



**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 FIRST TO
FOURTH AND SIXTH DEFENDANTS**

Date of document:	25 September 2020		
Filed on behalf of:	The Plaintiff		
Prepared by:	Slater and Gordon Lawyers	Lawyer code:	339
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In reply to the Defence of the First to Fourth and Sixth Defendants (**Defence**) dated 11 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 117, 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

A handwritten signature in blue ink, appearing to read "Slater & Gordon", is positioned above a horizontal line.

Slater and Gordon Lawyers

Solicitors for the Plaintiff