

**IN THE SUPREME COURT OF VICTORIA
AT MELBOURNE
COMMERCIAL COURT
GROUP PROCEEDINGS LIST**

S ECI 2023 05830

BETWEEN:

JEREMEY CLARKE

Plaintiff

- and -

JB HI-FI GROUP PTY LTD (ACN 093 114 286)

Defendant

ORDER

JUDGE: The Honourable Justice Delany

DATE MADE: 23 September 2025

ORIGINATING PROCESS: Writ filed on 8 December 2023

HOW OBTAINED: Following the case management conference on 16 September 2025

ATTENDANCE: Rachel Doyle SC with James Page for the plaintiff
Michael Rush KC with Andrew McRobert for the defendant

OTHER MATTERS:

- A. The parties are continuing to confer in relation to security for costs and, if a ruling is required, the parties will contact the Chambers of Justice Delany prior to 6 October 2025 proposing consent timetabling orders for the exchange of evidence and submissions and the listing of an application to be heard by an appropriate judicial officer.
- B. The Court anticipates making pre-trial directions including with respect to a court book, trial plan, list of issues and outlines of submissions at the case management conference listed on 6 October 2025. The parties should confer and seek to agree on appropriate pre-trial orders before that time.



THE COURT ORDERS THAT:

Further and better particulars in relation to sample group members

1. By **4:00pm** on **7 October 2025** the plaintiff will provide to the defendant any further and better particulars with respect to the sample group members, Amarnda Corlett and Lawrence Pigot.

Discovery

2. Subject to further order, and paragraph 3 of this Order, the defendant is to give discovery in accordance with the Discovery Plan at Annexure A to this Order in tranches as follows:
 - (a) Tranche One by 31 October 2025, comprising the exported data referred to in categories 3.1 and 4.1(a);
 - (b) Tranche Two by 21 November 2025; and
 - (c) Tranche Three by 2 March 2026.
3. On or before **4:00pm** on **3 October 2025** the parties are to confer with respect to an updated Discovery Plan and the plaintiff is to provide to the Court, by email to chambers.delany@supcourt.vic.gov.au, an updated Discovery Plan amended to include any additional Identified Consumer Goods. To the extent there is any dispute between the parties as to the content of the updated Discovery Plan, that dispute will be heard at the case management conference listed for **6 October 2025**.
4. Within 14 days of giving discovery in accordance with paragraph 2(c), the defendant is to file and serve an affidavit in accordance with r 29.04 of the *Supreme Court (General Civil Procedure) Rules 2025* (Vic) ('Rules').
5. By **4:00pm** on **31 October 2025** the plaintiff is to give discovery in accordance with the Discovery Plan at Annexure A to this Order, and file and serve an affidavit in accordance with r 29.04 of the Rules
6. By **4:00pm** on **31 October 2025**, pursuant to s 33ZF of the *Supreme Court Act 1986* (Vic) ('the Act') Amarnda Corlett and Lawrence Pigot are to give general discovery in accordance with rr 29.01.1 and 29.04 of the Rules.

Soft class closure

7. By **4:00pm** on **25 September 2025** the defendant is to file and serve on the plaintiff any application seeking orders for soft class closure pursuant to s 33ZG and 33ZF of the Act, together with any submissions (limited to five A4 pages) and evidence on which it intends to rely.
8. By **4:00pm** on **3 October 2025** the plaintiff is to file and serve on the defendant any submissions (limited to five A4 pages) and evidence in response to any application filed pursuant to paragraph 7 of this Order.
9. The application referred to at paragraph 7 of this Order is listed for hearing on **6 October 2025**.



Opt out

10. By **4:00pm** on **7 November 2025** the plaintiff is to serve on the defendant a proposed form of notice pursuant to ss 33X(1)(a) and 33Y of the Act ('Opt Out Notice') and the process for distributing that Opt Out Notice.
11. By **4:00pm** on **28 November 2025** the parties are to provide the Court, by email to chambers.delany@supcourt.vic.gov.au:
 - (a) a proposed minute of consent order regarding the form of Opt Out Notice and the process for distributing that notice; or
 - (b) if a consent position cannot be agreed, competing proposals regarding the Opt Out Notice and the process for distributing that notice and submissions of no more than two A4 pages in support of each party's position.
12. Any dispute in relation to the content of the Opt Out Notice or the process for distributing that notice, including in relation to the contact information for potential Group Members, shall be decided on the papers unless otherwise advised by the Court.

Lay evidence

13. By **4:00pm** on **28 November 2025** the plaintiff is to file and serve on the defendant witness outlines for each lay witness he intends to call at the initial trial or any lay evidence in the form of a witness statement if considered necessary.
14. Subject to paragraph 13 of this Order, by **4:00pm** on **29 April 2026** the defendant is to file and serve on the plaintiff any witness outlines for any lay witnesses it intends to call at the initial trial or any lay evidence in the form of a witness statement if considered necessary.

Expert evidence

15. Each party must serve on the other party any letters of instruction to any expert witnesses, including the questions to which the party proposes those expert witnesses respond, and copies of the documents which the party proposes to provide to those experts, within 7 days of each letter being provided to the relevant expert.
16. By **4:00pm** on **29 April 2026** the plaintiff is to file and serve on the defendant any expert evidence (other than in relation to behavioural economics) upon which he intends to rely at the initial trial.
17. By **4:00pm** on **10 June 2026** the plaintiff is to file and serve on the defendant any behavioural economics expert evidence upon which he intends to rely at the initial trial.
18. By **4:00pm** on **8 July 2026** the defendant is to serve on the plaintiff any independent expert evidence (other than in relation to behavioural economics) together with any lay or expert evidence in reply to the plaintiff's expert evidence upon which it intends to rely at the initial trial.
19. By **4:00pm** on **22 July 2026** the defendant is to file and serve any behavioural economics expert evidence upon which it intends to rely at the initial trial.



20. By **4:00pm** on **10 August 2026** the plaintiff is to file and serve on the defendant any expert evidence in reply.

Expert conclaves

21. The parties are to confer and seek to agree upon a list of the questions or topics to be addressed by the experts in the expert conclaves.
22. If the parties are unable to agree upon the matters in paragraph 21 of this Order, by **4:00pm** on **19 August 2026** the parties are to provide the Court a marked up document showing the areas of agreement and disagreement which is to be determined by the Court unless the Court otherwise informs the parties.
23. The parties are to confer and seek to reach agreement upon the need, if any, for a facilitator and if so, the identity of the facilitator for one or more of the expert conclaves.
24. If the parties are unable to agree upon the matters in paragraph 23 of this Order, by **4:00pm** on **19 August 2026** the parties are to provide the Court marked up proposal showing the areas of agreement and disagreement which is to be determined by the Court unless the Court otherwise informs the parties.
25. By **4:00pm** on **11 September 2026** each expert is to confer with their relevant counterpart and provide the parties and the Court a joint report containing their joint opinion as to each of the questions raised by their respective reports, in accordance with the Expert Witness Code of Conduct (Form 44A) cls 6 and 7.
26. If any group of experts is unable to express a joint opinion on any question, the relevant joint report must describe the difference(s) between the opinions and set out the experts' respective reasons for disagreement.
27. The expert conclave is intended to be a consultation of the experts without any influence from a party to the proceeding. To that end, subject to the terms of this order:
- (a) the expert conclave and all further communications between the experts in relation to the preparation of the joint report must be conducted in the absence of the parties, their employees or agents, or any practitioners for or associated with any party;
 - (b) none of the experts may in the preparation of the joint report consult with any party, their employees or agents, or any practitioners for or associated with any party; and
 - (c) notwithstanding subparagraphs (a) and (b), the experts may jointly request further information or direction by letter signed by them directed to the practitioners for each of the parties and may receive such further information.
28. Save as contained in the joint report, unless the parties agree in writing, no evidence may be admitted of anything said or done by any person at any conference between the experts.
29. Subject to any subsequent Order made by the Court, there will be no cross-examination at trial in relation to any matter on which the experts agree.



Initial trial and common questions

30. Paragraph 2 of the Order made on 15 August 2025 be vacated.
31. The proceeding is listed for an initial trial of common issues commencing on **5 October 2026** on an estimate of 6 weeks.
32. By **4:00pm** on **3 July 2026** the defendant is to provide the plaintiff with its amended list of common questions.
33. By **4:00pm** on **31 July 2026**, the parties are to provide the Court the proposed common questions, indicating the extent to which the common questions are agreed and the extent to which the common questions are not agreed.

Mediation

34. Pursuant to section 24A of the Act the proceeding is to be referred to mediation, with such mediation to have commenced by no later than **28 August 2026** and to continue until the mediator concludes the mediation.
35. The mediation is to be conducted by a mediator agreed between the parties, or failing agreement as to the identity of the mediator by **5 June 2026**, an associate justice or a judicial registrar of the Court.
36. Within five business days of the conclusion of the mediation referred to in paragraph 34 of this Order, the mediator is to report back to the Court as to whether the mediation was successful.

E-Trial

37. The trial of this proceeding be conducted as an electronic trial (e-trial) using documents in an electronic format in accordance with an electronic hearing protocol ('Electronic Hearing Protocol') to be agreed by the parties.
38. By **4:00pm** on **9 March 2026**, the parties are to confer and endeavour to agree on a third-party electronic trial provider for the trial ('e-Trial Provider') and notify the Court of the identity of the e-Trial Provider.
39. The e-Trial Provider will:
 - (a) facilitate the creation of an electronic Court Book in a text searchable format;
 - (b) provide the parties, the Court, and the Judge access to the electronic Court Book once prepared in accordance with this Order, including during the course of the trial, and facilitate the electronic presentation of evidence in Court during the trial; and
 - (c) provide transcription services during the trial.
40. By **4:00pm** on **17 April 2026**, the parties, in consultation with the e-Trial Provider, are to agree to and file with the Court a draft electronic trial protocol, which has regard to the matters set out in the Practice Note ('Electronic Trial Protocol').

Other



41. The matter is listed for a further case management conference on **6 October 2025** before Justice Delany.
42. Costs are reserved.
43. Liberty to apply.

DATE AUTHENTICATED: 23 September 2025



The Hon. Justice Delany

ANNEXURE A

CATEGORIES OF DISCOVERY

Defendant categories

Category 1: Rationale, Methodology or Formulae Documents	
1.1	Documents recording or relating to the rationale, methodology or formula(e) used to determine the duration of the Extended Warranties (including any changes in duration) sold by JB Hi-Fi during the Relevant Period.
1.2	Documents recording or relating to the rationale, methodology or formula(e) used to determine the price of the Extended Warranties (including any price changes) sold by JB Hi-Fi during the Relevant Period.
1.3	Documents recording or relating to the rationale, methodology or formula(e) used to determine which Consumer Goods were eligible for the Extended Warranties (including any change in the eligibility of Identified Consumer Goods) during the Relevant Period.
1.4	Documents recording or relating to the rationale, methodology or formula(e) used to determine the duration of the JB Hi-Fi Voluntary Warranty (including any changes in duration) during the Relevant Period.
1.5	Documents recording or relating to any amendment (whether proposed or made) to the Extended Warranty brochures during the Relevant Period (including in relation to changing the name of the Extended Warranty products).
1.6	Documents recording or relating to any amendment (whether proposed or made) to the JB Hi-Fi Voluntary Warranty during the Relevant Period.
1.7	<p>Documents recording or relating to the process by which, and the basis upon which, JB Hi-Fi formed the belief or understanding that its Voluntary Warranty was consistent with consumer rights under the ACL, as reflected in the following statements made in its Voluntary Warranty brochures:</p> <p>“Whilst individual circumstances may vary and the law is uncertain, the policies set out above are intended to provide you with remedies that JB Hi-Fi believes in most circumstances to be consistent with your statutory rights under the ACL in the event of breach of a Consumer Guarantee relating to faulty products.” (Jul ‘14, Jan ‘18)</p> <p>“The policies are intended to provide you with remedies that are consistent with your statutory rights under the ACL in the event of breach of a Consumer Guarantee.” (Dec ‘13, Feb ‘14)</p> <p>“The policies are intended to cover the vast majority of different circumstances that would be taken into account when determining an appropriate remedy consistent with your statutory rights.” (Dec ‘10, Nov ‘11)</p>
1.8	Documents recording or relating to the process by which, and the basis upon which, JB Hi-Fi formed the belief or understanding that its Extended Warranties provided a

	<p>period of cover that was longer than the Statutory Guarantees were likely to provide, as reflected in:</p> <p>(a) the following statements made in its Extended Warranty brochures:</p> <p>“JB Hi-Fi Extended Care provides customers who purchase our goods with additional protection and peace of mind for mechanical or electrical failure:</p> <p>- arising after your manufacturer’s warranty has expired and for a longer period than your ACL rights are likely to provide protection...” (Jan ’11)</p> <p>“In addition to your JB Hi-Fi Voluntary Warranty, JB Hi-Fi wants to ensure that you can enjoy many years of trouble free ownership of your purchase for a longer period than your ACL rights are likely to provide, which is why JB Hi-Fi is delighted to offer JB Hi-Fi Extended Care.” (Feb ’14, Jul ,14, Jan ’16, May ’16, ’17, Feb ’18, Oct ’18, ’20 and ’21)</p> <p>“In addition to your JB Hi-Fi Voluntary Warranty, JB Hi-Fi wants to ensure that you can enjoy peace of mind on your purchase for a longer period than your ACL rights are likely to provide, which is why JB Hi-Fi is delighted to offer JB Hi-Fi Extra Care” (’22 and ’23)</p> <p>(b) the following statements made in its Voluntary Warranty brochures:</p> <p>“... your JB HI-FI Extended Care plan will provide you with rights for a longer period than those minimum rights set out on page 6 and that are likely to apply under the ACL.” (Dec ’13)</p> <p>“JB Hi-Fi offers Extended Care plans which can be purchased to provide protection against mechanical or electrical failure for a longer period than the minimum rights set out in this brochure and for longer than your ACL rights are likely to provide.” (Feb ’14)</p>
Category 2: Lifespan Documents	
2.1	Documents recording or relating to the expected or predicted life and/or design life of LG refrigerators, Sony televisions, Apple laptops and HP laptops.
Category 3: Sales Documents	
3.1	<p>Exported data recording the following data points, or equivalent data points:</p> <p>(a) [set out in order 1 of the orders made by Gitsham JR on 27 May 2025]</p> <p>(b) for Transaction Data:</p> <p>(i) “Dept No”;</p> <p>(ii) “Dept Name”;</p> <p>(iii) “Product Group No” / “product_group_id”;</p> <p>(iv) “Prod Group Name” / “product_group_descript”;</p> <p>(v) “Brand” (for Extra Care Transaction Data only)</p> <p>(vi) [not used]</p> <p>(vii) price paid for Extended Warranty.</p>
3.2	All periodic reporting (excluding daily reports) on company and staff performance in the sale of Extended Warranties in the Relevant Period.
3.3	<p>The following ‘Services Variation Reports’, to the extent they exist:</p> <p>(a) weekly variation reports from within the period of week ending 17 September</p>

	<p>2023 to 3 December 2023;</p> <p>(b) monthly variation reports for January to March 2022, May to September 2022, and October to November 2023;</p> <p>(c) quarterly variation reports (excluding the previously produced Q3 and Q4 FY23, and Q1 FY24); and</p> <p>any half or full year variation reports.</p>
3.4	The 'Services Beats Sales Update' report for week ending 5 November 2023.
3.5	<p>The following 'Conversion' reports, to the extent they exist and insofar they cover 'All Regions':</p> <p>(a) conversion reports for the categories of 'Whitegoods', 'Visual', 'Mac' and 'Computers' from within the period of week ending 30 January 2022 to 3 December 2023;</p> <p>(b) conversion reports for the category of 'Whitegoods' from within the period of weeks ending 2 January 2011 to 6 October 2013.</p>
Category 4: Warranty Claims, Returns and Complaints Documents	
4.1(a)	[ORDERED: order 1 of the orders made by Gitsam JR on 27 May 2025]
4.1(b)	Current and historical versions of the SolvUp "script" referred to in HSF's letter of 19 July 2024.
4.2	<p>Documents in the Relevant Period summarising or analysing:</p> <p>(a) the frequency or volume of returned Identified Consumer Goods;</p> <p>(b) the types of problems or faults consumers were experiencing with Identified Consumer Goods;</p> <p>(c) the age of Identified Consumer Goods when problems or faults occurred;</p> <p>(d) the number, percentage or rate of Extended Warranties that were called upon after sale;</p> <p>(e) the number, percentage or rate of Extended Warranties that were cancelled within the cooling off period;</p> <p>(f) the number of Warranty Claims in respect of Identified Consumer Goods;</p> <p>(g) the outcomes of Warranty Claims in respect of Identified Consumer Goods;</p> <p>(h) the time taken to resolve Warranty Claims in respect of Identified Consumer Goods;</p> <p>(i) the number, percentage or rate of customer complaints in respect of Warranty Claims;</p> <p>(j) the reasons for customer complaints in respect of Warranty Claims; and/or</p> <p>(k) communications from consumers recorded through the contact form at www.jbhifi.com.au/ACL-Warranty- Claims and responses from JB Hi-Fi.</p>
4.3	<p>Copies of the following documents insofar as they relate to LG refrigerators, Sony televisions, Apple laptops and HP laptops:</p> <p>(a) any trading/supplier agreement;</p> <p>(b) any reverse logistics/JBRL agreement; and</p>

	(c) any communications to or from manufacturers or suppliers of the Identified Consumer Goods concerning faults or failures in those products that were returned, repaired or replaced under manufacturer warranty, Extended Warranty, JB Hi-Fi Voluntary Warranty or the ACL.
4.4	Copies of the FY16 and FY17 Tic Group 'JB Hi-Fi Reverse Logistics' annual report.
4.5	<p>Regular and ad hoc reports from Tic Group, and any related correspondence, regarding:</p> <p>(a) ACL and Warranty returns, repairs or replacements (jointly and severally);</p> <p>(b) performance of Identified Consumer Goods, including:</p> <ul style="list-style-type: none"> i. faulty returns to sales comparison; ii. SKU faulty returns to sales comparison within same category; iii. Ave Age @ Fault; iv. Age Profile; v. products tested for functional/customer usage issues; vi. root cause of returns. <p>(c) performance of manufacturers and suppliers, including:</p> <ul style="list-style-type: none"> i. supplier faulty returns to sales comparisons; ii. supplier comparison by department; <p>(d) repairer turnaround time;</p> <p>(e) store overrides;</p> <p>(f) the duration of the JB Hi-Fi Voluntary Warranty;</p> <p>(g) reverse logistics for Extended Warranty returns, repairs or replacements.</p>
Category 5: Corporate Governance Documents	
5.1	[not used]
5.2	<p>Copies of any board or board sub-committee (including the Audit & Risk Management Committee) presentations, papers or meeting minutes in the Relevant Period which address any of the following matters:</p> <p>(a) the sale of Extended Warranties (in-store or online);</p> <p>(b) the financial performance (whether budgeted, actual or forecast) of Extended Warranties;</p> <p>(c) Warranty Claims and any associated costs or liabilities;</p> <p>(d) contracting with Administrators;</p> <p>(e) any of the matters described in Category 8 (ACL and Regulator Documents).</p>
5.3	<p>Documents recording or relating to policy or procedure in the Relevant Period in respect of:</p> <p>(a) the pricing of Extended Warranties (including discounting);</p> <p>(b) sales practices, merchandising strategies and marketing of Extended Warranties including requirements for the provision and placement In Store of Extended Warranty Brochures, "Your Rights" Brochures and/or signs for Extended Warranties and the ACL;</p>

	<p>(c) key performance indicators, incentives and/or bonuses for selling Extended Warranties;</p> <p>(d) how Warranty Claims, or enquiries about Warranty Claims, should be handled, escalated, and processed, and the monitoring of that handling, escalation and processing; and/or</p> <p>(e) communicating with the ACCC regarding Extended Warranties.</p> <p>(f) team member purchase policy as at 21 November 2020, including any policy that applied to the plaintiff's purchase as pleaded in FASOC [44].</p>
5.4	Documents recording or relating to policy or procedure in respect of, or decision in relation to, refunding the cost of Extended Warranties outside of the cooling off period.
5.5	<p>Documents recording or relating to:</p> <p>(a) the marketing, merchandising, and/or documentation of the Extended Warranties, including but not limited to:</p> <ol style="list-style-type: none"> i. Product Documentation; ii. POS Merchandising; <p>(b) communications between JB Hi-Fi and the Administrators regarding (a).</p>
Category 6: Training and Compliance Documents	
6.1	<p>Documents recording or relating to Training in the Relevant Period in respect of:</p> <p>(a) Extended Warranties (including in respect of content and sales practices);</p> <p>(b) the rights under the ACL with respect to consumer guarantees;</p> <p>(c) the JB Hi-Fi Voluntary Warranty;</p> <p>(d) how to handle or direct customers that approach JB Hi-Fi with respect to Warranty Claims or enquiries; and/or</p> <p>(e) faulty goods and customer returns.</p>
6.2	Documents in the Relevant Period directing, reminding, encouraging or incentivising staff to sell Extended Warranties.
6.3	<p>Documents recording or relating to any quality assurance processes or monitoring undertaken in the Relevant Period in respect of:</p> <p>(a) compliance with Training of the kind described in 6.1 above;</p> <p>(b) compliance with the matters specifically pleaded in paragraph 28(b)(i)-(iii) of the Defence; and/or</p> <p>(c) Enforceable Undertakings.</p>
6.4	<p>Documents recording or relating to any monitoring or research (e.g. by mystery shoppers) in the Relevant Period which relates to:</p> <p>(a) the sale of Extended Warranties; or</p> <p>(b) statements made by JB Hi-Fi staff to consumers regarding their ACL rights.</p>
6.5	<p>Documents referencing or discussing, during the Relevant Period, the following articles:</p> <p>(a) Choice Article, 'Customers still buying extended warranties they don't need – survey' last updated 4 December 2020;</p> <p>(b) Choice Article, 'Best and worst electronic stores in 2022' last updated 14 July</p>

	<p>2022;</p> <p>(c) Choice Article, 'Retailers push extended warranties and get your consumer rights wrong' last updated 22 November 2022; and/or</p> <p>(d) Choice Article, '7 out of 10 Australians misunderstand extended warranties and their rights' last updated 1 August 2023.</p>
Category 7: Administrator Documents	
7.1	<p>Documents in the Relevant Period recording:</p> <p>(a) any contract or terms governing the relationship between JB Hi-Fi and its Administrators;</p> <p>(b) reporting, analysis, or summary on, or the exchange of information relevant to, the sale of Extended Warranties;</p> <p>(c) reporting, analysis, or summary on, or the exchange of information relevant to, claims assessment, administration, and outcomes; and/or</p> <p>(d) compliance monitoring and quality assurance for sales, claims handling, and Enforceable Undertakings (including any policies, procedures, or manuals).</p>
7.2	<p>Documents in the Relevant Period recording:</p> <p>(a) rates cards during the Relevant Period containing the retail price of the Extended Warranties sold to consumers; and</p> <p>(b) correspondence between JB Hi-Fi and the Administrators regarding each such rate card.</p>
Category 8: ACL and Regulator Documents	
8.1	Documents, in the period of July 2009 to 8 December 2023, regarding the proposed introduction, and operation in force, of the ACL and its potential or actual impact on JB Hi-Fi's Extended Warranty offering, including any communications with the Administrators.
8.2	Documents, in the period of July 2009 to 8 December 2023, regarding the possible or perceived intersections or overlap between the Extended Warranties and the ACL.
8.3	Documents, in the period of July 2009 to 8 December 2023, regarding amendments made, or proposed to be made, to the Extended Warranty brochures, Blue Brochures and/or the JB Hi-Fi webpage that relate to the ACL.
8.4	Documents, in the period of July 2009 to 8 December 2023, regarding concerns raised, or complaints raised with, by any government, government department, statutory authority or regulator in relation to JB Hi-Fi's Extended Warranty offering specifically, Extended Warranties generally, or how retailers communicate with consumers about their rights under the ACL.
8.5	Documents regarding the Enforceable Undertakings.
Category 9: Website Documents	
9.1	Documents recording or relating to the drafting, presentation and/or publishing of content on JB Hi-Fi's website in the Relevant Period regarding Extended Warranties, the JB Hi-Fi Voluntary Warranty or the ACL.

9.2	[not used]
9.3	<p>Documents in the Relevant Period recording or relating to any decision to offer, or not to offer, Extended Warranties for sale online, including any document recording:</p> <ul style="list-style-type: none"> (a) the decision, or any matters related to the decision, to cease offering Extended Warranties for sale online in or around January 2014; (b) matters related to the maintenance of that decision until in or around May 2022; and (c) the decision, or any matters related to the decision, to offer Extended Warranties for sale online from in or around May 2022.

Plaintiff categories

No.	Category description
1.	<p>The original or one copy of:</p> <ul style="list-style-type: none">(a) bank statements for any accounts held by the plaintiff, showing the plaintiff's personal savings as at 21 November 2020;(b) the plaintiff's income declarations (by whatever name) provided to Centrelink for the period 20 June 2020 to 21 November 2020;(c) the plaintiff's payslips for his employment with Woolworths for the period 20 June 2020 to 21 November 2020;(d) to the extent not already captured by item (c) above, the plaintiff's payslips for any employment income he received in the period 20 June 2020 to 21 November 2020.