



**IN THE SUPREME COURT OF VICTORIA  
COMMERCIAL COURT  
GROUP PROCEEDING LIST**

Case: S ECI 2024 05243

Filed on: 26/11/2025 05:11 PM

**No. S ECI 2024 05243**

**B E T W E E N**

**TRACEY LEIGH HEPI, ERU MARTIN HEPI AND GLENDA WALKER**

Plaintiffs

**-and-**

**TOYOTA FINANCE AUSTRALIA LIMITED (ACN 002 435 181)**

First Defendant

**AIOI NISSAY DOWA INSURANCE COMPANY AUSTRALIA PTY  
LTD (ACN 132 524 282)**

Second Defendant

**REPLY**

---

Date of Document:	26 November 2025	Solicitors Code:	11747
Filed on behalf of:	The Plaintiffs	DX:	N/A
Prepared by:	Echo Law	Telephone:	(03) 7046 3565
	L2 / 533 Little Lonsdale St.	Ref:	E23031501
	Melbourne VIC 3000	Email:	andrew.paull@echolaw.com.au

---

As to the Second Defendant's defence to the further amended statement of claim filed on 5 November 2025, the Plaintiffs join issue with each and every allegation made therein, and further —

1. As to paragraph 1(b)(ii), say that any applicable limitation period which may have expired may be extended by a court pursuant to s 38 of the *Limitation Act 2005* (WA).
2. As to paragraph 11(b)(iii), say that at all relevant times the issuing of Add-on insurance products was a financial service pursuant to ss 12BAB(1)(b) and 12BAB(7)(b) of the *Australian Securities and Investments Commission Act 2001* (Cth).

3. As to paragraph 152, say that any applicable limitation period which may have expired may be extended by a court or were postponed (as the case may be) pursuant to:
- (a) ss 55 and 56 of the *Limitation Act 1969* (NSW);
  - (b) s 27 of the *Limitation of Actions Act 1958* (Vic);
  - (c) s 38 of the *Limitation of Actions Act 1974* (Qld);
  - (d) s 32 of the *Limitation Act 1974* (Tas);
  - (e) s 38 of the *Limitation Act 2005* (WA);
  - (f) ss, 42, 43 and 44 of the *Limitation Act 1981* (NT); and
  - (g) ss 33 and 43 of the *Limitation Act 1985* (ACT).

Dated: 26 November 2025

E Dias



.....  
Andrew Paull

**Lawyer for the Plaintiffs**