

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

SCI 2014 06770

BETWEEN:

MAJID KARAMI KAMASAE

Plaintiff

and

COMMONWEALTH OF AUSTRALIA and others
(in accordance with the attached Schedule)

Defendants

DEFENCE TO AMENDED COUNTERCLAIM OF THE THIRD DEFENDANT

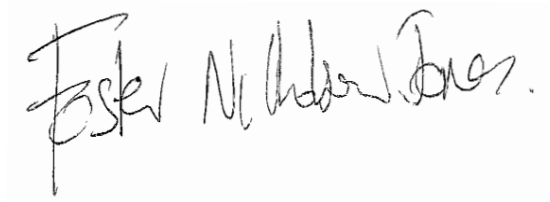
Date of document: 4 November 2016
Filed on behalf of: the second defendant
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To the Third Defendant's Amended Counterclaim dated 21 September 2016 (**the Counterclaim**), the Second Defendant (**G4S**) says as follows:

1. The claim against it by way of Counterclaim is embarrassing, contrary to the rules of this Court and ought be struck out.
2. It does not plead to paragraphs 1 to 188 (both inclusive) of the Counterclaim as they contain no allegations against it.
3. It denies the allegations contained in paragraph 189(a) of the Counterclaim and repeats and relies upon the facts and assertions contained in its Defence to the Plaintiff's Third Amended Statement of Claim dated 19 September 2016.
4. It denies the allegations contained in paragraph 189(b) of the Counterclaim.

Date: 4 November 2016

A handwritten signature in black ink, reading "Foster Nicholson Jones." The signature is written in a cursive style with a large initial 'F' and a period at the end.

**Foster Nicholson Jones Lawyers
Solicitors for the second defendant**

SCHEDULE OF PARTIES**MAJID KARAMI KAMASAE**

Plaintiff

and

COMMONWEALTH OF AUSTRALIA

First Defendant

and

G4S AUSTRALIA PTY LTD (ABN 64 100 104 658)

Second Defendant

and

TRANSFIELD SERVICES (AUSTRALIA) PTY LTD (ABN 11 093 114 553)

Third Defendant

and

**INTERNATIONAL HEALTH AND MEDICAL SERVICES PTY LTD
(ABN 40 073 811 131)**

First Third Party

and

WILSON PROTECTIVE SERVICES PNG LIMITED (COMPANY NO. 1-100593)

Second Third Party