

## Quintin Rozario

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**From:** Silvana Perovich <s.perovich@spars.net.au>  
**Sent:** Thursday, October 24, 2013 10:54 AM  
**To:** 'Francis Douglas'; Thomas Prince  
**Cc:** r.spencer@spars.net.au; 'Michael Spencer'; admin@deltalaw.com.au  
**Subject:** Mio Art - 4352.12 strike out and judgment sought by Rex  
**Attachments:** Draft ltr to HWL Ebsworth 23 10 13.docx; ltr HWLE to DL 22 10 13.pdf

Francis, Tom,

Attached is the recent letter from HWLE Ebsworth for Rex, and a draft reply which we have prepared.

We have found the letter rather sinister, basking in the support foreshadowed by Jackson J and relying on the fictions which Savage is promoting to him.

As to the matters they have raised with respect to costs and security for costs, Michael Spencer explained correctly that he did not know who the shareholders of Delta Law are. The structure is set out below. That structure is largely redundant in that there has been no development of litigation funding. Delta Law is a subsistence firm which does the Mango Hill and Montague Road resumption matters and some local Wynnum work involving family law and petty crime.

Litigation funding of sorts was applied in the Montague Road Land Court resumption compensation matter – there Award Litigation Funding (ALF) had the liquidator of Neovest Jonathan McLeod agree to postpone priority as mortgagee in favour of Award Litigation Funding. That is all – ALF has not raised money or otherwise funded any litigation.

Clearly their overriding strategy is to incur costs with the assistance of Jackson J. But one would question how they could seek security presently as threatened when it they who are seeking the strike out. How could they achieve security for costs as against their own application? Appears to be posturing by Savage.

We appreciate that we would be able to claim set off as against BMD, but Rex and Varitimos while cyphers for BMD are not strictly one and the same?

Regards,

Silvana & Richard

Looks like they searched out that Resoil is a member of Delta Law Pty Ltd .....details of structure as follows:

### Members of Delta Law

- 40 shares - Natividad Calliten (Philippine bride/wife of former solicitor Peter Clapin, Quintin Rozario's previous employer and one time intended law partner)
- 40 shares – Port Klang Pty Ltd (trustee of the Quintin Rozario Family Trust)
- 40 shares – Resoil Pty Ltd (registered office at the home of Eddy Galea, also the director)

### Members of Resoil Pty Ltd

- 1 share – Acrondil Enterprises Pty Ltd (looks like an Eddy Galea company from Cyprus....)
- 60 shares – Award Litigation Funding Pty Ltd – (director is Eddy Galea)
- 59 shares – Resoil Holdings Inc (address in Houston, Texas – oil prospecting?)

### Members of Award Litigation Funding Pty Ltd

120 shares – Edmund Albert (Eddy) Galea