

Federal Court of Australia
District Registry: New South Wales
Division: General

No. NSD126/2017

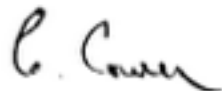
Applicants	Rodgers Reidy (QLD) Pty Limited Rodgers Reidy (NSW) Pty Limited Rodgers Reidy (VIC) Pty Limited Rodgers Reidy (INTERNATIONAL) Pty Limited
First Respondent	Google Australia Pty Ltd
Second Respondent	Gordon Craven

SECOND RESPONDENT'S RESPONSE
TO THE REQUEST OF JUSTICE BROMWICH
TO INDICATE MY POSITION IN THIS PROCEEDING
AND TO REQUEST LEAVE AND PARTICULARS

1. I will be vigorously defending this proceeding by :
 - (a) proving the truth of my website www.pleading.com.au;
 - (b) and apply to set aside the orders made against me on 1 & 2 February 2017;
at this stage I also intend :
 - (c) making a cross-claim against Rodgers Reidy (QLD) Pty Limited for being involved in the defamation of me;
 - (d) I understand that I will need to make an application for extension of the limitation period by the Court, pursuant to section 56A of the Limitation Act 1969 NSW, and that I need a reasonable excuse for not filing earlier.
2. The Originating Application does not set out the cause/s of action, however I have been informed by letter of 10 March 2017 from Polczynski Lawyers, that the causes of action are Malicious/Injurious Falsehood and/or Misleading or Deceptive Conduct.
3. Regarding the Malicious/Injurious Falsehood allegations, I request the Applicants to forward to me particulars of the material facts relating to damages.
4. As my website is not published in trade or commerce, particulars of material facts as to how it is alleged to be operating in trade or commerce, are also requested.

5. My wife and I will be presenting evidence in this proceeding and we intend to be present at the trial in Sydney, whenever that may be.
6. As I live at Gympie in Queensland and I am an aged pensioner that relies totally on a Centrelink pension, I will be unable to attend interlocutory hearings in Sydney.
As such I request leave to appear on 2 May 2017 by telephone.
7. I do not seek costs in the proceeding so far.
8. Regarding the case management hearing that is listed for Tuesday 2 May 2017:
 - (a) leave is requested for all future interlocutory matters be heard by telephone;
 - (b) alternatively, the proceeding be transferred to Brisbane;
 - (c) if I have not received the requested particulars at 3 and 4 by affidavit by 1 May 2017, that an order be made for their production;
 - (d) alternatively, an order that the Applicants file and serve a fully particularised statement of claim, which may be more appropriate as it seems that there will be substantial disputes of fact;
 - (e) directions pursuant to Rule 5.04;
 - (f) a timetable for parties to take steps in the proceeding, bearing in mind that as a litigant in person I am currently heavily involved with District Court of Queensland proceeding 3901/16 regarding the conduct of David James Hambleton, and a further Supreme Court of Queensland proceeding regarding another person is imminent;
 - (g) the giving of evidence at the trial to be by affidavits which are to be subject to cross-examination.
9. This letter is copied to the solicitors for all parties.

Yours faithfully



Gordon Craven - Second Respondent

Date: 13 March 2017