IN THE SUPREME COURT OF VICTORIA AT MELBOURNE COMMERCIAL AND EQUITY DIVISION COMMERCIAL COURT

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IN THE MATTER OF TIMBERCORP SECURITIES LIMITED (IN LIQUIDATION)

BETWEEN

TIMBERCORP SECURITIES LIMITED (IN LIQUIDATION) (ACN 092 311 469) IN ITS CAPACITY AS RESPONSIBLE ENTITY OF THE 2004 TIMBERCORP CITRUS PROJECT (ARSN 108 887 538) AND THE 2005 TIMBERCORP CITRUS PROJECT (ARSN 114 091 299) AND ORS ACCORDING TO THE SCHEDULE

AFFIDAVIT OF AMIR ZVI LEFKOVIC

Date of document:

25 February 2011

Filed on behalf of:

The Plaintiffs

Prepared by:

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- I, Amir Zvi Lefkovic, of PricewaterhouseCoopers, Freshwater Place, Level 19, 2 Southbank Boulevard. Southbank in the State of Victoria, do solemnly and sincerely affirm:
- I have been a manager in the Corporate Finance division of PricewaterhouseCoopers
 (*PwC*) since July 2009. I have been practising in the area of corporate finance for four
 years.
- 2. In the period from November 2009 to January 2011, I assisted, on a regular basis, with various aspects of the sale process undertaken in relation to the Kangara Estate property and associated assets, under the supervision of Mr Kirk, Mr Longley (who, until his resignation from the PwC partnership (effective as of 15 April 2010) was a joint and several Receiver together with Mr Kirk) and Mr Fung.

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- I have read the affidavit of Paul William Kirk sworn 23 February 2011 and filed in this
 proceeding (Kirk Affidavit). Insofar as Mr Kirk deposes in the Kirk Affidavit to:
 - (a) various information which I provided to him from time to time, I confirm that each of those matters is true and that I provided that information to Mr Kirk in the terms set out in the Kirk Affidavit;
 - (b) various acts that I undertook, I confirm that I did each of those acts as described in the Kirk Affidavit; and
 - (c) opinions or other states of mind I held, I confirm that I held those opinions or other states of mind as described in the Kirk Affidavit.

AFFIRMED by AMIR ZVI LEFKOVIC at Melbourne in the State of Victoria this 25 day of February 2011

Before me

DANIELLE RUTH NAHUM of 500 Golfins Street, Melbourne Victoria 3000 An Australian Legal Practitioner within, the meaning of the

Legai Profession Act 2004

SCHEDULE OF PARTIES

TIMBERCORP SECURITIES LIMITED (IN LIQUIDATION) (ACN 092 311 469)
IN ITS CAPACITY AS RESPONSIBLE ENTITY OF THE 2004 TIMBERCORP TABLE GRAPE
PROJECT (ARSN 108 648 086) AND THE 2005 TIMBERCORP TABLE GRAPE PROJECT
(ARSN 113 512 236)

First Plaintiff

MARK ANTHONY KORDA
IN HIS CAPACITY AS LIQUIDATOR OF TIMBERCORP SECURITIES LIMITED
(IN LIQUIDATION) (ACN 092 311 469)

Second Plaintiff

LEANNE KYLIE CHESSER
IN HER CAPACITY AS LIQUIDATOR OF TIMBERCORP SECURITIES LIMITED
(IN LIQUIDATION) (ACN 092 311 469)

Third Plaintiff