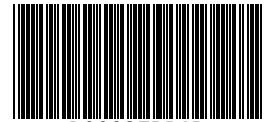




Filed: 17 July 2026 11:39 AM



D0002ERB1R

Defence to Amended Statement of Cross Claim

COURT DETAILS

Court	Supreme Court of NSW
Division	Common Law
List	Common Law General
Registry	Supreme Court Sydney
Case number	2024/00338021

TITLE OF PROCEEDINGS

First Plaintiff	Adam James Bray
First Defendant	TRANSPORT FOR NSW ABN 18804239602
Second Defendant	ACCIONA INFRASTRUCTURE PROJECTS AUSTRALIA PTY LTD
Number of Defendants	3

TITLE OF THIS CROSS-CLAIM

First Cross Claimant	LINQ BUSLINES PTY. LTD. ACN 131153896
First Cross Defendant	Brett Andrew Button (MIN: 708188)
Second Cross Defendant	ACCIONA INFRASTRUCTURE PROJECTS AUSTRALIA PTY LTD
Number of Cross Defendants	7

FILING DETAILS

Filed for	TRANSPORT FOR NSW,Cross Defendant 4
Filed in relation to	Cross-Claim 4
Legal representative	Brian Moroney
Legal representative reference	
Telephone	9232 2255
Your reference	BGM:500392

ATTACHMENT DETAILS

In accordance with Part 3 of the UCPR, this coversheet confirms that both the Lodge Document, along with any other documents listed below, were filed by the Court.

Defence to Amended Statement of Cross Claim (Defence to Amended Fourth Cross Claim - TfNSW.pdf)

[attach.]

Form 7A (version 5)
UCPR 14.3

FOURTH CROSS CLAIM
DEFENCE TO AMENDED FOURTH CROSS-CLAIM
BY FOURTH CROSS DEFENDANT

COURT DETAILS

Court	Supreme Court of NSW
Division	Common Law
List	General
Registry	Sydney
Case number	2024/338021

TITLE OF PROCEEDINGS

Plaintiff	Adam James Bray
First defendant	Transport for New South Wales (ABN 18 804 239 602)
Number of defendants	3

TITLE OF THIS CROSS-CLAIM

Cross-claimant	Linq Buslines Pty Limited (ACN 131 152 896)
First cross-defendant	Brett Andrew Button
Number of cross-defendants	7

FILING DETAILS

Filed for	Transport for New South Wales (ABN 18 804 239 602), Fourth cross-defendant
Filed in relation to	Fourth cross-claim
Legal representative	Brian Moroney, Moray & Agnew
Legal representative reference	BGM:500392
Contact name and telephone	Brian Moroney, + 61 2 9232 2255
Contact email	bmoroney@moray.com.au

PLEADINGS AND PARTICULARS

The fourth cross-defendant, Transport for NSW, responds as follows to the allegations in the amended fourth cross-claim, brought by Linq Buslines Pty Limited (**Linq**). Defined terms are as used in the fourth cross-claim filed on 7 May 2026, unless otherwise indicated.

- 1 Transport for NSW does not plead to paragraph 1, which does not contain any allegation against it, and otherwise does not admit the paragraph.

Brett Andrew Button

- 2 Transport for NSW admits the allegation in paragraph 2.
- 2a Transport for NSW admits the allegation in paragraph 2a.
- 3 Transport for NSW admits the allegation in paragraph 3.
- 4 Transport for NSW admits the allegation in paragraph 4.
- 5 Transport for NSW admits the allegation in paragraph 5.
- 6 Transport for NSW does not plead to paragraph 6, which does not contain any allegation against it, and otherwise does not admit the paragraph.

Acciona Infrastructure Projects Australia Pty Ltd

- 7 Transport for NSW admits the allegation in paragraph 7.
- 8 Transport for NSW does not plead to paragraph 8, which does not contain any allegation against it, and otherwise does not admit the paragraph.
- 9 Transport for NSW does not plead to paragraph 9, which does not contain any allegation against it, and otherwise does not admit the paragraph.
- 10 Transport for NSW does not plead to paragraph 10, which does not contain any allegation against it, and otherwise does not admit the paragraph.

Aecom Cost Consulting Pty Ltd

- 11 Transport for NSW admits the allegation in paragraph 11.
- 12 Transport for NSW does not plead to paragraph 12, which does not contain any allegation against it, and otherwise does not admit the paragraph.
- 13 Transport for NSW does not plead to paragraph 13, which does not contain any allegation against it, and otherwise does not admit the paragraph.
- 14 Transport for NSW does not plead to paragraph 14, which does not contain any allegation against it, and otherwise does not admit the paragraph.

Transport for NSW

- 15 Transport for NSW admits the allegation in paragraph 15.
- 16 In response to paragraph 16, Transport for NSW:

- (a) admits that as at 11 June 2023, it had responsibility for the design, construction, management and maintenance of the main road known as M220, being Wine Country Drive;
- (b) says that such responsibility was subject to any delegation of responsibility;
- (c) does not know and cannot admit what is meant by “all material times”; and
- (d) otherwise denies the paragraph.

17 In response to paragraph 17, Transport for NSW:

- (a) repeats paragraphs 3 to 11FA of its defence to the ASOC;
- (b) repeats paragraphs 78 to 86 of its defence to the Second Cross-Claim;
- (c) repeats paragraphs 13 to 17 of its defence to the Third Cross-Claim;
- (ca) repeats paragraphs 7 to 17 of its defence to the Fifth Cross-Claim; and
- (d) does not plead to the balance of paragraph 17, which does not contain allegations against it; and
- (e) otherwise does not admit the paragraph.

18 In response to paragraph 18, Transport for NSW:

- (a) repeats subparagraphs 17(a) and (b) above; and
- (b) otherwise does not admit the paragraph.

19 In response to paragraph 19, Transport for NSW:

- (a) repeats subparagraphs 17(a) and (c) above; and
- (b) otherwise does not admit the paragraph.

Jacobs Group (Australia) Pty Ltd

20 Transport for NSW admits the allegation in paragraph 20.

21 Transport for NSW does not plead to paragraph 21, which does not contain any allegation against it, and otherwise does not admit the paragraph.

22 Transport for NSW does not plead to paragraph 22, which does not contain any allegation against it, and otherwise does not admit the paragraph.

23 Transport for NSW does not plead to paragraph 23, which does not contain any allegation against it, and otherwise does not admit the paragraph.

SMEC Australia Pty Ltd

- 24 Transport for NSW admits the allegation in paragraph 24.
- 25 Transport for NSW does not plead to paragraph 25, which does not contain any allegation against it, and otherwise does not admit the paragraph.
- 26 Transport for NSW does not plead to paragraph 26, which does not contain any allegation against it, and otherwise does not admit the paragraph.
- 27 Transport for NSW does not plead to paragraph 27, which does not contain any allegation against it, and otherwise does not admit the paragraph.

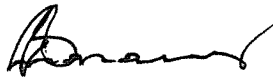
GHD Pty Ltd

- 28 Transport for NSW admits the allegation in paragraph 28.
- 29 Transport for NSW admits the allegation in paragraph 29.
- 30 Transport for NSW does not plead to paragraph 30, which does not contain any allegation against it, and otherwise does not admit the paragraph.
- 31 Transport for NSW does not plead to paragraph 31, which does not contain any allegation against it, and otherwise does not admit the paragraph.
- 32 Transport for NSW does not plead to paragraph 32, which does not contain any allegation against it, and otherwise does not admit the paragraph.
- 33 Transport for NSW does not plead to paragraph 33, which does not contain any allegation against it, and otherwise does not admit the paragraph.

SIGNATURE OF LEGAL REPRESENTATIVE

I certify under clause 4 of Schedule 2 to the Legal Profession Uniform Law Application Act 2014 that there are reasonable grounds for believing on the basis of provable facts and a reasonably arguable view of the law that the defence to the claim for damages in the fourth cross-claim has a reasonable prospects of success.

Signature



Capacity

Solicitor in the employ of the solicitor on record

Date of signature

~~26 March 2026~~ 17 July 2026