

13 February 2017

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**RE : FEDERAL COURT - NSD 126/2017 Rodgers Reidy v Google & Craven**

Dear Mr. Polczynski,

Regarding the four Rodgers Reidy applicants in this matter :

RODGERS REIDY (QLD) PTY LIMITED ACN 117 655 973

First Applicant

RODGERS REIDY (NSW) PTY LIMITED ACN 089 898 813

Second Applicant

RODGERS REIDY (VIC) PTY LIMITED ACN 112 011 321

Third Applicant

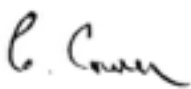
RODGERS REIDY (INTERNATIONAL) PTY LIMITED ACN 124 647 696

Fourth Applicant

As this proceeding is a defamation matter, and there is no evidence in your affidavit sworn 1 February 2017 filed in the Court that the applicants are "*excluded corporations*", please would you provide evidence that the applicants are "*excluded corporations*", and as such each of these company's have standing to sue for defamation pursuant to section 9 of the Defamation Act 2005 NSW.

That is, whether or not the number of persons who service these companies in their businesses (including their regional offices), is fewer than 10 persons and that these companies are not in any way "*related*" to each other or to another corporation.

Yours faithfully,



Gordon Craven - Second Respondent