IN THE HIGH COURT OF AUSTRALIA BRISBANE REGISTRY

No B55 of 2016

BETWEEN:

IAN MAURICE FERGUSON

Plaintiff

AND:



MARCUS WILLIAM AYRES, STEPHEN JAMES PARBERY AND MICHAEL ANDREW OWEN IN THEIR CAPACITIES AS LIQUIDATORS OF QUEENSLAND NICKEL PTY LTD (IN LIQ) ACN 009 842 068

Defendants

ANNOTATED SUBMISSIONS OF THE ATTORNEY-GENERAL FOR THE STATE OF VICTORIA (INTERVENING)

PART I: CERTIFICATION

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

PARTS II & III: INTERVENTION

 The Attorney-General for the State of Victoria intervenes pursuant to s 78A of the Judiciary Act 1903 (Cth), in support of the defendants in this proceeding and the defendants in B52 of 2016 (Palmer proceeding).

PART IV: APPLICABLE CONSTITUTIONAL AND STATUTORY PROVISIONS

3. The applicable constitutional and statutory provisions are set out in Annexure A to the plaintiff's written submissions in the Palmer proceeding, dated 6 October 2016.

Date of document: Filed on behalf of:

Prepared by: Alison O'Brien Acting Victorian Government Solicitor Level 25, 121 Exhibition Street Melbourne VIC 3000 3 November 2016 Attorney-General for the State of Victoria

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PART V: ARGUMENT

4. Victoria adopts its submissions in the Palmer proceeding.

PART VI: ESTIMATE OF TIME FOR ORAL ARGUMENT

5. Victoria will advance no more than 15 minutes of oral submissions in this proceeding and the Palmer proceeding combined.

Dated: 3 November 2016

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