

IN THE SUPREME COURT OF VICTORIA AT MELBOURNE
COMMERCIAL AND EQUITY DIVISION
COMMERCIAL LIST

F. 5382
BETWEEN:

No. 2115 of 2001

ANSETT AUSTRALIA GROUND STAFF SUPERANNUATION PLAN PTY LTD
(ACN 065 590 178) (as Trustee of the Ansett Australia Ground Staff
Superannuation Plan) and **ANSETT AUSTRALIA PILOTS/MANAGEMENT**
SUPERANNUATION PLAN PTY LTD (ACN 065 590 043) (as trustee of the Ansett
Transport Industries Limited Pilots/Management Superannuation Plan)
Plaintiffs

and

ANSETT AUSTRALIA LIMITED (Administrators Appointed) (ACN 004 209 410)
AND OTHERS
Defendants

AFFIDAVIT OF PETER EDMUND CASH

Date of document: 22 March 2002
Filed on behalf of: The plaintiffs

Prepared by:
DEACONS Solicitors code: 370
Lawyers DX 445
385 Bourke Street Tel: (03) 8686 6000
MELBOURNE VIC 3000 Ref: P E Cash

I, **Peter Edmund Cash** of 385 Bourke Street, Melbourne, Victoria, solicitor, **make oath**
and say as follows:

1. I am a member of Deacons, the solicitors for the plaintiffs. I am authorised to swear this affidavit on their behalf. I do so from my own knowledge.
2. On 19 March 2002 at 3:25pm I sent a letter by email to Mr Paul Chiappi of Arnold Block Liebler, the solicitors for the first and second defendants. Simultaneously, I sent a copy of that letter by email to the solicitors for each of the third and fourth defendants, to the solicitors for the ACTU, Maurice Blackburn Cashman, and to Mr Wollan. Now produced and shown to me and marked "PEC1" is a copy of that letter.
3. At the time of swearing this affidavit I have not received a response to my letter of 19 March 2002 from the solicitors for the first and second defendants. In



particular, I have not received a copy of the "SEESA" deed, apparently made on 18 December 2001.

- 4. In my respectful submission, that deed is relevant to the issues in this proceeding and should have been discovered by the first and/or second defendants.

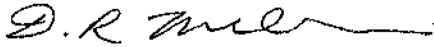
Sworn at Melbourne, Victoria on
22 MARCH 2002

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PETER EDMUND CASH

Before me:



DEAN ROBERT KAMBOVSKY

385 Bourke Street
Melbourne, Victoria

A natural person who is a current
practitioner within the meaning of the
Legal Practice Act 1996

This affidavit is filed on behalf of the plaintiffs