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** In cooperation with
Trench, Rossi e Watanabe
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11 July 2025

CONFIDENTIAL AND NOT FOR PUBLICATION

Artem Bryl
By email only

Our ref: 51265177

By email only

Dear Artem Bryl

Concerns Notice – Defamation Act

We act for Ms Nadya Haddad (**Ms Haddad**).

We write to you in your capacity as a lawyer previously attached to Odtojan Bryl Lawyers (**OBL**) and in your personal capacity.

This letter is a concerns notice pursuant to Part 3, section 12A of the *Defamation Act 2005* (NSW).

We are instructed that both you and OBL have defamed Ms Haddad in a number of publications set out below.

1. Parties

1.1 Ms Haddad is the Deputy Director, Legal Regulation, at the Law Society of New South Wales. The Law Society's Legal Regulation Department includes the Professional Standards Department (**PSD**). Prior to 13 June 2025, Ms Haddad held the position of Deputy Director, Investigations at the Law Society of New South Wales.

1.2 We are instructed that OBL is a law practice based in Parramatta NSW, where you were a named lawyer.

1.3 Your wife, Ms Odtojan, was the only other lawyer, and was the Principal, of OBL.

2. Summary

2.1 In the publications referred to in this concerns notice, OBL has complained that Ms Haddad has engaged in serious acts of criminality and misconduct in her official capacity. You have published and/or republished substantially similar content on various social media platforms. So has Ms Odtojan.

- 2.2 OBL has published content in which it appears to hold the view that each of you and Ms Odtojan are victims having made substantially similar allegations against various lawyers and judges in legal proceedings that concern you. Those allegations were considered in *Odtojan v Condon* [2023] NSWCA 129. There, the NSW Court of Appeal:
- (a) observed that each of you and Mr Bryl demonstrated (at [8]) “*a capacity... to make allegations of serious criminality and misconduct without a proper foundation*”; and
 - (b) observed (at [77]) that “*...it seems that if conduct occurs which is not to the liking of Ms Odtojan and Mr Bryl then they readily leap to making unfounded allegations of serious wrongdoing*”.
- 2.3 The Court’s judgment in that case, together with the whole of the papers, were referred to the NSW Legal Services Commissioner: *Odtojan v Condon* [2023] (No 2) NSWCA 143.
- 2.4 After seeking and obtaining further material from you and submissions in relation to your application to renew your practising certificate, on 30 May 2025, the Council of the Law Society of New South Wales (**Council**) had:
- (a) resolved not to renew your practising certificate under s 45 *Legal Profession Uniform Law* (NSW) (**Uniform Law**). In summary, Council was of the opinion that neither you, or Mr Bryl, were fit and proper persons; and
 - (b) appointed a Manager to oversee OBL’s operations for two years under s 334 of the Uniform Law.
- 2.5 Despite the above, each of OBL, you, and Ms Odtojan have continued to publish and/or republish content online alleging that our client has been engaged in serious acts of criminality and misconduct.
- 2.6 Each of the below publications, and republications, are plainly responsive to your disciplinary matter before the Council. We request that you take the steps set out at the end of this concerns notice. Failing to do so may result in our client seeking appropriate interlocutory relief without further notice to you.

3. First Matter Complained Of

Publication

- 3.1 On about 17 May 2025, OBL published a video on its public YouTube page, and which was accessible at the following URL:
https://www.youtube.com/watch?v=_MmSqQTymeQ (**First Matter Complained Of**).

- 3.2 In the First Matter Complained Of, Ms Haddad was referred to by image, name and title, and you made the following oral statements about her:

I sent an email to the Head of Registry, Nadya Haddad, and asked her what happened to our membership. You know what she did? She ignores that email. Shortly after, in March 24, this year, a letter came from the PSD department – where she assigned herself on our matter, and says that she is now the PSD Officer on the matter, removing Ms Griswold, of which I have alleged that Ms Griswold had done unlawful acts and fabricated findings of misconduct which does not exist. And Ms Haddad completely ignores the email that was sent to her asking what happened to our Practising Certificate and our membership. She just ignores it. And then she says to me and Mr Bryl that she says “Thank you for letting us know of our error.” Nobody said anything about error. And this is how dishonest this woman is. She writes on the letterhead of the Law Society Professional Standards Department and says “Thank you for giving us notice of the error that it’s an allegation of misconduct. Nobody ever said that they made any error. I said to them that they have engaged in unlawful, corrupt conduct of fabricating a statement of fact of misconduct. Now she’s saying “Oh, it’s an allegation.” It’s irrelevant whether it’s an allegation or a statement of fact. It is still a fabrication of misconduct. And that’s the mockery I get. That’s the gross dishonesty of someone as an officer in the Law Society who is supposed to be of integrity and honesty. And not only is she a PSD officer – she is a lawyer so she’s fully aware what she’s doing. And then she continues to rely on the fabricated misconduct.

- 3.3 Given the salacious nature of the First Matter Complained Of, OBL clearly intended to promote it as far and as wide as possible. Currently, the First Matter Complained Of has been viewed over 2,000 times on YouTube and has generated reactions (in the form of likes, shares and comments) by other internet users.
- 3.4 The natural and probable consequence of the publication of the First Matter Complained Of was that it would be republished. Between 17 May and 18 June 2025, the sense and substance of the First Matter Complained Of was, in fact, republished by each of OBL, you and Ms Odtojan. Specifically, we draw your attention to the following:

- (a) OBL republished the sense and substance of the First Matter Complained Of:

- (i) on 17 May 2025, when it published the content on OBL’s TikTok, accessible at:

<https://www.tiktok.com/@oblayers/video/7505309015346>

[384146?is_from_webapp=1&sender_device=pc&web_id=7516344519752320532](https://www.tiktok.com/@oblalawyers/video/7505309015346384146?is_from_webapp=1&sender_device=pc&web_id=7516344519752320532).

This post has currently amassed over 441 views online. In the circumstances, the Court will infer that the First Matter Complained Of has been widely republished on TikTok;

- (ii) on 17 May 2025, when it reposted the content at (i) on a TikTok page titled “Odtojan Bryl Justice Project” accessible at the following URL:

<https://www.tiktok.com/@oblalawyers/video/7505309015346384146>;

- (iii) on 18 May 2025, when it published the content on the social media platform, “X”, accessible at the following URL:

<https://x.com/OdtojanBrylLaw/status/1924045530344440289>.

This post has currently been “viewed” over 143 times. In the circumstances, the Court will infer that the First Matter Complained Of has been widely republished on X;

- (iv) on 30 May 2025, when it published the content on the OBL Facebook Page, accessible at the following URL:

<https://www.facebook.com/share/p/1Y1jrxfaX3/>.

This post has generated a number of reactions and has been shared at least 8 times. In the circumstances, the Court will infer that the First Matter Complained Of has been widely republished on Facebook;

- (v) on 30 May 2025, when it published the content on the website “change.org” and which was accessible at the following URL:

<https://www.change.org/p/call-for-nsw-attorney-general-daley-mp-mcdermott-to-resign-for-condoning-unlawful-acts> **(Change.Org Petition)**.

This petition has generated at least 30 verified signatures. In the circumstances set out in this notice, the Court will infer that the Change.Org Petition has been widely republished;

- (vi) on 30 May 2025, when it published the content on the website “gofundme.com” accessible at the following URL:

<https://www.gofundme.com/f/justice-for-artem-marie->

[unlawful-acts-by-nsw-law-society](#) (**Go Fund Me Post**).

This fundraiser has purportedly generated the sum of \$1,250. In the circumstances set out in this notice, the Court will infer that the Go Fund Me Post has been widely republished;

- (vii) on about 31 May 2025, when it republished the Change.Org Post on OBL's Facebook Page, accessible at:

<https://www.facebook.com/share/p/186T79e4CK/>.

It has been shared at least 7 times and the Court will infer that it has been widely republished and by at least OBL's 351 followers;

- (viii) on about 31 May 2025, when it republished the Go Fund Me Post on OBL's Facebook, accessible at:

<https://www.facebook.com/share/p/186T79e4CK/>.

It has been shared at least 7 times and the Court will infer that it has been widely republished and by at least OBL's 351 followers;

- (ix) on about 13 June 2025, when it posted content on the OBL website, accessible at the following URL:

<https://www.odtojanbryllawyers.com.au/single-post/public-notice-urgent-call-for-criminal-investigation-into-corrupt-conduct-in-nsw-legal-system-legal>.

In the circumstances set out in this concerns notice, the Court will infer that the post has been widely republished;

- (x) on about 18 June 2025, when it posted content on the OBL LinkedIn page, accessible at the following URL:

https://www.linkedin.com/posts/odtojanbryllawyers_marie-odtojan-lawyer-womaninlaw-poc-sydney-activity-7340969117425770496-TGKi?utm_source=share&utm_medium=member_desktop&rcm=ACoAAAFS9JEBEmQIUgmZBB9vQC1C14cL9_Xg00M.

In the circumstances, the Court will infer that the First Matter Complained Of has been widely republished, and by at least OBL's 269 LinkedIn followers; and

- (i) on 10 July 2025, when it posted content on the OBL YouTube page, accessible at the following URL:

<https://www.youtube.com/watch?v=cLHQCfLZSCE>.

The video has been reviewed at least 25 times. In the circumstances, the Court will infer that the video has been widely republished.

- (b) Ms Odtojan republished the sense and substance of the First Matter Complained Of:

- (i) on about 18 May 2025 when she posted content on X accessible at URL:

<https://x.com/MarieOdtojan/status/1924035004071596262>.

This post has been viewed at least 774 times, and the Court will infer that it has been republished widely on X;

- (ii) on about 14 June 2025, when she reposted the content on her Facebook page, accessible at the following URL:

<https://www.facebook.com/share/p/19HPMJPs6y/>.

In the circumstances, the Court will infer that this post has been widely republished, and to at least her 161 followers on Facebook;

- (iii) on about 14 June 2025, when she reposted the Change.Org Petition on her Facebook page, accessible at URL:

<https://www.facebook.com/share/p/1CNhdvYJS3/>.

The Court will infer that this post has been widely republished, and to at least her 161 followers on Facebook;

- (iv) on about 14 June 2025, when she reposted the Go Fund Me Post on her Facebook page, accessible at URL:

<https://www.facebook.com/share/p/1CNhdvYJS3/>.

It is to be inferred that this post has been widely republished, and to at least her 161 followers on Facebook;

- (v) on about 18 June 2025, when she reposted it to her LinkedIn page, accessible at URL:

https://www.linkedin.com/posts/marie-odtojan-b409521b_marie-odtojan-lawyer-womaninlaw-poc-sydney-activity-7340960444079067138-

[1DX?utm_source=share&utm_medium=member_desktop&rcm=ACoAAAFS9JEBEmQIUgmZBB9vQC1C14cL9_Xg00M](https://www.facebook.com/1DX?utm_source=share&utm_medium=member_desktop&rcm=ACoAAAFS9JEBEmQIUgmZBB9vQC1C14cL9_Xg00M).

This post has generated 9 reactions, 5 comments and 2 reposts. The Court will infer that it has been widely republished; and

- (vi) on about 25 June 2025, when she posted content to X, accessible at URL:

<https://x.com/MarieOdtojan/status/1937769774928310626>

This post has currently received 78 views. The Court will infer that it has been widely republished on X.

- (c) You republished the sense and substance of the First Matter Complained Of on about 18 June 2025, when you posted content to your LinkedIn page, accessible at URL:

<https://www.linkedin.com/in/artem-bryl-62624b79/>

This post has generated 9 reactions, 5 comments and 2 reposts. The Court will infer that it has been widely republished.

- 3.5 By the use of salacious hashtags in each of the above republications, it was the natural and probable consequence that the First Matter Complained Of would generate reactions (in the form of likes, shares and comments) from other social media users and be published widely. In this regard, our client will also rely on the following statement within the body of the YouTube post (which comprises part of the First Matter Complained Of):

We need help fighting these corporations & the continuous infliction of oppression & injustice. You can help by liking, sharing, saving & commenting on this video. Further info on how to support & donate will be shortly provided via bio & website. We have created an Odtojan Bryl Justice Project, so if one can help & be part of our team, reach out to us 🙌👉 Contact us and/or make enquires at objusticeproject@gmail.com

- 3.6 The Court will readily infer that one of the reasons why OBL, you, and Ms Odtojan have promoted the First Matter Complained Of widely was to generate revenue for the “Odtojan Bryl Justice Project”. That project was promoted in the Go Fund Me Post and Change.Org Petition (referred to above) and seeks to raise \$1 million which is relevantly to pay: “[l]egal fees in pursuit of legal actions against the Law Society of NSW and the Office of the Legal Services Commissioner”. Amongst other things, internet users are invited to share “our cause and videos etc” (including the First Matter

Complained Of) by using the hashtag “#Justice4MarieAndArtem”, and invited to: “...bring mass public attention and support by donating to this cause” because it “ [is] of great public importance”.

- 3.7 Within a month of the publication of the First Matter Complained Of, we observe that the “Odtojan Bryl Justice Project” received donations in the sum of about \$1,250. Given that nexus, and what we have said above, the Court will infer that the First Matter Complained Of has been widely published.
- 3.8 You are liable as publisher of the First Matter Complained Of because you have republished it in apparent approval. Further, and in any event, aside from your wife, you were the only other lawyer at OBL that is the subject of the First Matter Complained Of. Previously, you have jointly authored correspondence with Ms Odtojan to the Law Society concerning substantially similar allegations (for example, on 15 August 2024 which has been republished widely online), and in social media posts that are ostensibly controlled by OBL. In the circumstances, the Court will readily infer that you either authored the First Matter Complained Of jointly with Ms Odtojan and/or otherwise authorised it and/or approved it and/or conducted it, but in any event participated in the publication of the First Matter Complained Of on the OBL YouTube page.
- 3.9 Ms Haddad will rely on extent of publication and republication of the First Matter Complained Of, as evincing a clear intention by each of OBL, you and Ms Odtojan to disseminate it as wide, and as far, as possible to cause maximum damage to our client’s reputation. Ms Haddad will further rely on the grapevine effect.
- 3.10 A copy of a transcript of the First Matter Complained Of is annexed to this letter and marked “A”. As at the date of this letter, the First Matter Complained Of (and each republication) remains publicly available online.

Imputations of concern

- 3.11 In its natural and ordinary meaning, the First Matter Complained Of conveys the following defamatory imputations (or imputations not differing in substance):
 - (a) Ms Haddad, Deputy Director, Legal Regulation, has unlawfully tampered with data that informed the legitimate renewal of the practising certificates for each of Ms Odtojan and Mr Bryl.
 - (b) Ms Haddad, Deputy Director, Legal Regulation, has deliberately fabricated claims of misconduct about Ms Marie Odtojan and Mr Artem Bryl to cover up a matter of great public importance in Australia;

- (c) Ms Haddad, Deputy Director, Legal Regulation, has knowingly interfered with the practising certificates of NSW lawyers in contravention of her duties and obligations under the Uniform Law;
- (d) Ms Haddad, Deputy Director, Legal Regulation, has conspired with the Law Society Council to fabricate findings against Ms Marie Odtojan and Mr Artem Bryl to prevent them from renewing their practising certificates and subsequently mocked them.
- (e) Ms Haddad, Deputy Director, Legal Regulation, has knowingly engaged in, and approved, a targeted and discriminatory hate crime with respect to the renewal of practising certificates for each of Ms Odtojan and Mr Bryl.
- (f) Ms Haddad, Deputy Director, Legal Regulation, has engaged in fraudulent conduct to damage each of Ms Odtojan and Mr Bryl and subsequently relied on her position to conceal it.
- (g) Ms Haddad, Deputy Director, Legal Regulation, has deliberately ambushed Ms Odtojan and Mr Bryl to deny them due process, procedural fairness and natural justice.
- (h) Ms Haddad, Deputy Director, Legal Regulation, has knowingly fabricated claims of misconduct about Ms Marie Odtojan and Mr Artem Bryl to prevent Ms Odtojan from exposing unlawful coordinated acts committed by other lawyers.
- (i) Ms Haddad, Deputy Director, Legal Regulation, condones fraud and criminality amongst the legal sector as well as the impersonation of lawyers.
- (j) Ms Haddad, Deputy Director, Legal Regulation, has conducted herself in such a way that the integrity of the Courts and the legal profession have been irreparably damaged, and the public can have no faith in the administration of justice in New South Wales.
- (k) Ms Haddad, in her role as Deputy Director, Legal Regulation, has done unlawful acts and fabricated findings of misconduct.
- (l) Ms Haddad, in her role as Deputy Director, Legal Regulation, is so grossly dishonest that she is prepared to conceal fabricated allegations of misconduct.
- (m) Ms Haddad, in her role as Deputy Director, Legal Regulation, is so grossly dishonest that she fabricated allegations of misconduct about Ms Marie Odtojan and Mr Artem Bryl and then deceptively sought to conceal them.

3.12 We are instructed that each of the above imputations of concern is

demonstrably false.

4. Second Matter Complained Of

Publication

- 4.1 On 13 June 2025, you and OBL published a blog post on the OBL website, accessible at the following URL:

<https://www.odtojanbryllawyers.com.au/single-post/public-notice-urgent-call-for-criminal-investigation-into-corrupt-conduct-in-nsw-legal-system-legal> (Second Matter Complained Of)

- 4.2 The Second Matter Complained Of identified our client by name.
- 4.3 Whilst our client will rely on the whole of the Second Matter Complained Of, please find attached and marked “B” a schedule of some specific statements you made (and which comprise part of the Second Matter Complained Of). We are instructed that these statements, together with the public notice, are demonstrably false and convey the defamatory imputations of concern set out below.
- 4.4 The natural and probable consequence of the publication of the Second Matter Complained Of was that it would be republished. Between about 13 and 14 June 2025 the sense and substance of the Second Matter Complained Of was, in fact, republished by both Ms Odtojan and OBL. We specifically draw your attention to the following:
- (a) on 13 June 2025, OBL republished the sense and substance of the Second Matter Complained Of when it posted content to its OBL Facebook Page. Such content is accessible at the following URL: <https://www.facebook.com/share/p/1VGwH2TSV6/>.
 - (b) on 14 June 2025, Ms Odtojan republished the Second Matter Complained Of when she posted it on the social media platform, X. Such content is accessible at the following URL: <https://x.com/MarieOdtojan/status/1933837433881481284>.
- 4.5 The use of salacious language and hashtags in each of the above republications ensured that the Second Matter Complained Of generated widespread reactions (in the form of likes, shares and comments) from other social media users. In the circumstances, the Court will readily infer that the Second Matter Complained Of has been republished widely.
- 4.6 For substantially similar reasons explained above (at [3.8]), you are liable as publisher of the Second Matter Complained Of.
- 4.7 A copy of the Second Matter Complained Of is annexed to this letter and

marked “C”. As at the date of this concerns notice, we further note that it remains publicly available online.

Imputations of concern

4.8 In its natural and ordinary meaning, the Second Matter Complained Of conveys the following defamatory imputations (or imputations that do not differ in substance):

- (a) Ms Haddad, Deputy Director, Legal Regulation, knowingly condones fraud and criminality amongst the legal sector.
- (b) Ms Haddad, Deputy Director, Legal Regulation, subjected Ms Marie Odtojan and Mr Artem Bryl to a sustained campaign of harassment and intimation which included making false and fabricated allegations about them.
- (c) Ms Haddad, Deputy Director, Legal Regulation, has engaged in unlawful and corrupt conduct with respect to the renewal of the practising certificates for each of Ms Marie Odtojan and Mr Artem Bryl.
- (d) Ms Haddad, Deputy Director, Legal Regulation, has abused her position and deliberately sought to cause harm to each of Ms Marie Odtojan and Mr Artem Bryl
- (e) Ms Haddad, Deputy Director, Legal Regulation, conspired with Ms Valerie Griswold and the Law Society Council to fabricate findings against Ms Marie Odtojan and Mr Artem Bryl to strip each of them of their practising rights and reputational standing without lawful basis.
- (f) Ms Haddad, Deputy Director, Legal Regulation, deliberately ambushed Ms Odtojan and Mr Bryl to deny them a lawful hearing.
- (g) Ms Haddad, Deputy Director, Legal Regulation, fraudulently entered the names of Ms Odtojan and Mr Bryl in the OLSC Solicitors Disciplinary Register as being unfit to practise.
- (h) Ms Haddad, Deputy Director, Legal Regulation, is so unethical that she entered the names of Ms Odtojan and Mr Bryl in the OLSC Solicitors Disciplinary Register for her own self-serving reasons and out of retaliation.
- (i) Ms Haddad, Deputy Director, Legal Regulation, is responsible for enabling and executing the abuse of regulatory powers to engage in unlawful and corrupt actions against two solicitors.

Alternatively: There are reasonable grounds to investigate whether

Ms Haddad, Deputy Director, Legal Regulation is responsible for enabling and executing the abuse of regulatory powers to engage in unlawful and corrupt actions against two solicitors.

- (j) Ms Haddad, Deputy Director, Legal Regulation, has knowingly acted so unlawfully that the public should be protected from her.
- (k) Ms Haddad, Deputy Director, Legal Regulation, has been so dishonest that the public can have no faith in the administration of justice.
- (l) Ms Haddad, Deputy Director, Legal Regulation, has been so corrupt and unethical that she should be removed from her position immediately for the benefit of society.

Alternatively: Ms Haddad, Deputy Director, Legal Regulation, is so corrupt and unethical that there are reasonable grounds for the Law Society to investigate whether it ought to remove her from her position immediately for the benefit of society.

- 4.9 We are instructed that each of the above imputations of concern are demonstrably false.

5. Third Matter Complained Of

Publication

- 5.1 On or around 13 June 2025, you and OBL published a blog post on the OBL website, which was accessible at the following URL: <https://www.odtojanbryllawyers.com.au/single-post/law-society-of-nsw-unlawfully-prevents-the-legitimate-renewal-of-ms-odtojan-and-mr-bryl-s-practising> (**Third Matter Complained Of**).

- 5.2 The Third Matter Complained Of identified our client by name, and contained the following statement of and concerning Ms Haddad:

The Law Society of NSW PSD / Director Ms Valerie Griswold, Law Council, the Head of Registry Office, Ms Nadya Haddad, and the Legal Services Commissioner, Ms Samantha Gulliver, had unlawfully tampered with the legitimate renewal of the said solicitors practising certificates without lawful process.

- 5.3 The Court will readily infer that by the use of salacious language and hashtags in the Third Matter Complained Of, you and OBL intended that it generated widespread reactions (in the form of likes, shares and comments) from other internet users. In the circumstances, the Court will infer that the Third Matter Complained Of has been republished widely.

- 5.4 For substantially similar reasons explained above (at [3.8]), you are liable

as publisher of the Third Matter Complained Of.

- 5.5 A copy of the Third Matter Complained Of is annexed to this letter and marked “D”. As at the date of this letter, we note that it remains publicly available online.

Imputations of concern

- 5.6 In its natural and ordinary meaning, the Third Matter Complained Of conveys the following defamatory imputations (or imputations that do not differ in substance):

- (a) Ms Haddad, Deputy Director, Legal Regulation, has unlawfully tampered with the legitimate renewal of the practising certificates for each of Ms Odtojan and Mr Bryl.
- (b) Ms Haddad, Deputy Director, Legal Regulation, unlawfully deprived Ms Odtojan and Mr Bryl of being heard with respect to the renewal of their practising certificates.
- (c) Ms Haddad, Deputy Director, Legal Regulation, deliberately ambushed Ms Odtojan and Mr Bryl to deny them due process, procedural fairness and natural justice.
- (d) Ms Haddad, Deputy Director, Legal Regulation, conspired with Ms Valerie Griswold and the Law Society Council to fabricate findings against Ms Odtojan and Mr Bryl in order to unlawfully strip them of their practising rights and bring them into disrepute.
- (e) Ms Haddad, Deputy Director, Legal Regulation, conspired with Ms Valerie Griswold, the Law Society Council, and the NSW Legal Services Commissioner Ms Gulliver, to unlawfully tamper with the legitimate renewal of the practising certificates for each of Ms Odtojan and Mr Bryl.

- 5.7 We are instructed that each of the above imputations of concern are demonstrably false.

6. Serious Harm

- 6.1 Publication of each matter complained of has caused Ms Haddad serious harm within the meaning of section 10A of the *Defamation Act 2005* (NSW).
- 6.2 Ms Haddad is a qualified lawyer of the NSW Supreme Court. She held the position of Deputy Director, Investigations, in the Law Society’s Legal Regulation Department from January 2020 until 9 June 2025. Since 10 June 2025, Ms Haddad has held the position of Deputy Director of the Law Society’s Legal Regulation Department.

- 6.3 Previously, Ms Haddad has held Manager and Acting Director roles at the Law Society since 2018. Prior to that, she had over 17 years' experience as a solicitor working for the NSW Crown Solicitor's Office in senior roles in various teams, and was earlier a Litigation Solicitor at the Tenant's Union of NSW from 1999 to 2001. Our client has therefore built a portfolio of work over 26 years where her reputation is of particular importance.
- 6.4 As the Deputy Director, Investigations, Ms Haddad led the team responsible for the assessment and investigation of complaints and other suitability matters including court referrals and disclosures made by solicitors. The Deputy Director, Investigations works under the framework of the Uniform Law and in accordance with its objects which include to "promote the administration of justice and an efficient and effective Australian legal profession" by "ensuring lawyers are competent and maintain high ethical standards and professional standards in the provision of legal services" and "enhancing the protection of the clients of law practices and the protection of the public generally" (s 3 of the Uniform Law). Subsequent to Ms Haddad's promotion to the Deputy Director across the Legal Regulation Department, effective 10 June 2025, Ms Haddad and the Department which Ms Haddad assists Ms Griswold to lead are responsible for undertaking the regulatory activities associated with the Council and the Law Society's obligations under the Uniform Law. The Department licences and registers the NSW legal profession, assesses and investigates complaints in relation to the conduct of practitioners which are referred to it by the NSW Legal Services Commissioner.
- 6.5 The PSD plays a crucial role in maintaining high professional and ethical standards and investigating potential misconduct within the legal profession. Our client's obligations to the legal profession and the public of NSW include acting as a model litigant.
- 6.6 Consequently, it is crucial to ensure public confidence in the judicial system for our client to hold the reputation as someone that is objective, impartial, fair and reasonable person and who provides natural justice and procedural fairness to every person. All of this is inherent to all aspects of her work.
- 6.7 Indeed, prior to the publication of each matter complained of, our client held such a reputation in the legal sector, as well as in NSW generally. In her long and distinguished career, Ms Haddad has not been the subject of any investigations, adverse findings, or disciplinary action. She was also well known to provide a professional high-level investigative service that has produced information, including reports, capable of withstanding scrutiny by NSW Tribunals and Courts. In that way, Ms Haddad also held the reputation as a someone that ensured public confidence in the administration of justice.
- 6.8 Each matter complained of has caused, or is likely to cause, damage to our

client's reputation in the above sectors of her life. They each portray her as the antithesis of what she is – an objective, fair, honest and respectable professional.

- 6.9 The harm already caused to Ms Haddad's reputation is plainly evident from the reaction from members of the public to the Change Petition and Go Fund Me Post above. In this regard, we note some members of the public that have apparently signed the petition believing the matters complained of to be true and have donated their own money to the "Odtojan and Bryl Justice Project".
- 6.10 The publication of the matters complained of are further likely to cause serious harm because of:
- (a) the gravity of the imputations of concern. These include allegations of criminality, corruption, dishonesty. The publication of the matters complained of therefore has the inherent tendency to cause serious harm to Ms Haddad's reputation;
 - (b) each of the imputations of concern strike at the heart of Ms Haddad's professional role as Deputy Director, Legal Regulation, namely honesty and integrity;
 - (c) the circumstances, manner and extent of publication. Specifically, each matter complained of:
 - (i) was published in the context of an investigation conducted by Ms Haddad into your conduct as a NSW solicitor and each of the matters complained of are responsive to that investigation;
 - (ii) contained salacious and tendentious content calculated to fuel discussion and to reach as wide an audience as possible;
 - (iii) was published and/or republished as part of a targeted online campaign by you and OBL against Ms Haddad. The clear intent of the campaign was to spread each matter complained of as far and as wide as possible to cause maximum damage to Ms Haddad's professional reputation. Whilst our client will rely on each matter complained of in this regard, we specifically will rely on the third matter complained of which has been viewed over 2000 times on YouTube, and OBL's TikTok that has been viewed over 10,000 times;
 - (iv) was purportedly authored and/or approved by a law practice and/or practising solicitors that held themselves out to be innocent victims of fraud at the hand of Ms Haddad. The matters complained of therefore had the imprimatur of officers of the Court which increased their credibility;

- (v) were published to persons, including Ms Haddad's employer, that have power and influence over Ms Haddad's position. It is to be inferred that this was done to cause maximum damage to Ms Haddad's internal reputation within the Law Society, and ultimately, to have her summarily removed; and
- (vi) was published either in the knowledge that each of the above imputations of concern were false, or at the very least, recklessly and with an indifference to their truth or falsity.

7. Aggravated damages

- 7.1 Our client's hurt and harm occasioned by reason of the publication of the matters complained of was aggravated by her knowledge of the matters set out in this letter.
- 7.2 To the extent that we are instructed to commence defamations proceedings against you and seek damages, our client may rely on those matters as particulars of aggravation.
- 7.3 In particular, our client may amongst other things rely upon the following:
 - (a) Ms Haddad's knowledge of falsity with respect to each imputation set out above;
 - (b) your conduct in publishing or republishing each matter complained of on social media platforms for unrestricted downloading and sharing by users;
 - (c) your conduct in using salacious and tendentious language to promote each matter complained of;
 - (d) your conduct in publishing the matters complained of, which contain allegations of criminality and serious misconduct, without any proper basis to do so;
 - (e) your conduct in republishing the matters complained of as evidence of your continuing campaign against Ms Haddad;
 - (f) your conduct in publishing the matters complained of in response to an investigation conducted by Ms Haddad into your conduct as a solicitor of NSW; and
 - (g) your conduct in publishing each of the matters complained of despite the findings of the NSW Court of Appeal set out at [**Error! Reference source not found.**] above.
- 7.4 Further particulars may be provided in due course.

8. Next Steps

8.1 We are instructed by our client to request you do the following:

- (a) Permanently remove each matter complained of (or matter that does not differ in substance);
- (b) provide in writing an apology to Ms Haddad (**Apology**) on the following terms:

During May and June 2025, Odtojan Bryl Lawyers and Artem Bryl published material that was defamatory of Nadya Haddad in which we imputed, amongst other things, that she was corrupt and dishonest, and had acted unlawfully.

That material published by us was a complete fabrication. We did so with the intention to injure Nadya Haddad's reputation.

We retract our statements and unreservedly apologise to Nadya Haddad for the damage to reputation, hurt and distress that we caused her.

- (c) publish the apology to each location controlled by you on which the matters complained of (or matter that does not differ in substance) were published or republished;
 - (d) agree to pay Ms Haddad's reasonable legal fees in relation to this matter;
 - (e) provide a written undertaking that you will not publish the matters complained of, or any imputations that do not differ in substance.
- 8.2 If you do not agree to those demands by 5:00 pm on **Friday, 8 August 2025**, our client reserves her rights to commence defamation proceedings against you without further notice, including to seek an urgent interlocutory injunction.
- 8.3 In that context, in the event that OBL or you publishes any further content of a substantially similar nature to the matters complained of set out above, our client may approach the Common Law Duty Judge seeking leave to commence proceedings prior to the expiry of 28 days and rely on your conduct on the question of costs in accordance with ss 12B and 40 respectively of the *Defamation Act 2005* (NSW).
- 8.4 Further, and notwithstanding that this concerns notice is clearly marked "confidential and not for publication", should any of its contents be published by you or OBL, or each of you cause any of its contents to be published, we will seek instructions to seek urgent interlocutory relief from the Court without further notice to you.

8.5 Our client otherwise reserves all rights.

Yours faithfully

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