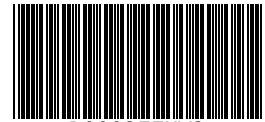




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Defence to Amended Statement of Cross Claim

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	AECOM COST CONSULTING PTY LTD,Cross Defendant 3
Filed in relation to	Cross-Claim 4
Legal representative	Gregory McKenzie
Legal representative reference	
Contact name and telephone	Natale Ilardo
Your reference	GJM:2129148

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 (2026.08.14 - Defence to Amended Fourth Cross-Claim.pdf)

[attach.]

Form 7A (version 5)
UCPR 14.3

DEFENCE TO AMENDED FOURTH CROSS-CLAIM

COURT DETAILS

Court	Supreme Court of New South Wales
Division	Common Law
List	General
Registry	Sydney
Case number	2024/00338021

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 96
First cross-defendant	BRETT ANDREW BUTTON
Number of cross-defendants	7

FILING DETAILS

Filed for	AECOM Cost Consulting Pty Limited , third cross-defendant
Legal representative	Greg McKenzie Lander & Rogers
Legal representative reference	PCN: P0000755 VIC Ref: GJM:2129148
Contact name and telephone	Greg McKenzie Tel. +61 3 9269 9000
Contact email	nilardo@landers.com.au

HEARING DETAILS

If the proceedings do not already have a listing date, they are to be listed at

PLEADING AND PARTICULARS

The third cross-defendant, Aecom Cost Consulting Pty Ltd ("**ACC**") pleads and responds to the Fourth Cross-Claim Amended Statement of Cross-Claim ("**Fourth Cross-Claim**") filed 7 May 2026 as follows, adopting the defined terms therein and in ACC's Defence to the Amended Statement of Claim, unless stated otherwise or the context requires.

1. ACC does not plead to paragraph 1 of the Fourth Cross-Claim as it contains no allegations against ACC.

Brett Andrew Button

2. ACC admits paragraph 2 of the Fourth Cross-Claim.
- 2a. ACC admits paragraph 2a of the Fourth Cross-Claim.
3. In answer to paragraph 3 of the Fourth Cross-Claim, ACC:
 - (a) admits sub-paragraph (a); and
 - (b) does not admit sub-paragraph (b).
4. In answer to paragraph 4 of the Fourth Cross-Claim, ACC:
 - (a) admits Mr Button was under the influence of an opioid painkiller, Tramadol;
 - (b) admits Mr Button was driving dangerously and negligently, including at excessive and unreasonable speed, causing him to lose control of the bus; and
 - (c) otherwise does not know and cannot admit the paragraph.
5. ACC does not plead to paragraphs 5 and 6 of the Fourth Cross-Claim as they contain no allegations against ACC.

Acciona Infrastructure Projects Australia Pty Ltd

6. ACC does not plead to paragraphs 7 to 10 of the Fourth Cross-Claim as they contain no allegations against ACC.

Aecom Cost Consulting Pty Ltd

7. ACC admits paragraph 11 of the Fourth Cross-Claim.
8. In response to paragraph 12 of the Fourth Cross-Claim:
 - (a) as to sub-paragraph (a), ACC repeats its responses to paragraphs 25 to 33 of the ASOC against ACC in paragraphs 25 to 33 and 34 to 38 of its Defence to the ASOC;
 - (b) does not plead to sub-paragraph (b) as it contains no allegations against ACC;
 - (c) as to sub-paragraph (c), ACC repeats its responses to paragraphs 30 to 42 of the Further Amended First Cross-Claim against ACC in paragraphs 17 to 39 and 40 to 45 of its Defence to the Further Amended First Cross-Claim;
 - (d) does not plead to sub-paragraph (d) as it contains no allegations against ACC; and

- (e) as to sub-paragraph (e), ACC repeats its responses to paragraphs 49 to 77 of the Second Cross-Claim against ACC in paragraphs 7 to 35 and 36 to 38 of its Amended Defence to the Second Cross-Claim.

9. ACC denies paragraph 13 of the Fourth Cross-Claim.

10. ACC denies paragraph 14 of the Fourth Cross-Claim.

Transport for NSW

11. ACC does not plead to paragraphs 15 to 19 of the Fourth Cross-Claim as they contain no allegations against ACC.

Jacobs Group (Australia) Pty Ltd

12. ACC does not plead to paragraphs 20 to 23 of the Fourth Cross-Claim as they contain no allegations against ACC.

SMEC Australia Pty Ltd

13. ACC does not plead to paragraphs 24 to 27 of the Fourth Cross-Claim as they contain no allegations against ACC.

GHD Pty Ltd

14. ACC does not plead to paragraphs 28 to 33 of the Fourth Cross-Claim as they contain no allegations against ACC.

SIGNATURE OF LEGAL REPRESENTATIVE

I certify under clause 4 of Schedule 2 of 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 cross-claim in these proceedings has reasonable prospects of success.

Signature



Capacity

Solicitor on record

Date of signature

14/08/2026