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The Executive Officer
Victorian Parliament Law Reform Committee
Parliament House
Spring Street
East Melbourne VIC 3002

Dear Sirs

Vexatious litigants submission for the Law Reform Committee of Victoria

At the direction of A J Mullumby, Solicitor Victoria for Commonwealth Bank of Australia (Bank) I have been requested to prepare submissions for the purposes of the inquiry into vexatious litigants being conducted by the Law Reform Committee for the Parliament of Victoria.

I personally have dealt with many vexatious litigants in my 19 years at the Commonwealth Bank in Legal Services Victoria. The most notable example being The Attorney General for the State of Victoria v Horvath, Senior [2001] VSC 269 which ultimately resulted in Mr Horvath being declared vexatious not only in the State jurisdiction but in the Federal courts as well (see Tab 1). The Horvath cases are oft-cited in these matters (Horvath).

Since Horvath I have had a number of matters which, in my opinion, are clearly being conducted by vexatious litigants. Recently, the Bank sought to have one such person declared vexatious both the State and Federal jurisdictions. The applications were in effect refused (letters to State and Federal Attorneys-General and responses see Tab 2).

It seems appropriate for me to follow the Questions and Issues set forth in the Law Reform Paper of April 2008. I will follow the headings and dot points set forth in the Issues Paper and where necessary supplement submissions with supporting evidence, information and opinion from me. Due to the very nature of such litigants, I find myself constrained by the prospect of being sued from mentioning greater and more specific anecdotal evidence.

I realise that this inquiry pertains to the State jurisdiction of Victoria however it is quite clear from the authorities on vexatious litigation that Courts, in deciding whether or not to declare a person vexatious, can and do take into account the conduct of such persons in other jurisdictions. For example, it is my experience in Horvath that vexatious litigants seek to bring proceedings in every conceivable jurisdiction, in order to frustrate their opponent.

Mr Horvath also charged me criminally for treason, perjury and treachery and sabotage of the Constitution, on more than one occasion, and I note that shortly thereafter Section 21 of the Supreme Court Act was changed so as to include both criminal and civil proceedings. I attach (at Tab 3) an extract from Hansard of a petition of his to the House of Representatives which gives you some idea of what lengths he went to.
I concur with the overriding principle set forth in the Issues Paper that it is a fundamental principle of a democratic country subject to the rule of law that people should have access to the Courts and a right to a fair hearing and that such access should strike a balance between access and the need to protect other parties and the justice system itself from repeated vexatious litigation.

It is also quite clear from my experience that justice delayed is often justice denied. Vexatious litigation in Victoria is wasting an inordinate amount of court time, sometimes many hundreds of hours at great cost not only to their opponents but more importantly to the judicial system.

I concur with the view that it is a “balancing act between access to the Courts for the majority of people who wish to promote legitimate aims within the justice system and those who seek to frustrate the aims of others by way of improper purpose or in cases which are utterly hopeless”.

I would be pleased to discuss these matters with you and if necessary I would be prepared to give evidence to the Law Reform Committee.

Questions and Issues – Law Reform Committee Issues Paper 20 April 2008

1 Vexatious Litigants in Victoria

1.1 How common are vexatious litigants in Victoria’s courts and tribunals?

Vexatious litigants are becoming more and more prevalent. At any one time the Bank’s legal department in Victoria, or its external lawyers, would be dealing with, on average between four and seven such litigants. Economic conditions, access to no-cost jurisdiction such as VCAT, waiving of filing fees and access to the Internet are all making it easier for such litigants to conduct their own cases, master civil procedure, and on occasion to collaborate with each other.

1.2 Are vexatious litigants more common in some courts or tribunals, or in some types of legal disputes, than others?

No

1.3 Why do you think some people become vexatious litigants? Do they try to solve their legal disputes in other ways before going to court? If so, are there features from their previous attempts to solve disputes that contribute to them becoming vexatious litigants?

In my view, it is a combination of a number of things. Usually it is a perception that the vexatious litigant has not obtained a fair go in the Court system, they seek to delay the inevitable for as long as possible. They often do not respect or understand the law if an adverse decision is made against them. There may also at times be a mental health element to this issue. Common characteristics include the development of obsessive fixations on, and a hatred of, their opponent, and an exaggerated sense of grievance and a loss of the ability to make objective assessments. A result is a refusal to accept professional advice that an argument is hopeless or is an abuse of process.

1.4 Do vexatious litigants have any common characteristics?

Yes. Often they are people who are not fully employed and have a great deal of time on their hands to attend Court and work on cases. Others are aided and abetted by certain individuals who themselves are vexatious litigants. In this regard I refer to one Jack Moran who has habitually and consistently advises vexatious litigants (see Attorney General v Moran [2008] VSC 159 at Tab 4). In most cases such advice follows the same defences which on many occasions have been held to be “hopeless” and “devoid of any merit”. Defences such as trial by jury, the Magna Carta, judicial officers shareholding in the Bank, fractional reserve banking “fraud”, bias and Masonry have all been held to be devoid of substance – see decision of Dodds-Streton J in NAB v Walter [2004] VSC 36 (at Tab 5). Typically Walter refused to accept the decision of Her Honour and appealed to the Court of Appeal. That appeal was refused and Walter sought special leave from the High Court to appeal from the orders of the Court of Appeal which refused the stay of proceedings. The
applications were refused by Gummow and Heydon JJ on 7 March 2006 (see Tab 6). Those litigants are serial defaulters in respect of their obligations under interlocutory court orders and the rules of court (see Freeman v Rabinov [1981] VR 539,544 per Lush J).

1.5 *In 2007 the Victorian Law Reform Committee suggested that the Victorian Parliament Law Reform Committee should consider the relationship between mental health and vexatious litigation. What is the relationship, if any, between mental health and vexatious litigation?*

I refer to my comments above. Some years ago a professor of psychology from Monash University gave a lecture in regards to this very subject matter. Recently I made enquiries with Monash University in order to speak to that person whose name I cannot remember. The following names were given to me as persons who would be able to opine on this question:

(i) Professor James R R Ogloff, Director of Psychological Services at Victoria Institute of Forensic Mental Health (t/as Forensicare)
(ii) Dr Grant Lester (t/as Forensicare)
(iii) Professor Paul Mullen, Monash University

It is my opinion that there is a strong relationship between mental health and vexatious litigation but I am not an expert in that area. Vexatious litigants are sometimes threatening and appear to the layperson to be mentally unstable. I have mentioned above (at 1.3) the apparent obsessive compulsive nature of vexatious litigants.

2 *The effect of vexatious litigants on the justice system*

2.1 *What effect do vexatious litigants have on courts and tribunals in Victoria? What are the costs for courts and tribunals?*

Such litigants have a debilitating effect on the whole justice system, not only in the case of court time. They occupy many hundreds of hours of time in fruitless, hopeless litigation and dilute limited resources, in particular court time, which could well be used by others. The economic cost to the community and to the persons opposing the vexatious litigants runs into hundreds of thousands of dollars annually.

In the proceedings involving the litigants referred to in this submission, the number of court appearances (at interlocutory and full hearings) that each litigant has occasioned average around 80. Hundreds of hours of court time are expended.

2.2 *What effect do they have on judges and tribunal members, court staff, lawyers and witnesses?*

I have noticed over the past five to six years that vexatious litigants and litigants in person in general are having less and less respect for officers of the Court. They have become emboldened to treat both the sitting members of Courts, lawyers and witnesses (including Bank officers) with little or no respect whatsoever. They are often threatening and abusive. Further it seems that judicial officers of the Court are reluctant to check this trend for fear of being accused of bias or of being taken on appeal. As I have mentioned, I was personally charged with “treason” and “sabotage of the Constitution” and perjury by Horvath. I can testify to the fact that such conduct was intimidating, time consuming and unpleasant.

I have noticed a colleague of mine suffering stress in other matters where the litigants should, in my opinion, be declared vexatious. On one matter alone, he has spent up to 70% of his time dealing with one litigant’s numerous applications in both the Federal and the State jurisdiction. I include (at Tab 7) a summary of the history of that matter to demonstrate amount of work involved.
It is a common occurrence by vexatious litigants that any person who swears an affidavit in these matters will be joined as a defendant to the proceeding or in another civil or criminal proceeding. Practitioners and witnesses are therefore reluctant to swear affidavits in such matters.

3 The effect on individuals and agencies who are the victims of vexatious litigants

3.1 What effect do vexatious litigants have on the individuals or organisations who are victims of their conduct?

To a certain extent I have already answered this question. Needless to say, the economic effect is enormous. There is often a perception of hopelessness in fighting these people as so few persons have been declared vexatious. One is faced with the dilemma of utilising one’s time in working up a submission for the attorney general or just hoping that the next appeal/application by the vexatious litigant will be the last. Another consideration is the prospect of an appeal by the vexatious litigant from the decision to declare him or her to be “vexatious”.

3.2 If you think you or your organisation has been the victim of a vexatious litigant, describe the impact on you. What were the financial costs? Were there other costs?

Personally, I have found over the years that my ability to deal with vexatious litigants to be more and more stressful. It is very difficult to conduct one’s other work in an efficient manner when every couple of weeks, the vexatious litigant bring applications of one sort or another. It is time consuming and energy sapping. Costs are enormous. In one case the Bank is employing a Barrister to work almost full time on such matters. The costs of running the proceedings often exceed the value of any assets which may be available for realisation if and when the proceedings come to a conclusion. There are not only financial costs there are costs from an occupational health and safety point of view in that vexatious litigants are often becoming more and more belligerent and threatening in their conduct. In a number of cases, Bank officers have been joined to the proceeding as Defendants, High Court Justices have been sued and other judicial officers have been sued by the vexatious litigants (apart from me) in the Horvath matter as mentioned above.

4 Applying for a declaration under Victoria’s vexatious litigant laws

4.1 Are there people in Victoria’s courts and tribunals who are vexatious litigants, but have not been the subject of action under the vexatious litigant laws? If so, why do you think no action has been taken?

Yes. There are a number of people who have not been declared vexatious with whom the Bank is currently dealing. It takes some time to realise during the conduct of a matter, whether or not the matter is truly vexatious. The watershed between a genuine litigant and a vexatious one takes time to emerge. Once one realises this, it is time consuming to formulate a case for submission to the Attorney-General when one is dealing with a vexatious litigant. One always hopes that a matter will resolve at the next hearing. Unfortunately, they never do.
4.2 If you think you or your organisation has been the victim of a vexatious litigant, did you take any action to have the person declared a vexatious litigant? If not, why not? What other action did you take?

Refer to the preceding answer. Only in one case did I take action and that was the Horvath matter where the Supreme Court and the Federal Court made declarations.

4.3 Does the community know enough about the fact that a person can be declared a vexatious litigant, and how? How could community awareness be improved?

It would seem to me that there is not sufficient publicity in regard to this subject matter.

4.4 Should the Attorney General be the only person who can apply to have a person declared a vexatious litigant? Who else should be able to apply, eg senior court staff, or other parties to the litigation?

It would seem to me that the Attorney-General should not be the only person who can apply to have a person declared vexatious. Senior court staff should be able to do so by virtue of the fact that they soon realise who vexatious litigants are. Provided such members of court staff are senior and have sufficient expertise, they should be entitled to make such applications. A Justice of the Court of Appeal recently remarked that a particular litigant, (when applying for yet another adjournment) by the Court's reckoning had been involved in 41 separate hearings in that Court and others (being a reference to Federal Court proceedings). I submit that officers of the court, having knowledge of that nature, should be in a position to initiate the process. It would seem that other parties to the litigation should also be entitled to bring such proceedings. After all it is they who usually furnish the detailed submission to the Attorney-General for an application to be made under Section 21 of the Supreme Court Act.

4.5 Should courts and tribunals other than the Supreme Court have the power to declare a person a vexatious litigant? Should they be able to make a declaration on their own motion, i.e. without an application from another person?

It would seem to me that the appropriate forum for such a declaration is the Supreme Court and that such declaration should apply to all Courts in the State of Victoria. If other Courts on their own motion were allowed to declare a person vexatious, this would lead to a multiplicity of declarations in the various courts and tribunals. It would seem that this would be undesirable. Currently a declaration by the Supreme Court under Section 21 of the Supreme Court Act is binding on other State Courts.

5 Who is a vexatious litigant under Victoria's laws?

5.1 Does the law in Victoria make it too easy or too difficult for a person to be declared a vexatious litigant?

It would seem having regard to the experience I have had in trying to declare people vexatious that it is too difficult to have a person declared a vexatious litigant. The law needs to be amended as vexatious litigants are becoming more prevalent. As I address below, regard should be had to vexatious conduct within a proceeding not necessarily initiated by that litigant.
5.2 What should the ‘test’ be for determining whether a person is a vexatious litigant? For example, should the test be that the person has brought vexatious legal proceedings ‘frequently’, rather than stricter test of ‘habitually’ or ‘persistently’?

I think that the test should be less rigorous and it would seem that ‘frequently’ should be introduced into the legislation rather than the stricter test of ‘habitually’ or ‘persistently’.

5.3 Should the Supreme Court (or other courts and tribunals if appropriate) be able to consider other criteria? For example, should it be able to consider –

- the way the person has conducted the litigation?
- the person’s motive for bringing the litigation, e.g. whether the proceedings were brought to harass or annoy another person or to cause delay or detriment?

Unequivocally yes. I refer to my comment at 5.1 above. Such conduct of vexatious litigants affects the whole fabric of the judicial system both from a State and Federal point of view. A global approach, not an insular one should be adopted.

5.4 Should the Supreme Court be able to take into account any interlocutory (or interim) applications that the person has brought during the litigation?

There is authority for the proposition that such applications should be taken into account in whether or not to declare a person a vexatious litigant under the present law. I believe that the law should be changed so as to make it quite clear that Courts can take into account the conduct of a defendant who frequently brings appeals and applications, interlocutory or otherwise, that are hopeless and devoid of merit and that the conduct of the applicant in general should be taken into account, including the strategic seeking of adjournments as a matter of course and on spurious grounds. The conduct of a number of litigants is extremely hostile, unacceptable and hopeless and is slowly but surely leading the judicial system into disrepute. The conduct of some vexatious litigants in court is there for all to see. The Judiciary appears to be facing behaviour which in particular is disrespectful and not long ago may have lead to contempt proceedings being brought against the offender. Such conduct encourages vexatious litigants, and emboldens them to bring further proceedings and to push the boundaries of disrespect for the Judiciary, other officers of the court and including witnesses.

6 What rights should an alleged vexatious litigant have?

6.1 What rights should an alleged vexatious litigant have when the Supreme Court (or other courts and tribunals, if appropriate) hears an application? For example, should he or she have a right to free legal representation?

No. Vexatious litigants usually become highly proficient at conducting themselves in the courts. In generally, they are familiar with the Court Rules, thus have ample time to competently conduct their cases. My experience is that a number of them have substantial knowledge of the Rules of Court and use them to their best advantage. Vexatious litigants are also experts at delay. Excuses of ill health often feigned with no supporting medical evidence, regularly and with cynical calculation changing solicitors at the last minute or denying having received documents are some of the armoury of the vexatious litigant in his/her pursuit of delay. Why should they be given free legal representation in matters that are clearly hopeless and are devoid of merit?

6.2 What rights of appeal should a vexatious litigant have?

Assuming that such applications continue to be heard in the Supreme Court, I believe that a vexatious litigant should have no further right of appeal other than to the Court of Appeal in the State of Victoria.
The powers of the court to control vexatious litigation

7.1 Should the Supreme Court (or other courts and tribunals if appropriate) be able to make other orders to control vexatious litigants? For example, should it be able to:-

- impose conditions on the right of the person to continue or bring litigation, such as a power to order that the person cannot bring proceedings unless they are legally represented?

- prevent a person from entering court premises?

I believe that vexatious litigants should be subject to strict controls such as obtaining leave from a judge before issuing proceedings. Further conditions could be imposed on them such as obtaining leave from the Prothonotary to waive filing fees. It should not be left to the registry staff to waive such fees. A provision should be inserted into the Supreme Court Act similar to those that appear in the Trade Practices Act to make it illegal for persons to aid and abet vexatious litigants in the conduct of their proceedings. In this regard I refer to Mr Moran's conduct above (see Moran case Tab 4).

The effect of a vexatious litigant declaration

8.1 Are vexatious litigant declarations effective at stopping vexatious litigants? How do they try to press their claim after a declaration is made?

In my experience they have sought to press their claims in other forums, to dress the same claims up in a different fashion, to join further parties to the claim or to press their claim in the Federal jurisdiction. In the past they have sought to press their claims in the criminal jurisdiction. The discretion vested in the court officials to waive application fees does not help the situation. They do so in circumstances that are quite clearly not warranted and moreover where a vexatious litigant is well known to the Court. Waiving fees in undeserving cases makes it easy for a vexatious litigant to continue to waste court time and harass their opponents and persons who in any way participate in such litigation.

8.2 Are there 'loopholes' in the laws that allow vexatious litigants to continue litigating, eg through relatives, friends or other associates? Should the Supreme Court be able to control litigation by people who act 'in concert' with a vexatious litigant?

In this regard, see my comments regarding Mr Moran and aiding and abetting.

8.3 Does the law make it too easy or too difficult for a vexatious litigant to get leave from a court or tribunal to continue or bring litigation? For example, should the vexatious litigant have to show that there are reasonable grounds for the litigation?

Yes. It is too easy for them to bring vexatious proceedings and they should have to show that there are reasonable prospects for success in the litigation before being given leave to issue the proceedings. A Judge of the Supreme Court should determine whether or not a proposed proceeding has any merit.

8.4 Under the current law, a vexatious litigant can apply for leave ex parte (without the court or tribunal hearing from anyone else). Should the Attorney-General, or any other people, be notified when a vexatious litigant seeks leave? What rights should those people have?

I am of the opinion that the Attorney-General or the appropriate court official who initiated the declaration of the person as vexatious should be given notice of a leave application. Those persons are familiar with the matter and having initiated the declaration of the person as vexatious are in the best position to refer or grant such application. One of the problems for the Bank is that it does not wish to incur costs in opposing such applications that are in many cases absolutely unmeritorious. If the Bank were given notice it may well consider that it has to attend to oppose such an application. I believe it is best to leave this up to the court officials and the Attorney-General in the light of the legislation which hopefully will be amended.
8.5 **Should courts and tribunals be able to decide leave applications ‘on the papers’, without hearing from anyone in person?**

Unequivocally yes. Most applications are based on public documents in prior cases/applications. It is undesirable to waste the Court’s time on matters that can be easily decided on the documentary material before them. It should only be in exceptional cases that a hearing should be necessary. The option should be there.

8.6 **Should courts or tribunals be able to impose conditions when they grant leave to a vexatious litigant to bring litigation, e.g. should they be able to order the vexatious litigant to provide security for the likely legal costs of the defendant?**

Yes.

8.7 **Should vexatious litigants have a right of appeal when a court or tribunal refuses to grant leave?**

No. It is my view that in order for a person to be declared vexatious he or she would have abused the process of the legal system. Due process should be available to persons who have a genuine dispute. Rights to an appeal should not be available to those persons who have abused the system as have vexatious litigants. In a broad context, rights and privileges afforded to all of us in the community are of a limited nature and those that abuse them should not be granted the same privileges as others.

9 **Balancing rights and interests**

9.1 **Victoria has a Charter of Human Rights and Responsibilities that, amongst other things, protects the rights of people to a fair hearing. Do you think Victoria’s vexatious litigant laws strike the right balance between access to the courts and the need to protect other parties and the justice system from vexatious litigants?**

I am aware that by section 38(1) of the Charter, a court acting judicially is not positively or directly obliged to act compatibly with the Charter. However, as raised by Bell J in *Kortel v Mirik & Mirik* [2008] VSC 103 under s 6(2)(b) the Charter applies to courts to the extent that they have functions under Part 2, which includes section 24(1), which accords a party to a civil proceeding the right to have it decided after a “fair hearing”.

In that event, the Charter will rightly enhance and expand the inherent duty of a judge to ensure a fair trial by giving due assistance to a self represented litigant acknowledging the genuine disadvantages suffered by that litigant. Those disadvantages are broadly two fold: the lack of professional skill and ability possessed by the self represented litigant (typically manifesting itself in a failure to understand and appreciate the issues for determination before the court) and the lack of objectivity on the part of that litigant and the emotional investment in his/her case (see *Tomasevic v Travaglini* [2007] VSC 337 at paragraphs 69 and 70).

The duty to give procedural and substantive assistance to an unrepresented litigation places a judge in a difficult position. A balancing act is required to be performed. The judge must at the same time guard against becoming an advocate for that litigant and must maintain the reality and appearance of judicial neutrality *Tomasevic v Travaglini* [2007] VSC 337 at paragraphs 129 and 130). Importantly, that assistance must not give the self represented litigant an advantage over his/her opponent, and advantage that would not have been available if legally represented.

The effect of the Charter in increasing the courts sensitivity to the duty to assist creates the potential for the vexatious litigant, with his/her typical guile, to exploit that heightened awareness (in case management, in the issue of subpoenas, in adjournment applications, in the conduct of a trial, in a decision to waive filing fees, in the propensity to grant vexatious litigant orders). With an increase in awareness of Part 2 of the Charter, a tipping of the balance such that the opponent of the unrepresented litigant is unfairly disadvantaged is a concern of mine. In short, I have concern that the Charter may, gradually and without amendment to vexatious litigant laws, give that litigant an easier run.
As it is, in my view the balance is tipped in favour of the vexatious litigant at the moment. These laws should be tightened. What is happening in my view is that many thousands of hours of court time is being used by vexatious litigants at the expense of others who are entitled to justice quickly and at a reasonable cost. The Supreme Court is stretched for resources; those resources it does have should not be squandered on vexatious litigants.

10 Other ways to respond to vexatious litigants

10.1 What other laws in Victoria could be used to respond to vexatious litigation and vexatious litigants? Are they used too little or too often?

The waiver of fees for vexatious litigants facilitates such litigants to bring proceedings. If they were required to pay the usual fees that would in many cases contain the bringing of vexatious proceedings.

10.2 Are there any laws that would help the courts and tribunals respond to vexatious litigants that should be introduced in Victoria?

My view is that the Supreme Court Act should be amended so as to make it easier for the Supreme Court to declare a person vexatious, to prevent aiding and abetting vexatious litigants, and to make it more difficult for such litigants to bring proceedings without paying the usual filing fees.

10.3 Is there any other action that courts and tribunals could take to manage vexatious litigants, e.g. should there be more guidelines or training for judges, tribunal members and court staff on how to deal with difficult litigants?

Yes. After a number of hearings and applications by a potentially vexatious litigant it should become clear to the Judiciary that persons are or are likely to be vexatious. The attached examples quite clearly show that after a number of applications usually venting the same causes of action or defences that have already been litigated the courts allow these people to carry on and on in circumstances where their conduct should be disallowed. Court officials should be apprised of those persons who are vexatious or likely to be vexatious and a list of such persons should be circulated amongst the judiciary (including between state and federal courts) with perhaps a brief history of the number of applications brought or sought. A pattern would soon emerge as to the general conduct and purpose of such litigants' conduct.

10.4 Should courts and tribunals be able to refer vexatious litigants to support services?

What kinds of support services would be required?

It would seem to me that most vexatious litigants should be referred to psychologists or psychiatrists suitably qualified to deal with such persons. Orders could be made that they attend counselling with such experts.

10.5 How should the law, and courts and tribunals respond to any mental health issues arising from vexatious litigation?

See my previous answer.
The impact of vexatious litigation in other federal, state and territory courts

11.1 If a person is declared a vexatious litigant by a federal court or a court in another state or territory, what effect should that have in Victoria? For example:

- should the declaration automatically apply in Victoria as well?

- should the Supreme Court (or other courts and tribunals if appropriate) be able to take account of the person’s litigation in federal or other state or territory courts when they are considering whether to declare the person a vexatious litigant in Victoria?

I believe the answer to this question should be yes. Vexatious litigants should be shut out of as many forums as possible, failing which they will forum shop (see Horvath as a prime example).

General commentary

The Bank has spent an enormous amount of time and money on these matters. Apart from the Bank has at least four ongoing vexation litigant matters costing thousands of dollars a year.

In conclusion I quote an extract from the Moran Judgment at paragraph 50 which may be equally applicable to and other such cases:

“When one looks at the overall impression created by the various proceedings, and I here specifically exclude the proceedings in the Federal jurisdiction; their general character, wide ranging and sometimes bizarre allegations, the relief sought and the frequency with which they are issued, my conclusion is that despite the relatively small number of proceedings, they are nonetheless indicative of someone who is prepared to institute proceedings as a matter of course and entirely without regard to the merits of the case”.

I strongly believe that if the laws relating to vexatious litigants are not amended so as to make their conduct more difficult and more unacceptable, the limited resources and budgetary restraints imposed on courts and tribunals of the State of Victoria will be wasted on people such as Horvath, and others. Other litigants (either represented or in person) who seek justice from the system are unable to obtain hearings as quickly as they might do but for the conduct of a minority of people who seek to frustrate not only their adversaries, but the justice system as a whole.

I trust my contribution to this issue will be of assistance.

Yours faithfully

A. J. Mulhunby

Solicitor Victoria

per: Ross Thomson