

From: Martin O'Connor [mailto:Martin.OConnor@addisonslawyers.com.au]
Sent: Wednesday, 7 May 2014 5:15 PM
To: Shane Dowling
Cc: Richard Keegan
Subject: RE: Kerry Stokes - Urgent - Abuse of process - Judgement already handed down on same issues - Conspiracy tpo have someone falsley charged

Dear Mr Dowling

I refer to your email below.

For the record, I point out that during our 9 minute telephone conversation yesterday:

1. I advised you that I did not attend Court yesterday and as I had just come out of a meeting, I had not yet received a report as to what happened at Court from the solicitor I had attend Court; and
2. We discussed a number of other matters which are not referred to your email.

Of the matters which are listed in your email, although I agree these matters were discussed, I do not agree that your summary of what we discussed is an accurate or full summary of our discussions regarding these matters.

In relation to the three questions set out at the conclusion of your email, I do not propose to respond to questions 1 & 2, as I do not believe these questions are relevant to any matter in issue in the proceedings nor seriously call for a response.

In relation to question 3, I note that of your own volition, you had this matter listed before Justice Hall today and that his Honour stood this matter over until 10.00 am tomorrow. His Honour also directed my clients to provide you with an outline of submissions in support of the orders which they are seeking prior to tomorrow's hearing. I anticipate being in a position to provide you with the outline of submissions later today. Once you read these submissions you should be able to understand why my clients say this matter is urgent and why my clients seek the orders which are set out in their Notice of Motion.

Regards

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From: Shane Dowling [mailto:shanedowling@hotmail.com]
Sent: Tuesday, 6 May 2014 8:10 PM
To: Martin O'Connor
Cc: Richard Keegan; Kate Eaglen; michael.phelan@afp.gov.au; jeffrey.kokles@afp.gov.au; office@hazzard.minister.nsw.gov.au; andrew.carter@ashurst.com; crownsol@agd.nsw.gov.au
Subject: Kerry Stokes - Urgent - Abuse of process - Judgement already handed down on same issues - Conspiracy tpo have someone falsley charged

Dear Mr O'Connor

Just to confirm what you said on the phone today in our conversation at 5.35 pm which lasted 9 minutes.

1. I asked you at least 5 times "*is Kerry Stokes paying Justine Munsie to represent him in my matters*". Each and every time you refused to answer. All you would say was that Addison Lawyers was representing Kerry Stokes which you said each time and you said that you did not have to answer my question.
2. I said words to the effect that your barrister Sandy Dawson had deliberately lied and misled the court in my matters. You said to me "*you should watch what you say on your website*" I said that I had already said it on my website in a post that I had posted on Sunday. You said that you do not read my website.
3. I asked you who the judge was today who set the hearing down for Thursday. You said you did not know.
4. I asked you who was the barrister who was in court today representing Kerry Stokes and you said you did not know.
5. I asked you if Sandy Dawson would be the barrister in court on Thursday and you said you did not know. You said if it was not him it would be someone else.
6. I pointed out that it was a criminal offence to have someone falsely charged in relation to your application for contempt which seemed to agitate you. You may wish to look at section 42 of the 1914 Crimes Act.
42 Conspiracy to defeat justice
Any person who conspires with another to obstruct, prevent, pervert, or defeat, the course of justice in relation to the judicial power of the Commonwealth, shall be guilty of an indictable offence. Penalty: Imprisonment for 5 years.

Three questions Mr O'Connor

1. Can you please explain why you do not have a clue about my matters given you are listed on the court documents as the "Legal Representative" for Kerry Stokes and Justine Munsie.
2. Is it true that you are nothing more than a front and Justine Munsie is the lawyer getting paid to represent Kerry Stokes as per her email to me last Friday? (This shows up in an affidavit she filed as per attached) (As it turns out I was going to file that email as evidence but she has done it for me. Thank you)
3. You are well aware that Justice Harrison has handed down a judgement on the suppression orders that Kerry Stokes sought and you lost see: (*Munsie v Dowling [2014] NSWSC 458*) 24/04/2014. Now you want the court to hear the same issue on Thursday, at the tax payers expense, which you claim is urgent but failed to reveal why it is urgent. Can you please explain why it is urgent

Please confirm the above immediately.

Regards

Shane Dowling

[Kangaroo Court of Australia](#)

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