

**IN THE SUPREME COURT OF VICTORIA AT MELBOURNE
COMMON LAW DIVISION**
No. 4538 of 2012

B E T W E E N:

KATHERINE ROWE

Plaintiff

and

**AUSNET ELECTRICITY SERVICES PTY LTD
(ACN 064 651 118)
& ORS (according to the schedule of parties)**

Defendants

(by original proceeding)

A N D B E T W E E N :

**AUSNET ELECTRICITY SERVICES PTY LTD
(ACN 064 651 118)**

Plaintiff by Counterclaim

and

**(ACN 060 674 580)
& ORS (according to the schedule of parties)**

Defendants by Counterclaim

(by counterclaim)

AFFIDAVIT OF ANDREW JOHN WATSON

Date of Document:

6 June 2017

Filed on behalf of:

The Plaintiff

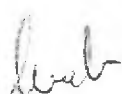
Prepared by:

Maurice Blackburn Lawyers
Level 10, 456 Lonsdale Street
Melbourne Vic 3000

Solicitor's Code: 564
Tel: (03) 9605 2700
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Ref: AW/3052534

I, Andrew John Watson, Solicitor, of Level 10, 456 Lonsdale Street, Melbourne in the State of Victoria, make oath and say as follows:

1. I am a Principal in the firm of Maurice Blackburn Pty Ltd (**Maurice Blackburn**), the solicitors for the Plaintiff in this proceeding and pursuant to the Orders of this Court dated 27 May 2015 I am the Scheme Administrator.

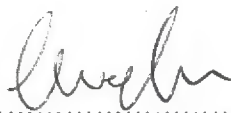


2. I make this affidavit from my own knowledge unless otherwise stated. Where statements are not made from my own knowledge, they are made to the best of my information and belief after due enquiry and I have set out the source of my information.
3. Consistent with prior income taxation years, on 24 May 2017 PwC confirmed that in order to reduce the taxation burden on the interest generated on the Distribution Sum during this financial year, it would be prudent to seek court approval of settlement administration costs incurred or anticipated to be incurred during FY17 prior to 30 June 2017.
4. Consistent with PwC's advice, I make this affidavit for the purpose of seeking court approval of such settlement administration costs.
5. Accordingly, I make this affidavit for the purpose of seeking court approval to pay settlement administration costs for the period 1 January 2017 to 30 June 2017 in an amount of up to \$2,628,921.28 or the amounts showing on Maurice Blackburn's finalised invoices for these periods, whichever is the lesser.
6. In fact, based on my analysis of costs incurred to date, I anticipate that the likely costs for this period will be substantially less than \$2,628,921.28 but as a matter of prudence seek approval for up to that amount because it is consistent with the estimates previously referred to in Mr White's reports. Consistent with previous orders, I would propose that any payment of administration expenses would only take place upon review and approval by Mr John White, Special Referee and any subsequent orders deemed necessary by the Court following receipt of such report.

SWORN by the deponent at)
 Melbourne in the State of Victoria)
 this 6 day of June 2017)
)



Before me:



FILED on behalf of the Plaintiff

CLAIRE PHYLLIS BROWN
 of 456 Lonsdale Street, Melbourne
 an Australian Legal Practitioner
 within the meaning of the Legal
 Profession Uniform Law (Victoria)