



Form 40 (version7)  
UCPR 35.1

R.H Kenna (L.S.)  
Principal Registrar &  
Chief Executive Officer

**AFFIDAVIT OF**  
**Andrew John Bates**  
**3 June 2025**

**COURT DETAILS**

Court	Supreme Court
Division	Common Law
List	General Case Management List
Registry	Sydney
Case number	2024/00462838

**TITLE OF PROCEEDINGS**

Plaintiff	<b>Andrew John Bates</b>
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First defendant	<b>Virginia Edlington</b>
Number of defendants	Eight Defendants

**FILING DETAILS**

Filed for	Andrew John Bates, Plaintiff
Filed in relation to	Plaintiff's claim
Legal representative	SELF REPRESENTED
#Legal representative reference	[reference number]
Contact name and telephone	Andrew John Bates, 0413 594 504
Contact email	andrewbates.au@gmail.com

**AFFIDAVIT**

Name Andrew John Bates  
Address 2/10 CROUDACE ROAD, TINGIRA HEIGHTS NSW 2290  
Occupation Architectural Draftsperson  
Date 3 June 2025

I Affirm:

- 1 I am the Plaintiff, Andrew John Bates.
- 2 Generative artificial intelligence was not used to generate:
  - a. this affidavit.
  - b. any annexure/exhibit to this affidavit.
- 3 It should be noted the Corporations Act protects a Whistleblower against Legal Action relating to the Whistleblower Disclosure. For further information contact ASIC for ASIC Information Sheet 238 (INFO 238) 'Protections for Whistleblowers Against Legal Action'.
- 4 This Affidavit is in opposition to Notice of Motion to Dismiss filed on 5 March 2025.
- 5 The case is not Frivolous I have ASIC Whistleblower Rights and Protections.
- 6 A Subpoena of the ASIC Registrar will confirm Ownership of the Bonds.
- 7 A Request for a Court Order through the Supreme Court for a Subpoena of the ASIC Registrar has been submitted.
- 8 The Case is not Vexatious. In 1999 a Police Report over the Phone and in Paper with attending Police was made.
- 9 To obtain a Historical Police Report a Subpoena of the Australian Federal Police is required.
- 10 A request for a Court Order through the Supreme Court for a Subpoena of the Police will be applied for.
- 11 It is noted that a case with No Reasonable Cause of Action is considered Frivolous. As noted above I have ASIC Whistleblower Rights and Protections and the Legal Matter is Not Frivolous.
- 12 Your Honour has request Pleadings be added to the Statement of Claim to allow a Reasonable Cause Of Action. ON TRANSCRIPT. 27 FEBRUARY 2025.
- 13 As written on the Statement of Claim, Relief is Sought.
- 14 An Amended Statement of Claim has been Filed and Served.



15 It should be noted on 27 February 2025, Your Honour has made a Request for ASIC to Provide All Evidence . ON TRANSCRIPT. 27 February 2025.

16 A Supreme Court Order to Subpoena the ASIC Registrar will confirm the Value of the Loses and will be used as Evidence.

AFFIRMED at BELMONT NSW

Signature of deponent

Name of witness Molly Mae Billy Lancett

Address of witness 1A/571 Pacific Hwy, Belmont NSW 2280

Capacity of witness [#Justice of the peace #Solicitor #Barrister #Commissioner for affidavits #Notary public]

And as a witness, I certify the following matters concerning the person who made this affidavit (the deponent):

- 1 #I saw the face of the deponent. [OR, delete whichever option is inapplicable]  
~~#I did not see the face of the deponent because the deponent was wearing a face covering, but I am satisfied that the deponent had a special justification for not removing the covering.\*~~
- 2 #I have known the deponent for at least 12 months. [OR, delete whichever option is inapplicable]  
 #I have confirmed the deponent's identity using the following identification document:

NSW Driver Licence

Identification document relied on (may be original or certified copy)†

Signature of witness

Note: The deponent and witness must sign each page of the affidavit. See UCPR 35.7B.

Molly Mae Billy Lancett  
A Justice of the Peace in and for  
the State of New South Wales  
Reg. No. 260170

[\* The only "special justification" for not removing a face covering is a legitimate medical reason (at April 2012).]

[† "Identification documents" include current driver licence, proof of age card, Medicare card, credit card, Centrelink pension card, Veterans Affairs entitlement card, student identity card, citizenship certificate, birth certificate, passport or see [Oaths Regulation 2011](#) or refer to the guidelines in the NSW Department of Attorney General and Justice's "Justices of the Peace Handbook" section 2.3 "Witnessing an affidavit" at the following address: <http://www.jp.nsw.gov.au/Documents/jp%20handbook%202014.pdf> ]