

**VINCENT SCOTT TYLOR**  
Applicant

[REDACTED] **MERCIER**  
Respondent

**RESPONDENT'S GENUINE STEPS STATEMENT – RULE 4.10**

The Respondent disagrees in whole or in part with the Applicant's Genuine Steps Statement filed in this proceeding, in the following respects:

1. The Respondent did not receive the letter dated 7 January 2014 from the Applicant's solicitor, Mr Peter Knight of Banki Haddock Fiora, until 20 March 2014 via email to the Respondent's barrister, [REDACTED].
2. The Respondent did not reply to the letter dated 7 January 2014 because that letter was not received by the Respondent until 20 March 2014 via email to the Respondent's barrister, [REDACTED].
3. The Respondent did not receive the letter dated 22 January 2014 nor any settlement offer from the Applicant's solicitor, Mr Peter Knight of Banki Haddock Fiora, until 20 March 2014 via email to the Respondent's barrister, [REDACTED].
4. The Respondent did not reply to the letter dated 22 January 2014 because that letter was not received by the Respondent until 20 March 2014 via email to the Respondent's barrister, [REDACTED].

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**Filed on behalf of the Respondent**

Prepared by:

Name of Law Firm:

Address for service in Australia:

State and Postcode:

Email:

Telephone:

[REDACTED]

5. On 19 March 2014, the Respondent received a letter dated 14 March 2014 via unregistered mail from the Applicant's solicitor, Mr Peter Knight of Banki Haddock Fiora.
6. On 20 March 2014, the Respondent – through his barrister, [REDACTED] – sent a letter dated 20 March 2014 to the Applicant's solicitor, Mr Peter Knight of Bank Haddock Fiora, advising that the Respondent had not received the letters dated 7 January 2014 and 22 January 2014, as well as requesting copies of those letters.
7. On 20 March 2014, the Respondent – through his barrister, [REDACTED] – received via email from the Applicant's solicitor, Mr Peter Knight of Bank Haddock Fiora, the letters dated 7 January 2014 and 22 January 2014.
8. On 1 April 2014, the Respondent – through his barrister, [REDACTED] – sent a letter dated 1 April 2014, in which the Respondent made a settlement offer, to the Applicant's solicitor, Mr Peter Knight of Bank Haddock Fiora.
9. On 2 April 2014, the Respondent – through his barrister, [REDACTED] – received from the Applicant's solicitor, Mr Peter Knight of Bank Haddock Fiora, a letter dated 2 April 2014, in which the Applicant did not make any further settlement offer.
10. On 4 April 2014, the Respondent – through his barrister, [REDACTED] – sent a letter dated 4 April 2014 to the Applicant's solicitor, Mr Peter Knight of Bank Haddock Fiora. In that letter, the Respondent made a further settlement offer, as well as a written apology dated 2 April 2014 to the Applicant.
11. On 4 April 2014, the Respondent – through his barrister, [REDACTED] – received from the Applicant's solicitor, Mr Peter Knight of Bank Haddock Fiora, an email, in which the Applicant did not make any further settlement offer but stated that proceedings would be initiated against the Respondent and on behalf of the Applicant.
12. On 8 April 2014, the Respondent – through his barrister, [REDACTED] – received from the Applicant's solicitor, Mr Peter Knight of Bank Haddock Fiora, an email, in which the Applicant did not make any further settlement offer but stated that proceedings had been initiated against the Respondent and on behalf of the Applicant.

13. On 8 April 2014, the Respondent – through his barrister, [REDACTED] – sent a letter dated 8 April 2014, in which the Respondent made a further settlement offer, to the Applicant’s solicitor, Mr Peter Knight of Bank Haddock Fiora.
14. On 15 April 2014, the Respondent – through his barrister, [REDACTED] – sent a letter dated 15 April 2014 to the Applicant’s solicitor, Mr Peter Knight of Bank Haddock Fiora. In this letter, the Respondent made a further settlement offer, as well as requested further and better particulars to the Statement of Claim attached to the Application of the Applicant.
15. On 16 April 2014, the Respondent – through his barrister, [REDACTED] – received from the Applicant’s solicitor, Mr Peter Knight of Bank Haddock Fiora, a letter, in which the Applicant did not make any further settlement offer.

Date: 22 April 2014

[REDACTED]

Signed by [REDACTED]