



HIGH COURT OF AUSTRALIA

NOTICE OF FILING

This document was filed electronically in the High Court of Australia on 10 Jun 2026 and has been accepted for filing under the *High Court Rules 2004*. Details of filing and important additional information are provided below.

Details of Filing

File Number: S155/2025
File Title: Estate of the late Geoffrey Croft v. MTH & Ors
Registry: Sydney
Document filed: Form 27F - R1 Outline of oral argument
Filing party: Respondents
Date filed: 10 Jun 2026

Important Information

This Notice has been inserted as the cover page of the document which has been accepted for filing electronically. It is now taken to be part of that document for the purposes of the proceeding in the Court and contains important information for all parties to that proceeding. It must be included in the document served on each of those parties and whenever the document is reproduced for use by the Court.

Form 27F – Outline of oral submissions

Note: see rule 44.08.2.

IN THE HIGH COURT OF AUSTRALIA
SYDNEY REGISTRY

BETWEEN:

ESTATE OF THE LATE GEOFFREY CROFT

Appellant

and

MTH

First Respondent

STATE OF NEW SOUTH WALES

Second Respondent

SANDRA CROFT

Third Respondent

FIRST RESPONDENT SUBMISSIONS

Part I: Certification

1. These Submissions are in a form suitable for publication on the Internet

Part II:

2. Background Information – outlining the progression of the case, a brief outline of the History and the Barriers (BOFM 1)
3. Address that the Evidence Act issues raised by the Appellant are easily rebutted and resolved and that the most critical elements of failure in the Primary Hearing have not been fully exposed. Identify how the removal of the criminal evidence via the Transcript was a huge burden and prevented the First Respondent to properly present her case.
4. The Breakdown and Involvement of the Independent Administrator and when and how they were appointed and for what purpose
5. The Process and Barriers that relate to significant and relevant items under Case Management and their relevance to show that a miscarriage of Justice had occurred, and is only partly addressed by the Appeal Judges (BOFM 6,7,8, 9,11, 12, 13)

6. Address the constant reiteration of the First Respondent not being credible and how that should never have occurred if the Primary Judge had not been swayed in an inappropriate direction in this case by the other parties.
7. Address the evidence that has remained unheard in the matter so this can confirm once and for all that the First Respondent has continued to be wrongly accused of lying and that this was unwarranted and caused a miscarriage of justice (Various Criminal Transcript references)
8. Identify how and where the Primary Judge did not interpret the medical evidence and allowed the Appellant to create medical conditions that the First Respondent does not suffer from in order to attempt to discredit her and her very exemplary medical reports and Expert Witness reports (BOFM 32,33,34,35,36,37, 38)
9. Items of the Appeal that where the correct or most current legislation was not quoted and this impeded the judges to consider all of the correct items related to the abuse issue and what impact that has had including the foster mother's estate matter
10. Identify the Adoption evidence and identify how the Appellant and Third Respondent failed to carry out their duties and interfered with the relationship with the long term foster parents. Also identify how the First Respondent has been left without any identity (BOFM 27,28,29)
11. Identify the relevance of Section 6a and how the Appeal Judges were also misled by the wrong legislation being quoted and how to apply the rights of Section 6a in such a case particularly when the State had an obligation to consider putting further burden on the First Respondent when considering all aspects of the criminal conviction and the relevance to acknowledge their significant failure to the First Respondent causing her to be abused, traumatized and suffer significant physical sexual and psychological abuse.
12. Identify the relevance of understanding the obligations of Government Guiding Principles and Model Litigant Policy and how they relate to the matters raised by the Appellant (BOFM 30,31)
13. Identify the accessing of file records and the sharing of these items has placed a large burden on the First Respondent and that there was some very difficult facts to work through – the State indicated that the First Respondent was placed with the Appellant and Third Respondent for the purpose of keeping the First Respondent close to her Foster parents and yet the Appellant and Third Respondent failed to comply to the obligations of the placement.
14. Identify the Victim Impact of these matters and the fact that these matters should have been settled without the need to have ended up being heard in the various courts after the hearing and conviction in the criminal trial.

15. Identify the process of the obligations of the Independent Administrator related to the Costs Order and the Freezing Order and the Notice of Intention to Appeal Notice (BOFM 1.2)
16. Identify the issues to be raised in regards to quantum (BOFM 39),
17. Identify and seek to ensure all aspects of Costs are clearly understood and given proper considerations related to the need to identify the obligations of the other parties when considering all the appropriate obligations and why it is important that this be recognized and given due consideration (BOFM 40, 41, 42, 43, 44, 45)
18. Identify what orders are sought and if there is an award in the First Respondent's Favour, that there be a writ issued immediately so there needs to be no further delay in resolve for the First Respondent as she has indicated a very strained rental situation that has been an added burden whilst progressing through this matter.
19. Request the Judges to consider some sort of travel and accommodation compensation/reimbursement, because there have now been three hearings where the First Respondent has had to pay travel and accommodation costs to attend the Hearings.

Dated: *10 June, 2026*

.....MTH.....

Self Represented