

By \_\_\_\_\_  
FILED  
ATTORNEY GENERAL  
STATE OF NEW SOUTH WALES

on 10 SEP 2008

Form 40 (version 1)  
UCPR 35.1

**AFFIDAVIT OF JANET LOUGHMAN 10 SEPTEMBER 2008**

**COURT DETAILS**

Court District Court of New South Wales

Registry Sydney

Case number 3199/08

**TITLE OF PROCEEDINGS**

First plaintiff Kathleen Monica BILES

Number of plaintiffs 13

Defendant STATE OF NEW SOUTH WALES

**FILING DETAILS**

Filed for Plaintiff

Legal representative Janet Loughman  
Women's Legal Services NSW

Legal representative reference JL:DH:B410/07

Contact name and telephone

██████████  
██████████

[on separate page]

**AFFIDAVIT**

Name Janet Loughman  
 Address PO Box 206, Lidcombe NSW 1825  
 Occupation Solicitor  
 Date 10 September 2008

I affirm:

- 1 I am the solicitor for the Plaintiffs in matter no. 3199 of 2008.
- 2 The solicitor for the Defendant has raised an issue as to the propriety of the form of the proceedings, due to the involvement of more than one plaintiff.
- 3 Each of the Plaintiffs consents to being joined to these proceedings.
- 4 On my instructions each of the Plaintiffs sues the Defendant in circumstances involving common questions of law and fact.
- 5 I am familiar with matter no. 2218 of 2008 which also concerns Plaintiffs who allege injury against the Defendant in circumstances giving rise to questions of fact and law, common if not identical, to those involved in these proceedings.
- 6 On the advice I have received from Counsel, I anticipate that in the running of the trial there will be a substantial overlap of evidence, particularly on the question of liability, but also relevant to damages.

AFFIRMED at

Signature of deponent

[REDACTED]

Signature of witness

*D. Hamey*

Name of witness

Dianne Hamey

Address of witness

PO Box 206, Lidcombe NSW 1825

Capacity of witness

Solicitor

Note: The deponent and witness must sign each page of the affidavit. See UCPR 35.7B.