

BETWEEN:

LIEN-YANG LEE

Appellant

and

CHIN-FU LEE

First Respondent

and

CHAO-LING HSU

Second Respondent

and

RACQ INSURANCE LIMITED

Third Respondent

SUBMISSIONS OF THE SECOND RESPONDENT

30 **Part I: Certification regarding publication**

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

Part II: Issues

2. The Second Respondent has filed a separate Notice of Appeal (High Court Proceeding No. B62 of 2018).
3. The interests of the Second Respondent are precisely co-extensive with those of the Appellant and the Second Respondent adopts and relies upon Part II of the submission filed on behalf of the Appellant.

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Part III: *Judiciary Act 1903 (Cth)*, s 78B

4. The Second Respondent certifies that she has considered whether any notice should be given to the Attorneys-General in compliance with s 78B of the *Judiciary Act*



1903 (Cth) and has concluded that no such notice need be given.

Part IV: Facts

5. The interests of the Second Respondent are precisely co-extensive with those of the Appellant and the Second Respondent adopts and relies upon Part IV of the submission filed on behalf of the Appellant.

Part V: Argument

- 10 6. The interests of the Second Respondent are precisely co-extensive with those of the Appellant and the Second Respondent adopts and relies upon Part V of the submission filed on behalf of the Appellant.

PART VI: Not applicable

Part VII: Time Estimate

7. The Second Respondent's estimate is that 30 minutes will be required for the presentation of her oral argument.

Dated: 8 February 2019

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