

IN THE HIGH COURT OF AUSTRALIA  
BRISBANE REGISTRY  
BETWEEN

No. B63 of 2018

**CHIN-FU LEE**

Appellant

And

**RACQ INSURANCE LIMITED**

Respondent

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### RESPONDENT'S SUBMISSIONS

#### Part I:

1. I certify that this submission is in a form suitable for publication on the internet.

20 **Part II:**

2. The issues raised by the appeal are those referred to in the appellant's submissions.

#### Part III:

3. I certify that the respondent has considered a notice in compliance with section 78B of the *Judiciary Act* 1903 (Cth), and concluded same is not required.

30 **Part IV:**

4. The relevant narrative of facts is that set out in Part IV of the respondent's submissions in appeal B61 of 2018.

#### Part V:

5. The respondent's argument is set out in Part V of the respondent's said submissions in appeal B61 of 2018.

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#### Respondent's Submissions

Filed on behalf of the Respondent  
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**Part VI:**

6. Not applicable.

**Part VII:**

7. I estimate 3 hours to present the respondent's case in the three appeals being heard concurrently.

10 Dated this 8th day of February 2019.

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Legal Practitioner  
Representing the Respondent

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