

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:	10/08/2026 9:52:42 AM AEST
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File Number:	QUD492/2026
File Title:	MICHAEL JOE BOTICA & ORS v ADAM WATSON & ORS
Registry:	QUEENSLAND REGISTRY - FEDERAL COURT OF AUSTRALIA



A handwritten signature in blue ink that reads "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. QUD 492 of 2026

Federal Court of Australia
District Registry: Queensland
Division: General Division

IN THE MATTER OF PIONEER LAKES PTY LTD ACN 108 681 563

MICHAEL JOE BOTICA and others

Plaintiffs

ADAM WATSON and others

Defendants

Affidavit of: **John Leslie O'Toole**
Address: 8 Ringwood Court, Highvale QLD 4520
Occupation: Company director
Date: 10 August 2026

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1	Affidavit of John Leslie O'Toole in support of originating process affirmed on 10 August 2026		1-3

Signed by:
John Leslie O'Toole
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Signed by:
Heath Cruden
58F63E283CBD4F7...

Filed on behalf of (name & role of party)	Michael Joe Botica, Stephen Brian Coleman, John Leslie O'Toole, Grassland Properties Pty Ltd ACN 106 656 802, Jomist Developments Pty Ltd ACN 104 650 526, Plaintiffs		
Prepared by (name of person/lawyer)	Scott David Guthrie		
Law firm (if applicable)	Thomsons		
Tel	+61 7 3338 7516	Fax	07 3338 7599
Email	sguthrie@thomsons.com.au		
Address for service (include state and postcode)	c/- Thomsons Level 28, One Eagle – Waterfront Brisbane 1 Eagle Street BRISBANE QLD 4000		

[Version 3 form approved 02/05/2019]

I, John Leslie O'Toole, company director, affirm:

1. I am the Third Plaintiff.
2. I am also a director (together with the Second Plaintiff, Mr Coleman) of:
 - (a) Jomist Developments Pty Ltd ACN 104 650 526 (**Jomist**), the Fifth Plaintiff; and
 - (b) Pioneer Lakes Pty Ltd ACN 108 681 563 (**Pioneer Lakes**), the Fourth Defendant.
3. I am authorised to make this affidavit on behalf of Jomist.
4. In this affidavit, I refer to the affidavit of Michael Joe Botica affirmed 5 August 2026 (**First Botica Affidavit**). I adopt the definitions used in the First Botica Affidavit.

First Botica Affidavit

5. I have reviewed the First Botica Affidavit.
6. In relation to the First Botica Affidavit, I note as follows:
 - (a) I confirm that I executed the documents exhibited at **MJB-39** to the First Botica Affidavit, as detailed at paragraph 17 of the First Botica Affidavit. I did so in anticipation of completion of the Share Sale Agreement. In signing those documents before completion, which never occurred, I did not do so to effect any change to the directorship and shareholding of Pioneer Lakes prior to completion, but merely to ensure that Jomist as one of the sellers could easily fulfil its obligations under the Share Sale Agreement at completion.
 - (b) I refer paragraph 18 of the First Botica Affidavit and confirm I did not call any, nor was there any, meeting of members to effect a change in directorship of Pioneer Lakes to Mr Watson.
 - (c) I refer to paragraph 34 of the First Botica Affidavit and confirm that I have reviewed the online transaction history for bank account held by Jomist and myself. Neither the company nor I have received any funds in relation to the Share Sale Agreement.
 - (d) I refer to paragraph 42 of the First Botica Affidavit, and the Form 484 which is exhibited at **MJB-16** to the First Botica Affidavit. I never authorised the signing and lodgement of the Form 484 by Mr Watson.
 - (e) For the reasons which Mr Botica has given at paragraphs 61 to 65 of the First Botica Affidavit, I agree that the true ownership and directorship of Pioneer Lakes is an urgent matter.
 - (f) At paragraph 54 of the First Botica Affidavit, Mr Botica deposes to an email from Mr Stanger to Mr Watson on 31 July 2026 at 5.05pm which terminated the Share Sale Agreement. I agreed to the termination of the Share Sale Agreement.

Signed by:

John Leslie O'Toole

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Signed by:

Heath Cruden

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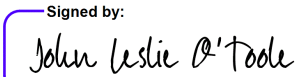
Affirmed by the deponent
at Highvale
in Queensland
on 10 August 2026

Before me:
Signed by:



58F63FE282CDD4F7
Signature of witness

)
)
)
)

Signed by:


F53AF4D707E94A1...

Signature of deponent

Heath William David Cruden
Australian Legal Practitioner

Thomsons
Level 28, One Eagle – Waterfront Brisbane
1 Eagle Street
BRISBANE QLD 4000

I am a special witness under the *Oaths Act 1867* (Qld).

This affidavit was made in the form of an electronic document.

I electronically signed this affidavit.

This affidavit was made, signed and witnessed under Part 6A of the *Oaths Act 1867* (Qld). I understand the requirements for witnessing a document by audio visual link and have complied with those requirements.