (ii) Second Defendant;

(iii) Third Defendant;

(iv) Fourth Defendant –

were employees of the Sixth Defendant as alleged in particular (a) thereto.

(c) Describe and give the usual particulars of the “*scope of employment*” of the –

(i) First Defendant;

(ii) Second Defendant;

(iii) Third Defendant;

(iv) Fourth Defendant –

referred to in particular (a) thereto.

(d) Give the usual particulars of the allegation that the –

(i) First Defendant;

(ii) Second Defendant;

(iii) Third Defendant;

(iv) Fourth Defendant –

“*acted within the scope of their employment*” referred to in particular (a) thereto.

(e) Give the usual particulars of the allegations that -

(i) the Tenth Defendant;

(ii) the Eleventh Defendant; -

A. were members of the Sixth Defendant;

B. had been “*asked to act on behalf of the Sixth Defendant*”;

C. acted “*within the scope of their membership*”

D. acted “*in accordance with those requests*” -

as alleged in particular (b) thereto.

(f) Give the usual particulars of the asking of the Tenth Defendant and the Eleventh Defendant as referred to in particular (b) thereto.

(g) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in asking the Tenth Defendant and Eleventh Defendant to act on its behalf as alleged in particular (b) thereto.

(h) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in asking the Tenth Defendant and Eleventh Defendant to act on its behalf as alleged in particular (b) thereto.

The Japanese Customers Action

185. **As to paragraph 542 –**

(a) Specify and identify the times referred to as the “*material times*”.

(b) Give the usual particulars of the allegation that –

(i) the Sixth Defendant;

(ii) the Second Defendant –

knew that the First Plaintiff conducted its trade and business by selling woodchips and other forest products to –

A. Mitsubishi Paper Mills Ltd;

B. Nippon Paper Industries Co. Ltd;

C. Oji Paper Co Ltd.

186. As to paragraph 543 –

- (a) Specify and identify the dates of the acts of interference alleged to have occurred “*between 2000 and 2004*”.
- (b) Give the usual particulars of the acts of interference by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –
referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in each such act of interference.
- (e) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –
intended to cause injury to the First Plaintiff’s trade or business.
- (f) Identify and describe the “*trade and business*” referred to therein.
- (g) Identify and describe the “*unlawful means*” referred to therein.
- (h) Identify and describe the “*injury*” intended by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –
to have been caused to the First Plaintiff.

- (i) Describe and give the usual particulars of the “*logging operations, disruption campaigns and actions*” referred to in the particular (a) thereto.
- (j) Identify and give the usual particulars of the contracts referred to in particular (b) thereto.
- (k) Identify, describe and give the usual particulars of the “*Wilderness Fund*” referred to in particular (b) thereto.
- (l) Give the usual particulars of the alleged “*improper use of monies*” referred to in particular (b) thereto.
- (m) Give the usual particulars of and state the substance of the agreement referred to in particular (c)(i) thereto.
- (n) Give the usual particulars of the participation in the making of the agreement referred to in particular (c)(i) thereto by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (o) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.
- (p) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such agreement.

187. **As to paragraph 544–**

- (a) Give the usual particulars of the participation by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant;
 in the –

A. making of;

B. conduct of –

the conspiracy and combination referred to therein.

- (b) Identify and describe the “*unlawful means*” referred to therein.
- (c) Identify and describe the injury intended by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant;

to have been caused to the First Plaintiff,
- (d) Describe and give the usual particulars of the “*logging operations, disruption campaigns and actions*” referred to in particular (a) thereto.
- (e) Identify and give the usual particulars of the contracts referred to in particular (b) thereto.
- (f) Identify, describe and give the usual particulars of the “*Wilderness Fund*” referred to in particular (b) thereto.
- (g) Give the usual particulars of the alleged “*improper use of monies*” referred to in particular (b) thereto.

188. **As to paragraph 545–**

- (a) Give the usual particulars of the making of the agreement referred to therein.
- (b) Give the usual particulars of the participation in the making of the agreement referred to therein by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.

- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such agreement.
- (e) Identify and describe the “*similar products*” referred to therein.
- (f) Identify the participants in each of the “*discussions*” referred to in particular (a) thereto.
- (g) Give the usual particulars and state the substance of the “*discussions*” referred to in particulars (a) thereto.
- (h) Specify and identify each of the “*nature, timing and results*” referred to in particular (a) thereto.

189. **As to paragraph 546 –**

- (a) Give the usual particulars of the decision referred to therein.
- (b) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant -“*decided*” the matters referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such decision.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such decision.

190. **As to paragraph 547 –**

Give the usual particulars of the allegation that –

- (a) the Sixth Defendant;

(b) the Second Defendant -

formed the intention referred to therein.

The Japan Overt Acts

191. **As to paragraph 548 –**

(a) Give the usual particulars of the allegation that –

(i) the Sixth Defendant;

(ii) the Second Defendant;

did “*the overt acts which they are alleged to have done in paragraphs 549 to 633.*”

(b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.

(c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

(d) Give the usual particulars of the allegation that the “*acts*” referred to therein were done “*in furtherance of the Japanese Customers Action and Japan Conspiracy*”.

192. **As to paragraph 549 –**

(a) Identify the dates of the “*meetings*” referred to therein.

(b) Give the usual particulars of the meetings referred to therein.

(c) Identify the location and attendees at each such meeting. Give the usual particulars of the determinations of the meetings as referred to therein.

(d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in making such agreement.

- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such agreement.

193. **As to paragraph 550 –**

- (a) Give the usual particulars of the publication of the media release by the Sixth Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant publishing the media release.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in publishing the media release.

194. **As to paragraph 552 –**

- (a) Identify the date and give the usual particulars of the meeting referred to therein.
- (b) Identify the location and attendees at each such meeting. Give the usual particulars of the determinations of the meetings as referred to therein.
- (c) Give the usual particulars of the agreement referred to therein.

195. **As to paragraph 554 –**

- (a) Identify the dates and give the usual particulars of the meeting or meetings referred to therein.
- (b) Give the usual particulars of the agreement referred to therein.

196. **As to paragraph 556 –**

- (a) Give the usual particulars of the allegation that Sixth Defendant “*sponsored and arranged*” the matters referred to therein.

- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act.
- (d) Give the usual particulars of the “*public meetings*” and “*media interview*” referred to therein.

197. **As to paragraph 558 –**

- (a) Give the usual particulars of the allegation that Sixth Defendant –
 - (i) “*established*” the Gunns Ethical Shareholders Group.
 - (ii) “*provided funds and resources*” to the said groupas alleged therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act.
- (d) Give the usual particulars of the writing to shareholders referred to therein.

198. **As to paragraph 559 –**

Give the usual particulars of the statement referred to therein.

199. **As to paragraph 560 –**

- (a) Give the usual particulars of and state the substance of the “*statements*” referred to therein.

- (b) Give the usual particulars of the allegation that the Sixth Defendant *“ensured that these statements were drawn to the attention of the First Plaintiff’s customers in Japan”*.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act.

200. **As to paragraph 561 –**

- (a) Give the usual particulars of the response by the Sixth Defendant as referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant making such response.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in making such response.

201. **As to paragraph 562-**

Give the usual particulars in support of the allegation that the Fourth Defendant obtained the written advice for the purpose of using it to encourage recruitment and commitment to the alleged Japanese customers’ action.

202. **As to paragraph 570–**

- (a) Identify and describe the publicising referred to therein.
- (b) Give the usual particulars in support of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant -

publicised the actions referred to therein.

203. **As to paragraph 571 –**

- (a) Identify the Sixth Defendant's employees and volunteers referred to therein.
- (b) Identify and describe the "*posters*" referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act.

204. **As to paragraph 573 –**

- (a) Identify the "*senior officers of Mitsubishi Corporation*" referred to therein.
- (b) Identify and state the substance of the "*correspondence*" referred to therein.
- (c) Give the usual particulars of the decision of senior officers of Mitsubishi Corporation referred to therein.
- (d) Give the usual particulars of the allegation that the alleged senior officers of Mitsubishi Corporation were aware of the capacity of the Sixth Defendant and Greenpeace to create adverse publicity and to engender consumer boycotts and direct actions.

205. **As to paragraph 575 –**

- (a) Give the usual particulars of the arranging by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

for Greenpeace Japan to publish a document on its website.

- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.
- (d) Specify and identify the “*document*” alleged to have been published on the Greenpeace Japan website.
- (e) Identify the author of the “*bulletin*” referred to therein.

206. **As to paragraph 577 –**

Identify the passage or passages in the letters, correspondence and documents (identifying same) referred to therein in which it was suggested that the First Plaintiff would not be able to remain a reliable source for woodchips.

207. **As to paragraph 578 –**

Identify and state the substance of the letters alleged to have been written by the First Plaintiff’s customers as referred to therein.

208. **As to paragraph 581 –**

- (a) Specify and identify the letter alleged to have been written by Yuka Ozaki as referred to therein.
- (b) Give the usual particulars in support of the allegation that such letter was written on behalf of the Sixth Defendant.
- (c) Give the usual particulars in support of the allegation that such letter was written with the encouragement of the Fourth Defendant.

209. **As to paragraph 583 –**

- (a) Specify and identify the author or authors of the letter or letters referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.

210. **As to paragraph 588 –**

- (a) Specify and identify the author of the letters to the Japanese Customers referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.

211. **As to paragraph 590 –**

Give the usual particulars of the allegation that the Sixth Defendant published the statement referred to therein.

212. **As to paragraph 591 –**

Give the usual particulars in support of the allegation that Greenpeace Japan published and distributed the messages referred to therein on behalf of the Sixth Defendant.

213. **As to paragraph 592 –**

- (a) Give the usual particulars in support of the allegation that the article was published “*at the behest of*” the Sixth Defendant.

- (b) Give the usual particulars of the provision of information for the article by Greenpeace Japan.
- (c) Give the usual particulars of the obtaining of the information from the Fourth and Sixth Defendants.
- (d) Give the usual particulars of the encouraging referred to therein.
- (e) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (f) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.

214. **As to paragraph 593 –**

- (a) Give the usual particulars of the allegation that the article appeared “*at the behest*” of the Sixth Defendant.
- (b) Give the usual particulars of the allegation that Greenpeace Japan staff obtained the information for the article from the Sixth Defendant.
- (c) Identify the “*Greenpeace Japan staff*” referred to therein.
- (d) Give the usual particulars of the encouragement to Greenpeace Japan by the Sixth Defendant as referred to therein.
- (e) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (f) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.

215. **As to paragraph 595 –**

- (a) Specify and identify the authors of the letter to the President of the Daio Paper Co Ltd referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.

216. **As to paragraph 596**

- (a) Give the usual particulars of the “*publication*” of the statement referred to therein.
- (b) Give the usual particulars in support of the allegation that Sakyō Noda published and distributed the messages referred to therein –
 - (i) for;
 - (ii) on behalf of –

the Sixth Defendant.

217. **As to paragraph 597 –**

- (a) Give the usual particulars of the “*promotion*” of the article referred to therein by the Sixth Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.
- (d) Identify and specify the “*implied criticisms*” referred to therein.

218. As to paragraph 602 -

- (a) Give the usual particulars of the forming of the view by Nippon Paper Industries Co. Ltd referred to therein.
- (b) Specify and identify and state the substance of each of the “*misleading statements*” by the Sixth Defendant referred to therein.
- (c) Give the usual particulars of the urging referred to therein.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.

219. As to paragraph 603 –

- (a) Give the usual particulars of the “*publication*” of the statement referred to therein.
- (b) Give the usual particulars in support of the allegation that Cathy Moore published the statement referred to therein –
 - (i) for;
 - (ii) on behalf of –

the Sixth Defendant.

220. As to paragraph 605 –

- (a) Identify the author or authors of the letter referred to therein.
- (b) Give the usual particulars in support of the allegation that such letter was written by the Sixth Defendant.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.

- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.
- (e) Identify the passage or passages in the letter in which the Sixth Defendant –
 - (i) threatened to publicly denigrate Nippon Paper Industries Co. Ltd;
 - (ii) demanded that Nippon Paper Industries Co. Ltd cease trading with Gunns.

221. As to paragraph 606 –

- (a) Identify the author or authors of the letter referred to therein.
- (b) Give the usual particulars in support of the allegation that such letter was written by the Sixth Defendant.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.

222. As to paragraph 607 –

Identify and state the substance of the material alleged to have been published on the Mitsubishi Paper Mills Co. Ltd website.

223. As to paragraph 609 –

- (a) State the substance of the article referred to therein.
- (b) Give the usual particulars of the allegation that –

- (i) the Sixth Defendant;
- (ii) the Second Defendant –

published the article referred to therein.

- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.

224. As to paragraph 610 –

- (a) Identify and specify where the “*statement*” referred to therein was published.
- (b) Give the usual particulars of the allegation that the Sixth Defendant published the statement referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.

225. As to paragraph 611 –

- (a) Identify the author or authors of the letter referred to therein.
- (b) Give the usual particulars in support of the allegation that such letter was written by Greenpeace “*on behalf*” the Sixth Defendant.

226. As to paragraph 612 –

- (a) Identify and state the substance of the material alleged to have been published on the Greenpeace International website.
- (b) Give the usual particulars in support of the allegation that such letter was so published by Greenpeace International “*on behalf*” of the Sixth Defendant.

227. **As to paragraph 613 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant “*conducted*” the Triabunna 2004 protest
- (b) Give the usual particulars of the interference referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.

228. **As to paragraph 614 –**

- (a) Identify the protestor referred to therein.
- (b) Give the usual particulars of the allegation that the protestor published the said message “on behalf” of the Sixth Defendant as alleged therein.
- (c) Give the usual particulars of the publication of the message on the internet.

229. **As to paragraph 615 –**

- (a) Identify and state the substance of the “*entry*” alleged to have been carried on the Greenpeace Japan website.
- (b) Give the usual particulars in support of the allegation that such “*entry*” was carried “*on behalf*” of the Sixth Defendant.

230. **As to paragraph 616 –**

- (a) Give the usual particulars of the providing of the information and material referred to therein by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

to Greenpeace International and Greenpeace Japan.
- (b) Give the usual particulars of the requesting and encouraging of the publication of such material by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.

231. **As to paragraph 617 –**

- (a) Give the usual particulars of the providing of the information and material referred to therein by the Sixth Defendant to ‘Weekly Asahi.’
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.

232. **As to paragraph 619 –**

- (a) Identify and describe the “*press release*” and state the substance of that release.
- (b) Give the usual particulars of the allegation the Sixth Defendant issued the press release.
- (c) Identify and describe the “*campaign*” referred to therein.
- (d) Give the usual particulars of the increasing of the campaign by the Sixth Defendant as alleged therein.
- (e) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (f) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.

233. **As to paragraph 620 –**

- (a) State the substance of the letter referred to therein.
- (b) Give the usual particulars in support of the allegation that Greenpeace Japan wrote to the President of the Kawasho Corporation on behalf of the Sixth Defendant.

234. **As to paragraph 621 –**

- (a) State the substance of the letter referred to therein.
- (b) Give the usual particulars in support of the allegation that Greenpeace Japan wrote to the President of the Kawasho Corporation on behalf of the Sixth Defendant.

235. **As to paragraph 622 –**

- (a) State substance of the letter referred to therein.

- (b) Give the usual particulars in support of the allegation that the Second Defendant wrote the said letter on behalf of the Sixth Defendant.

236. **As to paragraph 623 –**

- (a) Give the usual particulars of the of the “*logging operations disruption campaigns*” referred to therein.
- (b) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

ensured that there were logging operations disruption campaigns.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.

237. **As to paragraph 624 –**

- (a) Identify and describe the “*proper purposes*” of the Wilderness Fund referred to therein.
- (b) Give the usual particulars of the allegation that “*monies*” from the Wilderness Fund were expended in “*in furtherance of the Japanese Customers Action and the Japan Conspiracy*” as alleged therein.
- (c) Give the usual particulars of the allegation that the Sixth Defendant expended monies from the Wilderness Fund as alleged therein.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in so acting as alleged therein.

- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in so acting as alleged therein.

238. **As to paragraph 625 –**

- (a) Give the usual particulars of the allegation that the acts referred to therein were done by the Sixth Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) Give the usual particulars of the allegation that the “acts” referred to therein were done “*in furtherance of the Japanese Customers Action*”.
- (e) Give the usual particulars of the interference alleged therein.

239. **As to paragraph 626 –**

- (a) Specify and identify the:
 - (i) “*contractual arrangements*”
 - (ii) “*purchasing arrangements*”referred to therein.
- (b) Give the usual particulars of the allegation that the Japanese Customers reviewed and questioned the contractual arrangements referred to therein.
- (c) Give the usual particulars of the threat or threats by the Japanese Customers to withdraw from the purchasing arrangements referred to therein.

240. **As to paragraph 627 –**

- (a) Give the usual particulars of the –
 - (i) substantial response;
 - (ii) writing to Japanese Customers;
 - (iii) speaking with the Japanese Customers
 - (iv) travelling to Japan to meeting with the Japanese Customers;
 - (v) examination of the material provided to the Japanese Customers.

as referred to therein and in the particulars thereto.

- (b) Identify, state the substance of and give the usual particulars of the “*advice from consultants*” referred to it the particulars thereto.

241. **As to paragraph 628 –**

- (a) State the facts by reference to which the First Plaintiff claims loss and damage in respect to costs of “*travel*”, “*consultants*”, “*reports*”, “*legal advice*” and “*trouble and inconvenience*”.
- (b) State the manner in which the sum claimed in respect to each such claim for loss and damage is calculated.

242. **As to paragraph 632 –**

- (a) Give the usual particulars of the allegation that the “*overt acts*” referred to therein were done by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant;
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act.

- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant
 - (ii) the Second Defendant;
 intended that the First Plaintiff be injured.

Joint Several and Vicarious Liability

243. **As to paragraph 634 –**

- (a) Give the usual particulars of the allegation that the “*overt acts*” referred to therein were done by or on behalf of -
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) Give the usual particulars in support of the allegation that such acts were done “*in furtherance of the Japan Conspiracy*”.

244. **As to paragraph 635 –**

- (a) Give the usual particulars of the allegation that each of the “*overt acts*” referred to therein was done by the person or persons acting in concert with –

- (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (b) Give the usual particulars of the doing of the “*overt acts*” referred to therein by –
- (i) the Sixth Defendant;
 - (ii) the Second Defendant.

245. **As to paragraph 637–**

- (a) Give the usual particulars of and state the substance of the alleged “*common purpose and design*” referred to therein.
- (b) Give the usual particulars by which the common purpose and design may be “*inferred from the nature, location, timing and results of the acts done and the persons involved*” as alleged in particular (a) thereto.
- (c) Give the usual particulars of and state the substance of the “*common understanding*” referred to in particular (c) thereto.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant;

were “*well familiar*” with the acts referred to in particular (c) thereto.
- (e) Give the usual particulars of the alleged “*course of action*” determined by the Sixth Defendant referred to in particular (c) thereto.
- (f) Give the usual particulars of the determination upon a course of action referred to in particular (c).
- (g) Give the usual particulars of the “*acts to be done*” referred to in particular (c) thereto.

246. **As to paragraph 638 –**

- (a) Give the usual particulars of the allegation that the person or persons alleged (identifying same) as “*agent*” for the Sixth Defendant.
- (b) Give the usual particulars of the allegation that –
 - (i) First Defendant;
 - (ii) Second Defendant;
 - (iii) Third Defendant;
 - (iv) Fourth Defendant –were employees of the Sixth Defendant as alleged in particular (a) thereto.
- (c) Describe and give the usual particulars of the “*scope of employment*” of the –
 - (i) First Defendant;
 - (ii) Second Defendant;
 - (iii) Third Defendant;
 - (iv) Fourth Defendant –referred to in particular (a) thereto.
- (d) Give the usual particulars of the allegation that the –
 - (i) First Defendant;
 - (ii) Second Defendant;
 - (iii) Third Defendant;
 - (iv) Fourth Defendant –

“acted within the scope of their employment” referred to in particular (a) thereto.

- (e) Give the usual particulars of the allegations that –
- (i) the Tenth Defendant;
 - (ii) the Eleventh Defendant -
 - A. were members of the Sixth Defendant;
 - B. had been “asked to act on behalf of the Sixth Defendant”;
 - C. acted “within the scope of their membership”;
 - D. acted “in accordance with their status as members and the requests made of them”

as alleged in particular (b) thereto.

- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in asking the Tenth Defendant and Eleventh Defendant to act on its behalf as alleged in particular (b) thereto.
- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in asking the Tenth Defendant and Eleventh Defendant to act on its behalf as alleged in particular (b) thereto.

The Banks Action

247. **As to paragraph 640 -**

Give the usual particulars of the allegation that –

- (i) the Sixth Defendant;
- (ii) the Second Defendant;

knew that the First Plaintiff conducted its trade and business in the manner referred to therein.

248. **As to paragraph 641 –**

- (a) State the dates in the period “*between 2001 and 2004*” on which the alleged acts of inference occurred.
- (b) Give the usual particulars of the acts of interference by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant -referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each such act of interference.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in each such act of interference.
- (e) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –intended to cause injury to the trade and business of the First Plaintiff.
- (f) Identify and describe the “*trade and business*” referred to therein.
- (g) Identify and describe the “*injury*” intended to have been caused to the First Plaintiff.
- (h) Identify and describe the “*unlawful means*” referred to therein.
- (i) Identify and describe the “*contractual relationships*” referred to in particular (b) thereto.

- (j) Identify and describe the “*improper use of monies*” referred to in particular (b) thereto.
- (k) Specify and identify the “*logging operations disruption campaigns and actions*” referred to in particular (a).
- (l) Give the usual particulars of the agreement referred to in particular (c)(i).
- (m) Give the usual particulars of the knowledge referred to in particular (c)(ii).

249. **As to paragraph 642 –**

- (a) Give the usual particulars of the participation by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant;

in the –

 - A. making of;
 - B. conduct of –

the conspiracy and combination referred to therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in the acts alleged therein.

State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in the acts alleged therein.
- (c) Identify and describe the “*unlawful means*” referred to therein.
- (d) Identify and describe the “*injury*” intended by –
 - (i) the Sixth Defendant;

- (ii) the Second Defendant –
to have been caused to the First Plaintiff,
- (e) Give the usual particulars of the agreement referred to in particular (a).
- (f) Specify and identify each of the “*nature, timing and results*” referred to in particular (a).
- (g) Identify and describe the “*contractual relationships*” referred to particular (c) thereto.
- (h) Identify and describe the “*improper use of monies*” referred to in particular (c) thereto.

250. **As to paragraph 643 –**

- (a) Give the usual particulars of the agreement referred to therein.
- (b) Give the usual particulars of the participation by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant;
 in the making of the agreement referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in the acts alleged therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in the acts alleged therein.
- (e) Give the usual particulars and state the substance of the “*discussions*” referred to in the particular (a) thereto.
- (f) Give the usual particulars of the participation in such “*discussions*” by–

- (i) the Sixth Defendant;
 - (ii) the Second Defendant;
- (g) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in each of the “*discussions*” referred to in particulars (a) thereto.
- (h) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in the “*discussions*” referred to in particular (a) thereto.
- (i) Specify and identify each of the “*nature, timing and results*” referred to in particular (a).

251. **As to paragraph 644 –**

Give the usual particulars of the allegation that –

- (i) the Sixth Defendant;
- (ii) the Second Defendant –

intended the compel the Banks to do the matters referred to therein.

252. **As to paragraph 645 –**

Give the usual particulars of the allegation that –

- (i) the Sixth Defendant;
- (ii) the Second Defendant –

intended the compel the Banks to cause the First Plaintiff the matters referred to therein.

253. **As to paragraph 646 –**

- (a) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;

(ii) the Second Defendant –

did the acts referred to therein (identifying same).

- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.
- (d) Give the usual particulars of the allegation that the “acts” referred to therein were done “*in furtherance of the Banks Action and Banks Conspiracy*”.

254. **As to paragraph 647 –**

Give the usual particulars of the meetings and discussions referred to therein.

255. **As to paragraph 648 –**

Give the usual particulars of the statement referred to therein.

256. **As to paragraph 649 –**

Give the usual particulars of the statement referred to therein.

257. **As to paragraph 650 –**

Give the usual particulars of the other distribution referred to therein.

258. **As to paragraph 651 –**

- (a) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (b) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

- (c) Identify and describe the other distribution referred to therein.

259. **As to paragraph 652 –**

- (a) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (b) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.
- (c) Identify and describe the other distribution referred to therein.

260. **As to paragraph 653 –**

- (a) Give the usual particulars in support of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant -

organised large numbers of protestors to protest at offices of banks across Australia.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.
- (d) Identify and state the substance of the report referred to therein.

261. **As to paragraph 654 –**

- (a) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;

(ii) the Second Defendant–

organised for protestors to advance certain resolutions (identifying same) to be brought before general meetings of banks.

- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

262. **As to paragraph 655 –**

Identify and state the substance of the bulletin referred to therein.

263. **As to paragraph 656 –**

- (a) Give the usual particulars of the encouragement referred to therein.
- (b) Give the usual particulars of the alleged encouragement by the –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

264. **As to paragraph 657 –**

- (a) Give the usual particulars of the encouragement referred to therein.
- (b) Give the usual particulars of the alleged encouragement by the –

- (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

265. **As to paragraph 658 –**

Identify and state the substance of the bulletin referred to therein.

266. **As to paragraph 659 –**

- (a) Give the usual particulars of the distribution of –
- (i) flyers;
 - (ii) brochures;
 - (iii) internet material –
- by the Sixth Defendant as referred to therein.
- (b) Identify and describe the substance of the flyers, brochures and internet material respectively.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

267. **As to paragraph 660 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant submitted a resolution as referred to therein.
- (b) Give the usual particulars and state the substance of the resolution.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

268. **As to paragraph 661 –**

- (a) Give the usual particulars of the allegation that the Fourth Defendant wrote to the Mercury Newspaper on behalf of the Sixth Defendant.
- (b) Specify and identify the passages in the letter that encouraged shareholders and customers to apply pressure as alleged.

269. **As to paragraph 662 –**

- (a) Give the usual particulars in support of the allegation that the Sixth Defendant submitted the resolution referred to therein.
- (b) Give the usual particulars and state the substance of the resolution.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

270. **As to paragraph 663 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant sought to have the ANZ Bank withdraw the \$250 million loan facility.
- (b) Give the usual particulars in support of the allegation that the purpose of so seeking was to cause financial loss and damage and commercial embarrassment to the First Plaintiff.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

271. As to paragraph 664 –

- (a) Specify and identify “*the propaganda material*” referred to therein.
- (b) Give the usual particulars of the distribution of such material to all shareholders.
- (c) Give the usual particulars of the distribution of such material by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant;
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

272. As to paragraph 665 –

- (a) Identify and describe the material referred to therein.

- (b) Give the usual particulars of the distribution of the material by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant;
- (c) Identify and describe the “*other means*” referred to therein.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

273. **As to paragraph 666 –**

- (a) Give the usual particulars of maintaining of the Styx Action referred to therein.
- (b) Give the usual particulars of the allegation that the –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant -
 - A. maintained;
 - B. obtained publicityfor the Styx Action.
- (c) Identify and describe the “*site*” referred to therein.
- (d) State whether the Sixth and Second Defendants “attended at and participated in the Styx action at the site” as alleged therein.
- (e) Give the usual particulars of any such attendance and participation by –
 - (i) the Sixth Defendant;

(ii) the Second Defendant.

- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

274. As to paragraph 667 –

- (a) Identify and state the substance of the bulletin referred to therein.
- (b) Give the usual particulars of the distribution of the bulletin by Eli Greig as alleged therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that Eli Greig acted on behalf of the Sixth Defendant in acting as alleged therein.

275. As to paragraph 668 –

- (a) Identify and state the substance of the circular referred to therein.
- (b) Give the usual particulars of the “*publication*” of such material by the Sixth Defendant.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

276. As to paragraph 669 –

- (a) Identify and describe the “*Tarkine Action Group*” referred to therein.

- (b) Identify and state the substance of the “*request*” referred to therein.
- (c) Give the usual particulars of the publication of the “*request*” by the Tarkine Action Group as alleged therein.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.
- (f) Give the usual particulars of the allegation that the “*request*” was published on behalf of the Sixth Defendant.

277. As to paragraph 671 –

- (a) Identify and describe the “*Sydney Tarkine Action Alliance*” referred to therein.
- (b) Give the usual particulars of the allegation of the organising referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.
- (e) Give the usual particulars of the allegation that the organising was on behalf of the Sixth Defendant.

278. As to paragraph 672 -

- (a) State the location of the “*various offices of banks in capital cities in Eastern Australia*” referred to therein.

- (b) Describe the various protests (identifying same) referred to therein.
- (c) Give the usual particulars of the allegation that the Sixth Defendant organised the protests.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

279. **As to paragraph 673 –**

- (a) Identify and state the substance of the notice referred to therein.
- (b) Give the usual particulars of the publication of the said notice.
- (c) Give the usual particulars of the allegation that the Sixth Defendant published the notice.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

280. **As to paragraph 674 –**

- (a) Give the usual particulars of the allegation that the Sixth Defendant called for a “*National Day of Action*”.
- (b) Identify and state the substance of the bulletins referred to therein.
- (c) Identify, describe and state the substance of “*the other material*” referred to therein.

- (d) Give the usual particulars of the allegation that the Sixth Defendant published the bulletins
- (e) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (f) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

281. **As to paragraph 675 –**

- (a) Identify and state the substance of the bulletin referred to therein.
- (b) Give the usual particulars of the publication of the said bulletin.
- (c) Give the usual particulars of the allegation that the Sixth Defendant published the bulletin.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

282. **As to paragraph 677 –**

- (a) Give the usual particulars in support of the allegation that protestors entered the London branch of the Commonwealth Bank “*on behalf of the Sixth Defendant*” as alleged therein.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same)

comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

283. **As to paragraph 678 –**

- (a) Give the usual particulars of the allegation that monies were expended from the Wilderness Fund in furtherance of the Banks Action,
- (b) Give the usual particulars of the allegation that the Sixth Defendant expended monies from the Wilderness Fund as alleged.
- (c) Identify and describe the proper purposes of the Wilderness Fund.
- (d) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in acting as alleged therein.
- (e) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in acting as alleged therein.

284. **As to paragraph 679 –**

- (a) Specify and identify the contracts alleged to have been interfered with.
- (b) Give the usual particulars of the allegation that each of the “acts” referred to therein was done by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant;
- (c) Specify and identify the manner in which the acts referred to (identifying same) are alleged to have interfered with such contracts.
- (d) Give the usual particulars of the –
 - (i) hindrance;
 - (ii) prevention –

of the performance of such contracts by reason of the acts referred to therein.

- (e) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act.
- (f) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act.

285. As to paragraph 680 –

- (a) Give the usual particulars of the reviewing and questioning of the investment referred to therein.
- (b) Give the usual particulars of the communication by officers of the Commonwealth Bank to officer of the First Plaintiff referred to therein.

286. As to paragraph 681 –

- (a) Give the usual particulars of the “*substantial response*” referred to therein.
- (b) Identify and describe the “*trade and business*” referred to therein.
- (c) Give the usual particulars of the –
 - (i) making representations;
 - (ii) fielding attacks;
 - (iii) attempts to change the investments;
 - (iv) lobbying government;
 - (v) lobbying public officials –referred to in the particulars thereto.

287. As to paragraph 682 -

- (a) Give the usual particulars of the reviewing and questions by the ANZ Bank.
- (b) Give the usual particulars of the communication or communications to officers of the First Plaintiff.

288. **As to paragraph 683 -**

- (a) Give the usual particulars of the “*substantial response*” referred to therein.
- (b) Identify and describe the “*trade and business*” referred to therein.
- (c) Give the usual particulars of the –
 - (i) making representations;
 - (ii) fielding attacks;
 - (iii) attempts to change the loan facility;
 - (iv) lobbying government;
 - (v) lobbying public officials -referred to in the particulars thereto.

289. **As to paragraph 684 –**

- (a) Specify and identify each way in which it is alleged that the First Plaintiff has suffered loss and damage.
- (b) State the facts by reference to which the claims of loss and damage are made by reference to the costs of –
 - (i) travel;
 - (ii) consultants;
 - (iii) reports;

- (iv) legal advice;
 - (v) trouble and inconvenience.
- (c) Specify the manner in which the sum of loss and damage in respect of each such item of travel, consultants, reports, legal advice and trouble and inconvenience is to be calculated.

Joint Several and Vicarious Liability

290. As to paragraph 690 –

- (a) Give the usual particulars of the allegation that the “*overt acts*” referred to therein were done by or on behalf of -
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

291. As to paragraph 691 –

- (a) Give the usual particulars of the allegation that each of the “*overt acts*” referred to therein was done by the person or persons acting in concert with –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (b) Give the usual particulars of the doing of the “*overt acts*” referred to therein by –
 - (i) the Sixth Defendant;

- (ii) the Second Defendant.

292. **As to paragraph 693–**

- (a) Give the usual particulars of and state the substance of the alleged “*common purpose and design*” referred to therein.
- (b) Give the usual particulars by which the common purpose and design may be “*inferred from the nature, location, timing and results of the acts done and the persons involved*” as alleged in particular (a) thereto.
- (c) Give the usual particulars of and state the substance of the “*common understanding*” referred to in particular (c) thereto.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant;

were “*well familiar*” with the acts referred to in particular (c) thereto.
- (e) Give the usual particulars of the alleged “*course of action*” determined by the Sixth Defendant referred to in particular (c) thereto.
- (f) Give the usual particulars of the determination by the Sixth Defendant upon a course of action.
- (g) Give the usual particulars of the “*acts to be done*” referred to in particular (c) thereto.

293. **As to paragraph 694 –**

- (a) Give the usual particulars of the allegation that the persons or persons alleged (identifying same) did the acts referred to therein as “*agent*” for the Sixth Defendant.
- (b) Give the usual particulars of the allegation that –
 - (i) First Defendant;

- (ii) Second Defendant;
- (iii) Third Defendant;
- (iv) Fourth Defendant;

were employees of the Sixth Defendant as alleged in particular (a) thereto.

- (c) Describe and give the usual particulars of the “*scope of employment*” of the –

- (i) First Defendant;
- (ii) Second Defendant;
- (iii) Third Defendant;
- (iv) Fourth Defendant –

referred to in particular (a) thereto.

- (d) Give the usual particulars of the allegation that the –

- (i) First Defendant;
- (ii) Second Defendant;
- (iii) Third Defendant;
- (iv) Fourth Defendant;

“*acted within the scope of their employment*” referred to in particular (a) thereto.

- (e) Give the usual particulars of the allegations that –

- (i) the Tenth Defendant;
- (ii) the Eleventh Defendant –

A. were members of the Sixth Defendant;

- B. had been “*asked to act on behalf of the Sixth Defendant*”;
- C. acted “*within the scope of their membership*”;
- D. acted “*in accordance with those requests*”

as alleged in particular (b) thereto.

- (f) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in asking the Tenth Defendant and Eleventh Defendant to act on its behalf as alleged in particular (b) thereto.
- (g) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in asking the Tenth Defendant and Eleventh Defendant to act on its behalf as alleged in particular (b) thereto.

Campaign Against Gunns

294. As to paragraph 697 -

- (a) Give the usual particulars of the alleged “*campaign of interference and disruption*” referred to therein.
- (b) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –

“*conducted*” the campaign referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same)

comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

- (e) Give the usual particulars of the allegation that –
- (i) the Sixth Defendant;
 - (ii) the Second Defendant–
- aimed to injure the First Plaintiff in its trade and business.
- (f) Identify and describe the “*trade and business*” referred to therein.
- (g) Identify and describe the “*unlawful means*” referred to therein.
- (h) Identify and describe the injury intended by the –
- (i) the Sixth Defendant;
 - (ii) the Second Defendant –
- to have been caused by the First Plaintiff.
- (i) Give the usual particulars of the allegation that the -
- (i) the Sixth Defendant;
 - (ii) the Second Defendant –
- intended and continue to intend to –
- A. denigrate the First Plaintiff;
 - B. interfere with the performance of work (identifying same) of the First Plaintiff’s employees and contractors;
 - C. interfere with the conduct of the First Plaintiff’s operations (identifying same);
 - D. interfere with the First Plaintiff’s relationships (identifying same) with its customers, investors and banks;

E. cause financial loss and damage to the First Plaintiff –
as alleged in particular (a) and (b) thereto.

- (j) Specify and identify the contracts referred to in particular (c) thereto.
- (k) Give the usual particulars of the interference with the contracts referred to in particular (c).
- (l) Give the usual particulars of the alleged –
 - (i) trespasses;
 - (ii) interference with property ;
 as alleged in particular (c) thereto.
- (m) Identify, describe and give the usual particulars of the “*protest action at logging operations sites*” referred to in particular (c) thereto.
- (n) Give the usual particulars of the “*improper allocation and use of funds*” referred to in particular (c) thereto.
- (o) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to in particular (c) thereto.
- (p) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to in particular (c) thereto.

295. **As to paragraph 698 –**

- (a) Identify each of the “*meetings*” referred to therein.
- (b) Give the usual particulars and state the substance of each of the “*meetings*” referred to therein.
- (c) Identify the participants in each of the “*meetings*” referred to therein.

- (d) Give the usual particulars of the allegation that the Sixth Defendant “*conducted*” each of the meetings referred to therein.
- (e) Give the usual particulars of the decision referred to therein.
- (f) Give the usual particulars of the “*planning*” referred to therein.
- (g) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (h) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

296. **As to paragraph 699 –**

- (a) Give the usual particulars of the agreement referred to therein.
- (b) Give the usual particulars of the participation in the making of the agreement referred to therein by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

297. **As to paragraph 700 –**

- (a) Give the usual particulars of the participation by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant–

in the –

A. making of;

B. conduct of –

the conspiracy and combination referred to therein.

(b) Identify and describe the “*unlawful means*” referred to therein.

(c) Identify and describe the injury intended by –

(i) the Sixth Defendant;

(ii) the Second Defendant -

to have been caused to the First Plaintiff.

298. **As to paragraph 701 –**

(a) Give the usual particulars of the decision referred to therein.

(b) Give the usual particulars of the participation by –

(i) the Sixth Defendant;

(ii) the Second Defendant–

in the making of the decision referred to therein.

(c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.

(d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

299. **As to paragraph 702 –**

(a) Give the usual particulars of the decision referred to therein.

- (b) Give the usual particulars of the participation by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant–in the making of the decision referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

300. **As to paragraph 703 –**

- (a) Give the usual particulars of the decision referred to therein.
- (b) Give the usual particulars of the participation by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant–in the making of the decision referred to therein.
- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

301. **As to paragraph 704 –**

- (a) Give the usual particulars of the decision referred to therein.
- (b) Give the usual particulars of the participation by –

- (i) the Sixth Defendant;
- (ii) the Second Defendant–

in the making of the decision referred to therein.

- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

302. As to paragraph 705 –

- (a) Give the usual particulars of the decision referred to therein.
- (b) Give the usual particulars of the participation by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant–

in the making of the decision referred to therein.

- (c) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (d) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

303. As to paragraph 706 –

- (a) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (b) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same)

comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

- (c) Give the usual particulars of the allegation that the “acts” referred to therein were done “*in furtherance of the Campaign against Gunns and the Campaign against Gunns Conspiracy*”.
- (d) Give the usual particulars of the doing by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant –of each of the “*overt acts*” referred to therein.
- (e) Give the usual particulars of the allegation that the Sixth Defendant “*conducted*” the meetings referred to in paragraph (a) therein.
- (f) Give the usual particulars of –
 - (i) the “*approval*” of the campaign;
 - (ii) the “*allocation*” of fundsalleged in paragraph (a) therein.
- (g) Give the usual particulars of the appointment by the Sixth Defendant of a Corporate Campaigner as alleged in paragraph (b) therein.
- (h) Give the usual particulars of the allegation that the Corporate Campaigner referred to therein had “*specific responsibility*” for carrying out the Campaign against Gunns as alleged in paragraph (b) therein.
- (i) Give the usual particulars of the meetings referred to in paragraph (c) therein.
- (j) Give the usual particulars of the determination referred to in paragraph (c) therein

- (k) Identify, state the substance of and give the usual particulars of each of the “*several meetings*” referred to in paragraph (d) therein.
- (l) Identify the participants in each of the “*several meetings*” referred to in particular (d) therein.
- (m) Give the usual particulars of the “*decision*” referred to in paragraph (d) therein.
- (n) Identify, state the substance of and give the usual particulars of the “meeting” referred to in paragraph (e) therein.
- (o) Give the usual particulars of the “*decision*” referred to in paragraph (e) therein.
- (p) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant
 - (ii) the Second Defendant“*ensured*” the allocation of funds as alleged in paragraph (g) therein.
- (q) Give the usual particulars of the allocation of funds from the Wilderness Fund as referred to in paragraph (g) therein.
- (r) Give the usual particulars of the allegation that the Sixth Defendant “*ensured*” that the Fourth Defendant was available and focussed upon the activities referred to in paragraph (h) therein.
- (s) Identify, state the substance of and give the usual particulars of the statements referred to in paragraph (i) therein.
- (t) Give the usual particulars of the allegation that the Sixth Defendant “*conducted*” the meetings referred to in paragraph (j) therein.
- (u) Identify, state the substance of and give the usual particulars of each of the “*meetings*” referred to in paragraph (j) therein.

- (v) Identify the participants in each of the “*meetings*” referred to in paragraph (j) therein.
- (w) Give the usual particulars of the allegation that the Sixth Defendant “*developed and adopted*” the campaign strategy referred to in paragraph (k) therein.
- (x) Identify and describe the “*direct actions*” referred to in paragraph (j)(i) therein.
- (y) Give the usual particulars of the allegation that the Sixth Defendant –
 - (i) established;
 - (ii) organised;
 - (iii) provided funding;
 - (iv) provided resources (identifying same) –
to the groups referred to in paragraph (l) therein.
- (z) Identify, describe and state the person, persons or entities alleged to comprise –
 - (i) the Melbourne Tarkine Action Group;
 - (ii) the Sydney Tarkine Action Alliance;
 - (iii) the Newcastle Tassie Action Group;
 - (iv) the South Australian Tarkine Action Group.
- (aa) Give the usual particulars and state the substance of the “*meetings*” referred to in paragraph (m) therein.
- (bb) Identify the participants in such meetings referred to in paragraph (nm) therein.
- (cc) Give the usual particulars in support of the allegation that the Sixth Defendant held such meetings referred to in paragraph (m) therein.

- (dd) Give the usual particulars of the allegation that–
- (i) the Sixth Defendant;
 - (ii) the Second Defendant;
- “*endorsed, refined and adapted*” the strategy referred to in paragraph (o) therein
- (ee) Give the usual particulars of the allegation that –
- (i) the Sixth Defendant;
 - (ii) the Second Defendant;
- “*decided*’ the matters referred to in paragraph (o) therein.
- (ff) Identify and describe the “*protest actions*” referred to in paragraph (o)(i) therein.
- (gg) Identify and describe the “*direct actions*” referred to in paragraph (o)(i) therein.
- (hh) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (ii) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.
- (jj) Give the usual particulars and state the substance of the “*meetings*” referred to in paragraph (q) therein.
- (kk) Identify the participants in such meetings referred to in paragraph (q) therein
- (ll) Identify the “*employees*” of the Sixth Defendant referred to in paragraph (q) therein.

- (mm) Give the usual particulars in support of the allegation that the Sixth Defendant held such meeting as referred to in paragraph (q) therein.
- (nn) Give the usual particulars of the encouragement referred to in paragraph (q) therein.
- (oo) Identify and describe the “*protest actions*” referred to in paragraph (q) therein.
- (pp) State the dates in the period “*between September 2003 to March 2004*” in which the “*meetings*” referred to in paragraph (r) therein were held.
- (qq) Give the usual particulars and state the substance of the “*meetings*” referred to in paragraph (r) therein.
- (rr) Identify the “*employees*” of the Sixth Defendant referred to in paragraph (r) therein.
- (ss) Give the usual particulars in support of the allegation that the Sixth Defendant held such meetings as referred to in paragraph (r) therein.
- (tt) Give the usual particulars of the encouragement referred to in paragraph (r) therein.
- (uu) Identify and describe the “*protest actions*” referred to in paragraph (r) therein.
- (vv) Give the usual particulars and state the substance of the “*training workshop*” referred to in paragraph (s) therein.
- (ww) Give the usual particulars in support of the allegation that the training workshop was conducted by the Sixth Defendant as alleged in paragraph (s) therein.
- (xx) Give the usual particulars of the encouragement referred to in paragraph (s) therein.
- (yy) Identify and describe the “*protest actions*” referred to in paragraph (s) therein.

- (zz) State the dates in the period “*between October 2003 to March 2004*” in which the “*meetings*” referred to in paragraph (t) therein were held.
- (aaa) Give the usual particulars and state the substance of the “*meetings*” referred to in paragraph (t) therein.
- (bbb) Identify the “*employees*” of the Sixth Defendant referred to in paragraph (t) therein.
- (ccc) Give the usual particulars in support of the allegation that the Sixth Defendant held such meetings referred to in paragraph (t) therein.
- (ddd) Give the usual particulars of the encouragement referred to in paragraph (t) therein.
- (eee) Identify and describe the “*protest actions*” referred to in paragraph (t) therein.
- (fff) Give the usual particulars and state the substance of the “*meeting*” referred to in paragraph (u) therein.
- (ggg) Give the usual particulars in support of the allegation that the Sixth Defendant conducted such meeting referred to in paragraph (u) therein.
- (hhh) Identify and describe the “*protest campaigns*” referred to in paragraph (u) therein.
- (iii) Identify and describe the “*campaigns and protests*” referred to in paragraph (u)(ii).
- (jjj) Give the usual particulars of the allegation that the Sixth Defendant “*determined*” the matters referred to in paragraph (u)(ii).
- (kkk) Give the usual particulars and state the substance of the “*meeting*” referred to in paragraph (v) therein.
- (lll) Give the usual particulars in support of the allegation that the Sixth Defendant conducted such a meeting referred to in paragraph (v) therein.

- (mmm) Give the usual particulars of the encouragement referred to in paragraph (v) therein.
- (nnn) Identify and describe the “*protest actions*” referred to in paragraph (v) therein.
- (ooo) Give the usual particulars and state the substance of the “*meeting*” referred to in paragraph (w) therein.
- (ppp) Give the usual particulars in support of the allegation that the Sixth Defendant conducted such a meeting referred to in paragraph (w) therein.
- (qqq) Give the usual particulars of the encouragement referred to in paragraph (w) therein.
- (rrr) Identify and describe the “*protest actions*” referred to in paragraph (w) therein.
- (sss) Give the usual particulars and state the substance of the “*training workshop*” referred to in paragraph (y) therein.
- (ttt) Give the usual particulars in support of the allegation that the training workshop was conducted by the Sixth Defendant as alleged in paragraph (y) therein.
- (uuu) Give the usual particulars of the encouragement referred to in paragraph (y) therein.
- (vvv) Identify and describe the “*protest actions*” referred to in paragraph (y) therein.
- (www) Identify, describe and give the usual particulars of the “*request*” referred to in paragraph (z) therein.
- (xxx) Identify the “*environmental groups and supporters*” referred to in paragraph (z) therein.
- (yyy) Give the usual particulars of the involvement of –

- (i) the Sixth Defendant;
 - (ii) the Second Defendant –
in the protest activities (identifying same) –
 - A. at the Triabunna Mill site;
 - B. the Styx;
- as alleged in paragraph (aa) therein.

- (zzz) Give the usual particulars of the involvement of –
- (i) the Sixth Defendant;
 - (ii) the Second Defendant –
in the campaigns (identifying same) directed at –
 - A. the Japanese Customers;
 - B. Banks;
- as alleged in paragraph (aa) therein.

304. As to paragraph 707 –

- (a) Give the usual particulars of the “*injury*” alleged therein.
- (b) Identify and describe the “*trade and business*” referred to therein.
- (c) State each and every way in the First Plaintiff has been damaged in its “*standing and prestige*” as alleged.
- (d) State the facts comprising the “*trouble and inconvenience*” referred to in the particular (a) thereto
- (e) Specify the manner in which the sum of damages claimed in respect to each such item of loss and damage is calculated.

Joint Several and Vicarious Liability

305. **As to paragraph 710 –**

- (a) Give the usual particulars of the allegation that the acts referred to therein were done by or on behalf of –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.
- (b) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing each such act referred to therein.
- (c) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing each such act referred to therein.

306. **As to paragraph 711 –**

- (a) Give the usual particulars of the allegation that each of the “*overt acts*” referred to therein was done by the person or persons acting in concert with the Sixth Defendant.
- (b) Give the usual particulars of the doing of the “*overt acts*” referred to therein by –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant.

307. **As to paragraph 713 –**

- (a) Give the usual particulars of and state the substance of the alleged “*common purpose and design*” referred to therein.
- (b) Give the usual particulars by which the common purpose and design may be “*inferred from the nature, location, timing and results of the acts done and the persons involved*” as alleged in particular (a) thereto.

- (c) Give the usual particulars of and state the substance of the “*common understanding*” referred to in particular (c) thereto.
- (d) Give the usual particulars of the allegation that –
 - (i) the Sixth Defendant;
 - (ii) the Second Defendant -was “*well familiar*” with the acts referred to in particular (c) thereto.
- (e) Give the usual particulars of the alleged “*course of action*” determined by the Sixth Defendant referred to in particular (c) thereto.
- (f) Give the usual particulars of the determination by the Sixth Defendant upon a course of action.
- (g) Give the usual particulars of the “*acts to be done*” referred to in particular (c) thereto.

308. **As to paragraph 714 –**

- (a) Give the usual particulars of the allegation that each of the Defendants there referred to did the acts referred to therein as “*agents*” for the Sixth Defendant.
- (b) Describe and give the usual particulars of the “*scope of employment*” of the –
 - (i) First Defendant
 - (ii) Second Defendant;
 - (iii) Fourth Defendant;
 - (iv) Fifth Defendant;referred to in particular (a) thereto.
- (c) Give the usual particulars of the allegation that the –
 - (i) First Defendant

- (ii) Second Defendant;
- (iii) Fourth Defendant;
- (iv) Fifth Defendant;

“acted within the scope of their employment” as alleged in particular (a) thereto.

- (d) Give the usual particulars of the allegation that the Sixth Defendant *“engaged”* the Eighteenth and Nineteenth Defendants as *“volunteers”* as alleged in particular (b).
- (e) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in engaging the persons referred to in particulars (b) thereto.
- (f) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in engaging the persons referred to in particular (b) thereto.
- (g) Give the usual particulars of the allegation that the persons referred in particular (b) *“acted as volunteers”* for the Sixth Defendant.
- (h) Give the usual particulars of the allegation that *“volunteers”* referred to therein engage in *“protest activities”* with the *“authority”* of the Sixth Defendant as referred to in particulars (b) thereto.
- (i) Describe and give the usual particulars of the *“scope of membership”* of the –
 - (i) Tenth Defendant
 - (ii) Eleventh Defendant –

referred to in particular (c) thereto
- (j) Give the usual particulars of the allegations that –

- (i) the Tenth Defendant;
- (ii) the Eleventh Defendant -
 - A. were members of the Sixth Defendant;
 - B. had been “*asked to act on behalf of the Sixth Defendant*”;
 - C. acted “*within the scope of their membership*”;
 - D. acted “*in accordance with the request*” -

as alleged in particular (c) thereto.

- (k) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in asking –

- (i) the Tenth Defendant;
- (ii) the Eleventh Defendant –

to act on its behalf as alleged in particular (c) thereto.

- (l) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in asking –

- (i) the Tenth Defendant;
- (ii) the Eleventh Defendant –

to act on its behalf as alleged in particular (c) thereto.

- (m) Give the usual particulars of the allegation that the Sixth Defendant –

- (i) established;
- (ii) funded;
- (iii) auspiced –

the Twentieth Defendant as alleged in particular (d) thereto.

- (n) Identify the person, persons or entity alleged to comprise or act on behalf of the Sixth Defendant in doing the acts referred to in particular (d) thereto.
- (o) State the facts comprising the authorisation by reference to which it is alleged that such person, persons or entities (identifying same) comprised or acted on behalf of the Sixth Defendant in doing the acts referred to in particular (d) thereto.
- (p) Give the usual particulars of the allegations that –
 - (i) the First Defendant;
 - (ii) the Second Defendant;
 - (iii) the Third Defendant;
 - (iv) the Fourth Defendant;
 - (v) the Fifth Defendant;
 - (vi) the Eleventh Defendant;
 - (vii) Eighteenth Defendant;
 - (viii) Nineteenth Defendant -were members of the Sixth Defendant;
- (q) Describe and give the usual particulars of the “*authority as members*” referred to in particular (e) thereto.
- (r) Give the usual particulars of the allegations that –
 - (i) the First Defendant;
 - (ii) the Second Defendant;
 - (iii) the Third Defendant;

- (iv) the Fourth Defendant;
- (v) the Fifth Defendant;
- (vi) the Eleventh Defendant;
- (vii) Eighteenth Defendant;
- (viii) Nineteenth Defendant -

acted “*in accordance*” with their “*authority as members*”.

Dated: 14 September 2005

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MAURICE BLACKBURN CASHMAN
Solicitors for the Second and Sixth Defendants