

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, reading "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.



1

Form 59
Rule 29.02(1)

Affidavit

No. QUD492 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: **Michael Joe Botica**
Address: 5 Wian Street, Buderim QLD 4556
Occupation: Company director
Date: 10 August 2026

Contents

Document number	Details	Paragraph	Page
1	Affidavit of Michael Joe Botica in support of originating process affirmed on 10 August 2026		1-4
2	Annexure " MJB-41 ", being copy of a share certificate for 25 ordinary shares held by Grassland Properties Pty Ltd ACN 106 656 802 (Grassland) in Pioneer Lakes Pty Ltd ACN 108 681 563 (Pioneer Lakes)	5	5-6

Signed by:

Michael Joe Botica

EF35931579E9488...

Signed by:

Heath Cruden

E58563F283C8D457

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

c/- Thomsons

Level 28, One Eagle – Waterfront Brisbane

1 Eagle Street

Address for service

(include state and postcode)

BRISBANE QLD 4000

[Version 3 form approved 02/05/2019]

Document number	Details	Paragraph	Page
3	Annexure " MJB-42 ", being a copy an extract from the Pioneer Lakes company register	8	7-16

I, Michael Joe Botica, company director, affirm:

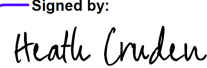
1. I am the First Plaintiff. I am also:
 - (a) a director of Grassland Properties Pty Ltd ACN 106 656 802 (**Grassland**), the Fourth Plaintiff; and
 - (b) a director of Pioneer Lakes Pty Ltd ACN 108 681 563 (**Pioneer Lakes**), the Fourth Defendant.
2. I refer to my first affidavit affirmed 5 August 2026 (**First Affidavit**). I adopt the definitions used in my First Affidavit.
3. I make this affidavit from my own knowledge except where otherwise indicated. Where I make this affidavit from facts outside my personal knowledge, I am informed by the source stated and believe those facts to be true.

Grassland's share certificate

4. As I have deposed to at paragraphs 7 and 20 of my First Affidavit, and consistent with the true position:
 - (a) Grassland was recorded on the database maintained by ASIC as the holder of 30 ordinary shares, or 30% of the issued share capital in Pioneer Lakes, until 3 July 2026; and
 - (b) the register of members of Pioneer Lakes records Grassland as holding 30 ordinary shares, or 30% of the ordinary issued share capital in Pioneer Lakes. The register of members of Pioneer Lakes which is exhibited at **MJB-6** to my First Affidavit shows that:
 - (i) on 2 September 2009, Grassland received 25 ordinary shares in Pioneer Lakes; and
 - (ii) on 28 June 2016, Grassland received a further 5 ordinary shares in Pioneer Lakes.
5. Exhibited at **MJB-41** is a true copy of a share certificate for 25 ordinary shares (or 25% of the ordinary issued share capital in Pioneer Lakes) dated 2 September 2009.
6. I have not been able to locate a share certificate for the balance of 5 ordinary shares (5% of the ordinary issued share capital in Pioneer Lakes) held by Grassland.

Signed by:

 EF35931579E9488...

Signed by:

 58F63E283CBD4F7...

Extracts from Pioneer Lakes' company register

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.

No. QUD492 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

ANNEXURE CERTIFICATE

This is the document referred to as “**MJB-41**” in the Affidavit of Michael Joe Botica affirmed at Kunda Park on 10 August 2026.

Signed by:

EF35931579E9488...
Michael Joe Botica

Signed by:

58F63E283CBD4F7...
Witness

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		

Share Certificate

Pioneer Lakes Pty Ltd

A.C.N. 108 681 563

Registered under the provisions of the Corporations Act

REGISTERED OFFICE: 26 Mittech Drive Kunda Park Q 4556

CERTIFICATE NO: 6 for 25 share(s)

This is to Certify that Grassland Properties P/L A/T/F The Grassland Trust of 1,134 Alexandra Parade, Alexandra Headland is the Registered Holder, subject to the Constitution, of the undermentioned shares in the company on which the sum of \$ 1 per Share has been paid and on which the sum of \$ 0 is unpaid.

No of Shares	Class	Distinctive Numbers		No of Shares	Class	Distinctive Numbers	
		From	To			From	To
10	ORD	1	10				
15	ORD	61	75				

Executed in accordance with the Corporations Act

dated 2/9/09

 Director

 Secretary

Note: This certificate must be surrendered to the Company on Transfer of any of the above shares

No. QUD492 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

ANNEXURE CERTIFICATE

This is the document referred to as “**MJB-42**” in the Affidavit of Michael Joe Botica affirmed at Kunda Park on 10 August 2026.

Signed by:

EF35931579E9488...
Michael Joe Botica

Signed by:

58F63E283CBD4F7...
Witness

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

REGISTER OF DIRECTORS

Pioneer Lakes
Riverside Country Estate Pty Ltd
A.C.N. 108 681 563

Full Name (present and former) **Michael Ronald, COLEMAN**
 Residential Address **52 Sassifras Street, Mudjimba Qld 4564**
 Date and Place of Birth **Taree NSW 23/02/1960**

Date of Appointment	Particulars of Other Directorships	Business Occupation	Nature of Change and Relevant Date
08/04/2004	Nil	Company Director	<i>(died) removed 27/7/2025</i>

Full Name (present and former) **Leslie James, BARTLETT**
 Residential Address **21A ~~29~~ Wattle Street, Andergrove Qld 4740**
 Date and Place of Birth **Wollongong NSW 06/09/1948**

Date of Appointment	Particulars of Other Directorships	Business Occupation	Nature of Change and Relevant Date
08/04/2004	Nil	Company Director	<i>resigned 3/12/12</i>

5 Wian St. Buderim Q 4556

Full Name (present and former) *Michael Joe Botica - 5 Foote Ridge Buderim*
 Residential Address *Unit 1, 134 Alexandra Parade, Alexandra Headland Q 4556*
 Date and Place of Birth *24/2/1958 Te Koperu, New Zealand*

Date of Appointment	Particulars of Other Directorships	Business Occupation	Nature of Change and Relevant Date
<i>2/9/09</i>	<i>NIL</i>	<i>Company Director</i>	

Full Name (present and former) *John Leslie O'Loole*
 Residential Address *8 Ringwood Court Sanford Q 4520*
 Date and Place of Birth *27/7/1960 - Bundaberg Q*

Date of Appointment	Particulars of Other Directorships	Business Occupation	Nature of Change and Relevant Date
<i>3/12/12</i>	<i>NIL</i>	<i>Company Director</i>	

REGISTER OF DIRECTORS

Pioneer Lakes
~~Riverside Country Estate~~ Pty Ltd
 A.C.N. 108 681 563

Full Name (present and former)

Residential Address

Date and Place of Birth

Stephen Brian Coleman
11 Riffelbird Ave Arona Q 4551
25/12/1958 Taree NSW

Date of Appointment	Particulars of Other Directorships	Business Occupation	Nature of Change and Relevant Date
<i>3/12/12</i>	<i>NIL</i>	<i>Company Director</i>	

Full Name (present and former)

Residential Address

Date and Place of Birth

Date of Appointment	Particulars of Other Directorships	Business Occupation	Nature of Change and Relevant Date

Full Name (present and former)

Residential Address

Date and Place of Birth

Date of Appointment	Particulars of Other Directorships	Business Occupation	Nature of Change and Relevant Date

Full Name (present and former)

Residential Address

Date and Place of Birth

Date of Appointment	Particulars of Other Directorships	Business Occupation	Nature of Change and Relevant Date

REGISTER OF SECRETARIES

Pioneer Lakes
~~Riverside Country Estate Pty Ltd~~
 A.C.N. 108 681 563

Full Name (present and former) **Michael Ronald, COLEMAN**
 Residential Address **52 Sassifras Street, Mudjimba Qld 4564**
 Date and Place of Birth **Taree NSW 23/02/1960**

Date of Appointment	Other Occupations	Nature of Change and Relevant Date
08/04/2004		<i>Died 27/7/2025</i>

Full Name (present and former) *John Leslie O'Boole*
 Residential Address *8 Ringwood Court, Highvale Q 4520*
 Date and Place of Birth *27/7/1960 Bundaberg Qld.*

Date of Appointment	Other Occupations	Nature of Change and Relevant Date
<i>28/7/2025</i>		

Full Name (present and former)
 Residential Address
 Date and Place of Birth

Date of Appointment	Other Occupations	Nature of Change and Relevant Date

Full Name (present and former)
 Residential Address
 Date and Place of Birth

Date of Appointment	Other Occupations	Nature of Change and Relevant Date

REGISTER OF MEMBERS

Riverside Country Estate Pty Ltd
A.C.N. 108 681 563

①

Full Name **Stormpine Pty Ltd ACN 010 936 651**Address **36 Wood Street, Mackay Qld 4740**Date and Entry as a Member: **08/04/2004** Date of Cessation as a Member: **9/2/05**

Date	Allotment or transfer	Class of Share	Cert. No.	Serial No.		No. of Shares		Balance Held	Amount Paid Per Share
				From	To	Acq'd	Trf'd		
08/04/2004 9/2/05	Allotment Transfer	Ord ord	1 1	1 1	10 10	10	- 10	10 NIL	\$1.00

②

Full Name **Jomist Developments Pty Ltd ACN 104 650 526**Address **26 Hi-Tech Drive, Kunda Park Qld 4556**Date and Entry as a Member: **08/04/2004** Date of Cessation as a Member:

Date	Allotment or transfer	Class of Share	Cert. No.	Serial No.		No. of Shares		Balance Held	Amount Paid Per Share
				From	To	Acq'd	Trf'd		
08/04/2004 15/6/09 31/12/12	Allotment subdivide TRF	Ord ORD ORD	2 5 8	11 21 76	20 60 95	10 40 20	- - 70	10 50 70	\$1.00

Leslie James Bartlett & Tina Bartlett

③

Full Name (present and former)

Address **36 Wood Street, Mackay Q 4740**Date and Entry as a Member: **9/2/05** Date of Cessation as a Member:

Date	Allotment or Transfer	Class of Share	Cert. No.	Serial No.		No. of Shares		Balance Held	Amount Paid Per Share
				From	To	Acq'd	Trf'd		
9/2/05 15/6/09 2/9/09	Transfer subdivide Transfer	ORD ORD ORD	3 4 4	1 61 61	10 100 100	10 40 25		10 50 25	\$1.00

- PTO

④

Full Name (present and former) **Grasslands Properties P/L altf The Grassland Trust**Address **1,134 Alexandra Parade Alexandra Headland**Date and Entry as a Member: **2/9/09** Date of Cessation as a Member:

Date	Allotment or Transfer	Class of Share	Cert. No.	Serial No.		No. of Shares		Balance Held	Amount Paid Per Share
				From	To	Acq'd	Trf'd		
2/9/09 28/6/16 28/6/16	transfer Transfer Transfer	Ord Ord Ord	6 11 11	61 96 100	10 96 100	25 4 1		25 29 30	\$1 \$1

REGISTER OF MEMBERS

Riverside Country Estate Pty Ltd
A.C.N. 108 681 563

Leslie James Bartlett & Tina Bartlett
A I T I F

The Squirrel Trust
36 Wood Street Mackay Q 4740

③ Full Name (present and former)

Address

CONT'D

Date and Entry as a Member: 9/2/05

Date of Cessation as a Member: 28/6/16

Date	Allotment or Transfer	Class of Share	Cert. No.	Serial No.		No. of Shares		Balance Held	Amount Paid Per Share
				From	To	Acq'd	Trf'd		
Cont'd.									
31/2/12	TRF	ORD	9	76	95		20	5	
31/2/12	TRF	ORD	9	96	99		4	1	
28/6/16	TRF	ORD	-					NIL	

Matthew Morris Cohen
A I T I F

MACO Holdings Trust

⑤ Full Name (present and former)

Address Unit 6 71-73 DUPOUTH AVENUE MAROOCHYDORE Q 4558

Date and Entry as a Member: 3/12/12

Date of Cessation as a Member: 28/6/16

Date	Allotment or Transfer	Class of Share	Cert. No.	Serial No.		No. of Shares		Balance Held	Amount Paid Per Share
				From	To	Acq'd	Trf'd		
3/12/12	TRF	ORD	9	96	99	4		4	
28/6/16	TRF	ORD					4	NIL	

Full Name (present and former)

Address

Date and Entry as a Member:

Date of Cessation as a Member:

Date	Allotment or Transfer	Class of Share	Cert. No.	Serial No.		No. of Shares		Balance Held	Amount Paid Per Share
				From	To	Acq'd	Trf'd		

Full Name (present and former)

Address

Date and Entry as a Member:

Date of Cessation as a Member:

Date	Allotment or Transfer	Class of Share	Cert. No.	Serial No.		No. of Shares		Balance Held	Amount Paid Per Share
				From	To	Acq'd	Trf'd		

SHARE SCRIP REGISTER

Riverside Country Estate Pty Ltd
A.C.N. 108 681 563

DATE ISSUED	CERT. NO	TO WHOM ISSUED	SHARES		SERIAL NOS.		DATE OF SURRENDER	DETAILS OF SURRENDER
			NO.	CLASS	FROM	TO		
08/04/2004	1	Stormpine Pty Ltd ACN 010 936 651	10	Ord	1	10		
08/04/2004	2	Jomist Developments Pty Ltd ACN 104 650 526	10	Ord	11	20		
27/6/09	4	The Squirrel Trust	40	ORD	61	100	2/9/09 Various	
27/6/09	5	Jomist Developments P/L	40	ORD	21	60		
2/9/09	6	The Grassland Trust	25	ORD	1 61	10 75		
2/9/09	7	The Squirrel Trust	25	ORD	76	100	3/12/12	
3/12/12	8	Jomist Developments P/L	20	ORD	76	95		
3/12/12	9	Maco Holdings Trust	4	ORD	96	99	28/6/16	
3/12/12	10	The Squirrel Trust	1	ORD	100	100	28/6/16	
28/6/16	11	The Grassland Trust	5	ORD	96	100		

APPLICATION and ALLOTMENT JOURNAL

Riverside Country Estate Pty Ltd
A.C.N. 108 681 563

①

Name of Applicant **Stormpine Pty Ltd ACN 010 936 651** - *trf to The Squirat Trust 9/2/05*
Date Received: **08/04/2004**

Number of Shares Applied for	Number Shares Allotted	Certificate. No.	Distinctive No's		Amount Paid on Application per Share	Balance Payable	Date of Allotment
			From	To			
10	10	1	1	10	\$1.00	Nil	08/04/2004

②

Name of Applicant **Jomist Developments Pty Ltd ACN 104 650 526**
Date Received: **08/04/2004**

Number of Shares Applied for	Number Shares Allotted	Certificate. No.	Distinctive No's		Amount Paid on Application per Share	Balance Payable	Date of Allotment
			From	To			
10	10	2	11	20	\$1.00	Nil	08/04/2004

③

Name of Applicant *The Squirat Trust*
Date Received *27/6/09*

Number of Shares Applied for	Number Shares Allotted	Certificate. No.	Distinctive No's		Amount Paid on Application per Share	Balance Payable	Date of Allotment
			From	To			
40	40	4	61	100	—	—	27/6/09

④

Name of Applicant *Jomist Developments Pty Ltd*
Date Received *27/6/09*

Number of Shares Applied for	Number Shares Allotted	Certificate. No.	Distinctive No's		Amount Paid on Application per Share	Balance Payable	Date of Allotment
			From	To			
40	40	5	21	60	—	—	27/6/09

TRANSFER JOURNAL

Riverside Country Estate Pty Ltd
A.C.N. 108 681 563

TRANSFEROR: ~~The Squirrel Trust~~ Stormpine Pty Ltd

TRANSFEE: The Squirrel Trust

NO. TRANS-FER	TRANSFER DATE	TOTAL SHARES	SCRIP CAN-CELLED	DISTINC-TIVE NO. OF SHARES	FOLIO REG. OF MEMBERS T'FOR	FOLIO REG. OF MEMBERS T'FEE	SCRIP ISSUED	CONSID-ERATION PER SHARE	PAID-UP PER SHARE	DATE OF MINUTE
1	9/2/05	10	1	1-10	1	3	3	\$1.00	\$1.00	9/2/05

TRANSFEROR: The Squirrel Trust

TRANSFEE: Grassland Properties A/T/F The Grasslands Trust

NO. TRANS-FER	TRANSFER DATE	TOTAL SHARES	SCRIP CAN-CELLED	DISTINC-TIVE NO. OF SHARES	FOLIO REG. OF MEMBERS T'FOR	FOLIO REG. OF MEMBERS T'FEE	SCRIP ISSUED	CONSID-ERATION PER SHARE	PAID-UP PER SHARE	DATE OF MINUTE
2	2/9/09	25	3 4	1-10 61-75	3	4	6		\$1.00	

TRANSFEROR: The Squirrel Trust

TRANSFEE: Comist Developments Pty Ltd

NO. TRANS-FER	TRANSFER DATE	TOTAL SHARES	SCRIP CAN-CELLED	DISTINC-TIVE NO. OF SHARES	FOLIO REG. OF MEMBERS T'FOR	FOLIO REG. OF MEMBERS T'FEE	SCRIP ISSUED	CONSID-ERATION PER SHARE	PAID-UP PER SHARE	DATE OF MINUTE
3	3/12/12	20	7	76-95	3 ~~95~~	2	8		\$1.00	

TRANSFEROR: The Squirrel Trust

TRANSFEE: Maco Holdings Trust

NO. TRANS-FER	TRANSFER DATE	TOTAL SHARES	SCRIP CAN-CELLED	DISTINC-TIVE NO. OF SHARES	FOLIO REG. OF MEMBERS T'FOR	FOLIO REG. OF MEMBERS T'FEE	SCRIP ISSUED	CONSID-ERATION PER SHARE	PAID-UP PER SHARE	DATE OF MINUTE
4	3/12/12	4	7	96-99	3 ~~99~~	5	9		\$1.00	

TRANSFER JOURNAL*Pioneer Lakes Pty Ltd**A.C.N. 108 681 563*TRANSFEROR: *The Squirrel Trust*TRANSFeree: *The Grasslands Trust*

NO. TRANSFER	TRANSFER DATE	TOTAL SHARES	SCRIP CANCELLED	DISTINCTIVE NO. OF SHARES	FOLIO REG. OF MEMBERS T'FOR	FOLIO REG. OF MEMBERS T'FEE	SCRIP ISSUED	CONSIDERATION PER SHARE	PAID-UP PER SHARE	DATE OF MINUTE
5	28/6/16	1			3	4		\$1	\$1	28/6/16

TRANSFEROR: *Macro Holdings Trust*TRANSFeree: *The Grasslands Trust*

NO. TRANSFER	TRANSFER DATE	TOTAL SHARES	SCRIP CANCELLED	DISTINCTIVE NO. OF SHARES	FOLIO REG. OF MEMBERS T'FOR	FOLIO REG. OF MEMBERS T'FEE	SCRIP ISSUED	CONSIDERATION PER SHARE	PAID-UP PER SHARE	DATE OF MINUTE
6	28/6/16	4			5	4		\$1	\$1	28/6/16

TRANSFEROR:

TRANSFeree:

NO. TRANSFER	TRANSFER DATE	TOTAL SHARES	SCRIP CANCELLED	DISTINCTIVE NO. OF SHARES	FOLIO REG. OF MEMBERS T'FOR	FOLIO REG. OF MEMBERS T'FEE	SCRIP ISSUED	CONSIDERATION PER SHARE	PAID-UP PER SHARE	DATE OF MINUTE

TRANSFEROR:

TRANSFeree:

NO. TRANSFER	TRANSFER DATE	TOTAL SHARES	SCRIP CANCELLED	DISTINCTIVE NO. OF SHARES	FOLIO REG. OF MEMBERS T'FOR	FOLIO REG. OF MEMBERS T'FEE	SCRIP ISSUED	CONSIDERATION PER SHARE	PAID-UP PER SHARE	DATE OF MINUTE