

NOTICE OF PROPOSED SETTLEMENT

CAMDEN LAND SUBSIDENCE CLASS ACTION

Moussa v Camden Council & Ors – Supreme Court of NSW Proceedings

THIS NOTICE CONTAINS IMPORTANT INFORMATION ABOUT THE CAMDEN LAND SUBSIDENCE CLASS ACTION.

PLEASE READ IT CAREFULLY, AS IT MAY AFFECT YOUR LEGAL RIGHTS.

There has been a settlement of the Camden Land Subsidence Class Action (**Proposed Settlement**). The Supreme Court of NSW must decide whether it is a fair settlement for the class members.

It is proposed that the settlement will be distributed only to Group Members who currently own an “Eligible Property” (as defined below), being properties situated upon the land formerly owned by the Council, or reasonably proximate to it. A complete list of the Eligible Properties are at Annexure A to this notice.

If you are a Group Member who owns or owned a property that is not an Eligible Property, pursuant to the Proposed Settlement, it is proposed that your legal claim in relation to the Camden Land Subsidence Class Action will be extinguished but you will **not** be entitled to any distribution from the Settlement Sum.

You have three options in response to this notice.

Option 1 (only Group Members that currently own an Eligible Property) – Register to participate in the Proposed Settlement (defined below):

- If you currently own an Eligible Property and have previously signed up to the Spring Farm Litigation Funding Scheme (defined below) you do not need to do anything further at this stage. If you are unsure whether you have signed up to the Spring Farm Litigation Funding Scheme, please contact the Funder using the contact details below.
- If you currently own an Eligible Property and have **not** signed up to the Spring Farm Litigation Funding Scheme and wish to participate in the Proposed Settlement without objection, you must register your details with the Funder by **18 September 2026** by either:
 - (a) completing and submitting the online Registration Form available at <https://portal.omnibridgeway.com/spring-farm>; or
 - (b) completing and returning the hard copy Registration Form (at Annexure B to this Notice) to the Funder by email or post (address details are on the form).

Option 2 – Object to the Proposed Settlement. If you disagree with the Proposed Settlement (or any aspect of it), you may file a completed Notice of Objection to Proposed Settlement (at Annexure C to this Notice) and any evidence and written submissions in support of your objection in the Registry of the Supreme Court of New South Wales by **18 September 2026** and send a copy of these documents to the Funder. The Court will consider the reasons why you disagree with the Proposed Settlement or any particular aspect of it. Despite your objection, if you currently own an Eligible Property, you will still be entitled to participate in the Proposed Settlement if approved, provided that you register your details by **18 September 2026**, if you have not done so already or signed up to the Spring Farm Litigation Funding Scheme.

Option 3 – Do nothing. If you currently own an Eligible Property, have previously signed up to the Spring Farm Litigation Funding Scheme and you have not opted out, you are deemed to have registered to participate in the Proposed Settlement. If you have not signed up to the Spring Farm Litigation Funding Scheme and do nothing you will remain a Group Member and be bound by the Proposed Settlement, your legal claim in relation to the Camden Land Subsidence Class Action will be extinguished but you will **not** be entitled to any distribution from the Settlement Amount (even if otherwise eligible to do so).

WHY IS THIS NOTICE IMPORTANT?

- 1 A class action was commenced in 2020 in the Supreme Court of New South Wales on behalf of persons who, at the relevant time, owned residential lots within Spring Farm NSW 2570 (**Relevant Properties**) and who claim that they have suffered damage to their lots by reason of the conduct of the defendants: Camden Council, Cornish Group Spring Farm Pty Ltd and/or SMEC Testing Services Pty Limited (In liq) (**Defendants**). The solicitors for the plaintiff were Mayweathers, and the class action was funded by Omni Bridgeway (Fund 5) Australian Inv. Pty Ltd (ACN 635 083 984) (**the Funder**).
- 2 A settlement of the Camden Land Subsidence Class Action has been reached, which is conditional upon it being approved by the Supreme Court.
- 3 This notice is being sent to you because you are or may be a “Group Member” in the class action. You are a Group Member in the Camden Land Subsidence Class Action if you owned any of the Relevant Properties at any time during the period after 31 December 2010 up to 17 September 2021. The full Group Member definition is contained at paragraph 1(c) of the Second Further Amended Statement of Claim (**2FASOC**), available on request. If you live in a Relevant Property but are **not** the owner of the property please pass this notice onto the landlord, agent or owner.
- 4 You may previously have received a notice about your right to opt out of the Camden Land Subsidence Class Action. If you opted out, you are no longer a Group Member and should disregard this notice.
- 5 **If you are a Group Member and have not opted out, you should read this Notice carefully.** This Settlement Notice provides important information about: (a) the Proposed Settlement; (b) whether you are eligible to participate in the Proposed Settlement, and how to register if you have not already done so, (c) what will happen if you do not register by the Court-ordered deadline of **18 September 2026**, (d) how distributions to eligible registered Group Members will be determined; and (e) what you need to do if you wish to object to the Proposed Settlement.

WHAT IS THE CAMDEN LAND SUBSIDENCE CLASS ACTION ABOUT?

- 6 In the Camden Land Subsidence Class Action:
 - (a) it is alleged that the Defendants’ conduct caused the land in Spring Farm to be unfit or unsuitable for residential development;
 - (b) it is alleged that from around 2015, homes have been constructed in Spring Farm on land that was unfit or unsuitable for residential development;

- (c) it is alleged that as a result of the above, some Spring Farm property owners have:
 - (i) suffered property damage or economic loss as a result of damage to residential buildings located on their properties and/or their properties being in a defective condition because of the condition of the soil on their properties; or
 - (ii) suffered economic loss as a result of a reasonable apprehension that some land within the Spring Farm area is unfit for residential buildings because of the condition of the soil of some properties within the Spring Farm area – however the plaintiff informed the Supreme Court that these claims were not being pressed;
- (d) it is alleged that the Defendants caused the loss and damage and ought to compensate the Spring Farm property owners for the loss or damage claimed against them.

7 The Defendants deny the allegations and have settled the class action without any admission of liability.

TERMS OF THE PROPOSED SETTLEMENT

8 Shortly before the initial trial of the matter was scheduled to commence, the parties agreed to a proposed settlement under which the Defendants will pay, without admission of liability, AUD \$18 million (**Settlement Sum**) to settle the claims of the Plaintiff and Group Members.

9 The Proposed Settlement must be approved by the Supreme Court of New South Wales as fair and reasonable and in the interests of Group Members before it will be binding. If approved, the Proposed Settlement (after deduction of approved legal costs and other costs which are explained below) will be distributed to Eligible Group Members (defined below) who, on or before **4pm on 18 September 2026**, register to receive money under the settlement.

10 The key terms of the Proposed Settlement are as follows:

- (a) The Defendants, collectively, will pay AUD \$18 million to settle the claims of the Plaintiff and Group Members which is inclusive of interest, costs and applicable GST;
- (b) The Plaintiff and all Group Members will release and discharge the Defendants from the claims the subject of the Camden Land Subsidence Class Action and any other claims arising from or in connection with the Camden Land Subsidence Class Action;
- (c) The Defendants will release and discharge the Plaintiff and Group Members from any claims relating to the Camden Land Subsidence Class Action;
- (d) The settlement and the releases will only become effective once the Court has approved the Proposed Settlement and on and from the date on which the Defendants pay the Settlement Amount in full; and

- (e) Once the Proposed Settlement is approved by the New South Wales Supreme Court, the Settlement Sum will be distributed pursuant to the proposed **Settlement Distribution Scheme**. A copy of the proposed Settlement Distribution Scheme can be requested from Mayweathers or the Funder.

PARTICIPATION IN THE PROPOSED SETTLEMENT

- 11 Being a Group Member does not automatically mean you will receive money from the Proposed Settlement. The Plaintiff considers that not every person who is a Group Member has a factually or legally viable claim.
- 12 The Plaintiff will be asking the Court to distribute the Proposed Settlement in accordance with the proposed Settlement Distribution Scheme. To be entitled to register to receive a distribution under the proposed Settlement Distribution Scheme (**Eligible Group Member**), you must meet all of the following criteria:
 - (a) you must be a Group Member in the Camden Land Subsidence Class Action;
 - (b) you must not have opted out; and
 - (c) you must be the current registered owner of one of the properties identified in Annexure A to this notice (**Eligible Property**).
- 13 If you are an Eligible Group Member, it is proposed that:
 - (a) you are not automatically entitled to receive money from the Proposed Settlement;
 - (b) if you register to participate, the Settlement Distribution Scheme will determine whether you are entitled to receive money from the Proposed Settlement and, if so, how much money you will receive; and
 - (c) if you have not already signed up to the Spring Farm Litigation Funding Scheme, you must register in order to be considered to receive compensation under the Settlement Distribution Scheme.
- 14 If you are not an Eligible Group Member, it is proposed that:
 - (a) you will not be entitled to receive any money from the Proposed Settlement, and
 - (b) your claim against the Defendants relating to the allegations made in the Camden Land Subsidence Class Action as well as any other related claims will be extinguished.
- 15 If you are unsure whether you are an Eligible Group Member or have any questions about the process set out above, please contact Mayweathers using the details below.

PROPOSED DEDUCTIONS FROM THE PROPOSED SETTLEMENT

- 16 The Settlement Distribution Scheme provides for the deduction of amounts from the Settlement Sum to be paid to Mayweathers and the Funder, together with a reimbursement payment to the Plaintiff. Approval of these amounts will be sought at the Approval Hearing.

- 17 The Funder provided litigation funding for the Plaintiff's prosecution of the Camden Land Subsidence Class Action on behalf of Group Members, and:
- (a) indemnified the Plaintiff against any adverse costs orders;
 - (b) paid '**Project Costs**' comprising legal costs and other costs incurred in prosecuting the Camden Land Subsidence Class Action, such as the costs of solicitors, barristers, experts and GST where applicable;
 - (c) paid, in addition to the Project Costs, other costs and/or provided other financial support ancillary to the provision of security for the Defendants' costs, for which no reimbursement is sought to be deducted from the Settlement Amount;
 - (d) provided client liaison team services to Group Members; and
 - (e) in respect of the Plaintiff and Group Members who were accepted as registered members of the Spring Farm Litigation Funding Scheme is contractually entitled to be paid a commission of 35% of the Settlement Amount in consideration for providing funding and other financial support in prosecuting the Camden Land Subsidence Action (**Funder's Commission**).
- 18 The Funder asserts an entitlement to be reimbursed the Project Costs it has paid and be paid its Funder's Commission from the Settlement Amount. A 'Common Fund Order' (**CFO**) or a 'Funding Equalisation Order' (**FEO**) will be sought from the Court.
- (a) A CFO is an order of the Court that provides for the Funder to receive a percentage of the Settlement Amount that the Court considers to be fair and reasonable, which is deducted from the Settlement Amount before distribution to Group Members. This means that if a CFO is made, all Group Members will contribute to the Funder's Commission, regardless of whether they have signed up to the Spring Farm Funding Scheme.
 - (b) A FEO is an order of the Court that requires the 'unfunded' Group Members (being those Group Members who have not previously signed up to the Spring Farm Funding Scheme and wish to participate in the Proposed Settlement) to contribute equally to the funding commission that 'funded' Group Members (being those Group Members who have signed up to the Spring Farm Funding Scheme) have agreed to pay to the Funder. This means that if a FEO is made, all Group Members, both funded and unfunded, will contribute equally to the commission that funded Group Members have agreed to pay to the Funder. The rate of commission for which the Spring Farm Funding Scheme provided was 35%.
- 19 Mayweathers provided their services in respect of the Camden Land Subsidence Class Action at a discount to their hourly rate or on a deferred and contingent basis in return for their contractual entitlement to be paid their:
- (a) Remaining Cost, being legal fees not paid by the Funder as Project Costs deferred and contingent on the Proposed Settlement, which total an estimated amount of \$1,299,416 including GST; and
 - (b) Remaining Costs Uplift, being 25% of the Remaining Costs subject to Court approval of the Proposed Settlement, which total an estimated amount of \$324,854 including GST,

and they claim an entitlement to be paid these **Deferred Costs**.

- 20 **Administration Costs** will be incurred in administering the Settlement Distribution Scheme. It is proposed that Mr André Adams, a Partner at Mayweathers, is the settlement administrator designated under the Settlement Distribution Scheme (**Scheme Administrator**). The Settlement Administration Costs will include the fees of the Scheme Administrator and the solicitors and other employees at Mayweathers who assist him, together with any expenses that the Scheme Administrator incurs in administering the Settlement Distribution Scheme.
- 21 The Plaintiff incurred time, expense and inconvenience in acting in a representative capacity on behalf of the Group Members, and a claim is made for a **Reimbursement Payment** to be made on top of any distribution the Plaintiff would otherwise receive under the Settlement Distribution Scheme
- 22 The deductions described above total approximately \$14,464,074:
- (a) Project Costs paid (and to be paid) by the Funder by the time of the approval hearing, in an estimated amount of approximately \$6,273,404 (inclusive of GST);
 - (b) Funder's Commission in an amount of up to \$6,300,000 (being 35% of the Settlement Sum, being the rate provided for in the Spring Farm Funding Scheme);
 - (c) Deferred Costs incurred by Mayweathers, and a 25% uplift on those Deferred Costs, which total an estimated amount of \$1,624,270 (incl. GST);
 - (d) Administration Costs: in an estimated amount of up to \$220,000 (incl GST);
 - (e) Reimbursement Payment: the Plaintiff will seek an amount of \$20,000;
 - (f) Cost Assessor Costs: the legal costs and disbursements will be scrutinised by an independent expert, who will charge an estimated amount of approximately \$26,400 (incl GST).
- 23 If the Court were to approve deductions in the above amounts approximately \$3,535,926 will be available for distribution to Group Members, plus any interest accrued.
- 24 The Funder believes that \$3,535,926 is an insufficient sum to be made available to group members. At the Approval Hearing, the funder intends to submit that its Funder's Commission should be reduced by \$1,800,000 from \$6,300,000 to \$4,500,000 (a reduction from the 35% rate provided for in the Spring Farm Funding Scheme to 25%) and Mayweathers' deferred legal fees and uplift should be reduced by their full amount, estimated to be \$1,624,270 – which the Funder considers to be consistent with the Spring Farm Litigation Funding Scheme. This would mean an additional amount of approximately \$3,424,270 would be available for distribution to group members, taking the total available for distribution to approximately \$6,960,196.
- 25 Mayweathers also believes that \$3,535,926 is an insufficient sum to be available to group members. Mayweathers do not accept that their deferred legal fees and uplift should be reduced by their full amount. At the Approval Hearing, Mayweathers intends to submit that the Funder Commission should be reduced by \$3,061,800 from

\$6,300,000 to \$3,238,200, being a reduction of 48.6%; and Mayweathers deferred legal fees and uplift should be reduced by \$789,395 from \$1,624,270 to \$834,875, being a reduction of 48.6%. This would mean an additional amount of approximately \$3,851,195 would be available for distribution to group members, taking the total available for distribution to approximately \$7,387,121.

- 26 The Court will need to approve all of the proposed deductions and may approve lesser amounts than what is proposed. If you have a concern about the costs or charges proposed to be deducted, you are free to tell the Court your concerns by objecting to the settlement (see paragraph 37).

DISTRIBUTION TO GROUP MEMBERS

- 27 The Settlement Distribution Scheme will provide for the distribution of the net Settlement Sum to the Plaintiff and Group Members (after the Court approved deductions are made).
- 28 Subject to Court approval, the amount payable to registered Eligible Group Members will be determined by the Scheme Administrator pursuant to the Settlement Distribution Scheme. The proposed Settlement Distribution Scheme will provide for Eligible Group Members who register to be grouped into categories based upon an engineer's assessment of the type and incidence of damage sustained to their properties. If you register you will need to agree to the engineering assessment being carried out.
- 29 The proposed Settlement Distribution Scheme will provide for the allocation of the net Settlement Sum between Group Members in the different categories according to the confidential Loss Assessment Formula, a copy of which will be made available to Eligible Group Members who register on request (subject to maintaining its confidentiality).
- 30 It is not presently possible to estimate with accuracy how much (if any) each registered Eligible Group Member will receive, because this will depend on factors including:
- (a) the number of Eligible Group Members who register;
 - (b) the nature and extent of damage to each Eligible Property, which in turn will depend upon engineering assessments which have not all been carried out yet and cannot all be carried out until after the registration date;
 - (c) the total amount of the deductions approved by the Court;
 - (d) the terms of the Settlement Distribution Scheme that are approved by the Court; and
 - (e) the interest earned on the Settlement Sum, noting that once the Settlement Sum is paid to Mayweathers by the Defendants, it will be held by Mayweathers on trust for the Plaintiff and Group Members in an interest-bearing account until it is distributed pursuant to the Settlement Distribution Scheme.

THE SETTLEMENT APPROVAL PROCESS

- 31 The Proposed Settlement will only take effect if it is approved by the Court. In deciding whether to approve the Proposed Settlement, the Court will consider whether the

Proposed Settlement is fair and reasonable and in the interests of Group Members as a whole.

- 32 The Court will hear the application for approval of the proposed settlement at **10am** on **13 October 2026** at the Supreme Court of New South Wales, 184 Phillip Street, Sydney (**Approval Hearing**).
- 33 If you are a Group Member, you have the right to attend the Approval Hearing and/or make submissions as to whether the Court should approve the proposed settlement. If you wish to do so, follow the steps under 'Objecting to the Proposed Settlement' below.

WHAT ARE MY OPTIONS?

- 34 **Option 1 (only Group Members that currently own an Eligible Property) – Register to participate in the Proposed Settlement:** Group Members who currently own an Eligible Property and have already registered with Mayweathers do not need to do anything further (unless they wish to object). If you currently own an Eligible Property and have previously signed up to the Spring Farm Litigation Funding Scheme you do not need to do anything further at this stage. If you are unsure whether you have signed up to the Spring Farm Litigation Funding Scheme, please contact the Funder using the contact details below.
- 35 If you own an Eligible Property, have not signed up to the Spring Farm Litigation Funding Scheme, and wish to participate in the Proposed Settlement you must register your details with the Funder by the **18 September 2026** deadline by either:
- completing and submitting the online Registration Form available at <https://portal.omnibridgeway.com/spring-farm> ; or
 - completing and returning the hard copy Registration Form (at Annexure B to this Notice) to the Funder by email or post (address details are on the form).
- 36 **Option 2 – Object to the Proposed Settlement:** If you disagree with the Proposed Settlement (or any aspect of it), you may file a completed Notice of Objection to Proposed Settlement (at Annexure C to this Notice) and any evidence and written submissions in support of your objection in the Registry of the Supreme Court of New South Wales by **18 September 2026** and send a copy of these documents to the Funder. The Court will consider the reasons why you disagree with the Proposed Settlement or any particular aspect of it. Despite your objection, if you currently own an Eligible Property, you will still be entitled to participate in the Proposed Settlement if approved, provided that you register your details by **18 September 2026**, if you have not done so already or signed up to the Spring Farm Litigation Funding Scheme.
- 37 **Option 3: Do nothing.** If you currently own an Eligible Property, have previously signed up to the Spring Farm Litigation Funding Scheme (defined below) and you have not opted out, you are deemed to have registered to participate in the Proposed Settlement. If you have not signed up to the Spring Farm Litigation Funding Scheme and do nothing you will remain a Group Member and be bound by the Proposed Settlement, your legal claim in relation to the Camden Land Subsidence Class Action will be extinguished but you will **not** be entitled to any distribution from the Settlement Amount (even if otherwise eligible to do so).

CONSEQUENCES OF THE COURT APPROVING OR NOT APPROVING THE PROPOSED SETTLEMENT

- 38 If the Court approves the Proposed Settlement, you are a Group Member and you have **not** opted out of the Camden Land Subsidence Class Action, you will:
- (a) be bound by the Proposed Settlement;
 - (b) no longer have the right to pursue any claims against the Defendants of the kind made in, and relating to, the Camden Land Subsidence Class Action;
 - (c) if you are a registered Eligible Group Member, be entitled to participate in the Settlement Distribution Scheme and may receive a share of the Proposed Settlement (see paragraph 29).
- 39 If the Court does not approve the Proposed Settlement there will be no distribution of monies under the Proposed Settlement and the Camden Land Subsidence Class Action will need to proceed to a final hearing, unless some other agreement can be reached. This will take considerable time and be expensive. There is no guarantee that there will be another settlement.

WHO SHOULD I CONTACT FOR MORE INFORMATION?

- 40 Please contact Mayweathers by email at springfarm@mayweathers.com.au or on (02) 8551 2733.
- 41 Please direct initial queries to Mayweathers. If you need to contact the Funder, you may do so by email at springfarm@omnibridgeway.com or free call within Australia on 1800 016 464. If calling from outside Australia, please use +61 8 9225 2322.
- 42 Any questions you have concerning the matters contained in this Notice should **NOT** be directed to the Court. If there is anything that you do not understand or if you have any questions, you should contact Mayweathers, or seek your own legal advice.

RELEVANT DOCUMENTS

- 43 Copies of the relevant documents including the Settlement Distribution Scheme may be obtained by visiting the Funder's website at <https://portal.omnibridgeway.com/spring-farm>.

ANNEXURE A

LIST OF THE ELIGIBLE PROPERTIES

CAMDEN LAND SUBSIDENCE CLASS ACTION

Moussa v Camden Council & Ors
Supreme Court of New South Wales Proceeding No: 2020/00359004

No.	Address	Title Reference
1	38 Springs Road, Spring Farm	Lot 4001 in DP 1195585
2	40 Springs Road, Spring Farm	Lot 4002 in DP 1195585
3	42 Springs Road, Spring Farm	Lot 4003 in DP 1195585
4	44 Springs Road, Spring Farm	Lot 4004 in DP 1195585
5	46 Springs Road, Spring Farm	Lot 4005 in DP 1195585
6	48 Springs Road, Spring Farm	Lot 4006 in DP 1195585
7	50 Springs Road, Spring Farm	Lot 4007 in DP 1195585
8	52 Springs Road, Spring Farm	Lot 4008 in DP 1195585
9	54 Springs Road, Spring Farm	Lot 4009 in DP 1195585
10	24 Millman Road, Spring Farm	Lot 4010 in DP 1195585
11	26 Millman Road, Spring Farm	Lot 4011 in DP 1195585
12	28 Millman Road, Spring Farm	Lot 4012 in DP 1195585
13	30 Millman Road, Spring Farm	Lot 4013 in DP 1195585
14	32 Millman Road, Spring Farm	Lot 4014 in DP 1195585
15	34 Millman Road, Spring Farm	Lot 4015 in DP 1195585
16	36 Millman Road, Spring Farm	Lot 4016 in DP 1195585
17	38 Millman Road, Spring Farm	Lot 4017 in DP 1195585
18	40 Millman Road, Spring Farm	Lot 4018 in DP 1195585
19	42 Millman Road, Spring Farm	Lot 4019 in DP 1195585
20	44 Millman Road, Spring Farm	Lot 4020 in DP 1195585
21	21 Millman Road, Spring Farm	Lot 4111 in DP 1195599
22	23 Millman Road, Spring Farm	Lot 4110 in DP 1195599
23	25 Millman Road, Spring Farm	Lot 4109 in DP 1195599
24	27 Millman Road, Spring Farm	Lot 4108 in DP 1195599
25	29 Millman Road, Spring Farm	Lot 4107 in DP 1195599
26	31 Millman Road, Spring Farm	Lot 4106 in DP 1195599
27	33 Millman Road, Spring Farm	Lot 4105 in DP 1195599
28	35 Millman Road, Spring Farm	Lot 4104 in DP 1195599
29	37 Millman Road, Spring Farm	Lot 4103 in DP 1195599
30	39 Millman Road, Spring Farm	Lot 4102 in DP 1195599
31	41 Millman Road, Spring Farm	Lot 4101 in DP 1195599
32	22 Wagner Road, Spring Farm	Lot 4112 in DP 1195599
33	24 Wagner Road, Spring Farm	Lot 4113 in DP 1195599
34	26 Wagner Road, Spring Farm	Lot 4114 in DP 1195599
35	28 Wagner Road, Spring Farm	Lot 4115 in DP 1195599
36	30 Wagner Road, Spring Farm	Lot 4116 in DP 1195599
37	32 Wagner Road, Spring Farm	Lot 4117 in DP 1195599
38	34 Wagner Road, Spring Farm	Lot 4118 in DP 1195599
39	36 Wagner Road, Spring Farm	Lot 4119 in DP 1195599
40	38 Wagner Road, Spring Farm	Lot 4120 in DP 1195599
41	40 Wagner Road, Spring Farm	Lot 4121 in DP 1195599
42	42 Wagner Road, Spring Farm	Lot 4122 in DP 1195599
43	25 Wagner Road, Spring Farm	Lot 4133 in DP 1195599
44	27 Wagner Road, Spring Farm	Lot 4132 in DP 1195599

45	29 Wagner Road, Spring Farm	Lot 4131 in DP 1195599
46	31 Wagner Road, Spring Farm	Lot 4130 in DP 1195599
47	33 Wagner Road, Spring Farm	Lot 4129 in DP 1195599
48	35 Wagner Road, Spring Farm	Lot 4128 in DP 1195599
49	37 Wagner Road, Spring Farm	Lot 4127 in DP 1195599
50	39 Wagner Road, Spring Farm	Lot 4126 in DP 1195599
51	41 Wagner Road, Spring Farm	Lot 4125 in DP 1195599
52	43 Wagner Road, Spring Farm	Lot 4124 in DP 1195599
53	45 Wagner Road, Spring Farm	Lot 4123 in DP 1195599
54	26 Harland Road, Spring Farm	Lot 6207 in DP 1228465
55	28 Harland Road, Spring Farm	Lot 6206 in DP 1228465
56	30 Harland Road, Spring Farm	Lot 6205 in DP 1228465
57	32 Harland Road, Spring Farm	Lot 6204 in DP 1228465
58	34 Harland Road, Spring Farm	Lot 6203 in DP 1228465
59	36 Harland Road, Spring Farm	Lot 6202 in DP 1228465
60	38 Harland Road, Spring Farm	Lot 6201 in DP 1228465
61	40 Harland Road, Spring Farm	Lot 6104 in DP 1228464
62	42 Harland Road, Spring Farm	Lot 6103 in DP 1228464
63	44 Harland Road, Spring Farm	Lot 6102 in DP 1228464
64	46 Harland Road, Spring Farm	Lot 6101 in DP 1228464

ANNEXURE B

REGISTRATION FORM

CAMDEN LAND SUBSIDENCE CLASS ACTION

Moussa v Camden Council & Ors
Supreme Court of New South Wales Proceeding No: 2020/00359004

To: **Omni Bridgeway**

springfarm@omnibridgeway.com

The person identified below wishes to register as a Group Member in the Camden Land Subsidence Class Action and to participate in the Proposed Settlement:

A DETAILS OF GROUP MEMBER

Name of Group Member (i.e. the person or entity who owned a lot at Spring Farm during the relevant period)	
Address of the relevant lot at Spring Farm	
Title Reference (Lot and DP number, if known)	
Contact name (if different), and authority to complete this form on the Group Member's behalf	
Postal address	
Email address	
Telephone number(s)	

B OWNERSHIP DETAILS

☐ I am the current registered proprietor of the property described above.

Date you became the registered proprietor of the property	
Optional question: Have you observed physical damage to the property such as cracking in walls or broken utility lines? If so, please provide details.	

C AUTHORISATION AND CONSENT

By signing this form, I declare and agree as follows:

- ☐ I declare that the information provided in this form is true and correct to the best of my knowledge.
- ☐ I authorise Mayweathers and the Funder to collect, hold and use the information in this form for the purposes of my registration as a Group Member and my participation in the Camden Land Subsidence Class Action and the Proposed Settlement, and to disclose that information to the Court, the Defendants, and any Scheme Administrator appointed under the Settlement Distribution Scheme, as reasonably required for those purposes.

D SIGNING OF FORM

.....

Signature

Date:

*Please return this completed form to the Funder by email to springfarm@omnibridgeway.com, or by post to Omni Bridgeway, PO Box 5106, St Georges Terrace, Perth WA 6831, by 4pm on **18 September 2026**.*

ANNEXURE C

NOTICE OF OBJECTION TO PROPOSED SETTLEMENT

CAMDEN LAND SUBSIDENCE CLASS ACTION

Moussa v Camden Council & Ors
Supreme Court of New South Wales Proceeding No: 2020/00359004

To: **Mayweathers:** springfarm@mayweathers.com.au

The person identified below gives notice that they object to the proposed settlement of the Camden Land Subsidence Class Action:

A DETAILS OF OBJECTOR

Name of Group Member (i.e. the person or entity who owned a lot at Spring Farm during the relevant period)	
Address of the relevant lot at Spring Farm	
Contact name (if different), and authority to complete this form on the Group Member's behalf	
Postal address	
Email address	
Telephone number(s)	

B GROUND(S) OF OBJECTION

The ground(s) for my objection to the proposed settlement are as follows (set out in the space below any submissions you wish to make — you may attach additional pages if necessary):

--

C ATTENDANCE AT SETTLEMENT APPROVAL HEARING ON 13 OCTOBER 2026:

☐ I do not intend to appear at the Settlement Approval Hearing, but wish for my submission to be considered in my absence

☐ I do intend to appear at the Settlement Approval Hearing

(please tick one of the above two options)

If you do intend to appear at the Settlement Approval Hearing, please complete the following:

☐ I will appear on my own behalf

☐ I will be represented by a lawyer:

D SIGNING OF NOTICE:

.....

Signature

Date: