

IN THE SUPREME COURT OF VICTORIA
AT MELBOURNE
COMMON LAW DIVISION
GROUP PROCEEDINGS LIST

S ECI 2020 01535

BETWEEN:

NERITA SOMERS & ORS
(according to the attached Schedule)

Plaintiffs

-and-

BOX HILL INSTITUTE & ANOR
(according to the attached Schedule)

Defendants

ORDER

JUDGE: The Honourable Justice John Dixon

DATE MADE: 14 October 2020

ORIGINATING PROCESS: Writ filed 26 March 2020

HOW OBTAINED: By consent

ATTENDANCE: On the papers

OTHER MATTERS: Nil.

THE COURT ORDERS BY CONSENT THAT:

Notice to group members and opt out

1. Pursuant to ss 33X and 33Y of the *Supreme Court Act 1986* (Vic), by 4:00pm on 16 October 2020, notice in substantially the form and content set out in Annexure A (**Notice**) shall be given to group members by the solicitors for the plaintiffs causing:
 - (a) the Notice to be sent by email to each group member's last known email address, as provided by the defendants pursuant to paragraph 5 of the orders made 22 July 2020. In the event that the email transmission to a group member is unsuccessful, the solicitors for the plaintiffs shall contact that group member by telephone for the purpose of identifying a current email address maintained by the group member, and shall cause the Notice to be sent to that email address;



- (b) a copy of the Notice, together with copies of:
- (i) the plaintiffs' amended writ and amended statement of claim filed 3 August 2020;
 - (ii) the first defendant's defence to the amended statement of claim filed 4 September 2020;
 - (iii) the plaintiffs' reply (if any) to the first defendant's defence to the amended statement of claim filed 4 September 2020;
 - (iv) the amended third party notice filed 14 September 2020;
 - (v) the second defendant's defence to the first defendant's amended third party notice and counterclaim filed 31 August 2020;
 - (vi) the second defendant's defence to the plaintiff's amended statement of claim filed 31 August 2020;
 - (vii) the plaintiffs' reply (if any) to the second defendant's defence to the amended Statement of claim filed 31 August 2020; and
 - (viii) each order made in the proceeding to date,

to be available for download from the website of the plaintiffs' solicitors (<https://gordonlegal.com.au/services/class-actions/bhi-soar-class-action/>), and shall remain available until the entry of judgment or final orders in the proceeding.

2. If the solicitors for any party receive a notice purporting to be an opt out notice in the proceeding, the solicitors shall send that notice to the Court (to the address shown on the notice) within three business days, and it shall be treated as having been received by the Court at the time it was received by the solicitors.
3. Leave is granted to any party to inspect and copy any opt out notice sent to the Registry.
4. By 2 December 2020, the plaintiffs' solicitors shall provide the defendants' solicitors with a list of group members who have not opted out of the proceeding.

Initial discovery by the second defendant

5. By 4:00pm on 6 November 2020, the second defendant shall:
 - (a) file and serve an affidavit of documents making initial discovery of the documents set out in Annexure B; and

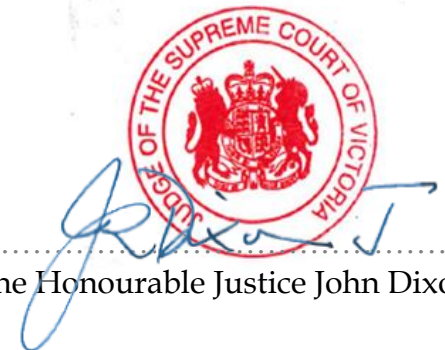


- (b) produce its discovery for inspection in accordance with the protocol agreed between the parties.

Further discovery by the first defendant

- 6. By 4:00 pm on 6 November 2020, the first defendant shall:
 - (a) file and serve a further affidavit of documents making initial discovery of the documents set out in Annexure C; and
 - (b) produce its discovery for inspection in accordance with the protocol agreed between the parties.
- 7. Costs reserved.

DATE AUTHENTICATED: 14 October 2020



The Honourable Justice John Dixon

ANNEXURE A

SUPREME COURT OF VICTORIA

BOX HILL INSTITUTE STUDENT PILOT CLASS ACTION

NERITA SOMERS

ADEL HASSANEIN

MATTHEW LAMONT

FELIX OULDANOV

V

BOX HILL INSTITUTE

GOBEL AVIATION PTY LTD

(trading as Soar Advanced Flight Training)

(S ECI 2020 01535)

IMPORTANT NOTICE

On 26 March 2020, Nerita Somers, Adel Hassanein, Matthew Lamont and Felix Ouldanov (**the Plaintiffs**) commenced a group proceeding in the Supreme Court of Victoria against Box Hill Institute (**BHI**). Gobel Aviation Pty Ltd (**Soar**) has since been joined as a second defendant.

The group proceeding arises out of the delivery of the Diploma of Aviation (Commercial Pilot Licence - Aeroplane) (**CPL Diploma**) and is brought by the Plaintiffs on their own behalf and on behalf of persons who it is alleged have suffered loss and damage as a result of the manner in which the CPL Diploma course was delivered and course fees were charged.

The Supreme Court has ordered that this notice be published for the information of persons who might be group members in the proceeding and who may be affected by it.

You have been identified as a potential group member. **You should read this notice carefully. Any questions you have concerning the matters contained in this notice should not be directed to the Court.** If there is anything in it that you do not understand, you should seek legal advice.



1. What is a group proceeding?

A group proceeding, also known as a class action, is a proceeding brought by the plaintiffs on their own behalf and on behalf of group members against the defendants, where the plaintiffs and the group members have similar claims against the defendants.

Group members are bound by any judgment in or settlement of the group proceeding unless they choose not to participate by “opting out” of the proceeding. This means that:

- (a) if the group proceeding is successful or settles through mediation or alternative dispute resolution, group members may be eligible for a share of any court awarded damages or settlement monies;
- (b) if the group proceeding is unsuccessful, group members are bound by that result; and
- (c) regardless of the outcome of the group proceeding, group members will not be able to pursue their claims against the defendants in separate legal proceedings unless they have opted out.

2. What is the Box Hill Institute Student Pilot group proceeding about?

The Plaintiffs allege that BHI failed to deliver the CPL Diploma course so as to enable group members to obtain their commercial pilot licence as it had represented. It is also alleged that BHI and Soar failed to put in place proper systems to monitor the delivery of the CPL Diploma course to ensure that the course materials, theoretical training and practical training was appropriate, so as to enable group members to meet the objectives of the CPL Diploma course within the represented time frames. The Plaintiffs claim loss and damage from BHI and Soar for these failures.

The defendants deny that they are liable to group members and defend the group proceeding on various grounds.

Copies of the amended statement of claim filed by the Plaintiffs and the defences filed by the defendants are available for download from the website of the solicitors of the Plaintiffs (see below).

3. Are you a group member?

You are a group member if you enrolled in the CPL Diploma course between 6 December 2015 and 26 March 2020, or are the legal personal representative of the estate of any deceased person who would otherwise have qualified as a group member.



If you are unsure whether or not you are a group member, you should contact Gordon Legal on 03 9603 3000 or email bhisoar@gordonlegal.com.au or seek your own legal advice without delay.

4. What does 'opt out' mean?

The Plaintiffs in a group proceeding do not need to seek the consent of group members to commence a group proceeding on their behalf. However, group members can cease to be group members by "opting out" of the group proceeding. If you do not want to continue to be a group member, you can opt out now (see below).

5. Will you be liable for legal costs if you remain a group member?

You will **not become liable for any legal costs** simply by remaining as a group member. However:

- (a) if the preparation or finalisation of your personal claim requires work to be done in relation to issues that are specific to your claim, you can engage Gordon Legal or other lawyers to do that work for you. A copy of the terms on which Gordon Legal are acting in the group proceeding may be obtained from them (contact details below);
- (b) if any compensation becomes payable to you as a result of any order, judgment or settlement in the group proceeding, the Court may make an order that some of that compensation be used to help pay a share of the costs that are incurred by the Plaintiffs in running the group proceeding but which are not able to be recovered from BHI or Soar; and
- (c) group proceedings are often settled out of court. If that occurs in this proceeding, you may be able to claim from the settlement amount without retaining a lawyer.

6. What should you do?

Option 1: Remain a group member

If you wish to remain a group member there is nothing you need to do at the present time. The Plaintiffs will continue to bring the proceeding on your behalf up to the point where the Court determines those questions that are common to the claims of group members. However, you are invited to contact the Plaintiffs' lawyers, Gordon Legal, at <https://gordonlegal.com.au/services/class-actions/bhisoar-class-action/> and register as a group member so that future notices about the group proceeding can be sent to your preferred address.



Unless you opt out, you will be bound by any settlement or judgment of the group proceeding.

If the group proceeding is successful, you will be entitled to share in the benefit of any order, judgment or settlement in favour of the group members, although you may have to satisfy certain conditions before your entitlement arises.

If the group proceeding is unsuccessful, or is not as successful as you might have wished, you will not be able pursue the same claims and may not be able to pursue related claims against BHI or Soar in other legal proceedings.

If you consider that you have claims against the defendants which are based on your individual circumstances, or otherwise additional to the claims described in the group proceeding, it is important that you seek independent legal advice about whether you should remain a group member **before** the deadline for opting out (see below).

Option 2: Opt out of the group proceeding

If you do not wish to remain a group member, you must opt out of the group proceeding by completing the “Opt Out Notice” below and returning it to the Supreme Court of Victoria at the address on the form.

If you opt out, you will not be bound by any order, judgment or settlement in the group proceeding and you will be able to bring your own claim against BHI or Soar. However, if you opt out, you will not be entitled to any share in the benefit of a successful outcome in the group proceeding.

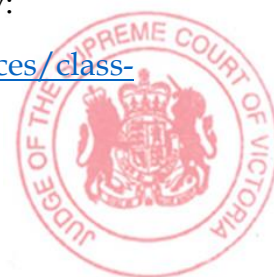
If you wish to bring your own claim against BHI or Soar, you should seek your own legal advice about your claim and the applicable time limits that apply to bringing a claim before opting out.

You must decide what to do BEFORE 18 November 2020. If you want to opt out, you must send your Opt Out Notice to the Supreme Court so that it arrives before **4:00pm on 18 November 2020**, otherwise it may not be effective.

7. Where can you obtain copies of relevant documents?

Copies of relevant documents, including the application, the statement of claim filed by the Plaintiffs and the defences filed by the defendants, can be obtained by:

- (a) downloading them from <https://gordonlegal.com.au/services/class-actions/bhi-soar-class-action/>;



- (b) telephoning Gordon Legal on (03) 9603 3000 and requesting that a copy be posted or emailed;
- (c) inspecting them by visiting the Registry of the Supreme Court of Victoria in Melbourne at Level 2, 436 Lonsdale Street, Melbourne; or
- (d) locating them on the Supreme Court website at <https://www.supremecourt.vic.gov.au/court-decisions/case-list/box-hill-institute-student-pilot-class-action>.

Please consider the above matters carefully. If you are not sure whether you are a group member or want further information, you should contact Gordon Legal on (03) 9603 3000 or email bhisoar@gordonlegal.com.au, or seek your own legal advice.

You should not delay in making your decision, as the deadline for the opt out is **18 November 2020**.

This notice is published pursuant to Orders made by the Supreme Court on 14 October 2020.



Rule 18A.04

Form 18AB

NOTICE OF OPTING OUT BY A GROUP MEMBER

IN THE SUPREME COURT OF VICTORIA
AT MELBOURNE
COMMON LAW DIVISION
GROUP PROCEEDINGS LIST

No. S ECI 2020 01535

BETWEEN:

NERITA SOMERS and others according to the
attached schedule

First Plaintiff

and

BOX HILL INSTITUTE

First Defendant

and

**GOBEL AVIATION PTY LTD (trading as Soar
Advanced Flight Training)**

Second Defendant

To: The Prothonotary, Supreme Court of Victoria Registry,
Level 2, 436 Lonsdale Street, Melbourne VIC 3000

Gordon Legal
22/181 William Street
Melbourne VIC 3000

Lander & Rogers
Level 12, 600 Bourke Street
Melbourne VIC 3000

Maddocks
Collins Square, Tower Two, Level 25
727 Collins Street
Melbourne VIC 3008



I, *[print name]*,
a group member in the above group proceeding, give notice under section 33J(2) of the
Supreme Court Act 1986 that I am opting out of this proceeding.

Date:	
Signature of group member or the group member's solicitor:	
Address of group member:	

Please return this notice by 18 November 2020 to:

The Group Proceedings Coordinator

By mail:

Supreme Court of Victoria Registry,

Level 2, 436 Lonsdale Street,

Melbourne VIC 3000

Or by email:

cldgroupproceedings@supcourt.vic.gov.au



ANNEXURE B

Categories of documents to be discovered by the second defendant

- A Documents evidencing offerings by Soar in the CPL Diploma course and due diligence
- i. All business proposals prepared by Soar concerning the provision and delivery of aviation training courses in connection with BHI, including the Diploma of Aviation (Commercial Pilot Licence Aeroplane) (AVISO215) (the “CPL Diploma”) course;
 - ii. A copy of all records demonstrating Soar’s assessment and review of its own compliance with the National Vocational Education and Training Regulator Act 2011 (Cth), Vet Quality Framework and with Australian Skills Quality Authority (ASQA) rules, regulations and standards concerning the CPL Diploma course;
 - iii. A copy of all records demonstrating BHI’s assessment and review of Soar’s compliance with the Vet Quality Framework and with ASQA rules, regulations and standards concerning the CPL Diploma course;
 - iv. A copy of all records demonstrating Soar’s assessment and review of its own compliance with the Civil Aviation Safety Authority (CASA) rules, regulations and standards concerning the CPL Diploma course;
 - v. A copy of all records demonstrating BHI’s assessment and review of Soar’s compliance with CASA’s rules, regulations and standards concerning the CPL Diploma course;
 - vi. A copy of all reports evidencing the number of students enrolled in the CPL Diploma course who have obtained their commercial pilots licence through CASA;
 - vii. A copy of all file notes, minutes and memoranda concerning any meetings between BHI and Soar regarding their respective compliance with the National Vocational Education and Training Regulator Act 2011 (Cth), Vet Quality Framework, ASQA and CASA rules, regulations and standards concerning the CPL Diploma course;
 - viii. A copy of all file notes, minutes and memoranda from any meetings conducted by or participated in by Soar concerning its compliance with the CASA rules, regulations and standards concerning the CPL Diploma course;
 - ix. A copy of all correspondence regarding BHI and / or Soar’s compliance with the National Vocational Education and Training Regulator Act 2011 (Cth), Vet Quality Framework, ASQA and CASA rules, regulations and standards concerning the CPL Diploma course.



B Agreements entered into by BHI concerning the CPL Diploma course

- i. A copy of all contracts entered into between BHI and Soar and /or any related corporate entities to Soar (“Soar”) relating to the provision of the CPL Diploma course at BHI;
- ii. The contracts between Soar and any external service providers, consultants, student experience consultants, flight instructors, lecturers relating specifically to the CPL Diploma course;
- iii. Administrative Staff Secondment Agreements between BHI and Soar associated with the delivery of the CPL Diploma course.

C Australian Skills Quality Authority (ASQA) enquiries

- i. A copy of all reports by ASQA concerning the CPL Diploma course;
- ii. A copy of all correspondence, reports, file notes and memoranda, excluding those of a purely administrative nature, connected to ASQA’s decision to amend the scope of the registration of BHI (provider number 4687) as a Registered Training Authority (RTO) concerning the CPL Diploma course dated 17 December 2019;
- iii. A copy of all correspondence, reports, file notes and memoranda connected to ASQA’s decision to cancel the registration of Gobel Aviation Pty Ltd (provider number 22488) as a RTO dated 17 December 2019;
- iv. A copy of all correspondence, reports, file notes and memoranda connected to ASQA’s decision to reconsider and amend its decisions referred to at orders ((C)(ii)) and ((C)(iii)) above;
- v. A copy of all communications sent to students enrolled in the CPL Diploma course concerning ASQA’s decisions referred to at orders ((C)(ii)) to ((C)(iii)) above.

D Communications from the Civil Aviation Safety Authority concerning the CPL Diploma course

- i. Copies of all correspondence and reports from the Civil Aviation Safety Authority (CASA) concerning the CPL Diploma course.

E Communications and reports connected to the CPL Diploma course

- i. A copy of all written reports and correspondence authored by Mr Alan Middleton regarding Middleton’s concerns and alleged deficiencies relating to course content, delivery and methods of charging fees concerning the CPL Diploma Course;



- ii. A copy of all file notes / memoranda of meetings between Mr Alan Middleton and Soar related to Middleton's concerns relating to the CPL Diploma Course;
- iii. A copy of all correspondence sent by Soar to BHI and / or Mr Alan Middleton in response to Middleton's concerns regarding the CPL Diploma Course;
- iv. A copy of all written reports and correspondence authored by Mr Andrew Grady regarding Grady's concerns and alleged deficiencies relating to course content, delivery and methods of charging fees concerning the CPL Diploma Course;
- v. A copy of all file notes / memoranda of meetings between Mr Andrew Grady and Soar related to Grady's concerns relating to the CPL Diploma Course;
- vi. A copy of all correspondence sent by Soar to Mr Andrew Grady in response to his concerns regarding the CPL Diploma Course;
- vii. A copy of all written reports and correspondence received by Soar from any employee / consultant / contractor of BHI or Soar concerning any alleged deficiencies in the CPL Diploma Course;

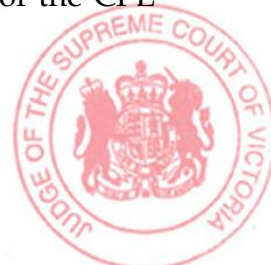
F Documentation concerning Mr Norman Gray's involvement in the CPL Diploma course

- i. All correspondence between Mr Norman Gray and Soar and /or any related corporate entities to Soar concerning the development of the CPL Diploma course;
- ii. All file notes and memoranda or meetings between Mr Norman Gray and Soar and /or any related corporate entities to Soar concerning the development of the CPL Diploma course;
- iii. Copies of all correspondence, minutes of meetings, file notes and memoranda concerning Norman Gray's intention to act as a director of (or relationship with) Double Sunrise Holdings Pty Ltd, being the sole shareholding company of Soar Aviation Holdings Pty Ltd;
- iv. Copies of all correspondence between former CEO of BHI, Norman Gray and BHI acting in his capacity as a director of Double Sunrise Holdings Pty Ltd;
- v. Copies of all documentation demonstrating all remuneration, payments and dividends paid by Soar and /or any related corporate entities to Mr Norman Gray.



G Documents concerning the internal management and administration of the CPL Diploma course

- i. Copies of all reports and correspondence received from the current CEO of BHI, Vivienne King, concerning any alleged deficiencies in the CPL Diploma course;
- ii. All training manuals and course materials delivered by BHI / Soar to students during the CPL Diploma course, categorised into year and class number;
- iii. All training and assessment strategies delivered by BHI / Soar to students during the CPL Diploma course, categorised into year and class number;
- iv. All policies and protocols for assessing student's progress through the CPL Diploma course;
- v. All policies and protocols for assessing student engagement through the CPL Diploma course;
- vi. All policies and protocols concerning charging fees to students through the CPL Diploma course;
- vii. All policies and protocols applying to the representative plaintiffs during their enrolment in the in the CPL Diploma course, which are relevant to the issues in dispute;
- viii. Professional credentials of all lecturers, course administrators, course designers and flight instructors associated with the delivery of the CPL Diploma;
- ix. For all flight instructors who delivered practical flight training during the CPL Diploma Course: (a) roster sheets demonstrating the days and times in which instructors were rostered to work; and (b) time sheets demonstrating the number of hours worked;
- x. Materials on file in relation to each of Soar's flight instructors that taught practical flight training during the CPL Diploma course, to the extent they are relevant to training, experience or performance;
- xi. All flight rosters demonstrating the practical flights undertaken by the representative plaintiffs during the CPL Diploma course;
- xii. All documents demonstrating the number and type of aircraft maintained by Soar associated with the delivery of the CPL Diploma course;
- xiii. All maintenance records concerning the aircraft fleet maintained by Soar associated with the delivery of the CPL Diploma course;
- xiv. All employment pathway agreements associated with the delivery of the CPL Diploma course;



- xv. All invoices sent by Soar to BHI and / or the Secretary of the Commonwealth Department of Education, Skills and Employment (as it is now known) concerning:
 - a. the CPL Diploma course; or
 - b. any payment for tuition / training fees in relation to each of the representative plaintiffs and each group member enrolled in the CPL Diploma course;
- xvi. A copy of the entire file held by Soar in relation to each of the representative plaintiffs.

H Documentation evidencing student progression through the CPL Diploma course

- i. Statements of Attainment from Soar in relation to each of the representative plaintiffs;
- ii. Statements of attainment / reports / certificates issued by the Civil Aviation Safety Authority in relation to each of the representative plaintiffs;
- iii. Copy of the student Pilot log book in relation to each of the representative plaintiffs;
- iv. Practical flight test reports in relation to each of the representative plaintiffs;
- v. Student progress / competency reports issued by Soar in relation to each of the representative plaintiffs;
- vi. All records demonstrating the steps taken by Soar to monitor, intervene and assist the representative plaintiffs who were failing to progress at a satisfactory rate through the CPL Diploma course.

I Feedback, complaints and investigations concerning the CPL Diploma course

- i. A copy of all correspondence, emails, reports, file notes and memoranda received or maintained by Soar regarding any student feedback and / or complaints made concerning the alleged deficiencies in CPL Diploma course;
- ii. Call logs or recordings of all phone calls between Soar and students of the CPL Diploma course capturing student feedback and / or complaints concerning the alleged deficiencies in the CPL Diploma course;
- iii. A copy of all correspondence, emails, reports, file notes and memoranda received or maintained by Soar concerning any incident investigated by CASA in connection with the CPL Diploma course;
- iv. A copy of all correspondence, emails, reports, file notes and memoranda received or maintained by Soar concerning any incident investigated by Recreational Aviation Australia in connection with the CPL Diploma course;



- v. A copy of all correspondence, emails, reports, file notes and memoranda received or maintained by Soar concerning any incident investigated by the Australian Transport Safety Bureau in connection with the CPL Diploma course.

J Feedback, complaints and investigations concerning the CPL Diploma course between BHI and Soar

- i. Records of communications between BHI and Soar (including any staff members of BHI and Soar) regarding any complaints about the alleged deficiencies in the CPL Diploma course;
- ii. Records of communications between BHI and Soar (including any staff members of BHI and Soar) regarding any compliance concerns in relation to the CPL Diploma course;
- iii. Records of communications between BHI and Soar (including any staff members of BHI and Soar) regarding any student feedback in relation to the CPL Diploma course;
- iv. Records of communications between BHI and Soar (including any staff members of BHI and Soar) regarding student progression in relation to the CPL Diploma course;
- v. Records of communications between BHI and Soar (including any staff members of BHI and Soar) regarding the adequacy of staff, course materials or administration in relation to the CPL Diploma course;
- vi. Records of communications between BHI and Soar (including any staff members of BHI and Soar) regarding the adequacy of aircraft and equipment, in relation to the CPL Diploma course.

K Documents to substantiate the claims made by Soar in its Defence to the ASOC filed 31 August 2020

- i. Documents evidencing the date of enrolment of the 82 group members referred to at paragraph 22.1 (a) of Soar's Defence to the ASOC filed 31 August 2020 (Soar's Defence);
- ii. All Lesson Entry Reports evidencing the post-flight debrief of the 82 group members referred to at paragraph 22.1 (a) of Soar's Defence;
- iii. All licence test reports of the 82 group members referred to at paragraph 22.1 (a) of Soar's Defence;
- iv. Documents evidencing recognition of prior learning and flight hours of the 82 group members referred to at paragraph 22.1 (a) of Soar's defence;
- v. All licence test reports referred to at paragraph 22.2(a) of Soar's defence;



- vi. All licence test reports referred to at paragraph 22.2(b) of Soar's defence;
- vii. All licence test reports referred to at paragraph 22.2(c) of Soar's defence;
- viii. All licence test reports referred to at paragraph 22.2(d) of Soar's defence;
- ix. All Lesson Entry Reports evidencing the post-flight debriefs pertaining to each flight lesson undertaken by the representative plaintiffs as referred to paragraph 26((a)(i) of Soar's defence.



ANNEXURE C

Categories of further documents to be discovered by the first defendant

A Feedback, complaints and investigations concerning the CPL Diploma course between BHI and Soar

- i. Records of communications between BHI and Soar (including any staff members of BHI and Soar) regarding any complaints about the alleged deficiencies in the CPL Diploma course;
- ii. Records of communications between BHI and Soar (including any staff members of BHI and Soar) regarding any compliance concerns in relation to the CPL Diploma course;
- iii. Records of communications between BHI and Soar (including any staff members of BHI and Soar) regarding any student feedback in relation to the CPL Diploma course;
- iv. Records of communications between BHI and Soar (including any staff members of BHI and Soar) regarding student progression in relation to the CPL Diploma course;
- v. Records of communications between BHI and Soar (including any staff members of BHI and Soar) regarding the adequacy of staff, course materials or administration in relation to the CPL Diploma course; and
- vi. Records of communications between BHI and Soar (including any staff members of BHI and Soar) regarding the adequacy or aircraft and equipment, in relation to the CPL Diploma course.

B Written course materials provided by BHI to Group Members

- i. Copies of all written course materials as delivered to each student cohort from the commencement of the CPL Diploma course until 26 March 2020 as specifically referred to at paragraphs 16.1 (a),(b) and (c) of Second Defendant's Defence to the Plaintiff's Amended Statement of Claim.



SCHEDULE OF PARTIES

S ECI 2020 01535

BETWEEN:

NERITA SOMERS

First Plaintiff

ADEL HASSANEIN

Second Plaintiff

MATTHEW LAMONT

Third Plaintiff

FELIX OULDANOV

Fourth Plaintiff

-and-

BOX HILL INSTITUTE

First Defendant

GOBEL AVIATION PTY LTD

Second Defendant

