

**IN THE HIGH COURT OF AUSTRALIA
SYDNEY REGISTRY**

No. S144 of 2018

BETWEEN:

BIANCA HOPE RINEHART

First Applicant

JOHN LANGLEY HANCOCK

Second Applicant

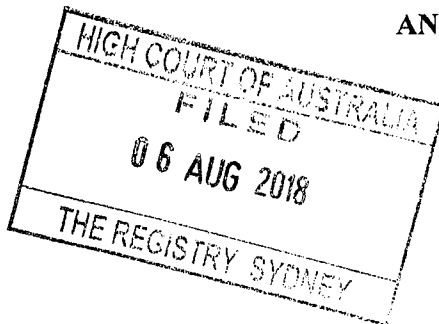
and

HANCOCK PROSPECTING PTY LTD ACN 008 676 417

AND OTHERS NAMED IN THE SCHEDULE

Respondents

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FIRST TO EIGHTH RESPONDENTS' SUBMISSIONS

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3474-8401-5115v1

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Part I: Certification

1. These submissions are in a form suitable for publication on the Internet.

Part II: Concise statement of issues

2. The issues in the appeal are those identified by the First to Eighth Respondents (**the HPPL Respondents**) in their written submissions filed on 3 August 2018 in appeal proceedings No. S143 of 2018 at [2]–[9].

Part III: Certification with respect to s 78B of the *Judiciary Act* 1903

3. The HPPL Respondents agree that no notice is required to be given in compliance with s 78B of the *Judiciary Act* 1903 (Cth).

10 **Part IV: Statement of material facts**

4. The HPPL Respondents adopt the statement of facts set out in their written submissions filed on 3 August 2018 in appeal proceedings No. S143 of 2018 at [11]–[29].

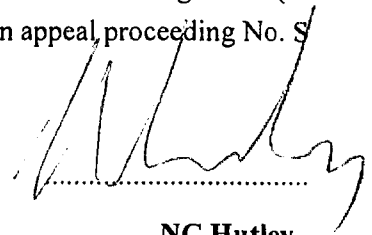
Part V: Argument in answer to the argument of the appellants

5. The HPPL Respondents adopt in these proceedings the written submissions filed by them on 4 August 2018 in appeal proceedings No. S143 of 2018, save in respect of their proposed cross-appeal in appeal proceedings No. S143 (being paragraph [87] of the written submissions).

Part VI: Time for oral argument

6. The HPPL Respondents do not require time for the presentation of oral argument (in addition to the time allocated for oral argument in the appeal in appeal proceeding No. S143 of 2018).

Dated 6 August 2018



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C Colquhoun

JJ Hutton

SCHEDULE

HANCOCK MINERALS PTY LTD (ACN 057 326 824)

Second Respondent

TADEUSZ JOSEF WATROBA

Third Respondent

WESTRAINT RESOURCES PTY LTD (ACN 009 083 783)

Fourth Respondent

HMHT INVESTMENTS PTY LTD (ACN 070 550 104)

Fifth Respondent

10 **ROY HILL IRON ORE PTY LTD (ACN 123 722 038)**

Sixth Respondent

HOPE DOWNS IRON ORE PTY LTD (ACN 071 514 308)

Seventh Respondent

MULGA DOWNS IRON ORE PTY LTD (ACN 080 659 150)

Eighth Respondent

GEORGINA HOPE RINEHART (IN HER PERSON CAPACITY AND AS TRUSTEE OF THE HOPE MARGARET HANCOCK TRUST AND AS TRUSTEE OF THE HFMF TRUST

Ninth Respondent

20 **HANCOCK FAMILY MEMORIAL FOUNDATION LTD (ACN 008 499 312)**

Tenth Respondent

150 INVESTMENTS PTY LTD (ACN 070 550 159)

Eleventh Respondent

HOPE RINEHART WELKER

Twelfth Respondent

GINIA HOPE FRANCES RINEHART

Thirteenth Respondent

MAX CHRISTOPHER DONNELLY (IN HIS CAPACITY AS TRUSTEE OF THE BANKRUPT ESTATE OF THE LATE LANGLEY GEORGE HANCOCK)

30 Fourteenth Respondent

MULGA DOWNS INVESTMENTS PTY LTD (ACN 132 484 050)

Fifteenth Respondent