

## NOTICE OF FILING

### Details of Filing

Document Lodged: Affidavit - Form 59 - Rule 29.02(1)  
Court of Filing: FEDERAL COURT OF AUSTRALIA (FCA)  
Date of Lodgment: 2/06/2025 3:59:40 PM AEST  
Date Accepted for Filing: 2/06/2025 3:59:46 PM AEST  
File Number: VID420/2025  
File Title: IN THE MATTER OF ONESTEEL MANUFACTURING PTY LIMITED  
(ADMINISTRATORS APPOINTED) ACN 004 651 325  
Registry: VICTORIA REGISTRY - FEDERAL COURT OF AUSTRALIA



*Sia Lagos*

Registrar

### Important Information

This Notice has been inserted as the first page of the document which has been accepted for electronic filing. 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.

The date of the filing of the document is determined pursuant to the Court's Rules.



Form 59  
Rule 29.02(1)

## Affidavit

No. VID 420 of 2025

Federal Court of Australia  
District Registry: Victoria  
Division: Commercial and Corporations List

**SEBASTIAN DAVID HAMS, MARK FRANCIS XAVIER MENTHA, LARA LUISA WIGGINS  
AND MICHAEL ANTHONY KORDA IN THEIR CAPACITY AS JOINT AND SEVERAL  
ADMINISTRATORS OF ONESTEEL MANUFACTURING PTY LTD (ADMINISTRATORS  
APPOINTED) ACN 004 651 325**

First Plaintiff

**ONESTEEL MANUFACTURING PTY LTD (ADMINISTRATORS APPOINTED) ACN 004 651  
325**

Second Plaintiff

**WHYALLA PORTS PTY LTD ACN 153 225 364**

First Defendant

**GOLDING CONTRACTORS PTY LTD ACN 009 732 794**

Second Defendant

Affidavit of: **Stacie Khuan Starcevich**

Address: c/o King & Wood Mallesons  
Level 30, QV1 Building  
250 St Georges Terrace  
Perth WA 6000

Occupation: Solicitor

Date: 2 June 2025

Filed on behalf of (name & role of party)	Second Defendant		
Prepared by (name of person/lawyer)	Samuel James Dundas		
Law firm (if applicable)	King & Wood Mallesons		
Tel	+61 8 9269 7097	Fax	+61 8 9269 7999
Email	Sam.Dundas@au.kwm.com		
<b>Address for service</b> (include state and postcode)	Level 30, QV.1 Building, 250 St Georges Terrace Perth WA 6000		

## Contents

Document number	Details	Paragraph	Page
1	Affidavit of Stacie Khuan Starcevich affirmed on 2 June 2025	[1] – [11]	1 – 4

I, Stacie Khuan Starcevich, care of Level 30, QV.1 Building, 250 St Georges Terrace, Perth WA 6000, affirm:

### A. Introduction

1. I am a solicitor employed by KWM. KWM acts for the second defendant (**Golding**) in this proceeding. I have day-to-day carriage of this matter, under the supervision of Samuel James Dundas and Nathan John Collins, who are both partners of KWM. I am authorised to make this affidavit on Golding's behalf.
2. Unless otherwise stated, this affidavit is based on my own knowledge, information and belief. Where I depose to matters on the basis of information and belief, I believe such matters to be true and correct and I state the basis for my information and belief.
3. I refer to the affidavit of Nathan John Collins sworn on 25 April 2025, served on the other parties to this proceeding on that date and filed in this proceeding on 30 April 2025 (**First Collins Affidavit**) and my affidavit sworn on 26 May 2025 (**First Starcevich Affidavit**).
4. This affidavit is made in support of an application for orders for inspection of property pursuant to rule 14.01 of the *Federal Court Rules 2011* (Cth) (**Inspection Application**).

### B. Inspection Application

5. Paragraph 20 of the First Collins Affidavit lists a number of assets which are secured under the General Security Agreement dated 6 December 2024 between the first and second defendants which are located at the Whyalla port. Those include:
  - (a) a rail unloading facility which is used to offload iron ore product from trains so that the iron ore product may be stored or shipped (**Tip Pocket**);
  - (b) two ore storage sheds (**Ore Storage Sheds**);
  - (c) the following conveyor systems:
    - (i) a system of conveyors and transfer towers linking the tip pocket to the Ore Storage Sheds (**Ore Storage Sheds Infeed System**);

J. Ayres



- (ii) a system of conveyors within the Ore Storage Sheds (**Ore Storage Sheds Reclaim System**);
  - (iii) a system of conveyors and transfer towers linking the Ore Storage Sheds to a shiploader (**Transfer Conveyor System**); and
  - (d) a shiploader located in the inner harbour.
6. The First Starceovich Affidavit also lists a number of assets located at the Whyalla port. Those include:
- (a) the Tip Pocket;
  - (b) the Ore Storage Sheds; and
  - (c) a crane comprising the shiploader system.
7. The Tenure Map at Tab 2 of SKS-1 specifies the locations of the assets described in paragraphs 5 and 6 above:
- (a) the Tip Pocket is located on CL6213/636 (marked as A on the Tenure Map);
  - (b) one of the Ore Storage Sheds is located on CT5582/363 and CT5463/457 (marked as G and H on the Tenure Map);
  - (c) one of the Ore Storage Sheds is located on CT6144/964 (marked as E on the Tenure Map);
  - (d) the Ore Storage Sheds Infeed System is located on CL6213/636, CT6144/964 and CT5463/457 (marked as A, E and H on the Tenure Map);
  - (e) the Transfer Conveyor System is located on CT6144/964, CT5603/813, CT5582/363, CT5463/457 and CT6144/965 (marked as E, F, G, H and I on the Tenure Map); and
  - (f) the crane comprising the shiploader system is located on CT6144/965 (marked as I on the Tenure Map).
8. I have reviewed schedule 2 of the first defendant's cross-claim dated 29 April 2025 (**Cross-Claim**) and I have identified that the assets listed in paragraph 7 above are items 2, 3, 4, 9, 10, 11, 18, 23, 29, 31, 32 and/or 33 of schedule 2 of the Cross-Claim.
9. The property to be inspected pursuant to the first defendant's Inspection Application are the assets, and the equipment and machinery located within those assets, specified in paragraphs 7 above. There may be other assets that may be the subject of a further application for inspection after any amended cross-claim is filed.

J. Simpson



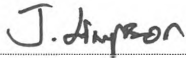
- 10. The orders sought by the Inspection Application are necessary for the first defendant to engage and instruct an expert witness for the purposes of this proceeding and to enable that expert witness to opine as to whether the property is personalty.
- 11. The access required for the expert witness to give effect to the purposes in paragraph 10 above is access to the areas of land under the plaintiffs' control upon which the property is located.

Sworn by Stacie Khuan Starcevich  
at Perth  
in Western Australia  
on 2 June 2025  
Before me: James Oliver Simpson

)  
)  
)  
)  
)



Signature of deponent



Signature of witness