



Federal Court of Australia

District Registry: Victoria Registry

Division: General

No: VID1252/2019

**KATHERINE PRYGODICZ** and others named in the Schedule of Parties  
Applicant

**COMMONWEALTH OF AUSTRALIA**  
Respondent

## ORDER

**JUDGE:** Justice Murphy

**DATE OF ORDER:** 31 October 2025

**WHERE MADE:** Melbourne

### THE COURT ORDERS THAT:

#### Settlement approval hearing

1. The application filed by the Applicants on 15 October 2025, for orders pursuant to s 33V of the *Federal Court of Australia Act 1976* (Cth) (**Act**) approving the proposed settlement (**Settlement Application**), be listed for hearing before the Honourable Justice Beach on **22 and 23 June 2026 (Settlement Approval Hearing)**.
2. The applications filed by the Applicants on 15 October 2025 for orders pursuant to:
  - (a) s 33K of the Act (**Section 33K Application**); and
  - (b) r 39.05(f) of the *Federal Court Rules 2011* (Cth) (the **Rules**) (**Set Aside Application**)be listed for hearing concurrently with the hearing of the Settlement Application at the Settlement Approval Hearing on **22 and 23 June 2026**.

#### Notices to group members

3. Pursuant to ss 33X and 33Y of the Act, between **24 November 2025** and **16 January 2026** (but not between 6 December 2025 and 4 January 2026), the Respondent is to send correspondence in the form of **Annexure A** to these orders (**Short Form Notice**) with or referring to the Notice of Proposed Settlement in the form of **Annexure B** to these orders (**Long Form Notice**) to Group Members, according to the following procedure and using its best endeavours:



- (a) the Respondent shall use its own resources to identify the names of all Group Members (including persons who were previously Group Members and who opted out of the proceeding and including representatives of estates of deceased group members only where those details are recorded in Services Australia's system), the myGov account details of those Group Members who have a myGov account which is in use for electronic communication by Services Australia, and (for those without such a myGov account) the last known email, SMS or postal contact details that are in use by Services Australia;
- (b) where a Group Member has a myGov account which is in use for electronic communication by Services Australia, the Respondent will cause the Short Form Notice (myGov version) and the Long Form Notice to be sent to each Group Members's myGov account; and
- (c) where a Group Member does not have a myGov account which is in use for electronic communication by Services Australia - the Respondent will send:
  - (i) the Short Form Notice (email version) to the Group Member's last known email address which is in use by Services Australia; or
  - (ii) the Short Form Notice (SMS version) to the Group Member's last known mobile phone number (by SMS) which is in use by Services Australia; or
  - (iii) the Short Form Notice (letter version) and the Long Form Notice by post to the last known postal address that is in use by Services Australia;according to the communication preferences recorded for the Group Member in Services Australia's system;
- (d) notwithstanding (b) and (c) above, the Respondent may implement a different method for directly providing notice to any particular group member where it considers it reasonable and preferable to do so; and
- (e) where a Group Member has a correspondence nominee appointed, the Respondent will use its best endeavours to send:
  - (i) the Short Form Notice; or
  - (ii) if sent via myGov or post, the Short Form Notice and the Long Form Noticeto the correspondence nominee, in accordance with the communication preferences recorded for the nominee in Services Australia's system.



4. Pursuant to ss 33X and 33Y of the Act, by **9.00am** on **24 November 2025**, the Respondent will cause the Long Form Notice to be published on the Services Australia website and Gordon Legal will cause the Long Form Notice to be published on the website of Gordon Legal.
5. Pursuant to ss 33X and 33Y of the Act, Gordon Legal are to cause a notice in the form of **Annexure C** to these orders (**Newspaper Notice**) to be published between **24 November and 5 December 2025** as follows:
  - (a) by a digital masthead homepage takeover of each of the following publications for one (1) weekday:
    - (i) The Australian (National);
    - (ii) Herald Sun (Victoria);
    - (iii) Daily Telegraph (New South Wales);
    - (iv) Courier Mail (Queensland);
    - (v) The Advertiser (South Australia);
    - (vi) Hobart Mercury (Tasmania);
    - (vii) The Canberra Times (Australian Capital Territory);
    - (viii) NT News (Northern Territory); and
    - (ix) The West Australian (Western Australia); and
  - (b) as a print half page placement in one (1) weekday edition of each of the following publications:
    - (i) The Australian (National);
    - (ii) Herald Sun (Victoria);
    - (iii) Daily Telegraph (New South Wales);
    - (iv) Courier Mail (Queensland);
    - (v) The Advertiser (South Australia);
    - (vi) Hobart Mercury (Tasmania);
    - (vii) The Canberra Times (Australian Capital Territory);
    - (viii) NT News (Northern Territory); and
    - (ix) The West Australian (Western Australia).



6. Pursuant to s 33ZF of the Act, the Short Form Notice, Long Form Notice and Newspaper Notice may be amended by one or more of the parties (with the consent of the other parties) before they are sent or published in order to correct any website, email address, telephone number or other non-substantive error or to make any minor formatting or other non-substantive change.

### **Registration to make claim in proposed settlement**

7. By **4.00pm on 21 November 2025**, Gordon Legal is to:
  - (a) establish the website portal (**Website Portal**); and
  - (b) publish the Registration Form on its website.
8. By no later than **4:00pm on 6 March 2026**, any Group Member who intends to make a claim pursuant to the settlement distribution scheme under the proposed settlement must give a Registration Form in the form of **Annexure D** to these orders to Gordon Legal by any of the following methods:
  - (a) completing the Registration Form on the Website Portal to be established by Gordon Legal; or
  - (b) emailing the completed Registration Form to [robodebt@gordonlegal.com.au](mailto:robodebt@gordonlegal.com.au); or
  - (c) providing the completed Registration Form to Gordon Legal at its registered address being:

Gordon Legal

Level 5, 500 Bourke Street

MELBOURNE VIC 3000; or
  - (d) via a teleconference with Gordon Legal, who will complete a Registration Form for the Group Member.
9. Pursuant to s 33ZF of the Act, Gordon Legal may amend the Registration Form to correct any website, email address, telephone number or other non-substantive error or to (with the consent of the Respondent) modify the privacy information in the notice. The format of the Registration Form and manner in which its contents are shown may differ as between the version on the Website Portal and the downloadable version.
10. Gordon Legal must use the methods specified in paragraph 8 to collect and record the authorisation of people who register for the purpose of the Eligibility and Categorisation Check as described in the Registration Process in the form of **Annexure E** to these orders,



and for the conduct of the Settlement Scheme (including authorisation for collection, use and disclosure of information).

11. Every 10 business days between **24 November 2025** and **13 March 2026**, Gordon Legal:
  - (a) will provide the Respondent with a list of all persons who, in the previous 10 business days, have completed Registration, and the information provided by those persons in their Registration Form; and
  - (b) in that list, will specifically identify any such persons:
    - (i) who say they are a Category 5 Group Member (and provide the name and details of the deceased Group Member to whom they are connected as provided upon Registration); or
    - (ii) who previously opted out of the proceeding and are applying for reinstatement as a Group Member.
12. At intervals between **5 January** and **14 April 2026**, the Respondent will provide Gordon Legal with Eligibility and Categorisation Check outcome information for persons who have registered (and for deceased group members in respect of whom Category 5 Group Members have registered) as described in the Registration Process and any other information which the Respondent considers is reasonably necessary to complete the Eligibility and Categorisation Check process.

### **Objections to proposed settlement**

13. By no later than **4:00pm** on **6 March 2026**, any Group Member who wishes to object to the proposed settlement must complete a Notice of Objection to Proposed Settlement in the form of **Annexure F** to these orders and provide it to Gordon Legal either by:
  - (a) emailing it to [robodebt@gordonlegal.com.au](mailto:robodebt@gordonlegal.com.au); or
  - (b) posting it to the postal address:

Gordon Legal  
Level 5, 500 Bourke Street  
MELBOURNE VIC 3000
14. By **4:00pm** on **6 March 2026**, any Group Member who wishes to provide written submissions or evidence to the Court on which the Group Member wishes to rely in objecting to the settlement, must provide any written submissions or evidence to Gordon Legal,



together with their Notice of Objection to Proposed Settlement, without prejudice to their right to file any further submissions following the Costs Referee's report.

15. By **13 March 2026**, Gordon Legal is to provide a copy of all Notices of Objection to Proposed Settlement, and any submissions, evidence or other document received from any person objecting in support of their objection, to the Court, Contradictor and Respondent.
16. Leave is granted to solicitors of the parties and the Contradictor to inspect the Court file for, and make copies of, any Notice of Objection to Proposed Settlement, any evidence or submissions and any other document provided in support of such notice.

### **Group Member reinstatement**

17. Any person who has opted out of the proceeding and wishes to be reinstated as a Group Member (subject to paragraph 21) must register and apply to be reinstated as a Group Member before **4.00pm** on **6 March 2026** by completing a Notice of Reinstatement in the form of **Annexure G** to these orders and providing it to Gordon Legal either by:
  - (a) emailing it to [robodebt@gordonlegal.com.au](mailto:robodebt@gordonlegal.com.au); or
  - (b) posting it to the postal address:

Gordon Legal  
Level 5, 500 Bourke Street  
MELBOURNE VIC 3000
18. By **13 March 2026**, Gordon Legal is to provide a copy of all Notices for Reinstatement, and any submissions, evidence or other document received from any person seeking to be reinstated as a Group Member, to the Court, Contradictor and Respondent.
19. Leave is granted to the solicitors for the parties and the Contradictor to inspect the Court file for, and make copies of, any Notice of Reinstatement and any submissions, evidence or other document provided by any person seeking to be reinstated as a Group Member.
20. Subject to further order and to paragraph 21, each application to be reinstated as a Group Member is to be determined on the papers.
21. If the Settlement Application is refused and:
  - (a) the period in which an application for leave to appeal or appeal to the Full Court against orders refusing the Settlement Application (and, if an application for leave to appeal or appeal to the Full Court is heard and determined, the period for any further application



for leave to appeal or appeal to the High Court) expires without an appeal or application for leave to appeal having been made; or

- (b) any application for leave to appeal or appeal to the Full Court against the orders refusing the Settlement Application is not allowed (or, if an application for leave to appeal or appeal against such orders to the High Court is heard and determined, that application or appeal is not allowed),

then, *nunc pro tunc*, any order reinstating a person as a Group Member pursuant to paragraphs 17 to 20 of these Orders is set aside.

## Opt Out

- 22. Any Group Member who has not previously opted out of the proceeding but who now wishes to opt out of the proceeding (subject to paragraph 24) must complete an Opt-Out Notice in the form of **Annexure H** to these orders and provide the completed Opt-Out Notice to Gordon Legal by **4:00pm** on **6 March 2026** either by:

- (a) emailing it to [robodebt@gordonlegal.com.au](mailto:robodebt@gordonlegal.com.au); or
- (b) posting it to the postal address:

Gordon Legal

Level 5, 500 Bourke Street

MELBOURNE VIC 3000

- 23. By **13 March 2026**, Gordon Legal is to file all Opt-Out Notices received from any person seeking to opt out of the proceeding with the Court and provide copies of the same to the Contradictor and Respondent.

- 24. If the Settlement Application is refused and:

- (a) the period in which an application for leave to appeal or appeal to the Full Court against orders refusing the Settlement Application (and, if an application for leave to appeal or appeal to the Full Court is heard and determined, the period for any further application for leave to appeal or appeal to the High Court) expires without an appeal or application for leave to appeal having been made; or
- (b) any application for leave to appeal or appeal to the Full Court against the orders refusing the Settlement Application is not allowed (or, if an application for leave to appeal or appeal against such orders to the High Court is heard and determined, that application or appeal is not allowed),



then, *nunc pro tunc*, any opting out by a person pursuant to paragraph 22 of these Orders is deemed not to have occurred.

### **Appointment of Contradictor**

25. Lachlan Armstrong KC and Gavin Rees are appointed as Contradictor to represent Group Members' interests and to assist the Court to perform its judicial function in relation to the Settlement Application, Set Aside Application, and Section 33K Application including:
- (a) whether the proposed settlement is fair and reasonable including having regard to the interests of Group Members who will be bound by the settlement;
  - (b) proposed deductions from the settlement for reimbursement to the lead applicants, and any funding commission payable to Omni Bridgeway (Fund 5) Lion Pty Ltd;
  - (c) in the event either party opposes the Court's adoption of the Report of the Costs Referee filed pursuant to paragraph 47 of these orders, whether the Court should adopt the Report of the Costs Referee;
  - (d) the reasonableness of the proposed Scheme Administration costs;
  - (e) whether the appointment of a scheme administrator ought to be determined following a tender process; and
  - (f) any other matter as directed by the Court.
26. In considering the question referred to in paragraph 25(e) of these orders, and for the purposes of the opinion referred to in paragraph 27 of these orders, the Contradictor must have regard to the following matters:
- (a) the overarching purpose within the meaning of s 37M of the Act;
  - (b) the nature, size, content and timetable of the proposed settlement scheme, and the attributes required of the scheme administrator to complete the scheme administration;
  - (c) the time which will be required for a tender process and the potential time savings in scheme administration that might be procured by a tender process;
  - (d) the cost of any tender process, and the potential cost savings in the scheme administration that might be procured by a tender process;
  - (e) the fact that the costs of the proposed scheme will be paid by the Commonwealth (but not out of the amount of compensation to be paid to the Applicants or Group Members);



- (f) the importance of administering the settlement with the necessary compassion and sensitivity in light of the characteristics of the cohort of Group Members, including that many Group Members are vulnerable, marginalised and economically disadvantaged;
  - (g) the particulars, including any advantages and disadvantages, of Gordon Legal's proposal to be appointed Scheme Administrator, and the potential advantages and disadvantages for scheme administration that might be procured by a tender process;
  - (h) the respective positions of the parties, to be ascertained by the Contradictor conferring with each of the parties' legal representatives;
  - (i) the remarks of the Honourable Justice Murphy, as recorded in the transcript of the hearing dated 27 October 2025, which transcript must be provided to the Contradictor by the Applicants;
  - (j) any other relevant matters.
27. By **4.00pm** on **18 February 2026**, the Contradictor file and serve an opinion addressing the question described in paragraph 25(e) of the orders (**Contradictor's opinion regarding a tender process**).
28. By **4.00pm** on **25 February 2026**, the Applicants and Gordon Legal are to file and serve any proposed orders and outline of submissions in relation to the Contradictor's opinion regarding a tender process.
29. By **4.00pm** on **4 March 2026**, the Respondent is to file and serve any proposed orders and outline of submissions in relation to the Contradictor's opinion regarding a tender process.
30. The matter be listed at 9.30am on **13 March 2026** for the Court to consider the Contradictor's opinion, hear the parties' submissions in that regard, and make any consequential orders.
31. The Contradictor may apply to the Court for the appointment of a firm of solicitors as solicitors assisting the Contradictor, if the Contradictor considers it necessary to do so.
32. The Contradictor has power to adduce evidence, make submissions, and seek information and documents in respect of the Settlement Application, Set Aside Application, and Section 33K Application. The Contradictor may seek such documents and information from Gordon Legal as they consider appropriate which, subject to appropriate confidentiality arrangements, shall be provided as soon as practicable.
33. If there is any dispute regarding the provision of the above material, each of the Contradictor, the Applicants and the Respondent have liberty to apply to the chambers of the Honourable Justice Murphy on 24 hours' notice.



34. Subject to further order, the Contradictor's reasonable costs are to be paid, in the first instance, by the Applicants within 30 days of the presentation of an invoice, with the question of where those costs ultimately fall to be reserved for the decision of the Court.

### **Settlement approval timetable**

35. By **4:00pm** on **27 March 2026**, the Applicants are to, in summary form, inform the Respondent, the Contradictor, and the Costs Referee of:
- (a) the number of group members who have registered (in this paragraph, 'registered' and 'registration' mean registration which has been verified by the Respondent or for which verification is ongoing);
  - (b) the number of Category 5 Group Members who have registered;
  - (c) the number of deceased Group Members in respect of whom a registration has been received;
  - (d) the number of people who have applied for reinstatement as a Group Member;
  - (e) the number of people who have opted-out;
  - (f) the number of people in each category (1, 2, 3A, 3B, 4 and 5 or still being verified) for the purpose of the settlement scheme;
  - (g) within each of those categories, the number of people who have indicated they intend to elect for a fixed payment and the number of people who have indicated they intend to elect for individual assessment.
36. Between **30 March** and **10 April 2026**, the Applicants and the Respondent will seek to agree any reasonably practicable variation to the proposed Settlement Scheme to shorten periods in, or streamline aspects of, the proposed Settlement Scheme (and any consequential variations) and will inform the Contradictor, and Costs Referee of the outcome of the conferral.
37. By **4.00pm** on **24 April 2026**, the Applicants file and serve any further affidavit material and an outline of submissions upon which they intend to rely in support of the Settlement Application, Set Aside Application, and Section 33K Application at the Settlement Approval Hearing (and serve any non-confidential materials), including in respect of any variation to the proposed Settlement Scheme agreed between the Applicants and the Respondent under paragraph 36 of these Orders.
38. By **4.00pm** on **24 April 2026**, Omni Bridgeway (Fund 5) Lion Pty Ltd file and serve any affidavit material and an outline of submissions upon which it intends to rely in support of the



approval of any Common Fund Order or other commission proposed to be paid to it out of the Compensation Sum, if settlement is approved.

39. Pursuant to s 37AI of the Act, any affidavit, exhibit or part thereof filed by the Applicants, Omni Bridgeway (Fund 5) Lion Pty Ltd or Gordon Legal under paragraphs 37 to 38 of these Orders in respect of which confidentiality orders are sought (**Confidential Documents**), are to highlight those parts over which confidentiality orders are sought, and are to be suppressed upon filing until further order of the Court.
40. To the extent that any Confidential Documents are only partly confidential, the Applicants, Omni Bridgeway (Fund 5) Lion Pty Ltd, and Gordon Legal shall file and serve a redacted copy of the documents, redacting only those parts that are claimed to be confidential.
41. By **4.00pm on 15 May 2026**, the Respondent file and serve any affidavit material and outline of submissions upon which it intends to rely in support of the approval of or in response to the Settlement Application, Set Aside Application, Section 33K Application or in respect of any Common Fund Orders, commissions or other payments.
42. By **4.00pm on 29 May 2026**, the Contradictor file and serve any submissions and affidavit material in relation to the Settlement Application, Set Aside Application, and Section 33K Application or in respect of any Common Fund Orders, commissions or other payments.
43. By **4.00pm on 5 June 2026**, the Applicants and Omni Bridgeway (Fund 5) Lion Pty Ltd file and serve any further affidavit material and outline of submissions in reply.

### **Costs Referee**

44. Pursuant to s 54A of the Act and subject to Court approval of the Settlement Scheme, Ms Kerrie Rosati is appointed as '**Costs Assessor**' for the purposes of Settlement Scheme.
45. Pursuant to s 54A of the Act, Ms Kerrie Rosati is appointed as a referee (**Costs Referee**) to inquire into and report to the Court (**Report**) stating, with reasons, the Costs Referee's opinion on the lump sum amount of reasonable legal costs that the Court should award in respect of the Applicants' legal costs for work done up to the hearing of the settlement approval application, including costs anticipated but yet to be incurred as at the date of the Report (**Reference**).
46. The Reference will commence forthwith and:
  - (a) the Costs Referee is to consider and implement the Reference without undue formality or delay so as to enable a just, efficient, and cost-effective resolution of the Reference. This may include enquiries by telephone and direct communication with any person



who the Costs Referee believes may have relevant information;

- (b) the Applicants' solicitors shall forthwith and without delay deliver to the Costs Referee a copy of this order; and
  - (c) the Costs Referee has power to seek information and documents in respect of the reference. The Costs Referee may seek such documents and information from Gordon Legal as they consider appropriate which, subject to appropriate confidentiality arrangements, shall be provided as soon as practicable.
47. By **4:00pm** on **10 April 2026**, the Costs Referee shall submit her Report to the Court in accordance with r 28.66 of the Rules, addressed to the chambers of the Honourable Justice Beach, and shall provide a copy of the Report to the parties and the Contradictor.
48. By **4:00pm** on **24 April 2026**, the Applicants file and serve any submissions and affidavit material upon which they intend to rely in response to the Report of the Costs Referee.
49. By **4:00pm** on **15 May 2026**, the Respondent file and serve any submissions and affidavit material upon which it intends to rely in response to the Report of the Costs Referee.
50. In the event either party opposes the Court's adoption of the Report of the Costs Referee, by **4:00pm** on **29 May 2026**, the Contradictor shall file and serve any submissions and affidavit material upon which it intends to rely in response to the opposition to the adoption of the Report.
51. By **4.00pm** on **5 June 2026**, the Applicants file and serve any further affidavit material and outline of submissions in reply in relation to the Report of the Costs Referee.
52. Subject to any further order, the costs of the Costs Referee of and incidental to the Reference be paid equally by the parties.
53. The Costs Referee may seek directions with respect to any matter arising in relation to the Reference and, for that purpose only, has leave to communicate with the Associate to the Honourable Justice Murphy without notice to the parties to the proceedings.



**Other**

54. Omni Bridgeway (Fund 5) Lion Pty Ltd and Gordon Legal have leave to intervene in relation to the Settlement Application.
55. Liberty otherwise be granted to both parties to apply on three days' notice or on such shorter notice as the Court allows.
56. Costs otherwise be reserved.
57. Such further orders as the Court thinks fit.

Date orders authenticated: 31 October 2025

*Sia Lagos*  
Registrar

Note: Entry of orders is dealt with in Rule 39.32 of the *Federal Court Rules 2011*.



## **ANNEXURE A – SHORT FORM NOTICES**

### **SHORT FORM NOTICE**

#### **MYGOV**

myGov subject line: Important notice from the Federal Court of Australia about the Robodebt class action

This message is approved by the Federal Court of Australia.

You have been identified as a group member of the Robodebt Class Action and Class Action Appeal.

There has been another settlement in the Robodebt Class Action. You may be entitled to compensation.

The Applicants in the Robodebt Class Action and Class Action Appeal who are represented by solicitors, Gordon Legal, and the Commonwealth have agreed to a second settlement in the amount of \$548.5 million. The proposed settlement will not take effect unless it is approved by the Court.

#### **What you need to do**

The terms of the proposed settlement are explained in the attached 'Notice of Proposed Settlement'. You should read the Notice carefully.

You will need to register with Gordon Legal if you want to claim compensation.

#### **More information**

If you have any questions about the proposed settlement, go to Gordon Legal's website or contact Gordon Legal by email or telephone on 1300 001 356.

Please do not call Centrelink about the proposed settlement.



## **SHORT FORM NOTICE**

### **EMAIL**

Email Subject line: Important Federal Court notice: Robodebt Class Action

This message is from Services Australia.  
Please DO NOT REPLY by email as this mailbox is not monitored.

This message is approved and sent by order of the Federal Court of Australia.

You have been identified as a group member of the Robodebt Class Action and Class Action Appeal.

There has been another settlement in the Robodebt Class Action. You may be entitled to compensation.

The Applicants in the Robodebt Class Action and Class Action Appeal who are represented by solicitors, Gordon Legal, and the Commonwealth have agreed to a second settlement in the amount of \$548.5 million. The proposed settlement will not take effect unless it is approved by the Court.

#### **What you need to do**

The terms of the proposed settlement are explained in the 'Notice of Proposed Settlement'. You can get a copy of this Notice from Gordon Legal's website or by contacting Gordon Legal.

You will need to register with Gordon Legal if you want to claim compensation.

#### **More information**

If you have any questions about the proposed settlement, go to Gordon Legal's website or contact Gordon Legal by email or telephone on 1300 001 356.

Please do not call Centrelink about the proposed settlement.



## **SHORT FORM NOTICE**

### **LETTER**

#### **Robodebt Class Action and Robodebt Class Action Appeal Notice of Proposed Settlement**

[IF DECEASED] This letter provides the estate of the late {CLIENT.FULLNAME} information about a proposed settlement and the actions required for the Robodebt Class Action and Robodebt Class Action Appeal.

This letter is approved and sent by order of the Federal Court of Australia.

You have been identified as a group member of the Robodebt Class Action and Robodebt Class Action appeal.

There has been another settlement in the Robodebt Class Action. You may be entitled to compensation.

The Applicants in the Robodebt Class Action and Class Action Appeal, who are represented by solicitors Gordon Legal, and the Commonwealth have agreed to a second settlement in the amount of \$548.5 million. The proposed settlement will not take effect unless it is approved by the Court.

#### **What you need to do**

The terms of the proposed settlement are explained in the enclosed 'Notice of Proposed Settlement'. You should read the Notice carefully.

You will need to register with Gordon Legal if you want to claim compensation.

#### **More Information**

If you have any questions about the proposed settlement, go to [www.gordonlegal.com.au](http://www.gordonlegal.com.au), or contact Gordon Legal by email at [robodebt@gordonlegal.com.au](mailto:robodebt@gordonlegal.com.au) or by telephone on 1300 001 356.

Please do not call Centrelink about the proposed settlement.



## **SHORT FORM NOTICE**

### **SMS**

Register for new Robodebt settlement. Go to the Gordon Legal website or call 1300 001 356.  
This message is approved by the Federal Court. Do not reply by SMS



## **ANNEXURE B – LONG FORM NOTICE OF PROPOSED SETTLEMENT**

### **FEDERAL COURT OF AUSTRALIA**

### **NOTICE OF PROPOSED SETTLEMENT**

**VID982/2024 Knox & Anor v Commonwealth of Australia & Ors**

**(“Robodebt Class Action Appeal”)**

**and**

**VID1252/2019 Prygodicz & Ors v Commonwealth of Australia**

**(“Robodebt Class Action”)**

**This notice has important information you need to know about a proposed \$548.5 million settlement of the Robodebt Class Action Appeal and the Robodebt Class Action.**

**It has been sent to you because you are a Group Member and you may be entitled to receive compensation.**

**To claim compensation, you must register by 6 March 2026. See Section N of this notice for information about how to register. If you do not register by 6 March 2026, you will not be entitled to claim compensation.**

**You should read this notice carefully, because your legal rights may be affected by the proposed settlement, even if you do not register.**

**If you do not understand the information in this notice or need help, you should contact the Applicants’ solicitors, Gordon Legal at [robodebt@gordonlegal.com.au](mailto:robodebt@gordonlegal.com.au) or 1300 001 356 or seek independent legal advice from another lawyer.**

### **WHY IS THIS NOTICE IMPORTANT?**

1. You are receiving this notice (or have been asked to review this notice) because you have been identified as a Group Member (or former Group Member) in the Robodebt Class Action and Robodebt Class Action Appeal. This notice has been issued pursuant to orders of the Federal Court of Australia (**Court**). It contains important information about a proposed settlement including:



- a. the key terms of the proposed settlement;
  - b. whether you are eligible to receive compensation from the settlement fund and what you **must** do to receive it; and
  - c. what you need to do if you wish to object to the proposed settlement or to any aspect of it.
2. Any questions concerning the matters contained in this notice should not be directed to the Court or Services Australia (Centrelink). You should contact the Applicants' solicitors, Gordon Legal at [robodebt@gordonlegal.com.au](mailto:robodebt@gordonlegal.com.au) or 1300 001 356 or seek independent legal advice from another lawyer.

### WHAT IS A CLASS ACTION?

3. A class action is a legal proceeding brought by one or more persons (called the **applicant/s**) on their own behalf and on behalf of a class of people (called **Group Members**), where the applicant/s and the Group Members have similar claims against another person/s (called the **respondent/s**).
4. Group Members are bound by any judgment or settlement in the class action, unless they have opted out of the proceeding. This means that:
  - a. if the class action is successful, Group Members may be eligible for the benefit of any settlement or order of the Court;
  - b. if the class action is unsuccessful, Group Members are bound by that result; and
  - c. regardless of the outcome, a Group Member **cannot** pursue claims against the respondent in separate legal proceedings if those claims were brought in the class action proceeding, unless the Group Member has opted out of the class action.

### WHAT IS THE ROBODEBT CLASS ACTION?

5. In 2019, a class action was commenced by Katherine Prygodicz and others (the **Prygodicz Applicants**), on behalf of all Group Members, against the Commonwealth of Australia, the legal entity responsible for Centrelink. That class action was known as the **Robodebt Class Action** or the **Prygodicz Proceeding**.
6. The Robodebt Class Action alleged that, since 1 July 2015, Centrelink had sent to Group Members a notification (including by postal mail, email, 'myGov' or 'Centrelink Express'):
  - a. referring to a difference between the income information obtained by Centrelink from the Australian Taxation Office (**ATO**) and that used by Centrelink in assessing the entitlements to certain social security payments; and
  - b. requesting, requiring or reminding the recipient to check, confirm, or update employment income information (**Robodebt Notification**).



7. The Robodebt Class Action also alleged that, by or following a Robodebt Notification, the Commonwealth asserted that there was an overpayment of one or more specified social security payments, which were recoverable by the Commonwealth as a debt (**Asserted Overpayment Debt**). Where the Asserted Overpayment Debt was partly or wholly raised by or based upon averaged ATO income information used to calculate a person's fortnightly income, without evidence of the frequency or regularity with which income was earned, the debt was a **Robodebt-raised Debt**.
8. Following a Robodebt Notification and the assertion of a Robodebt-raised Debt, Group Members, in many cases, either:
  - a. paid;
  - b. had paid on their behalf; or
  - c. had recovered from them (by, for example, demands from debt collectors, or having had their tax returns garnished)

amounts for these claimed overpayments. The Robodebt Class Action alleged that Centrelink had no right to demand or recover any part of these Robodebt-raised Debts, and that in doing so, the Commonwealth had been unjustly enriched, and/or had been negligent.

9. In 2020, the parties to the Robodebt Class Action agreed to settle the proceeding without a trial. The Court approved the settlement of the Robodebt Class Action on 11 June 2021. Settlement payments were made to eligible Group Members in 2022.

#### **WHAT IS THE ROBODEBT CLASS ACTION APPEAL?**

10. In 2024, Nathan Knox and David Mandell (the **Knox Applicants**) applied to the Court on behalf of Group Members, seeking an extension of time to commence an appeal from the orders approving the settlement of the Robodebt Class Action (the application being the **Robodebt Class Action Appeal** or the **Knox Proceeding**).
11. The Knox Applicants' position was that the settlement of the Prygodicz Proceeding did not adequately compensate people for the harm caused by the Robodebt System in light of what became known after the settlement. Specifically, at the time of the settlement, Group Members (and their lawyers) did not have access to important evidence that was produced to the Royal Commission into the Robodebt Scheme because it was not relevant to the claim made in the Robodebt Class Action. Having regard to this further evidence, the Knox Applicants believed that the settlement of the Prygodicz Proceeding was not fair and reasonable.
12. The purpose of the Robodebt Class Action Appeal was to obtain orders from the Court setting aside the settlement of the Prygodicz Proceeding which would allow new claims to be made in that proceeding. If those new claims were successful, additional compensation might have been payable to Group Members.

#### **THE PROPOSED KNOX SETTLEMENT**



13. The parties have reached an agreement to settle the Robodebt Class Action and the Robodebt Class Action Appeal.
14. Under the proposed Knox settlement, the Commonwealth has agreed that it will pay \$548,500,000 (**Settlement Sum**) comprising the following amounts:
  - a. an amount of \$475,000,000 to compensate eligible Group Members (**Compensation Sum**);
  - b. an amount not exceeding \$13,500,000 (inclusive of GST) in full and final satisfaction of the Applicants' professional fees and disbursements incurred in the course of the Robodebt Class Action Appeal and to be incurred in the Robodebt Class Action (**Legal Costs Sum**); and
  - c. an amount not exceeding \$60,000,000 (inclusive of GST) in respect of the costs of administration of the Settlement Scheme (**Administration Costs Sum**).
15. The Applicants and Omni Bridgeway (the litigation funder) will seek the Court's approval of the Compensation Sum being divided as follows:
  - a. \$403,550,000 (plus any interest which accrues on that amount) to be available to pay the claims of eligible Group Members;
  - b. \$71,250,000 to be paid as a Funding Commission (described at paragraphs 44 to 51 below); and
  - c. \$200,000 to be paid (in total) to the eight individual Knox Applicants and Prygodicz Applicants to reimburse them for their time and out-of-pocket expenses in performing their role as representatives of Group Members.
16. The Settlement Sum of \$548,500,000 is in addition to amounts already paid to Group Members in the Prygodicz Proceeding, Asserted Overpayment Debts previously repaid to Group Members and amounts previously claimed by the Commonwealth in the Prygodicz Proceeding which the Commonwealth agreed as part of that settlement not to pursue. The Commonwealth will not seek to recover sums paid to Group Members pursuant to the original settlement of the Robodebt Class Action or to recover invalid debts.
17. The parties have also agreed that:
  - a. the proposed settlement is without any admission by the Commonwealth as to any liability;
  - b. an amount not exceeding \$200,000 in total, and subject to the approval of the Court, will be deducted from the Compensation Sum to reimburse each of the eight individual Knox Applicants and Prygodicz Applicants for their time and out-of-pocket expenses in performing their role as representatives of Group Members.
18. The proposed settlement requires Court approval to be effective. The Court will decide whether to approve the settlement at a hearing to be held over two days, commencing at



**10.15am on 22 June 2026** in the Federal Court of Australia, in Melbourne. You can attend the hearing if you want to. Further details about the hearing are provided below.

19. The proposed settlement includes a scheme for the distribution of the Compensation Sum (**Settlement Scheme**), which will be considered as part of the Court approval process.

#### **CURRENT COURT APPLICATIONS**

20. The Applicants, with the consent of the Commonwealth, have applied to the Court for:

- a. approval of the settlement, in such a way that it replaces the Court's previous settlement approval of the Robodebt Class Action in June 2021, but without affecting the payments made under the old settlement scheme;
- b. Category 5 Group Members to be added as Group Members only if they chose to register in the Prygodicz Proceeding (so that they can participate in the settlement);
- c. opportunity for those who previously opted out of the Robodebt Class Action to apply to be reinstated as Group Members (if they wish to participate in the new settlement, but they will not be able to participate in the first settlement scheme); and

21. The Court will decide whether to approve the settlement, and make the other approvals above, at the hearing to be held over two days, commencing at **10.15am on 22 June 2026**.

22. If the Court grants the approvals:

- a. the Settlement Scheme will proceed;
- b. Category 5 Group Members who have registered in the Prygodicz Proceeding will be entitled to participate in the Settlement Scheme and will be bound by the terms of the proposed settlement;
- c. those who previously opted out of the Robodebt Class Action but who are approved to be reinstated as Group Members will be entitled to participate in the new Settlement Scheme and will be bound by the terms of the proposed settlement, but will not be able to participate in the first settlement scheme;
- d. all other Group Members will be entitled to participate in the Settlement Scheme and will be bound by the terms of the proposed settlement (unless they opt-out);
- e. those who opt-out (or, for those who previously opted-out of the Robodebt Class Action who do not request to be reinstated) will not be entitled to participate in the Settlement Scheme and will not be bound by the terms of the proposed settlement; and
- f. at the conclusion of the Settlement Scheme, the Robodebt Class Action and Robodebt Class Action Appeal will be discontinued or dismissed.



23. If the Court does not grant the approvals after the hearing commencing at **10.15am** on **22 June 2026**:

- a. the Settlement Scheme will not occur and there will be no distribution of payments to Group Members;
- b. no Category 5 Group Members will be able to opt in;
- c. those who previously opted out of the Robodebt Class Action will not be reinstated as Group Members;
- d. all other Group Members will remain Group Members in the Robodebt Class Action and Robodebt Class Action Appeal;
- e. the Applicants may seek to continue the Robodebt Class Action Appeal on behalf of the Group Members.

#### **THE KNOX SETTLEMENT SCHEME**

24. **To participate in the Settlement Scheme, you must register and make a claim, as explained below.**

25. Under the Settlement Scheme, the Scheme Administrator will assess and, where a claim is established, pay the claims of eligible Group Members as described below.

26. Group Members may fall into (one or more of) the five different categories (**Categories**). A Group Member may fall into multiple Categories because they had multiple debts. The Categories are as follows:

- a. **Category 1 Group Member:** means a Group Member whose Asserted Overpayment Debt(s) was partly or wholly a Robodebt-raised Debt, no part of which Asserted Overpayment Debt has been received or recovered by the Commonwealth.
- b. **Category 2 Group Member:** means a Group Member whose Asserted Overpayment Debt(s) was wholly a Robodebt-raised debt, part or all of which has been recovered or received by the Commonwealth.
- c. **Category 3(a) Group Member:** means a Group Member whose Asserted Overpayment Debt(s) was initially a Robodebt-raised Debt, was then recalculated other than on the exclusive basis of averaged ATO income information, and the recalculated debt was less than the amount recovered or received by the Commonwealth.
- d. **Category 3(b) Group Member:** means a Group Member whose Asserted Overpayment Debt(s) was initially a Robodebt-raised Debt, was then recalculated other than on the exclusive basis of averaged ATO income information, and the recalculated debt was equal to or more than the amount recovered or received by the Commonwealth.



- e. **Category 4 Group Member:** means a Group Member whose Asserted Overpayment Debt was neither wholly nor partly a Robodebt-raised debt but which was determined and asserted by the Commonwealth based upon income information provided by or on behalf of the Group Member in response to a Robodebt Notification.
  - f. **Category 5 Group Member:** means a Group Member who (a) was in a close personal relationship with a deceased Category 1 Group Member, Category 2 Group Member, Category 3(a) Group Member or Category 3(b) Group Member at the time of the death of the latter person, where the assertion of a Robodebt-raised Debt materially contributed to the death of the latter person; and (b) who has suffered a recognised psychiatric illness or condition which has been materially contributed to by the death of the latter person; and (c) who registers in to the Prygodicz Proceeding by **6 March 2026**.
27. Category 5 Group Members will be required to complete a Registration Form and to satisfy the Scheme Administrator that they fall within the terms of that category.
28. All persons who register will be asked whether they want to request a “**Fixed Payment**” or to have an “**Individual Assessment**” of their claim by the Scheme Administrator. They must choose how to claim by giving a Notice of Election to the Scheme Administrator.
29. A Group Member’s Category determines the type of Fixed Payment (if any) they are eligible for.
30. People who are only Category 4 Group Members are not able to make any claim but are bound by the settlement. The explanation below applies to all other Group Members.
31. The precise amount of each type of Fixed Payment is not yet known and will be decided at the time that the Court considers whether to approve the proposed settlement. For those who choose the fixed payment process it is presently intended that the Applicants will ask the Court to determine the amount of the proposed Fixed Payments within the following ranges:
- a. Category 2 Group Members and Category 3(a) Group Members: between \$750 and \$1750 (**Fixed Payment A**).
  - b. Category 1 Group Members and Category 3(b) Group Members: between \$350 and \$1000 if they can provide sufficient evidence that the Robodebt-raised Debt caused or contributed to financial loss (other than the Debt itself and interest on it) or compensable non-financial loss (such as a personal injury) (**Fixed Payment B**).
32. Category 5 Group Members are not eligible for a Fixed Payment and must request an Individual Assessment.
33. Any eligible person who requests an Individual Assessment, must give a Notice of Claim to the Scheme Administrator. Their claim will be assessed by the Scheme Administrator, who will apply applicable legal principles and the following claims assessment principles



(which will prevail over the common law principles and, insofar as permitted by law, over any statute):

- a. **Balance of probabilities:** Where the Scheme Administrator must decide facts, they will do so on the balance of probabilities.
- b. **Financial loss:** Compensation will be available if a person can show that a Robodebt-raised Debt materially contributed to their financial loss. For the Settlement Scheme, financial loss does not include the Robodebt-raised Debt itself or any interest on it (because those types of loss have already been addressed).
- c. **Non-economic loss consequential on financial loss:** Compensation of up to \$20,000 will be available to persons who can show that they have suffered non-economic loss (other than from personal injury), including distress and inconvenience, which is consequential on a financial loss referred to in sub-paragraph b above. Each Category 2 Group Member and Category 3(a) Group Member will be assumed to have suffered economic loss for this kind of loss.
- d. **Personal injury including a recognised psychiatric illness or condition:** Compensation of up to \$50,000 will be available to persons who can show that they have suffered loss arising from personal injury, including physical injury or a recognised psychiatric illness or condition (including the material aggravation of a pre-existing psychiatric illness or condition), to which a Robodebt-raised Debt materially contributed. Supporting material from a medical practitioner must also be provided. For claims for a psychiatric illness or condition, the illness or condition must also amount to a recognised psychiatric illness or condition.
- e. **Aggravated damages:** Compensation akin to aggravated damages will be available if a person can show that specific aspects of the assertion of a Robodebt-raised debt significantly contributed to the aggravation of their harm and the compensation akin to aggravated damages claimed is of the type available in accordance with ordinary common law principles.
- f. **Compensation by way of interest:** Compensation by way of interest (or interest) will be available in accordance with ordinary common law principles and/or statute.
- g. **No double compensation:** There will be no double compensation (that is, multiple amounts being allowed as compensation for the same harm), in accordance with ordinary common law principles.
- h. **Claims by estates/legal personal representatives:** Estates or legal personal representatives of a deceased Group Member may make claims relating to the forms of loss set out in sub-paragraphs b-e above suffered by the deceased Group Member. In addition, reasonable expenses of the funeral and burial arrangements of the deceased Group Member will be available if the death of the Group Member was materially contributed to by the assertion of a Robodebt-raised Debt.



- i. **Persons in a close personal relationship with a deceased Group Member (Category 5):** Compensation for Category 5 Group Members will be available where: a Category 1 Group Member, Category 2 Group Member, Category 3(a) Group Member or Category 3((b) Group Member has died (the **deceased Group Member**); the Category 5 Group Member was in a close personal relationship with the deceased Group Member; the death of the deceased Group Member was materially contributed to by the assertion of a Robodebt-raised Debt; and the Category 5 Group Member has suffered a recognised psychiatric illness or condition that was materially contributed to by the death of the deceased Group Member; and the loss relates to the recognised psychiatric illness or condition.
34. The amount which an eligible person who claims via Individual Assessment may receive depends on the total amounts claimed by all eligible persons and is subject to the caps mentioned above. It may be less than the actual amount of their loss.
35. Group Members who are dissatisfied with the initial decision made by the Scheme Administrator following an Individual Assessment may request that their claim be re-assessed by the Scheme Administrator.
36. A copy of the proposed Settlement Scheme, which provides further detail, is available to download from Gordon Legal's website at: <https://www.gordonlegal.com.au/>.

#### **LEGAL COSTS AND DEDUCTIONS FROM THE SETTLEMENT SUM**

37. The Scheme Administrator will not require a Group Member to pay any out-of-pocket or other costs to participate in the settlement scheme, but a Group Member might incur some costs, such as when gathering evidence to support their claim.

#### **Legal costs and lead applicant payments**

38. The Court will be asked to approve the reasonable legal costs and disbursements incurred by the Knox Applicants and the Prygodicz Applicants up to an amount of \$13,500,000 (inclusive of GST).
39. This includes all professional legal fees and disbursements incurred in the Robodebt Class Action Appeal to date and the estimated future costs for the approval of the proposed settlement. The Prygodicz Applicants have already been reimbursed in respect of the legal costs and disbursements incurred in the Prygodicz Proceeding up to and including the original settlement and those costs and disbursements will not be deducted from the Settlement Sum.
40. The Court will also be asked to approve payments of at most \$25,000 to each of the Knox Applicants and Prygodicz Applicants, \$200,000 in total, for their time and effort as lead applicants. If approved, this amount will be deducted from the Compensation Sum.

#### **Administration Costs**

41. The Court will be asked to approve an amount of up to \$60,000,000 (inclusive of GST) for settlement administration costs.



42. This includes all the costs involved in administering the Settlement Scheme, assessing claims and distributing the Compensation Sum to Group Members.
43. The Court will decide who to appoint as Scheme Administrator. The Prygodicz Applicants and the Knox Applicants will ask the Court to appoint Gordon Legal as the Scheme Administrator as part of the application for approval of the proposed settlement. The Commonwealth has not agreed with Gordon Legal that it be the Scheme Administrator.

#### **Payment to the Funder**

44. The legal fees incurred by the Knox Applicants in the Robodebt Class Action Appeal and the potential adverse costs liabilities, have been jointly funded by Gordon Legal partly on a no win no fee basis and by a litigation funder, Omni Bridgeway (Fund 5) Lion Pty Ltd (the **Funder**).
45. Under the Litigation Funding Agreement entered into between the Funder, the Knox Applicants, and certain Group Members, the Funder is entitled to be paid a funding commission of 20% of any settlement or judgment sum, subject to Court approval.
46. At the settlement approval hearing, the Prygodicz Applicants and the Knox Applicants will ask the Court to make a Common Fund Order (**CFO**). A CFO is an order of the Court that provides for the Funder to receive a percentage of any settlement or judgment sum that the Court considers fair and reasonable, which is deducted from the settlement or judgment sum before distribution to Group Members. If a CFO is made, all Group Members will contribute to the Funder's funding commission.
47. Notwithstanding the 20% rate agreed by funded group members, it is intended that the Court will be asked to make a CFO providing for the Funder to be paid \$71,250,000, being 15% of the Compensation Sum, or a lesser amount that the Court considers to be just.
48. The CFO (if ordered) compensates the Funder for the full risks associated with funding the Robodebt Class Action Appeal and agreeing to fund the reopened Robodebt Class Action, had the Robodebt Class Action Appeal been successful. Those risks include likely adverse costs had the case been unsuccessful.
49. The Court will decide whether the CFO is appropriate and, if so, the amount to be paid to the Funder (**Funding Commission**). This amount will be deducted from the Compensation Sum prior to settlement payments being distributed to eligible persons.
50. The estimated potential distribution amounts set out in this notice at paragraphs 31 (potential value of Fixed Payments) and 33 (compensation caps) above have been calculated on the assumption (among other matters) that the Court approves a Funding Commission of up to 20% of the Compensation Sum.
51. The Funder and Gordon Legal had agreed that, if permitted to do so by the Court, between 0% and 25% of the Funding Commission approved by the Court will be paid to Gordon Legal. However, Gordon Legal has elected to waive any entitlement under that agreement and will not claim a share of any Funding Commission approved by the Court.



## **CATEGORIES OF GROUP MEMBERS AND WHAT THE PROPOSED SETTLEMENT MEANS**

52. If the settlement is approved by the Court, \$475,000,000 (less the amounts paid to the Knox Applicants, the Prygodicz Applicants, and the Funding Commission), plus any interest which accrues on the Compensation Sum, will be made available to be paid to eligible Group Members.
53. The amount that an eligible Group Member might be eligible to receive will depend, in part, on their Category.
54. The table below explains how the proposed settlement will apply to each Category of Group Member:

<b>Category</b>	<b>What the proposed settlement means for this category</b>
<b>Category 1</b>	Category 1 Group Members may elect to pursue a Fixed Payment B or claim via an Individual Assessment.  Category 1 Group Members will only be entitled to a Fixed Payment B if they satisfy the Scheme Administrator, on the balance of probabilities, that they have suffered additional financial or compensable non-financial loss that was materially contributed to by the assertion of a Robodebt-raised Debt.
<b>Category 2</b>	Category 2 Group Members may elect to receive a Fixed Payment A or claim via an Individual Assessment.
<b>Category 3(a)</b>	Category 3(a) Group Members may elect to receive a Fixed Payment A or claim via an Individual Assessment.
<b>Category 3(b)</b>	Category 3(b) Group Members may elect to pursue a Fixed Payment B or claim via an Individual Assessment.  Category 3(b) Group Members will only be entitled to a Fixed Payment B if they satisfy the Scheme Administrator, on the balance of probabilities, that they have suffered financial or compensable non-financial loss that was materially contributed to by a Robodebt-raised Debt.
<b>Category 4</b>	Category 4 Group Members will be bound by the proposed settlement but are not eligible to make a claim.
<b>Category 5</b>	Category 5 Group Members will not be entitled to a Fixed Payment and will be required to claim via an Individual Assessment.

## **WHAT CATEGORY OF GROUP MEMBER AM I?**

55. If you are a Group Member - other than a Category 5 Group Member or a Group Member who opted out of the Robodebt Class Action, you will have received a communication from the Commonwealth following approval of the first Robodebt Class Action settlement (in 2021 or 2022) as to which category you come within.
56. In general terms:



- a. Group Members in categories 2 and 3(a) did receive a payment as part of the first Robodebt Class Action settlement;
- b. Group Members in categories 1, 3(b) and 4 did not receive a payment as part of the first Robodebt Class Action settlement.

57. If you believe you are a Category 5 Group Member, you will be required to register your claim with Gordon Legal by completing a Registration Form and show that you fall within the terms of that Category to make a claim.

58. Group Members may fall within the definition of more than one Category if they had more than one Robodebt-raised Debt. If the proposed settlement is approved, a Group Member will be given a single Category by reference to the Category for which that Group Member would receive the highest amount from the Settlement Sum if the Group Member received a Fixed Payment. For example, if a Group Member is in both categories 1 and 2, they will be given category 2 for the purpose of the Settlement Scheme.

#### **AM I ELIGIBLE TO PARTICIPATE IN THE PROPOSED SETTLEMENT?**

59. Under the proposed settlement, Group Members, as well as the estates or legal personal representatives of deceased Group Members, may be eligible to participate in the Settlement Scheme.

60. The Court has made orders that only those persons who register with Gordon Legal by **6 March 2026 (Registered Group Members)** can participate in the Settlement Scheme. This includes that Category 5 Group Members and people who apply for reinstatement as a Group Member do need to register if they wish to participate.

61. Further information about the options available to Group Members is set out in section **L** below.

#### **WHAT ARE MY OPTIONS?**

62. Group Members have four (4) options:

- a. **Option 1:** Register with Gordon Legal as a Registered Group Member by **6 March 2026**. More information about how to Register with Gordon Legal is in section **N** below.
- b. **Option 2:** Opt Out of the Robodebt Class Action and Robodebt Class Action Appeal and take no part in the Settlement Scheme. By opting out, you will cease to be a Group Member in the Robodebt Class Action and Robodebt Class Action Appeal. More information about how to lodge an Opt Out Notice is in section **O** below.
- c. **Option 3:** Register with Gordon Legal as a Registered Group Member and lodge a Notice of Objection to the proposed settlement. You should do this if you do not want the proposed settlement to go ahead. More information about how to lodge a Notice of Objection is in section **P** below.



- d. **Option 4:** Do nothing – if you do nothing, and the proposed settlement is approved by the Court, you will not be entitled to participate in the Settlement Scheme and will be bound by the proposed settlement. This means that a Group Member who does not Register as a Registered Group Member in accordance with Option 1 or 3 will not be able to have their claim assessed, either as part of the proposed settlement or otherwise.

63. If you have previously opted out of the Robodebt Class Action by filing an opt-out notice with the Court, you are no longer a Group Member and will need to lodge a Notice of Reinstatement as a Group Member and Register with Gordon Legal if you wish to participate in the Settlement Scheme. More information about how to lodge a Notice of Reinstatement as a Group Member is in section **Q** below.

#### **HOW DO I BECOME A CATEGORY 5 GROUP MEMBER?**

64. If you are a Category 5 Group Member and wish to participate in the proposed settlement, you can indicate your decision to participate by completing the Registration Form. The Court will consider any requests to participate as a Category 5 Group Member when it considers whether to approve the proposed settlement at the hearing commencing at **10.15am on 22 June 2026** at the Federal Court of Australia.

65. Further information about how to Register is provided in section **N** below.

#### **HOW DO I BECOME A REGISTERED GROUP MEMBER?**

66. Only Registered Group Members will be eligible to participate in the proposed settlement.

67. To become a Registered Group Member, you must complete a Registration Form and return it to Gordon Legal by **6 March 2026**.

68. The Registration Form can be submitted by:

- a. completing the online Registration Form at: [www.robodebtsettlement.com.au](http://www.robodebtsettlement.com.au);
- b. downloading a copy of the Registration Form from the website of Gordon Legal (or requesting the Registration Form from Gordon Legal) and sending it by email to [robodebt@gordonlegal.com.au](mailto:robodebt@gordonlegal.com.au) or by post to the office of Gordon Legal, contact details for which are available from [www.gordonlegal.com.au](http://www.gordonlegal.com.au);
- c. completing the Registration Form during a teleconference with Gordon Legal.

69. If you are having difficulties completing the Registration Form, please contact Gordon Legal on 1300 001 356 or seek independent legal advice.

70. As part of the registration process you will need to provide consent to the collection, use and disclosure of your personal information, including by Gordon Legal, the Scheme Administrator and the Commonwealth, during the registration process and during the administration of the settlement scheme.



71. As part of the registration process, anyone acting on behalf of a group member or on behalf of an estate or as legal personal representative for a deceased group member, will need to demonstrate that they have authority to act in that capacity.

### **HOW DO I OPT OUT?**

72. If you do not wish to be bound by the settlement, you can opt out of the proceedings by sending a completed Notice of Opting Out by a Group Member (**Annexure B**) by **6 March 2026** to Gordon Legal, who will then provide the notice to the Court and the Commonwealth. The Notice of Opting Out by a Group Member can be provided to Gordon Legal by:

**Email:** robodebt@gordonlegal.com.au

**Post:** Gordon Legal  
Level 5, 500 Bourke Street  
MELBOURNE VIC 3000

73. Group Members who complete a Notice of Opting Out by a Group Member will not be bound by the outcome of the Robodebt Class Action Appeal and will not be entitled to receive any compensation under the proposed settlement.

### **HOW DO I LODGE A NOTICE OF OBJECTION TO THE PROPOSED SETTLEMENT?**

74. If you want to ask the Court not to approve the settlement, you must send a completed copy of the Notice of Objection (**Annexure A**) by **6 March 2026** to Gordon Legal, who will then provide the notice to the Court and to the Commonwealth. The Notice of Objection can be provided to Gordon Legal by email or post as follows:

**By email:** robodebt@gordonlegal.com.au

**By post:** Gordon Legal  
Level 5, 500 Bourke Street  
MELBOURNE VIC 3000

75. The Court will consider any objections submitted by Group Members when it considers whether to approve the proposed settlement at the hearing commencing at **10.15am** on **22 June 2026** in the Federal Court of Australia located at Owen Dixon Commonwealth Law Courts Building, 305 William Street, Melbourne, Victoria
76. If you think you might want to object to the proposed settlement or any aspect of it, you may want to get independent legal advice now (this cannot be from Gordon Legal).
77. If you want to, you can file written submissions with the Court, which further explain the reasons why you object to approval of the proposed settlement, and any evidence upon



which you rely by **6 March 2026**. Written submissions and any evidence should be in approved Court forms. You are entitled to get an independent lawyer to help you.

78. You can also attend, or send a representative to, the hearing commencing at **10.15am** on **22 June 2026** when the Court will consider whether to approve the settlement and you or your representative may request permission from the Court to make oral submissions in support of your objection. The hearing will take place in the Federal Court of Australia located at Owen Dixon Commonwealth Law Courts Building, 305 William Street, Melbourne, Victoria. Information about how to attend will be available on the Court's website, and may include options to attend online or by telephone.

### **HOW DO I LODGE A NOTICE OF REINSTATEMENT AS A GROUP MEMBER?**

79. If you opted out of the Robodebt Class Action, you are no longer a Group Member. If you are not a Group Member, you cannot participate in the proposed settlement.
80. Group Members who have previously filed an opt out notice with the Court but who wish to participate in the proposed settlement can do so by lodging a Notice of Reinstatement as a Group Member (**Annexure C**) and registering with Gordon Legal by following the instructions in section **N** above.
81. Any Notice of Reinstatement as a Group Member must be submitted to Gordon Legal by no later than **6 March 2026**. Gordon Legal will then provide the Notices of Reinstatement as a Group Member it receives to the Court and to the Commonwealth. The Notice of Reinstatement as a Group Member can be provided to Gordon Legal by email or post as follows:

**By email:**     [robodebt@gordonlegal.com.au](mailto:robodebt@gordonlegal.com.au)

**By post:**     Gordon Legal  
  
                    Level 5, 500 Bourke Street  
  
                    MELBOURNE VIC 3000

82. The Court will consider any applications to be reinstated as a Group Member when it considers whether to approve the proposed settlement at the hearing commencing at **10.15am** on **22 June 2026** at the Federal Court of Australia.

### **WHAT IS THE PROCESS FOR THE COURT TO APPROVE THE SETTLEMENT?**

83. The Court will decide whether to approve the settlement at a hearing to be held over two days, commencing at **10.15am** on **22 June 2026** in the Federal Court of Australia located at Owen Dixon Commonwealth Law Courts Building, 305 William Street, Melbourne, Victoria. You can attend that hearing if you wish to. Information about how to attend will be available on the Court's website and may include options to attend online or by telephone.



84. At that hearing, the Court will consider any evidence and submissions from the Applicants and the Commonwealth. The Court must decide whether the proposed settlement is fair and reasonable in the interests of Group Members who will be bound by the settlement.
85. If the Court decides the proposed settlement is fair and reasonable in the interests of group members, the Court will approve the proposed settlement under s 33V of the *Federal Court of Australia Act 1976* (Cth).

#### **RELEVANT DOCUMENTS AND FURTHER INFORMATION**

86. Copies of certain documents filed in the Robodebt Class Action and the Robodebt Class Action Appeal, as well as a copy of the Deed of Settlement and the Settlement Distribution Scheme, can be obtained by:
- a. downloading them from Gordon Legal's website at: <https://www.gordonlegal.com.au>;
  - b. inspecting them between 9.00am and 5.00pm at the office of Gordon Legal, contact details for which are available from [www.gordonlegal.com.au](http://www.gordonlegal.com.au) or by calling 1300 001 356; or
  - c. visiting a District Registry of the Federal Court in Sydney, Canberra, Melbourne, Brisbane, Adelaide, Perth, Hobart or Darwin and paying the appropriate inspection fee. The addresses for these registries are available at [www.fedcourt.gov.au](http://www.fedcourt.gov.au).
87. If there is anything of which you are unsure, you should check Gordon Legal's website for more information. You can also call Gordon Legal on 1300 001 356 or email [robodebt@gordonlegal.com.au](mailto:robodebt@gordonlegal.com.au) or seek your own legal advice.



**ANNEXURE A NOTICE OF OBJECTION TO PROPOSED SETTLEMENT**

**ROBODEBT CLASS ACTION AND ROBODEBT CLASS ACTION APPEAL**

Complete this form if you wish to object to the proposed settlement or any aspect of it.

Your Notice of Objection will be considered by the Court when it is determining whether or not to approve the proposed settlement.

**If you wish to object to the proposed settlement, or any aspect of it, your Notice of Objection must be received by Gordon Legal by 4.00pm (AEST) on 6 March 2026.**

**Any objection received after this time may not be accepted.**

**If you do NOT wish to object to the proposed settlement, you do NOT need to return this form.**

**To:** Gordon Legal

**By email to:** robodebt@gordonlegal.com.au

**OR**

**By post to:** Gordon Legal  
Level 5, 500 Bourke Street  
MELBOURNE VIC 3000

The person identified below gives notice that the person **OBJECTS** to the proposed settlement of the Robodebt Class Action and Robodebt Class Action Appeal.

**A YOUR INFORMATION**

Your full name (including any middle names):	
Customer Reference Number (CRN):	
Date of birth:	
Postal address (including post code):	
Residential address (including post code) if different to postal address:	



Email address:	
Telephone number:	
Previous contact details (if your contact details are not current with Services Australia and were different in 2022, please provide previous contact details).	

**B IF YOU ARE REPRESENTING A GROUP MEMBER OR A DECEASED ESTATE**

Your full name (including any middle names):	
Your postal address (including postcode):	
Your email address:	
Your telephone number:	
Capacity in which you represent Group Member or deceased estate:	
Full name of Group Member (including any middle names):	
Customer Reference Number (CRN) of Group Member:	
Date of birth of Group Member:	
Postal address of Group Member (including post code):	
Residential address of Group Member (including post code) if different to postal address:	
Email address of Group Member:	
Telephone number of Group Member:	
Previous contact details of Group Member (if their contact	



details were different in 2022, please provide previous contact details).	
---	--

### **C      GROUNDS OF OBJECTION**

My submissions in support of my objection to the proposed settlement are as follows [set out in the space below any submissions you wish to make, attach additional pages if necessary]:

--

### **D      ATTENDANCE AT HEARING ON 22 AND 23 JUNE 2026 AT 10.15AM (AEST)**

<input type="checkbox"/> I intend to appear before the Court at the hearing commencing at <b>10.15am</b> on <b>22 and 23 June 2026</b> (AEST). You may appear by video or telephone. Arrangements for appearances will be published by the Court on the day prior to the hearing.  [If you intend to appear, please complete the following]:  <input type="checkbox"/> I will appear on my own behalf.  <input type="checkbox"/> I will be represented by a lawyer: _____
<input type="checkbox"/> I do not intend to appear, but wish for my submissions to be considered in my absence.

Signed:	
Name of person signing:	



Date:	
-------	--



**ANNEXURE B NOTICE OF OPTING OUT BY A GROUP MEMBER**

Form 21  
Rule 9.34

No. VID 1252 of 2019

Federal Court of Australia  
District Registry: Victoria  
Division: General

**Katherine Prygodicz** and others  
Applicants

**Commonwealth of Australia**  
Respondent

**By post:** Gordon Legal  
Level 5, 500 Bourke Street  
MELBOURNE VIC 3000

**By email:** robodebt@gordonlegal.com.au

**OPT OUT FORM**

**The Court has ordered that any person wishing to opt out of the Robodebt Class Action and Robodebt Class Action Appeal must do so by 6 March 2026.**

The person named below, a Group Member in this representative proceeding, gives notice under s 33J of the *Federal Court of Australia Act 1976* (Cth) that the person is opting out of the representative proceeding.

Name of the Group Member:	
Customer Reference Number (CRN):	
Date of Birth	
Postal address:	
Residential address (including post code) if different to postal address:	



Telephone number:	
Email address:	
Previous contact details (if your contact details are not current with Services Australia and were different in 2022, please provide previous contact details).	

If you are completing this form as the solicitor or representative of the Group Member:

Name of the person completing this form:	
Authority of the person completing this form:	
Postal address of the person completing this form:	
Telephone number:	
Email address:	

Signed:	
Name of person signing:	
Capacity of person signing ( <i>e.g., Group Member, Lawyer for the Group Member</i> )	
Date:	



**ANNEXURE C NOTICE OF REINSTATEMENT AS GROUP MEMBER**

No. VID 1252 of 2019

Federal Court of Australia  
District Registry: Victoria  
Division: General

**Katherine Prygodicz** and others  
Applicants

**Commonwealth of Australia**  
Respondent

**By post:** Gordon Legal  
Level 5, 500 Bourke Street  
MELBOURNE VIC 3000

**By email:** robodebt@gordonlegal.com.au

**REQUEST TO BE REINSTATED AS A GROUP MEMBER**

The person identified below gives that the person seeks to be reinstated as a Group Member in the Robodebt Class Action (VID 1252 of 2019).

**A YOUR INFORMATION**

Your full name (including any middle names):	
Customer Reference Number (CRN):	
Date of birth:	
Postal address (including post code):	
Residential address (including post code) if different to postal address:	



Email address:	
Telephone number:	
Previous contact details of Group Member (if your contact details are not current with Services Australia and were different in 2022, please provide previous contact details).	

**B IF YOU ARE REPRESENTING A GROUP MEMBER OR DECEASED ESTATE**

Full name of Group Member (including any middle names):	
Customer Reference Number (CRN) of Group Member:	
Postal address of Group Member (including post code):	
Residential address of Group Member (including post code) if different to postal address:	

**C GROUNDS FOR REINSTATEMENT AS A GROUP MEMBER**

My submissions in support of my request to be reinstated as a Group Member in this proceeding are as follows [set out in the space below any submissions you wish to make, attach additional pages if necessary]:

--



**D ATTENDANCE AT HEARING ON 22 and 23 JUNE 2026 AT 10.15AM (AEST)**

<input type="checkbox"/>	I intend to appear before the Court at the hearing commencing at <b>10.15am</b> on <b>22 and 23 June 2026</b> (AEST). You may appear by video or telephone. Arrangements for appearances will be published by the Court on the day prior to the hearing.  [If you intend to appear, please complete the following]:  <input type="checkbox"/> I will appear on my own behalf.  <input type="checkbox"/> I will be represented by a lawyer: _____
<input type="checkbox"/>	I do not intend to appear, but wish for my submissions to be considered in my absence.

Signed:	
Name of person signing:	
Date:	



## ANNEXURE C – NEWSPAPER NOTICE

### Robodebt Class Action and Robodebt Class Action Appeal <sup>1</sup>

#### Notice of Proposed Settlement

This notice has been issued by order of the Federal Court of Australia made on [date].

**This notice has important information you need to know about a proposed settlement of the Robodebt Class Action and Robodebt Class Action Appeal.**

**If you are or were a Group Member you may be entitled to compensation and your legal rights may be affected.**

**If you are entitled to receive compensation, you will need to register by 6 March 2026 and take other action to receive that compensation.**

**You should obtain a copy of the Notice of Proposed Settlement and read it carefully.**

If you are or were a Group Member in the Robodebt Class Action and Robodebt Class Action Appeal, you should go to the website of the solicitors for the Applicants in those proceedings, Gordon Legal, [www.gordonlegal.com.au](http://www.gordonlegal.com.au) or the Centrelink website, [www.servicesaustralia.gov.au](http://www.servicesaustralia.gov.au) to view the **Notice of Proposed Settlement** approved by the Court. That notice contains important information about your legal rights and your right to participate in the proposed settlement.

There is a new category of group member who may chose to participate in the proposed settlement. That new category is for people who were in a close personal relationship at the time of the death of a Category 1, 2, 3 or 4 Group Member, if (i) the assertion of a Robodebt-raised Debt materially contributed to the death of the Group Member; and (ii) the person has suffered a recognised psychiatric illness or condition which has been materially contributed to by the death of the Group Member. People in the new category will need to 'opt in' before they can participate in the proposed settlement.

If you are unable to view the notice approved by the Court on either of the websites, you may send an email to [robodebt@gordonlegal.com.au](mailto:robodebt@gordonlegal.com.au) requesting that a copy of the notice be sent to you (you will need to provide your current email and/or postal address). If you do not have access to email, you may contact Gordon Legal by telephone on 1300 001 356 or make a request for a copy of the notice, in writing, to Gordon Legal at:

Gordon Legal

Level 5, 500 Bourke Street

MELBOURNE VIC 3000

The Notice of Proposed Settlement explains:

- who is a Group Member and the different categories;

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<sup>1</sup> VID982/2024 Knox & Anor v Commonwealth of Australia & Ors (“**Robodebt Class Action Appeal**”) and VID1252/2019 Prygodicz & Ors v Commonwealth of Australia (“**Robodebt Class Action**”).



- that people who opted out during the Robodebt Class Action may apply to be reinstated as a Group Member so they can participate in the proposed settlement;
- who is eligible to participate in the proposed settlement;
- how to **register** to participate in the proposed settlement;
- the terms of the proposed settlement, including the deductions proposed to be made from the Settlement Sum;
- the options available to Group Members; and
- when certain steps must be taken by you.

**DO NOT DELAY. IF YOU DO NOT LODGE YOUR REGISTRATION NOTICE BY 6 MARCH 2026 YOUR RIGHT TO PARTICIPATE IN THE PROPOSED SETTLEMENT OR MAKE A CLAIM AGAINST THE COMMONWEALTH OF AUSTRALIA IN RELATION TO YOUR ROBODEBT MAY BE EXTINGUISHED.**

**DO NOT CONTACT THE FEDERAL COURT OF AUSTRALIA IN RELATION TO THIS NOTICE.**



## ANNEXURE D – REGISTRATION FORM

*This Registration Form will be available for completion on an online portal to be established and operated by Gordon Legal. It will also be available for download and can be completed in hard or soft copy. In some cases, Gordon Legal will assist people over the phone to complete the Registration Form. It will contain the following fields and questions for completion.*

*It will be an essential part of registration that each person is given privacy notice and provides authorisation in the terms set out in the box below. Registration will not be considered to be complete unless this has occurred and the privacy authorisation has been recorded. Gordon Legal will not provide information about a person to the Commonwealth for the eligibility verification process unless registration has been completed.*

### **IMPORTANT INFORMATION AND AUTHORISATION REGARDING DISCLOSURE OF YOUR PERSONAL INFORMATION**

**In order for your registration to be considered complete, you must give your authorisation to the collection, use and disclosure of personal information in accordance with the terms of this Privacy Notice by completing the “Record of authorisation” section of this Privacy Notice below.**

By completing and submitting this Registration Form, you agree and authorise as follows:

- a) Gordon Legal may collect, use and disclose to agencies of the Commonwealth of Australia, including Services Australia, Attorney-General's Department, Department of Health, Department of Veterans' Affairs, and the National Disability Insurance Agency (**the Commonwealth**) and Scheme Administrator all information that you provide about yourself (and, if different, about the Group Member in respect of whom you have completed the Registration Form) (including, without limitation, your name (including any other names that you have been known by), date of birth, Centrelink Customer Reference Number (CRN), contact details, the fact you have completed a Registration Form and information provided in the Registration Form) for the purpose of confirming your eligibility to participate in the Settlement Scheme, confirming your Group Member Category, conducting the registration process and conducting the settlement scheme; and
- b) Commonwealth may collect, use and disclose information about you provided to it by Gordon Legal (and, if different, about the Group Member in respect of whom you have completed the Registration Form) for the purposes of confirming your eligibility, confirming your Group Member Category, conduct of the registration process and conduct of the settlement scheme; and
- c) the Commonwealth may also use and may disclose to Gordon Legal and to the Scheme Administrator information that it holds at any time in relation to you (and, if different, about the Group Member in respect of whom you have completed the Registration Form) for the purpose of confirming your eligibility, confirming your Group Member Category, conduct of the registration process, conduct of the settlement scheme, and conduct of the first settlement scheme (2021 settlement of *Prygodicz & Ors v Commonwealth of Australia*). This may



include use and disclosure of sensitive information (within the meaning of the *Privacy Act 1988* (Cth)) and protected information (within the meaning the *Social Security Act 1991* (Cth), *Social Security (Administration) Act 1999* (Cth) and *Student Assistance Act 1974* (Cth)).

- d) the Commonwealth may disclose information that you provide about yourself (and, if different, about the Group Member in respect of whom you have completed the Registration Form) between Commonwealth agencies for the purpose of confirming your eligibility, confirming your Group Member Category, conduct of the registration process and conduct of the settlement scheme;
- e) the Scheme Administrator may collect, use and disclose all information that you have provided about yourself (and, if different, about the Group Member in respect of whom you have completed the Registration Form) for the purpose of conducting the settlement scheme, including making requests to Gordon Legal and the Commonwealth of Australia for additional information and including making any payments under the settlement scheme or as required by law in respect of the settlement scheme; and
- f) the Commonwealth may collect, use and disclose your personal information (and, if different, about the Group Member in respect of whom you have completed the Registration Form) for the purpose of administering statutory compensation repayment schemes, which may be applicable if you claim or receive compensation under the settlement scheme, including, without limitation, the *Health and Other Services (Compensation) Act 1995* (Cth), *Social Security Act 1991* (Cth), *Veterans' Entitlements Act 1986* (Cth), *National Disability Insurance Scheme Act 2013* (Cth) and *Income Tax Assessment Act 1997* (Cth). For the purpose of administering such schemes, the Commonwealth agencies may disclose that personal information to one another, the Scheme Administrator, Gordon Legal or other legal representative you engage, or the Federal Court of Australia.

Any new information created by Gordon Legal, the Commonwealth or the Scheme Administrator as a result of these activities may also be collected, used and disclosed in accordance with this authorisation.

Your personal information will not be disclosed to any overseas recipient unless required by law.

Further information on how the Commonwealth may use or disclose information that is received is available at: [www.servicesaustralia.gov.au/privacypolicy](http://www.servicesaustralia.gov.au/privacypolicy).

If you do not understand the information set out above, please contact Gordon Legal on 1300 001 356 to discuss.

### **Record of authorisation**

I confirm I have read and understood this Privacy Notice, and that I authorise the collection, use and disclosure of personal information in accordance with the terms of this Privacy Notice:

Name: \_\_\_\_\_

Signature: \_\_\_\_\_



Date: \_\_\_\_\_

**I am completing this form because:**

- **I believe I am a Group Member (other than a Category 5 Group Member)**  
*(please complete Section A of this form)*
- **I am the authorised estate or legal representative of a deceased Group Member other than a Category 5 Group Member** *(please complete Section B of this form)*
- **I wish to register in the Robodebt Class Action as a Category 5 Group Member if the Court approves the settlement** *(please complete Section C of this form)*



## **SECTION A – REGISTRATION OF GROUP MEMBERS OTHER THAN CATEGORY 5 GROUP MEMBERS**

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**Salutation:**

**First Name:**

**Middle Name(s):**

**Last Name:**

**Have you been known by any other name? [Y/N]**

**[If yes] provide any other names that you have been known by:**

**Date of birth:**

**Residential street address:**

**Postal box (if any):**

**Suburb:**

**State:**

**Country:**

**Postcode:**

**Phone:**

**Mobile:**

**Email:**

**Centrelink Customer Reference Number:**

**Approximate date of most recent dealings with Centrelink:**

**Previous contact details (if your contact details may not be current with Services  
Australia and were different in 2022, please provide previous contact details):**

**Please indicate your preferred point of contact in order of preference: [drop-down menu:  
email, mobile, phone, postal]**



If the proposed settlement is approved, Group Members who are eligible to receive compensation must elect one of two processes by which to have their claims assessed by the Scheme Administrator: the Fixed Payment Process, or the Individualised Assessment Process.

If you choose the Fixed Payment Process, it is intended that there be two Fixed Payments based on Group Member category: Fixed Payment A for Group Member Categories 2 and 3a (set at an amount between \$750 and \$1,750), and Fixed Payment B for Group Member Categories 1 and 3b (set at an amount between \$350 and \$1,000). If the proposed Settlement Scheme is approved, the value of the Fixed Payment A and the Fixed Payment B will be determined by the Court.

If you choose the Individualised Assessment Process, the payments are not so limited. For example, eligible Group Members who satisfy the relevant criteria to establish that they have suffered a recognised psychiatric illness or condition may be able to claim up to \$50,000.00 in compensation if that personal injury was suffered because of their Robodebt-raised Debt.

Please otherwise refer to the Notice of Proposed Settlement that has previously been sent to you and which is available at <https://www.gordonlegal.com.au/> for details of these two assessment processes.

**To assist the Court in considering the proposed settlement, please indicate your preference in respect of these two assessment options (you may not be eligible for compensation; your indication at this stage is not binding; you will be provided with an opportunity to formally select your preferred assessment method if the proposed settlement is approved by the Court): [select one]**

- 1. Fixed Payment Process;**
- 2. Individualised Assessment Process.**

**Are you completing this form on behalf of a living group member: [select one]**

- in your capacity as their legal representative;**
- in your capacity as their legal guardian;**
- because you have power of attorney in respect of the group member**

*[If one of the above options is selected]:*

**Representative First Name:**

**Representative Last Name:**



**Representative Phone:**

**Representative Mobile:**

**Representative Email:**

**Please provide one or more of the following documents showing your status as a legal representative, legal guardian, or confirming your power of attorney, in respect the group member:**

- a solicitor's letter confirming your status as a legal representative;
- an order in respect of your legal guardianship;
- the power of attorney;
- any other relevant document.



## **SECTION B – REGISTRATION OF EXECUTORS OF THE ESTATES OR LEGAL REPRESENTATIVES OF DECEASED GROUP MEMBERS**

---

If you are a legal representative of the estate of a deceased group member, you must provide the following documents with a copy of this form:

- a solicitor's letter confirming your status as a legal representative of the deceased group member and whether probate or letters of administration have been obtained, or are being sought;
- a certified copy of the deceased group member's death certificate;
- if available, a certified copy of the deceased group member's will; and
- if available, a copy of the letters of administration or grant of probate.

If you are an executor of the estate of a deceased group member, you must provide the following documents with a copy of this form:

- a certified copy of the deceased group member's death certificate;
- a certified copy of the deceased group member's will or, if a will is not available, the court order appointing you as executor; and
- if available, a copy of the letters of administration or grant of probate.

A representative of Gordon Legal will contact you to confirm your status as an executor of the estate, or legal representative, of a deceased Group Member.

To facilitate this, please provide your personal and contact details below and the personal and contact details of the deceased Group Member you represent.

### **Your personal and contact details**

**Salutation:**

**First Name:**

**Middle Name(s):**

**Last Name:**

**Mobile:**

**Email address:**

**The personal details of the deceased Group Member** *(please complete these details as you believe they would have been held by Centrelink at the time of the Group Member's death, to the extent you have them)*

**First Name:**



**Middle Name(s):**

**Last Name:**

**Has the deceased Group Member been known by any other name? [Y/N]**

**[If yes] provide any other names that they have been known by:**

**Date of birth:**

**Residential street address:**

**Postal box (if any):**

**Suburb:**

**State:**

**Country:**

**Postcode:**

**Phone:**

**Mobile:**

**Email address:**

**Centrelink Customer Reference Number:**

**Approximate date of most recent dealings with Centrelink:**

**Previous contact details (if the deceased Group Member's contact details may have been different in 2022, please provide previous contact details):**

If the proposed settlement is approved, Group Members who are eligible to receive compensation must elect one of two processes by which to have their claims assessed by the Scheme Administrator: the Fixed Payment Process, or the Individualised Assessment Process.

If you choose the Fixed Payment Process, it is intended that there be two Fixed Payments based on Group Member category: Fixed Payment A for Group Member Categories 2 and 3a (set at an amount between \$750 and \$1,750), and Fixed Payment B for Group Member Categories 1 and 3b (set at an amount between \$350 and \$1,000). If the proposed Settlement



Scheme is approved, the value of the Fixed Payment A and the Fixed Payment B will be determined by the Court.

If you choose the Individualised Assessment Process, the payments are not so limited. For example, eligible Group Members who satisfy the relevant criteria to establish that they have suffered a recognised psychiatric illness or condition may be able to claim up to \$50,000.00 in compensation if that personal injury was suffered because of their Robodebt-raised Debt.

Please otherwise refer to the Notice of Proposed Settlement which is available at <https://www.gordonlegal.com.au/> for details of these two assessment processes.

**To assist the Court in considering the proposed settlement, please indicate your preference in respect of these two assessment options (the deceased Group Member may not be eligible for compensation; your indication at this stage is not binding; you will be provided with an opportunity to formally select your preferred assessment method if the proposed settlement is approved by the Court): [select one]**

- 1. Fixed Payment Process;**
- 2. Individualised Assessment Process.**



## SECTION C – REGISTRATION OF CATEGORY 5 GROUP MEMBERS

---

If the proposed settlement is approved by the Court, a representative of the Scheme Administrator will contact you to confirm your status as a Category 5 Group Member. To facilitate this, please provide your personal and contact details below and, if you have them, the personal and contact details of the deceased Group Member with whom you were in a close personal relationship at the time of that person's death.

### **Your personal and contact details**

**Salutation:**

**First Name:**

**Middle Name(s):**

**Last Name:**

**Mobile:**

**Email address:**

**The personal details of the deceased Group Member** *(please complete these details as you believe they would have been held by Centrelink at the time of the Group Member's death, to the extent you have them)*

**Your relationship with the deceased Group Member (eg spouse):**

**First Name:**

**Middle Name(s):**

**Last Name:**

**Has the deceased Group Member been known by any other name? [Y/N]**

**[If yes] provide any other names that they have been known by:**

**Date of birth:**

**Residential street address:**

**Postal box (if any):**

**Suburb:**



**State:**

**Country:**

**Postcode:**

**Phone:**

**Mobile:**

**Email address:**

**Centrelink Customer Reference Number:**

**Approximate date of most recent dealings with Centrelink:**

**Previous contact details (if the deceased Group Member's contact details may have been different in 2022, please provide previous contact details):**

If the proposed settlement is approved, Category 5 Group Members will have their claims assessed by the Individualised Assessment Process.



## ANNEXURE E – REGISTRATION PROCESS

### Registration Process

1. Within **45 business days** of the Court making an order requiring the Commonwealth to provide notice of the proposed settlement to group members, the Commonwealth will, using its best endeavours, issue:
  - a. by way of the myGov portal for each Group Member that has a myGov account which is in use for electronic communication by Services Australia; or
  - b. if the Group Member does not have a myGov account which is in use for electronic communication by Services Australia, by way of email, SMS or letter to each Group Member for whom Services Australia has last known contact details that are in use by Services Australia; or
  - c. Notwithstanding (a) and (b) above, Services Australia may implement a different method for directly providing notice to any particular Group Member where it considers it reasonable and preferable to do so;

short form notice substantially in the form of Exhibit A, which for myGov and letter distribution will include a copy of the long form notice in Exhibit B. The form of the notice may differ slightly as between myGov , email and letter, but the substantive content will not differ. For the avoidance of doubt, the above requirement includes issuing notice to the representative of the estate of a deceased Group Member only if Services Australia has the representative's contact information. It also includes issuing notice to correspondence nominees for Group Members. For the avoidance of doubt, the above requirement does not require the issue of notices to Category 5 group members.
2. Shortly prior to the commencement of the period referred to paragraph 1 above,
  - a. the Commonwealth and Gordon Legal will publish a copy of the Notice of Proposed Settlement in the form set out in Exhibit B on their respective relevant websites (being pages accessible from <https://www.servicesaustralia.gov.au/>; and <https://www.gordonlegal.com.au/>; and, as determined by either to be appropriate, via any other news media or social media;
  - b. within the following **seven (7) days**, Gordon Legal will arrange for the **Notice of Proposed Settlement (Newspaper version)** in the form set out in Exhibit C to be published as follows:



i. by a digital masthead homepage takeover of each of the following publications for one (1) weekday:

1. The Australian (National);
2. Herald Sun (Victoria);
3. Daily Telegraph (New South Wales);
4. Courier Mail (Queensland);
5. The Advertiser (South Australia);
6. Hobart Mercury (Tasmania);
7. The Canberra Times (Australian Capital Territory);
8. NT News (Northern Territory); and
9. The West Australian (Western Australia); and

ii. as a print half page placement in one (1) weekday edition of each of the following publications:

1. The Australian (National);
2. Herald Sun (Victoria);
3. Daily Telegraph (New South Wales);
4. Courier Mail (Queensland);
5. The Advertiser (South Australia);
6. Hobart Mercury (Tasmania);
7. The Canberra Times (Australian Capital Territory);
8. NT News (Northern Territory); and
9. The West Australian (Western Australia).

3. By no later than **the seventieth business day** after the date on which the notification process ordered by the Court commences, any person who intends to participate in the Settlement Scheme must complete a **Registration Form** in the form set out in Exhibit D or as approved by the Court. This can be done by either completing the Registration Form on the online portal established by Gordon Legal; or by



requesting/downloading a hardcopy of the Registration Form from Gordon Legal and by completing and emailing the Registration Form to [robodebt@gordonlegal.com.au](mailto:robodebt@gordonlegal.com.au) or sending it by post to the office of Gordon Legal, contact details for which are available from <https://gordonlegal.com.au/>; or by telephoning Gordon Legal.

4. The Registration process will include the collection by Gordon Legal of authorisation from each person who registers to the exchange of information with the Commonwealth as described below and as may occur during the Knox settlement distribution scheme (including authorisation for collection, use and disclosure of information). Registration will not be complete unless consent has been provided.
5. The Registration process will include a requirement that Gordon Legal be satisfied that a person who registers in respect of a deceased group member has authority to act in respect of the deceased group member. Registration will not be complete unless Gordon Legal is so satisfied and remains so satisfied.

#### **Eligibility and Categorisation Check**

6. Within **5 business days** of the last date for a person to submit a Registration Form, Gordon Legal will provide the Commonwealth with a list of all persons who have completed Registration and their identifying information, including that Gordon Legal will specifically list any such persons who say they are a Category 5 group member (and the name and details of the deceased group member to whom they are connected) or who are applying for reinstatement as a group member who opted out of the Prygodicz proceeding.
7. Within **20 business days** of receipt of the list referred to in paragraph 6 above, the Commonwealth will provide Gordon Legal with a Microsoft Excel spreadsheet that contains the following information for Registered Group Members (for the avoidance of doubt, including for deceased Group Members in respect of whom a person has registered):
  - a. As to the person's eligibility to participate in the Knox settlement distribution scheme:
    - i. confirmation that the Commonwealth assessed the person (or the deceased group member) during the Prygodicz settlement distribution scheme as being a group member in one or more of Categories 1, 2, 3 or 4; or
    - ii. confirmation that the Commonwealth assessed the person (or the deceased group member) during the Prygodicz settlement distribution scheme as not being a group member in any of Category 1, 2, 3 or 4; or



- iii. that the Commonwealth has not been able, based on the information provided by Gordon Legal, to make a data match so as to place the person who has registered into either of the above cohorts;
  - b. As to the person's categorisation for the purpose of the Knox settlement distribution scheme:
    - i. For those within 7.a.i above, the Group Member Category for the person who registered (or for the deceased group member). Where a Group Member falls within multiple Group Member Categories, the Commonwealth will assign the Group Member to the Group Member Category that would, if the Group Member were an Eligible Claimant and were to elect to receive a Fixed Payment under the Settlement Scheme, result in the highest distribution of the Distribution Sum to them.
8. Notwithstanding the timeframes in paragraphs 6 and 7 above:
- a. Gordon Legal and the Commonwealth will endeavour to conduct the verification process through the earlier provision of information in tranches;
  - b. The Commonwealth may take longer than 20 business days to respond with categorization information for people applying for reinstatement as a group member who opted out of the Prygodicz proceeding (because a categorisation process will need to be undertaken by the Commonwealth for those people);
  - c. Gordon Legal may resubmit with additional information about a person to support data matching (up to 28 days after the Commonwealth provides its response in respect of that person).



## ANNEXURE F – NOTICE OF OBJECTION TO PROPOSED SETTLEMENT

### ROBODEBT CLASS ACTION AND ROBODEBT CLASS ACTION APPEAL

Complete this form if you wish to object to the proposed settlement or any aspect of it.

Your Notice of Objection will be considered by the Court when it is determining whether or not to approve the proposed settlement.

**If you wish to object to the proposed settlement, or any aspect of it, your Notice of Objection must be received by Gordon Legal by 4.00pm (AEST) on 6 March 2026.**

**Any objection received after this time may not be accepted.**

**If you do NOT wish to object to the proposed settlement, you do NOT need to return this form.**

**To:** Gordon Legal

**By email to:** robodebt@gordonlegal.com.au

**OR**

**By post to:** Gordon Legal  
Level 5, 500 Bourke Street  
MELBOURNE VIC 3000

The person identified below gives notice that the person **OBJECTS** to the proposed settlement of the Robodebt Class Action and Robodebt Class Action Appeal.

### A YOUR INFORMATION

Your full name (including any middle names):	
Customer Reference Number (CRN):	
Date of birth:	
Postal address (including post code):	
Residential address (including	



post code) if different to postal address:	
Email address:	
Telephone number:	
Previous contact details (if your contact details are not current with Services Australia and were different in 2022, please provide previous contact details).	

**B IF YOU ARE REPRESENTING A GROUP MEMBER OR A DECEASED ESTATE**

Your full name (including any middle names):	
Your postal address (including postcode):	
Your email address:	
Your telephone number:	
Capacity in which you represent Group Member or deceased estate:	
Full name of Group Member (including any middle names):	
Customer Reference Number (CRN) of Group Member:	
Date of birth of Group Member:	
Postal address of Group Member (including post code):	
Residential address of Group Member (including post code) if different to postal address:	
Email address of Group	



Member:	
Telephone number of Group Member:	
Previous contact details of Group Member (if their contact details were different in 2022, please provide previous contact details).	

### C GROUNDS OF OBJECTION

My submissions in support of my objection to the proposed settlement are as follows [set out in the space below any submissions you wish to make, attach additional pages if necessary]:

--

### D ATTENDANCE AT HEARING ON 22 AND 23 JUNE 2026 AT 10.15AM (AEST)

<p><input type="checkbox"/> I intend to appear before the Court at the hearing commencing at <b>10.15am</b> on <b>22 and 23 June 2026</b> (AEST). You may appear by video or telephone. Arrangements for appearances will be published by the Court on the day prior to the hearing.</p> <p>[If you intend to appear, please complete the following]:</p> <p><input type="checkbox"/> I will appear on my own behalf.</p> <p><input type="checkbox"/> I will be represented by a lawyer: _____</p>
<p><input type="checkbox"/> I do not intend to appear, but wish for my submissions to be considered in my absence.</p>



Signed:	
Name of person signing:	
Date:	



## ANNEXURE G – NOTICE OF REINSTATEMENT AS A GROUP MEMBER

No. VID 1252 of 2019

Federal Court of Australia  
District Registry: Victoria  
Division: General

**Katherine Prygodicz** and others  
Applicants

**Commonwealth of Australia**  
Respondent

**By post:** Gordon Legal  
Level 5, 500 Bourke Street  
MELBOURNE VIC 3000

**By email:** robodebt@gordonlegal.com.au

### REQUEST TO BE REINSTATED AS A GROUP MEMBER

The person identified below gives that the person seeks to be reinstated as a Group Member in the Robodebt Class Action (VID 1252 of 2019).

#### A YOUR INFORMATION

Your full name (including any middle names):	
Customer Reference Number (CRN):	
Date of birth:	
Postal address (including post code):	
Residential address (including post code) if different to postal address:	
Email address:	



Telephone number:	
Previous contact details of Group Member (if your contact details are not current with Services Australia and were different in 2022, please provide previous contact details).	

**B IF YOU ARE REPRESENTING A GROUP MEMBER OR DECEASED ESTATE**

Full name of Group Member (including any middle names):	
Customer Reference Number (CRN) of Group Member:	
Postal address of Group Member (including post code):	
Residential address of Group Member (including post code) if different to postal address:	

**C GROUNDS FOR REINSTATEMENT AS A GROUP MEMBER**

My submissions in support of my request to be reinstated as a Group Member in this proceeding are as follows [set out in the space below any submissions you wish to make, attach additional pages if necessary]:

--



--

**D ATTENDANCE AT HEARING ON 22 and 23 JUNE 2026 AT 10.15AM (AEST)**

<p><input type="checkbox"/> I intend to appear before the Court at the hearing commencing at <b>10.15am</b> on <b>22 and 23 June 2026</b> (AEST). You may appear by video or telephone. Arrangements for appearances will be published by the Court on the day prior to the hearing.</p> <p>[If you intend to appear, please complete the following]:</p> <p><input type="checkbox"/> I will appear on my own behalf.</p> <p><input type="checkbox"/> I will be represented by a lawyer: _____</p>
<p><input type="checkbox"/> I do not intend to appear, but wish for my submissions to be considered in my absence.</p>

Signed:	
Name of person signing:	
Date:	



## ANNEXURE H – OPT OUT NOTICE

Form 21  
Rule 9.34

No. VID 1252 of 2019

Federal Court of Australia  
District Registry: Victoria  
Division: General

**Katherine Prygodicz and others**  
Applicants

**Commonwealth of Australia**  
Respondent

**By post:** Gordon Legal  
Level 5, 500 Bourke Street  
MELBOURNE VIC 3000

**By email:** robodebt@gordonlegal.com.au

### OPT OUT FORM

**The Court has ordered that any person wishing to opt out of the Robodebt Class Action and Robodebt Class Action Appeal must do so by 6 March 2026.**

The person named below, a Group Member in this representative proceeding, gives notice under s 33J of the *Federal Court of Australia Act 1976* (Cth) that the person is opting out of the representative proceeding.

Name of the Group Member:	
Customer Reference Number (CRN):	
Date of Birth	
Postal address:	
Residential address (including post code) if different to postal address:	



Telephone number:	
Email address:	
Previous contact details (if your contact details are not current with Services Australia and were different in 2022, please provide previous contact details).	

If you are completing this form as the solicitor or representative of the Group Member:

Name of the person completing this form:	
Authority of the person completing this form:	
Postal address of the person completing this form:	
Telephone number:	
Email address:	

Signed:	
Name of person signing:	
Capacity of person signing ( <i>e.g., Group Member, Lawyer for the Group Member</i> )	
Date:	



## **Schedule of Parties**

No: VID1252/2019

Federal Court of Australia

District Registry: Victoria Registry

Division: General

Second Applicant	ELYANE PORTER
Third Applicant	STEVEN FRITZE
Fourth Applicant	FELICITY BUTTON
Fifth Applicant	SHANNON THIEL
Sixth Applicant	DEVON COLLINS