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6 February 2009

By Email - neigerpoodle@gmail.com

Ms Geraldine Robertson
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Our reference: 12352/12209/80070709

Dear Ms Robertson

Geraldine Robertson v Department of Primary Industries and Fisheries

1. We acknowledge your email of 02/02/09 and note your allegations including:
 - (a) To date all you have experienced is deception, lies, assault, defamation, threats from Clayton Utz and the RSPCA;
 - (b) Clayton Utz cannot be trusted; and
 - (c) Clayton Utz and the RSPCA have lied to the Court through Counsel.

2. Your baseless allegations are disputed. You will recall that:
 - (a) On 20/11/08, following the complaint that you had seen footage on TV which you did not have, the court directed that you come to our offices and view videos;
 - (b) That was done on 21/11/08, save for the Imagination TV Ltd NZ footage which you were told about;
 - (c) We endeavoured to get Imagination TV Ltd NZ to release the footage to you (on that day) but was unsuccessful;
 - (d) Following the meeting on 21/11/08, we advised the court (in your presence):
 - We had met with you and Mr Croll that morning and it was highly likely that the video footage that you were talking about was one of the commercial channels and neither RSPCA nor DPI&F had copies of that full footage;
 - There was about 48 minutes of video footage that was in Court already and you were given fresh copies that morning to prevent any argument or suggestion that the DVDs did not work;
 - There were news broadcasts of Channel 9 and Channel 7, and we showed them to you but did not have copyright and could not give copies to you;
 - There was further video footage in our possession and that video footage was from Imagination TV / Animal Rescue. We had sought permission from them to provide it, and that was declined;
 - It was highly unlikely that footage (i.e. Imagination TV) was the footage that you were talking about because, save for one small component which is on one of the discs already in Court, it had not been to air.
 - (e) You were then advised by the court about non-party disclosure and said that you would follow that course.

3. We are aware that you followed the course of seeking non-party disclosure but did not comply with the Service and Execution of Process Act. Clayton Utz also became aware that Imagination Television was New Zealand based and that that would complicate matters further. Accordingly,

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we made further contact and again pressed the issue of voluntary access to the material which was forthcoming.

4. For your convenience, we have offered to enable you to view the Imagination TV discs immediately. Given you consider the courts corrupt, the courts' concerns and our concerns about publication of disclosed documents on the web and use of material for non-litigation purposes, before copies will be provided, the RSPCA would require you to be subject to a specific order in relation to use of this material only for this litigation.
5. We repeat:
 - (a) We will make the DVD footage available for you to view at our offices at your convenience;
 - (b) Contact Tony Deane to arrange a suitable viewing time; and
 - (c) It seems highly likely that the video footage that you were talking about was one of the commercial channels (e.g. channels 7 or 9) and the RSPCA only has the broadcasts which have been shown to you.

Yours faithfully,



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