



IN THE SUPREME COURT OF VICTORIA AT MELBOURNE  
COMMERCIAL COURT  
CORPORATIONS LIST

Case: S ECI 2021 03110  
S ECI  
Filed on: 27/08/2021 02:36 PM

**IN THE MATTER OF GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED) (ACN 091 232 909)**

**DANIEL MATHEW BRYANT and CRAIG DAVID CROSBIE (in their capacities as joint and several Liquidators of GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED)) (ACN 091 232 909)**  
First Plaintiffs

and

**GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED) (ACN 091 232 909)**  
Second Plaintiff

**CERTIFICATE IDENTIFYING EXHIBIT**

Date of document: 26 August 2021  
Filed on behalf of: The Plaintiffs

Prepared by:

**ARNOLD BLOCH LEIBLER**  
Lawyers and Advisers  
Level 21  
333 Collins Street  
MELBOURNE 3000

Solicitor's Code: 54  
Tel: 9229 9999  
Fax: 9229 9900  
Ref: 011915621

(Justin Vaatstra – jvaatstra@abl.com.au)

This is the exhibit marked "**CDC-10**" now produced and shown to **CRAIG DAVID CROSBIE** at the time of swearing that person's affidavit on 26 August 2021:

.....  
Craig David Crosbie

Before me: .....

SAMUEL MARTIN CROCK  
Arnold Bloch Leibler  
Level 21, 333 Collins St, Melbourne 3000  
An Australian Legal Practitioner within the meaning of the  
Legal Profession Uniform Law (Vic)

**Exhibit "CDC-10"**  
**ABL letter to Ashurst**  
**and Form 16 notices**

## Sam Crock

---

**From:** Sam Crock  
**Sent:** Thursday, 22 July 2021 5:37 PM  
**To:** ross.mcclymont@ashurst.com  
**Cc:** Justin Vaatstra  
**Subject:** In the matter of Gunns Plantations Limited (in liquidation) (receivers and managers appointed) (ACN 091 232 909)  
**Attachments:** Letter of service - Ashurst 22.07.21.pdf; Form 16 - KordaMentha.pdf; Form 16 - banking syndicate.pdf; Affidavit of Craig David Crosbie sworn 13 July 2021.zip; Originating Process - Gunns Plantations Limited.DOCX

Dear Mr McClymont

Please see **attached** correspondence and enclosures.

Kind regards

**Sam Crock** | Lawyer

Arnold Bloch Leibler  
Level 21, 333 Collins Street, Melbourne Victoria 3000  
E: scrock@abl.com.au | T: 61 3 9229 9638 | M: 0418 205 291

---

**Arnold Bloch Leibler**  
Lawyers and Advisers



Arnold Bloch Leibler accepts the invitation contained in the Uluru Statement from the Heart to walk together with Aboriginal and Torres Strait Islander peoples in a movement of the Australian people for a better future.

22 July 2021

**By E-mail**

Ross McClymont  
Partner  
Ashurst  
ross.mcclymont@ashurst.com

Your Ref

File No. 011915621

**Contact**  
Sam Crock  
Direct 61 3 9229 9638  
scrock@abl.com.au

**Partner**  
Justin Vaatstra  
Direct 61 3 9229 9778  
jvaatstra@abl.com.au

Dear Mr McClymont

**Gunns Plantations Limited (in liquidation) (receivers and managers appointed)**

We act for Daniel Mathew Bryant and Craig David Crosbie in their capacities as joint and several Liquidators of Gunns Plantations Limited (in liquidation) (receivers and managers appointed) (ACN 091 232 909) (**GPL**).

We **enclose** with this letter, by way of service, copies of:

- (a) Form 16 – Notice of Intention to Apply for Remuneration, addressed to your clients:
  - (i) Mark Korda and Bryan Webster in their capacities as Receivers and Managers of the Gunns Group of Companies;
  - (ii) the Banking Syndicate, as the sole member of the Committee of Inspection of GPL;
- (b) an unfiled Originating Process seeking orders from the Supreme Court of Victoria concerning the liquidation of GPL; and
- (c) Affidavit of Craig David Crosbie sworn 13 July 2021.

The Liquidators seek orders:

- (a) approving their remuneration reasonably incurred in relation to the liquidation of GPL between 1 September 2016 and 31 December 2020;
- (b) entitling them to a lien over the property of GPL in respect of their remuneration;
- (c) indemnifying the Liquidators in respect of the costs of this application and entitling them to a lien over the property of GPL in respect of those costs; and
- (d) permitting the early destruction of the books and records of the Gunns Group of Companies two months after the completion of the liquidation.

The remuneration for which our clients seek approval relates solely to the liquidation of GPL. It does not relate to any work undertaken in connection with:



**MELBOURNE**  
**SYDNEY**

**Partners**  
Mark M Leibler AC  
Henry D Lanzer AM  
Joseph Borensztajn AM  
Leon Zwiener  
Philip Chester  
Ross A Paterson  
Stephen L Sharp  
Kenneth A Gray  
Kevin F Frawley  
Zaven Mardrossian  
Jonathan M Wenig  
Paul Sokolowski  
Paul Rubenstein  
Peter M Seidel  
John Mitchell  
Ben Mahoney  
Jonathan Milner  
John Mengolian  
Caroline Goulden  
Matthew Lees  
Genevieve Sexton  
Jeremy Leibler  
Nathan Briner  
Jonathan Caplan  
Justin Vaatstra  
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Teresa Ward  
Christine Fleer  
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Bridget Little  
Gia Cari  
Jason van Grieken  
Elyse Hilton  
Jonathan Ortner  
Stephen Lloyd  
Scott Phillips  
Gavin Hammerschlag  
Shaun Cartoon  
Damian Cuddihy  
Dorian Henneron  
Rebecca Zwiener  
**Consultant**  
Jane C Sheridan  
**Special Counsel**  
Sam Dollard  
Laila De Melo  
Emily Simmons  
Bridgid Cowling  
Rosalie Cattermole  
**Senior Associates**  
Liam Thomson  
Brianna Youngson  
Kaitlin Lowdon  
Stephanie Campbell  
Claire Stubbe  
Briely Trollope  
Laura Cochrane  
Rachel Soh  
Greg Judd  
Ben Friis-O'Toole  
Ely Bishop  
Liam Cavell  
Raphael Leibler  
Gabriel Sakka  
Peter Scott  
Mark Macrae  
David Monteith  
Rebekah French  
Gisella D'Costa  
Lisa Garson  
Vidushee Deora  
Luke Jedynak  
Emily Korda  
Jenny Leongue  
Chris Murphy  
Gabrielle Piesiewicz  
Michael Repse  
Anna Sapountsis  
Jessica Thrower  
John Birrell  
Rob Deev  
Caitlin Edwards  
Jessica Elliott  
Simone Gould  
Alexandra Harrison-Ichlov  
Andrew Low  
Genevieve Pope  
Claire Southwell  
Luise Squire

- (a) Gunns Limited (in liquidation) (receivers and managers appointed);
- (b) the Gunns Woodlot Schemes or Great Southern Schemes; or
- (c) any of the other Gunns Group of Companies.

The majority of the remuneration identified in our application relates to work performed in defending the Grower Litigation, being a claim issued by growers in the Gunns Woodlot Schemes against GPL and certain of its former directors and officers. These fees have been paid for by the insurers of GPL, and our clients will seek approval to apply those insurance proceeds to satisfy their outstanding remuneration.

Our clients intend to file the Originating Process in 21 days' time after having notified the relevant interested parties (including your clients). We will serve a copy of the Originating Process and supporting Affidavit as filed in due course.

Updates in relation to the application will be made available on our clients' website ([www.pwc.com.au](http://www.pwc.com.au)) and on our website ([www.abl.com.au](http://www.abl.com.au)).

Please contact us if you have any queries.

Yours sincerely  
**Arnold Bloch Leibler**



**Justin Vaatstra**  
Partner

Enc

**FORM 16**  
(Rules 9.2–9.5)

IN THE SUPREME COURT OF VICTORIA AT MELBOURNE  
COMMERCIAL COURT  
CORPORATIONS LIST

S E C I

**IN THE MATTER OF GUNNS PLANTATIONS LIMITED (IN LIQUIDATION)  
(RECEIVERS AND MANAGERS APPOINTED) (ACN 091 232 909)**

**DANIEL MATHEW BRYANT and CRAIG DAVID CROSBIE (in their capacities as  
joint and several Liquidators of GUNNS PLANTATIONS LIMITED (IN  
LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED)) (ACN 091 232 909)**  
First Plaintiffs

and

**GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND  
MANAGERS APPOINTED) (ACN 091 232 909)**  
Second Plaintiff

---

**NOTICE OF INTENTION TO APPLY FOR REMUNERATION**

---

TO:

Mark Korda and Bryan Webster in their capacity as Receivers and Managers of Gunns  
Plantations Limited (in liquidation) (receivers and managers appointed)  
KordaMentha  
Level 31, 525 Collins St Melbourne VIC 3000  
c/- Ross McClymont  
Ashurst Australia  
Level 16, South Tower, 80 Collins St Melbourne VIC 3000

TAKE NOTICE that, not less than 21 days after this notice is served on you, we, Daniel  
Mathew Bryant and Craig David Crosbie of 2 Riverside Quay, Southbank VIC, the  
liquidators of the above company, intend to apply to the Court to determine our  
remuneration.

If you object to our application, you must, within 21 days after being served with this  
notice, serve on us a notice of objection stating the grounds of objection to the  
remuneration claimed.

Date: 22 July 2021

  
.....

*Signature of liquidators*

**FORM 16**  
(Rules 9.2–9.5)

IN THE SUPREME COURT OF VICTORIA AT MELBOURNE  
COMMERCIAL COURT  
CORPORATIONS LIST

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**IN THE MATTER OF GUNNS PLANTATIONS LIMITED (IN LIQUIDATION)  
(RECEIVERS AND MANAGERS APPOINTED) (ACN 091 232 909)**

**DANIEL MATHEW BRYANT and CRAIG DAVID CROSBIE (in their capacities as  
joint and several Liquidators of GUNNS PLANTATIONS LIMITED (IN  
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First Plaintiffs

and

**GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND  
MANAGERS APPOINTED) (ACN 091 232 909)**  
Second Plaintiff

---

**NOTICE OF INTENTION TO APPLY FOR REMUNERATION**

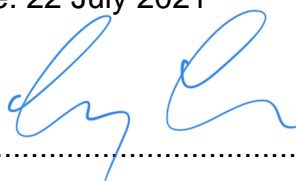
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TO:  
Banking Syndicate  
c/- Ross McClymont  
Ashurst Australia  
Level 16, South Tower, 80 Collins St Melbourne VIC 3000

TAKE NOTICE that, not less than 21 days after this notice is served on you, we, Daniel Mathew Bryant and Craig David Crosbie of 2 Riverside Quay, Southbank VIC, the liquidators of the above company, intend to apply to the Court to determine our remuneration.

If you object to our application, you must, within 21 days after being served with this notice, serve on us a notice of objection stating the grounds of objection to the remuneration claimed.

Date: 22 July 2021



.....  
*Signature of liquidators*

IN THE SUPREME COURT OF VICTORIA AT MELBOURNE  
COMMERCIAL COURT  
CORPORATIONS LIST

S E C I

**IN THE MATTER OF GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED) (ACN 091 232 909)**

**DANIEL MATHEW BRYANT and CRAIG DAVID CROSBIE (in their capacities as joint and several Liquidators of GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED)) (ACN 091 232 909)**  
First Plaintiffs

and

**GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED) (ACN 091 232 909)**  
Second Plaintiff

**CERTIFICATE IDENTIFYING EXHIBIT**

---

Date of document: 26 August 2021  
Filed on behalf of: The Plaintiffs

Prepared by:

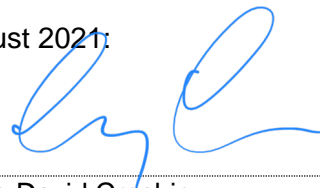
**ARNOLD BLOCH LEIBLER**  
Lawyers and Advisers  
Level 21  
333 Collins Street  
MELBOURNE 3000

Solicitor's Code: 54  
Tel: 9229 9999  
Fax: 9229 9900  
Ref: 011915621

(Justin Vaatstra – jvaatstra@abl.com.au)

---

This is the exhibit marked "**CDC-11**" now produced and shown to **CRAIG DAVID CROSBIE** at the time of swearing that person's affidavit on 26 August 2021:



.....  
Craig David Crosbie

Before me: .....



SAMUEL MARTIN CROCK  
Arnold Bloch Leibler  
Level 21, 333 Collins St, Melbourne 3000  
An Australian Legal Practitioner within the meaning of the  
Legal Profession Uniform Law (Vic)

**Exhibit "CDC-11"**  
**ABL letter to ASIC**

## Sam Crock

---

**From:** Sam Crock  
**Sent:** Thursday, 22 July 2021 5:35 PM  
**To:** 'ip.legal@asic.gov.au'  
**Cc:** Justin Vaatstra  
**Subject:** In the matter of Gunns Plantations Limited (in liquidation) (receivers and managers appointed) (ACN 091 232 909)  
**Attachments:** Letter of service - ASIC 22.07.21.pdf; Form 16 - Creditors of Gunns Plantations Limited.pdf; Form 16 - KordaMentha.pdf; Form 16 - banking syndicate.pdf; Affidavit of Craig David Crosbie sworn 13 July 2021.zip; Originating Process - Gunns Plantations Limited.DOCX

Dear Sir / Madam

Please see **attached** correspondence and enclosures.

Kind regards

**Sam Crock** | Lawyer

Arnold Bloch Leibler  
Level 21, 333 Collins Street, Melbourne Victoria 3000  
E: [scrock@abl.com.au](mailto:scrock@abl.com.au) | T: 61 3 9229 9638 | M: 0418 205 291

---

**Arnold Bloch Leibler**  
Lawyers and Advisers



Arnold Bloch Leibler accepts the invitation contained in the Uluru Statement from the Heart to walk together with Aboriginal and Torres Strait Islander peoples in a movement of the Australian people for a better future.



22 July 2021

**By E-mail**

Australian Securities and Investments Commission  
120 Collins St  
Melbourne VIC 3000  
[ip.legal@asic.gov.au](mailto:ip.legal@asic.gov.au)

Your Ref

File No. 011915621

**Contact**  
Sam Crock  
Direct 61 3 9229 9638  
[scrock@abl.com.au](mailto:scrock@abl.com.au)

**Partner**  
Justin Vaatstra  
Direct 61 3 9229 9778  
[jvaatstra@abl.com.au](mailto:jvaatstra@abl.com.au)

Dear Sir / Madam

**Gunns Plantations Limited (in liquidation) (receivers and managers appointed)**

We act for Daniel Mathew Bryant and Craig David Crosbie in their capacities as joint and several Liquidators of Gunns Plantations Limited (in liquidation) (receivers and managers appointed) (ACN 091 232 909) (**GPL**).

We **enclose** with this letter, by way of service, copies of:

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The Liquidators seek orders:

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- (b) entitling them to a lien over the property of GPL in respect of their remuneration;
- (c) indemnifying the Liquidators in respect of the costs of this application and entitling them to a lien over the property of GPL in respect of those costs; and
- (d) permitting the early destruction of the books and records of the Gunns Group of Companies two months after the completion of the liquidation.

Our clients intend to file the Originating Process in 21 days' time after having notified the relevant interested parties (including ASIC). We will serve a copy of the Originating Process and supporting Affidavit as filed in due course.

Updates in relation to the application will be made available on our clients' website ([www.pwc.com.au](http://www.pwc.com.au)) and on our website ([www.abl.com.au](http://www.abl.com.au)).



**MELBOURNE**  
**SYDNEY**

**Partners**  
Mark M Leibler AC  
Henry D Lanzer AM  
Joseph Borensztajn AM  
Leon Zwiier  
Philip Chester  
Ross A Paterson  
Stephen L Sharp  
Kenneth A Gray  
Kevin F Frawley  
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Rebecca Zwiier  
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Jane C Sheridan  
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Sam Dollard  
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**Senior Associates**  
Liam Thomson  
Brianna Youngson  
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Stephanie Campbell  
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Laura Cochrane  
Rachel Soh  
Greg Judd  
Ben Friis-O'Toole  
Ely Bishop  
Liam Cavell  
Raphael Leibler  
Gabriel Sakkal  
Peter Scott  
Mark Macrae  
David Monteith  
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Lisa Garson  
Vidushee Deora  
Luke Jedynak  
Emily Korda  
Jenny Leongue  
Chris Murphy  
Gabrielle Piesiewicz  
Michael Repse  
Anna Sapountsis  
Jessica Thrower  
John Birrell  
Rob Deev  
Caitlin Edwards  
Jessica Elliott  
Simone Gould  
Alexandra Harrison-Ichlov  
Andrew Low  
Genevieve Pope  
Claire Southwell  
Luise Squire

Please contact us if you have any queries.

Yours sincerely  
**Arnold Bloch Leibler**

A handwritten signature in black ink, appearing to read 'Justin Vaatstra', with a long, sweeping horizontal stroke at the end.

**Justin Vaatstra**  
Partner

Enc

IN THE SUPREME COURT OF VICTORIA AT MELBOURNE  
COMMERCIAL COURT  
CORPORATIONS LIST

S ECI

**IN THE MATTER OF GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED) (ACN 091 232 909)**

**DANIEL MATHEW BRYANT and CRAIG DAVID CROSBIE (in their capacities as joint and several Liquidators of GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED)) (ACN 091 232 909)**  
First Plaintiffs

and

**GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED) (ACN 091 232 909)**  
Second Plaintiff

**CERTIFICATE IDENTIFYING EXHIBIT**

---

Date of document: 26 August 2021  
Filed on behalf of: The Plaintiffs

Prepared by:

**ARNOLD BLOCH LEIBLER**

Lawyers and Advisers  
Level 21  
333 Collins Street  
MELBOURNE 3000

Solicitor's Code: 54

Tel: 9229 9999

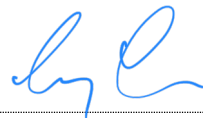
Fax: 9229 9900

Ref: 011915621

(Justin Vaatstra – jvaatstra@abl.com.au)

---

This is the exhibit marked "**CDC-12**" now produced and shown to **CRAIG DAVID CROSBIE** at the time of swearing that person's affidavit on 26 August 2021:



.....  
Craig David Crosbie

Before me: .....



SAMUEL MARTIN CROCK

Arnold Bloch Leibler

Level 21, 333 Collins St, Melbourne 3000

An Australian Legal Practitioner within the meaning of the  
Legal Profession Uniform Law (Vic)

**Exhibit "CDC-12"**  
**Form 16 notice to creditors of GPL**

**FORM 16**  
(Rules 9.2–9.5)

IN THE SUPREME COURT OF VICTORIA AT MELBOURNE  
COMMERCIAL COURT  
CORPORATIONS LIST

S E C I

**IN THE MATTER OF GUNNS PLANTATIONS LIMITED (IN LIQUIDATION)  
(RECEIVERS AND MANAGERS APPOINTED) (ACN 091 232 909)**

**DANIEL MATHEW BRYANT and CRAIG DAVID CROSBIE (in their capacities as  
joint and several Liquidators of GUNNS PLANTATIONS LIMITED (IN  
LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED)) (ACN 091 232 909)**  
First Plaintiffs

and

**GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND  
MANAGERS APPOINTED) (ACN 091 232 909)**  
Second Plaintiff

---

**NOTICE OF INTENTION TO APPLY FOR REMUNERATION**

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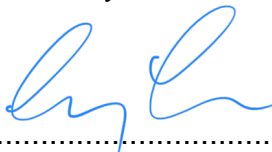
TO:

The Creditors of Gunns Plantations Limited (in liquidation) (receivers and managers appointed) (ACN 091 232 909)

TAKE NOTICE that, not less than 21 days after this notice is served on you, we, Daniel Mathew Bryant and Craig David Crosbie of 2 Riverside Quay, Southbank VIC, the liquidators of the above company, intend to apply to the Court to determine our remuneration.

If you object to our application, you must, within 21 days after being served with this notice, serve on us a notice of objection stating the grounds of objection to the remuneration claimed.

Date: 22 July 2021



.....  
*Signature of liquidators*

IN THE SUPREME COURT OF VICTORIA AT MELBOURNE  
COMMERCIAL COURT  
CORPORATIONS LIST

S E C I

**IN THE MATTER OF GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED) (ACN 091 232 909)**

**DANIEL MATHEW BRYANT and CRAIG DAVID CROSBIE (in their capacities as joint and several Liquidators of GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED)) (ACN 091 232 909)**  
First Plaintiffs

and

**GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED) (ACN 091 232 909)**  
Second Plaintiff

**CERTIFICATE IDENTIFYING EXHIBIT**

---

Date of document: 26 August 2021  
Filed on behalf of: The Plaintiffs

Prepared by:

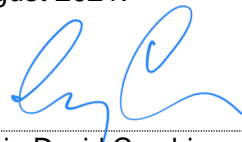
**ARNOLD BLOCH LEIBLER**  
Lawyers and Advisers  
Level 21  
333 Collins Street  
MELBOURNE 3000

Solicitor's Code: 54  
Tel: 9229 9999  
Fax: 9229 9900  
Ref: 011915621

(Justin Vaatstra – jvaatstra@abl.com.au)

---

This is the exhibit marked "**CDC-13**" now produced and shown to **CRAIG DAVID CROSBIE** at the time of swearing that person's affidavit on 26 August 2021:



.....  
Craig David Crosbie

Before me: .....



SAMUEL MARTIN CROCK  
Arnold Bloch Leibler  
Level 21, 333 Collins St, Melbourne 3000  
An Australian Legal Practitioner within the meaning of the  
Legal Profession Uniform Law (Vic)

**Exhibit "CDC-13"**  
**Email from Trevor Burdon**

---

**RE: SCI 2013 2095 - GPL Liquidation - Pulp Mill Opportunity - Assets Tracker**

1 message

---

**Trevor Burdon** <trevorburdon@bigpond.com>

9 August 2021 at 18:11

Reply-To: trevorburdon@bigpond.com

To: craig.crosbie@pwc.com, amunro@kordamentha.com

Cc: adele.ferguson@fairfaxmedia.com.au, Media I Adele Ferguson AM <adele@adeleferguson.com>, Michael West <info@michaelwest.com.au>, leah.campbell@pwc.com, Chloe.Pugsley@asic.gov.au

Craig, Antony,

Please provide your status on the Gunns Pulp Mill assets.

MIS grower-investors remain in the dark. We wait for the completion of sale of the PMO assets without any proposal as to how PwC expect to bring final settlement to a timely closure. Further, we note with concern the court request for the early destruction of Gunns records; the withdrawal of public, online, records from your lawyers, ABL's website; and the waiver of liability for any use of PwC online records that may be deemed defamatory.

The overall status of PMO assets, including the Toshiba generating plant (purchase price circa \$33M in 2009), expected mid-2021, remain undisclosed by PwC and KordaMentha.

Growers are waiting for their share of the asset value – whether they know it or not. (You didn't tell them!)

Coming up to six years in the dark.

Justice delayed ...



Trevor Burdon  
Grower investor Gunns Plantations  
9 Little Finlay St, Albert Park, VIC 3206  
M: 0415 125513

---

**From:** Trevor Burdon <trevorburdon@bigpond.com>

**Sent:** Saturday, 3 April 2021 5:31 PM

**To:** 'craig.crosbie@pwc.com' <craig.crosbie@pwc.com>; 'amunro@kordamentha.com' <amunro@kordamentha.com>

**Cc:** 'adele.ferguson@fairfaxmedia.com.au' <adele.ferguson@fairfaxmedia.com.au>; 'Media I Adele Ferguson AM'

<adele@adeleferguson.com>; Michael West (info@michaelwest.com.au) <info@michaelwest.com.au>;

'leah.campbell@pwc.com' <leah.campbell@pwc.com>; 'Chloe.Pugsley@asic.gov.au' <Chloe.Pugsley@asic.gov.au>

**Subject:** RE: SCI 2013 2095 - GPL Liquidation - Pulp Mill Opportunity - Assets Tracker

**Importance:** High

Craig, Antony,

Please provide your status on the Gunns Pulp Mill assets.

The List, the Tasmania Government's record of titles, now shows the sale of all Gunns Pulp Mill Opportunity (PMO) land. Contract Dates are recorded as 14/02/2020, 3/12/2019 and 8/11/2019, and total \$3.775M. The dates are at odds with the email provided by PwC, 13/10/2020, in which, Mr Crosbie had no additional information and implied KM was waiting for the final parcel to settle. (Standing request and references attached.)

The status of other PMO assets, including the Toshiba generating plant (purchase price circa \$33M in 2009) remain undisclosed by PwC and KordaMentha.

Growers are waiting for their share of the asset value – whether they know it or not. (You didn't tell them!)

Coming up to five and one half years in the dark.

Justice delayed ...



Trevor Burdon  
Grower investor Gunns Plantations  
9 Little Finlay St, Albert Park, VIC 3206  
M: 0415 125513

---

**From:** Trevor Burdon <trevorburdon@bigpond.com>  
**Sent:** Wednesday, 14 October 2020 6:45 PM  
**To:** 'craig.crosbie@pwc.com' <craig.crosbie@pwc.com>; 'amunro@kordamentha.com' <amunro@kordamentha.com>  
**Cc:** 'adele.ferguson@fairfaxmedia.com.au' <adele.ferguson@fairfaxmedia.com.au>; 'Media I Adele Ferguson AM' <adele@adeleferguson.com>; Michael West (info@michaelwest.com.au) <info@michaelwest.com.au>; 'leah.campbell@pwc.com' <leah.campbell@pwc.com>  
**Subject:** RE: SCI 2013 2095 - GPL Liquidation - Pulp Mill Opportunity - Assets Tracker

Craig, Antony,

Please provide your status on the Gunns Pulp Mill assets.

I understand that some land has been sold but is incomplete. Further, I understand that there is interest in the Toshiba generating plant also for sale.

Growers are waiting for their share of the asset value – whether they know it or not. (You didn't tell them!)

Coming up for five years in the dark.

Your most incredulous victim,



Trevor Burdon  
Grower investor Gunns Plantations  
9 Little Finlay St, Albert Park, VIC 3206  
M: 0415 125513

---

**From:** Trevor Burdon <trevorburdon@bigpond.com>  
**Sent:** Tuesday, 4 August 2020 9:29 PM  
**To:** 'craig.crosbie@pwc.com' <craig.crosbie@pwc.com>; 'amunro@kordamentha.com' <amunro@kordamentha.com>  
**Cc:** 'adele.ferguson@fairfaxmedia.com.au' <adele.ferguson@fairfaxmedia.com.au>; 'Media I Adele Ferguson AM' <adele@adeleferguson.com>; Michael West (info@michaelwest.com.au) <info@michaelwest.com.au>; 'leah.campbell@pwc.com' <leah.campbell@pwc.com>  
**Subject:** RE: SCI 2013 2095 - GPL Liquidation - Pulp Mill Opportunity - Assets Tracker

Craig, Antony,

Please provide your status on the Gunns Pulp Mill assets.

I understand a sale of PMO land has completed – unconfirmed.

Growers are waiting for their share of the asset value – whether they know it or not. (You didn't tell them!)

Four and three-quarter years on and counting,



Trevor Burdon  
M: 0415 125513

---

**From:** Trevor Burdon <[trevorburdon@bigpond.com](mailto:trevorburdon@bigpond.com)>  
**Sent:** Wednesday, 6 May 2020 4:25 PM  
**To:** 'lorraine.plail@pwc.com' <[lorraine.plail@pwc.com](mailto:lorraine.plail@pwc.com)>; 'amunro@kordamentha.com' <[amunro@kordamentha.com](mailto:amunro@kordamentha.com)>  
**Cc:** 'adele.ferguson@fairfaxmedia.com.au' <[adele.ferguson@fairfaxmedia.com.au](mailto:adele.ferguson@fairfaxmedia.com.au)>; 'Media I Adele Ferguson AM' <[adele@adeleferguson.com](mailto:adele@adeleferguson.com)>; Michael West ([info@michaelwest.com.au](mailto:info@michaelwest.com.au)) <[info@michaelwest.com.au](mailto:info@michaelwest.com.au)>  
**Subject:** RE: SCI 2013 2095 - GPL Liquidation - Pulp Mill Opportunity - Assets Tracker

Lorraine, Antony,

Please provide your status on the Gunns Pulp Mill assets.

Growers are waiting for their share of the asset value – whether they know it or not. (You didn't tell them!)

Four and a half years on and counting ,



Trevor Burdon  
M: 0415 125513

---

**From:** Trevor Burdon <[trevorburdon@bigpond.com](mailto:trevorburdon@bigpond.com)>  
**Sent:** Tuesday, 1 October 2019 9:25 PM  
**To:** 'lorraine.plail@pwc.com' <[lorraine.plail@pwc.com](mailto:lorraine.plail@pwc.com)>; 'amunro@kordamentha.com' <[amunro@kordamentha.com](mailto:amunro@kordamentha.com)>  
**Cc:** 'adele.ferguson@fairfaxmedia.com.au' <[adele.ferguson@fairfaxmedia.com.au](mailto:adele.ferguson@fairfaxmedia.com.au)>; Michael West ([info@michaelwest.com.au](mailto:info@michaelwest.com.au)) <[info@michaelwest.com.au](mailto:info@michaelwest.com.au)>  
**Subject:** SCI 2013 2095 - GPL Liquidation - Pulp Mill Opportunity - Assets Tracker

Lorraine, Antony,

Please provide your status on the Gunns Pulp Mill assets.

Growers are waiting for their share of the asset value – whether they know it or not. (You didn't tell them!)

Four years on,





Trevor Burdon  
M: 0415 125513



**SCI 2013 2095\_GPLLiquidation\_PMOTracker\_20210809.pdf**

222K

IN THE SUPREME COURT OF VICTORIA AT MELBOURNE  
COMMERCIAL COURT  
CORPORATIONS LIST

S E C I

**IN THE MATTER OF GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED) (ACN 091 232 909)**

**DANIEL MATHEW BRYANT and CRAIG DAVID CROSBIE (in their capacities as joint and several Liquidators of GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED)) (ACN 091 232 909)**

First Plaintiffs

and

**GUNNS PLANTATIONS LIMITED (IN LIQUIDATION) (RECEIVERS AND MANAGERS APPOINTED) (ACN 091 232 909)**

Second Plaintiff

**CERTIFICATE IDENTIFYING EXHIBIT**

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Date of document: 26 August 2021

Filed on behalf of: The Plaintiffs

Prepared by:

**ARNOLD BLOCH LEIBLER**

Lawyers and Advisers

Level 21

333 Collins Street

MELBOURNE 3000

Solicitor's Code: 54

Tel: 9229 9999

Fax: 9229 9900

Ref: 011915621

(Justin Vaatstra – jvaatstra@abl.com.au)

---

This is the exhibit marked "**CDC-14**" now produced and shown to **CRAIG DAVID CROSBIE**

at the time of swearing that person's affidavit on 26 August 2021:



.....  
Craig David Crosbie

Before me: .....



SAMUEL MARTIN CROCK

Arnold Bloch Leibler

Level 21, 333 Collins St, Melbourne 3000

An Australian Legal Practitioner within the meaning of the  
Legal Profession Uniform Law (Vic)

**Exhibit "CDC-14"**  
**Email from ASIC**

## Sam Crock

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**From:** Jennifer Fine <Jennifer.Fine@asic.gov.au>  
**Sent:** Monday, 26 July 2021 11:40 AM  
**To:** Sam Crock  
**Cc:** Justin Vaatstra  
**Subject:** FW: In the matter of Gunns Plantations Limited (in liquidation) (receivers and managers appointed) (ACN 091 232 909) [SEC=OFFICIAL]  
**Attachments:** Letter of service - ASIC 22.07.21.pdf; Form 16 - Creditors of Gunns Plantations Limited.pdf; Form 16 - KordaMentha.pdf; Form 16 - banking syndicate.pdf; Affidavit of Craig David Crosbie sworn 13 July 2021.zip; Originating Process - Gunns Plantations Limited.docx

Dear Mr Crock

I confirm receipt of your email dated 22 July 2021 and the attachments.

Yours sincerely

**Jennifer Fine**

Lawyer, Registered Liquidators Team

**Australian Securities and Investments Commission**

Level 20, 240 Queen St, Brisbane, 4000  
Tel: +61 7 3867 4836 | Mob: +61 434 800 155  
[jennifer.fine@asic.gov.au](mailto:jennifer.fine@asic.gov.au)



---

**From:** Sam Crock <SCrock@abl.com.au>  
**Sent:** Thursday, 22 July 2021 5:35 PM  
**To:** RL Legal <RL.Legal@asic.gov.au>  
**Cc:** Justin Vaatstra <JVaatstra@abl.com.au>  
**Subject:** In the matter of Gunns Plantations Limited (in liquidation) (receivers and managers appointed) (ACN 091 232 909)

**EXTERNAL EMAIL:** Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Dear Sir / Madam

Please see **attached** correspondence and enclosures.

Kind regards

**Sam Crock** | Lawyer

Arnold Bloch Leibler  
Level 21, 333 Collins Street, Melbourne Victoria 3000  
E: [scrock@abl.com.au](mailto:scrock@abl.com.au) | T: 61 3 9229 9638 | M: 0418 205 291

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# Arnold Bloch Leibler

Lawyers and Advisers



Arnold Bloch Leibler accepts the invitation contained in the Uluru Statement from the Heart to walk together with Aboriginal and Torres Strait Islander peoples in a movement of the Australian people for a better future.

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