

**IN THE FEDERAL COURT OF AUSTRALIA  
VICTORIAN DISTRICT REGISTRY**

**No. VID 621 of 2005**

**IN THE MATTER OF:**

**ANSETT AUSTRALIA LTD  
(ACN 004 209 410) & ORS (in accordance with  
the schedule attached) (All subject to a Deed of  
Company Arrangement)**

**and**

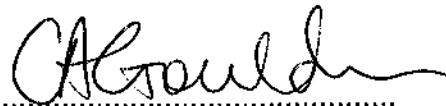
**MARK ANTHONY KORDA and MARK FRANCIS  
XAVIER MENTHA (as Deed Administrators of  
the Companies)**

**Plaintiffs**

**CERTIFICATE IDENTIFYING EXHIBIT**

This is the exhibit marked "**AWK-5**" now produced and shown to **ALEXANDER  
WILLIAM KING** at the time affirming his affidavit on 23 September 2005.

Before me: .....



**CAROLINE ANNE GOULDEN  
ARNOLD BLOCH LEIBLER  
LEVEL 21, 333 COLLINS STREET  
MELBOURNE 3000  
A NATURAL PERSON WHO IS A CURRENT  
PRACTITIONER WITHIN THE MEANING OF  
THE LEGAL PRACTICE ACT 1986.**

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Filed on behalf of the Plaintiffs

**ARNOLD BLOCH LEIBLER**  
Lawyers and Advisers  
Level 21, 333 Collins Street  
MELBOURNE VIC 3000

Telephone: (03) 9229 9696  
Facsimile: (03) 9229 9900  
Reference: AWK:01-1349951  
(Alex King)

"AWK-5"

**Kim Worrall**

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**From:** Kim Worrall on behalf of Alex King  
**Sent:** Thursday, 8 September 2005 2:58 PM  
**To:** 'Tim.Luxton@asic.gov.au'; 'ross.mcclure@ags.gov.au'; 'tony.troiani@malleons.com';  
'brendon.watkins@minterellison.com'  
**Cc:** 'as.goldbergJ@fedcourt.gov.au'; 'annabelle.roxon@fedcourt.gov.au'  
**Subject:** ANSETT: VID 621 of 05 (Pooling application)



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Dear Sirs

Further to my email a moment ago, I attach a PDF version of the poster-size chart which will be exhibit "MAK-14" to Mark Korda's affidavit. We provide the attached PDF copy for your convenience and, as noted in the last email, will hand deliver to you this afternoon an AO size version of the document.

Please acknowledge receipt.

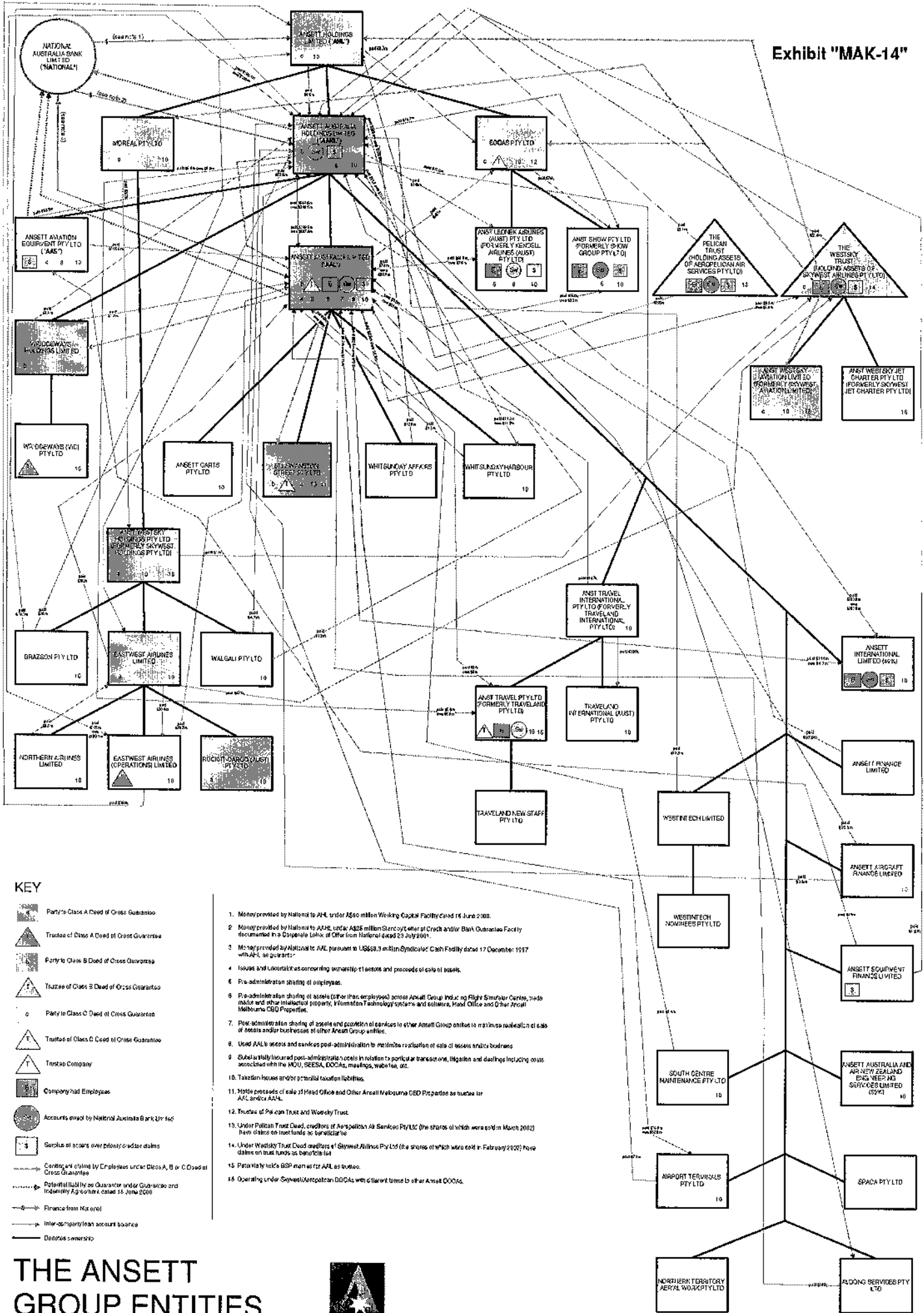
Regards

Alex King  
Partner

Arnold Bloch Leibler  
Lawyers and Advisers

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- KEY**
- 1. Party to Class A Deed of Cross Guarantee
  - 2. Trustee of Class A Deed of Cross Guarantee
  - 3. Party to Class B Deed of Cross Guarantee
  - 4. Trustee of Class B Deed of Cross Guarantee
  - 5. Party to Class C Deed of Cross Guarantee
  - 6. Trustee of Class C Deed of Cross Guarantee
  - 7. Trustee Company
  - 8. Company/Head Employee
  - 9. Accounts owed by National Australia Bank Ltd
  - 10. Service of accounts over priority order claims
  - 11. Contingent claims by Employees under Class A, B or C Deed of Cross Guarantee
  - 12. Potential liability as Guarantor under Guarantee and Indemnity Agreements dated 15 June 2000
  - 13. Finance from Maxtel
  - 14. Inter-company/loan account balances
  - 15. Director/owner(s)

1. Money provided by National to AHL under A\$50 million Working Capital Facility dated 16 June 2000.
2. Money provided by National to AAHL under A\$25 million Working Capital Facility documented in a Corporate Loan Offer from National dated 23 July 2000.
3. Money provided by National to AAL pursuant to US\$68.3 million Syndicated Cash Facility dated 17 December 1997 with AAL as guarantor.
4. Issues and undertakings concerning ownership of assets and proceeds of sale of assets.
5. Pre-administration sharing of employees.
6. Pre-administration sharing of assets (for those employees) across Ansett Group including Right of First Refusal, trade marks and other intellectual property, Information Technology systems and software, Head Office and Other Ansett Melbourne CBD Properties.
7. Pre-administration sharing of assets and provision of services to other Ansett Group entities to maximize realisation of sale of assets and/or businesses of other Ansett Group entities.
8. Used AAL's assets and services post-administration to minimize realisation of sale of assets and/or businesses.
9. Substantially insured post-administration assets in relation to particular transactions, litigation and dealings including cross associated with the MOU, SEESA, DOOCs, meetings, website, etc.
10. Taxation issues and/or potential taxation liabilities.
11. Hold proceeds of sale of Head Office and Other Ansett Melbourne CBD Properties as trustee for AAL and/or AAHL.
12. Trustee of Pelican Trust and Westsky Trust.
13. Under Pelican Trust Deed, conditions of Aeropelican Air Services Pty Ltd (the shares of which were sold in March 2002) have priority over those of AAHL.
14. Under Westsky Trust Deed and terms of Skywest Airlines Pty Ltd (the shares of which were sold in February 2002) have priority over those of AAHL.
15. Priority over AAHL's BSP monies for AAL as trustee.
16. Operating under Skywest/Aeropelican DOOCs with different terms to other Ansett DOOCs.

# THE ANSETT GROUP ENTITIES

