

DISTRICT COURT OF QUEENSLAND

REGISTRY: BRISBANE

NUMBER: 1707/18

Plaintiff: MICHAEL HONSUE CHO

AND

Defendant: MARK THOMAS

AFFIDAVIT

SCOTT PHILIP WATERS of 55 Covers Drive, Sunbury in the State of Victoria, Director, states on oath:

1. I know the plaintiff in the present proceeding, Michael Honsue Cho, both personally and professionally.
2. I met Mr Cho 18 years ago, when we were introduced by a business colleague of mine, who said that he had known Michael for five years.
3. At that time, Michael was operating in the IT industry, and I was aware that he had several successful business ventures in IT. The impression I formed from speaking to many other people around this time was that Michael had an excellent reputation in the IT industry; everybody I spoke to about him spoke of him in very high terms.
4. Michael and I became business partners, and have now been working together for 18 years. I have come to know him extremely well, and know all of his friends and business partners.

Signed:



Taken By:



AFFIDAVIT

Filed on behalf of the Plaintiff
Form 46, Version 1
Uniform Civil Procedure Rules 1999
Rule 431



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5. My own impression of Michael, which has remained constant over the 18 years we have spent working together, is that he is extremely honourable and honest in both his business and personal dealings.
6. I have observed Michael to have formed and pursued long-term relational goals rather than short-term transaction goals in business and his personal life. To my knowledge (and my knowledge of his life is extensive, as I know him very well), I have not known him to engage in any dishonest dealing ever.
7. Michael contacted me by phone very shortly after the publication of the first of the three articles that are the subject of the present litigation and that are published on the website www.uspiked.com. His reaction to the article was extremely agitated, and I observed him to be completely shocked that somebody would publish an article of this nature about him.
8. We have discussed the article, and the two follow-up articles, many times since. Michael remains confused and angry about the articles, and still cannot understand why somebody would write things so at odds with the excellent reputation he has developed through many years of hard work and investment in his personal life. I have observed him to be extremely embarrassed whenever the article is brought up.
9. All the facts and circumstances above deposed to are within my own knowledge save such as are deposed to from information only and my means of knowledge and sources of information appear in this my affidavit.

SWORN by SCOTT PHILIP WATERS on 14 March 2019 at Melbourne in the State of Victoria, in the presence of:



Deponent



Solicitor/~~Barrister~~/Justice of the
Peace/~~Commissioner for Declarations~~

Alexandra Marie McMurdo
Solicitor