

IN THE FEDERAL COURT OF AUSTRALIA
VICTORIA DISTRICT REGISTRY

No. VID 1019 of 2010

IN THE MATTER OF WILLMOTT FORESTS LIMITED (RECEIVERS AND MANAGERS
APPOINTED) (ADMINISTRATORS APPOINTED)
ACN 063 263 650

WILLMOTT FORESTS LIMITED (RECEIVERS AND MANAGERS APPOINTED)
(ADMINISTRATORS APPOINTED)
ACN 063 263 650

IN ITS PERSONAL CAPACITY AND IN ITS CAPACITY AS RESPONSIBLE ENTITY OF
EACH OF THE MANAGED INVESTMENTS SCHEMES LISTED IN SCHEDULE 1 AND IN
ITS CAPACITY AS MANAGER OF THE UNREGISTERED MANAGED INVESTMENT
SCHEMES LISTED IN SCHEDULE 2
First Plaintiff

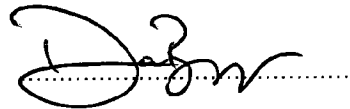
CRAIG DAVID CROSBIE
Second Plaintiff

IAN MENZIES CARSON
Third Plaintiff

CERTIFICATE IDENTIFYING EXHIBIT

This is the exhibit marked "CDC-13" now produced and shown to **CRAIG DAVID CROSBIE**
at the time of swearing his affidavit on 4 February 2011.

Before me:



DANIEL JOSEPH BRIGGS
Arnold Bloch Leibler
Level 21, 333 Collins Street
Melbourne 3000
An Australian Legal Practitioner within the
meaning of the Legal Profession Act 2004

Filed on behalf of the Plaintiffs
ARNOLD BLOCH LEIBLER
Lawyers and Advisers
Level 21
333 Collins Street
Melbourne 3000
ABL/1352538v1

DX 38455 Melbourne
Tel: 9229 9999
Fax: 9229 9900
Ref: 01-1565015
(Leon Zwier)

All communications to be addressed to:

Riverina Highlands Zone
NSW Rural Fire Service
76 Capper Street
Tumut NSW 2720

Riverina Highlands Zone
(Tumut, Tumbarumba & Gundagai)
PO Box 401
Tumut NSW 2720

Telephone: (02) 6941 2222
e-mail: riverina.highlands@rfs.nsw.gov.au

Facsimile: (02) 6941 2220



PPB
Administrator
Willmott Forests Ltd

Your Ref:
Our Ref: ZK/ADM/044

RE: Maintenance of fire and access trails – Willmott Plantations

7th December 2010

Att: Michael Carmody

Dear Michael,

As you are probably aware, the Bush Fire Danger Period commenced in the Tumbarumba and Tumut areas on December 1st 2010.

In past years, Willmott Forests Ltd has been very active in undertaking their statutory responsibilities under the Rural Fires Act 1997 to prevent the occurrence and spread of bushfire from their estates through regular maintenance.

Since going into receivership, many concerns have been raised with me by local landowners and rural fire brigades in regard to the lack of maintenance carried out on access roads, fire trails and weed control within Willmott plantations prior to this fire season.

As you can appreciate, local communities rely heavily on all landowners to maintain and prepare their properties to mitigate the threat of fire prior to and during the fire season. When fire does break out, a swift response via well maintained access roads and trails is essential for fire authorities and brigades to quickly contain and minimise the spread of fire. Well maintained access and egress is also paramount to the safety of our fire-fighters who may need to move rapidly due to changing fire behaviour and intensity.

As Fire Control Officer for the Riverina Highlands Zone, it is my responsibility to ensure that all is done that can be done to mitigate fires within the zone. As such, I would appreciate your earliest response to the concerns raised.

Your's sincerely,

Lindsay Lashbrook

Superintendent Lindsay Lashbrook
Manager
Riverina Highlands Zone

All communications to be addressed to:

NSW Rural Fire Service
Hume Zone
25 Airport Drive
ALBURY NSW 2640

NSW Rural Fire Service
Corowa/Berrigan Zone
Corowa Airport, Redlands Rd (PO Box 180)
COROWA NSW 2646

Telephone: (02) 6051 1511
Facsimile: (02) 6051 1500

Telephone: (02) 6033 4550
Facsimile: (02) 6033 0109

e-mail: george.alexander@rfs.nsw.gov.au



Michael Carmody
PPB Ltd
Administrator & Responsible Entity
Willmott Forests Ltd
Email: mcarmody@ppb.com.au

Your Ref:
Our Ref: BFM 54209

17 December 2010

Dear Michael

WILLMOTT PLANTATIONS – MAINTENANCE OF FIRE AND ACCESS TRAILS

The Bushfire Danger period within the Greater Hume area commenced on 1 November 2010.

In past years, Willmott Forests Ltd has been very active in undertaking its statutory responsibilities under the Rural Fires Act to prevent the occurrence and spread of bush fires from its assets, through regular maintenance.

During the past months heavy rain experienced in this area has seen a very marked deterioration in the condition of fire and access trails within Willmott's assets and, in some cases, trails are inaccessible.

Since going into receivership, many concerns have been raised by local landowners and rural fire brigades in regard to the lack of maintenance carried on access roads/fire trails within Willmott plantations prior to this fire season.

Local communities rely heavily on all landowners to maintain and prepare their properties to mitigate the threat of fire prior to and during the fire season. When fire does break out, a swift response via well maintained access roads and trails is essential for fire authorities and local brigades to quickly contain and minimise the spread of fire and loss of assets. Well maintained access and egress is also paramount to the safety of firefighters who may need to move rapidly due to changes in fire behaviour.

As the Manager (Fire Control Officer) for the Southern Border Team, I am responsible to ensure that all is done to mitigate fires within this area.

I now request that you take immediate action to inspect and, if needed, repair access roads and trails within the Willmott Forest areas.

Yours faithfully

A handwritten signature in black ink, appearing to read 'George Alexander'.

George Alexander
Manager
Southern Border Team (Albury Office)