

**IN THE SUPREME COURT OF VICTORIA
AT MELBOURNE
COMMON LAW DIVISION
MAJOR TORTS LIST**

SCI 2014 06770

BETWEEN:

MAJID KARAMI KAMASAE

Plaintiff

and

COMMONWEALTH OF AUSTRALIA and others
(in accordance with the attached Schedule)

Defendants

DEFENCE TO AMENDED THIRD PARTY NOTICE OF THE FIRST DEFENDANT

Date of document: 30 November 2016
Filed on behalf of: the second defendant
Prepared by:
Foster Nicholson Jones Lawyers
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To the Amended Third Party Notice of the First Defendant dated 27 September 2016 (the Third Party Notice) the Second Defendant (**G4S**) says as follows:

1. It admits the allegations contained in paragraph 1 of the Third Party Notice.
2. It does not plead to paragraph 2 of the Third Party Notice as it contains to allegations against it.
3. It admits paragraph 3 of the Third Party Notice.
4. It admits paragraph 4 of the Third Party Notice.
5. It denies the allegations contained in paragraph 5 of the Third Party Notice insofar as it makes allegations against G4S and repeats and relies upon the facts and assertions contained in its Defence to the Third Amended Statement of Claim ~~dated 7 August 2015~~ 19 September 2016 (Defence).

6. It denies the allegations contained in paragraph 6 of the Third Party Notice and repeats and relies upon the facts and assertions contained in its Defence dated ~~7 August 2015~~.

Date: 30 November 2016

A handwritten signature in black ink, appearing to read "Foster Nicholson Jones". The signature is written in a cursive, slightly slanted style.

**Foster Nicholson Jones Lawyers
Solicitors for the second defendant**

SCHEDULE OF PARTIES**MAJID KARAMI KAMASAE**

Plaintiff

and

COMMONWEALTH OF AUSTRALIA

First Defendant

G4S AUSTRALIA PTY LTD**ABN 64 100 104 658**

Second Defendant

TRANSFIELD SERVICES (AUSTRALIA) PTY LTD**ABN 11 093 114 553**

Third Defendant

and

INTERNATIONAL HEALTH AND MEDICAL SERVICES PTY LTD**ABN 40 073 81 131**

First Third Party