

NOTICE OF FILING

Details of Filing

Document Lodged:	Outline of Submissions
Court of Filing	FEDERAL COURT OF AUSTRALIA (FCA)
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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.

Outline



No. QUD 492 of 2026

Federal Court of Australia
District Registry: Queensland
Division: General

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

MICHAEL JOE BOTICA and others

Plaintiffs

ADAM WATSON and others

Defendants

PLAINTIFFS' SUPPLEMENTARY OUTLINE AS TO COSTS

Overview

1. These submissions are filed further to the outline of submissions filed by the Plaintiffs on 31 August 2026.
2. The Plaintiffs commenced these proceedings urgently in circumstances where:
 - (a) Mr Watson (the first defendant) had amended the ASIC register of Pioneer Lakes Pty Ltd (**Pioneer**) (the fourth defendant), to record himself as the sole director and as shareholder of Pioneer together with the second and third defendants (related entities of Mr Watson); and
 - (b) the Plaintiffs identified, through their inquiries with the Commonwealth Bank, that Mr Watson had also taken control of at least one of Pioneer's bank accounts, and there were two suspicious transactions on that account which resulted in the Plaintiffs seeking to freeze Pioneer's accounts (**Transactions**).
3. Orders were made by Wheatley J on 5 August 2026 to restrain Mr Watson and his related entities (the second and third defendants) from, amongst other things, dealing with the assets of Pioneer. Orders were made by Downes J to correct the ASIC register on 10 August 2026.
4. Since the delivery of the plaintiffs' initial submissions on costs, the Commonwealth Bank has undertaken an internal investigation and found that:¹
 - (a) on 31 July 2026, the authorities on Pioneer's bank accounts ending xxxx7697, xxxx3081 and xxx0631 were amended to remove the signatories and replace them with Mr Watson, upon Mr Watson presenting a company search in branch;
 - (b) those accounts were linked to Mr Watson's NetBank ID;
 - (c) the change of authority was processed arising from a company search presented in branch; and

¹ Fourth Affidavit of Scott David Guthrie affirmed 7 September 2026, [9]-[10].

(d) Mr Watson authorised the Transactions.

5. Mr Watson, during the course of the proceedings by an affidavit filed 17 August 2026 which he had been ordered to file, had deposed to having not dealt with any property or funds of Pioneer.²
6. It is submitted that the evidence justifies the Plaintiffs' concerns, demonstrates the need for urgent relief to protect the interests of the Plaintiffs, and is further reason that this is an appropriate matter for the court to exercise its discretion to award costs of the proceeding on the indemnity basis (except for the plaintiffs' costs of preparation and appearance at the case management hearing held 19 June 2026, 60% of which are to be paid on the indemnity basis).

8 September 2026

Thomsons

Solicitors for the plaintiffs

² Affidavit of Adam Watson affirmed 14 August 2026, filed 17 August 2026, [32].