



MINERALOGY PTY LTD

A.C.N. 010 582 680

INTERNATIONAL MINERALS PTY LTD

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2 August 2020

Ms Tania Jeyamohan
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By Email

WITHOUT PREJUDICE SAVE AS TO COSTS

Dear Ms Jeyamohan

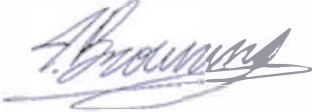
**RE: MINERALOGY PTY LTD & INTERNATIONAL MINERALS PTY LTD V STATE OF
WESTERN AUSTRALIA (ARBITRATION)**

1. As the State is aware, Mineralogy is currently pursuing a High Court challenge against the state's border closers. One of Mineralogy concerns is ensuring all its team and representatives are able to attend any hearing of the arbitration. Mineralogy's High Court case has caused considerable stress in the community when it became apparent last week that it may be successful.
2. In good faith, and despite the fact that the Applicants' decision maker will not be able to attend in Perth in person, the Applicants have agreed that the mediation takes place in Perth and that Wayne Martin AC QC act as mediator.
3. If the matter does not settle at mediation, Mr Palmer must be able to attend the arbitration hearing in person. Likewise, Peter Dunning QC must also be able to attend in person.
4. As the state cannot guarantee those parties entry to Western Australia, the only option is for Mineralogy to be successful in its High Court challenge and for the arbitration hearings to be held in Perth or, alternatively, for the parties to agree the arbitration hearings can be held outside Western Australia.
5. If the State can agree for the arbitration hearing being held in Canberra, Mineralogy could be agreeable to withdraw its High Court challenge on that basis with each party to pay their own costs.

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6. I can explore this option if the State thinks it has merit. I will be discussing matters in detail with the relevant parties at 3 pm (AWST) on Monday, 3 August 2020 and it would be helpful if you could provide some feedback by then.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'T. Browning', with a stylized flourish underneath.

Thomas Browning
In-House Counsel
Mineralogy Pty Ltd
International Minerals Pty Ltd