



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

No. S CI 2019 02916
Case: S ECI 2019 02916
Filed on: 25/09/2020 02:05 PM

BETWEEN

PATRICE SARAH TURNER

Plaintiff

– and –

**BAYER AUSTRALIA LTD (ACN 000 138 714) and Ors
(in accordance with the Schedule to the Amended Writ)**

Defendants

REPLY TO THE DEFENCE OF THE FIFTH DEFENDANT

Date of document:	25 September 2020		
Filed on behalf of:	The Plaintiff		
Prepared by:	Slater and Gordon Lawyers	Lawyer code:	339
	485 La Trobe Street	DX:	229
	MELBOURNE VIC 3000	Tel:	03 9602 6888
Email:	andrew.baker@slatergordon.com.au	Ref:	M578211

In reply to the Defence of the Fifth Defendant (**Defence**) dated 15 September 2020, the Plaintiff says:

1. Save as to the admissions contained in the Defence and where otherwise pleaded in this Reply, the Plaintiff joins issue with each and every allegation in the Defence.
2. As to paragraph 135, the Plaintiff:
 - a. says that to the extent that any limitation was found to apply to any of the claims made by her or group members pursuant to the legislation particularised, extensions to such limitation periods (as applicable) will or may be sought; and
 - b. otherwise denies the paragraph.

F FORSYTH

M SZYDZIK

Dated: 25 September 2020

Slater Gordon

Slater and Gordon Lawyers

Solicitors for the Plaintiff