

# DOBSON, MITCHELL & ALLPORT

BARRISTERS, SOLICITORS & NOTARIES

930. 7

ESTABLISHED 1834

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OUR REFERENCE: MEO:4287:KL YOUR REFERENCE:

January 14, 1993

The Executive Director,  
The Wilderness Society,  
130 Davey Street,  
HOBART TAS 7000

By Facsimile 23 5112

Dear Sirs,

**APPM - LONG HOT SUMMER**

We act for APPM.

In recent news reports it appears that the Wilderness Society is suggesting that it will promote and co-ordinate direct protest action at a number of our client's sites around the state. These include our client's woodchip mills at Tamar and Triabunna. It would appear that the action will specifically be aimed at disrupting our client's woodchip operations throughout Tasmania.

It would also appear to be the intention of your Society that the direct protest action should cause our client loss of production time and damage to its export markets.

We are not presently aware of the precise form which the direct action might take, but it might reasonably be expected that protestors will be entering upon our client's sites in an attempt to prevent operations. Further, it could be expected that people attempting to gain lawful access to our client's sites may be hindered or obstructed.

It is on that basis that we are instructed to write to you give you notice of the following matters:-

1. Any attempt by a protestor to enter upon our client's mill sites will be treated as a trespass and our client will take such steps as may reasonably be necessary to have that person removed;
2. Any obstruction or hinderence to our client's mill operations which causes our client loss or damage will be considered as actionable, either under section 45D of the Trade Practices Act 1974 (Commonwealth) or at common law.

As it is quite apparent that your Society is organising the protest campaign and that it will be carried out under its auspices, we give you notice that any damage which is caused to our client will result in proceedings being issued against both those persons who actually engage in conduct which causes our client damage and your Society without further notice.

Yours faithfully,  
DOBSON MITCHELL & ALLPORT

Per:

*Melissa Brownick*

for MICHAEL O'FARRELL

c.c. Mr. D.A. Wanless,  
Public Officer,  
The Wilderness Society Inc.  
1 Dynnyrne Road,  
DYNNYRNE