

Form 12 (version 1)  
Rule 15.12

DISTRICT COURT OF NSW  
Sydney

on 15 JUL 2008

**STATEMENT OF PARTICULARS**  
**PERSONAL INJURY PROCEEDINGS**



Court	District Court of New South Wales
Division	
List	
Registry	Sydney
Case number	3199/08



Plaintiff	<b>Kathleen Monica BILES</b>
Number of plaintiffs	1
First Defendant	<b>STATE OF NEW SOUTH WALES</b>
Number of defendants	1



Filed for	Plaintiff
Address for service	Women's Legal Services NSW PO Box 206, Lidcombe NSW 1825
DX address	n/a
Telephone	(02) 9749 7700
Fax	(02) 9749 4433

Reference number

[REDACTED]

The Plaintiff has suffered severe depression and anxiety and Post Traumatic Stress Disorder.

[REDACTED]

- a. The Plaintiff has suffered significant psychiatric injury and continues to suffer Post Traumatic Stress Disorder
- b. The Plaintiff has been affected in her capacity to maintain a normal lifestyle and has resorted to alcohol and drug use.
- c. The Plaintiff has been incapable of maintaining relationships with her partners and has found it difficult, if not impossible to maintain a sexual relationship with her partners.
- d. The Plaintiff has been incapable of maintaining a normal lifestyle or of looking after children and some of the Plaintiff's children have been put into the care of other people because of the Plaintiff's own inability to render assistance to her children.
- e. The Plaintiff because of her psychiatric illness has not been capable of maintaining a steady lifestyle and has changed places of abode on many occasions.

[REDACTED]

The Plaintiff does not pursue a claim for economic loss

[REDACTED]

The Plaintiff, on turning 18 years of age has required significant assistance in her day to day life. The Plaintiff claims domestic assistance of 20 hours per week since turning 18 to date.

[REDACTED]

The Plaintiff claims 20 hours per week either domestic assistance or paid commercial care for the remainder of her life expectancy.

[REDACTED]

Particulars of future out of pocket expenses will be provided

[REDACTED]

The Plaintiff has required significant psychiatric and psychological counselling and particulars of the costing will be provided in due course.

[REDACTED]

The Plaintiff will require significant psychiatric treatment, hospitalisation, medication and regular counselling for the remainder of her life expectancy. Particulars will be provided when the relevant figures are available from the qualified psychiatrists.

[REDACTED]

Kathleen Biles - Report of Ms Natalie Green, Psychologist, Bettalife Solutions P/L, dated 22 August 2007.

[REDACTED]

Signature

*J. Loughman*

Name

Janet Loughman


Capacity

Principal Solicitor, Women's Legal Services NSW

Solicitor for Plaintiff

Date

*15 July 2008*

  
**Parties to the proceedings****PLAINTIFF**

Family name **Biles**

Given names **Kathleen Monica**

Address **C/- Women's Legal Services NSW**  
**PO Box 206, Lidcombe NSW 1825**

**PLAINTIFF'S REPRESENTATIVE****Solicitor on the record**

Name **Janet Loughman**

Practising certificate number **3338**

Firm **Women's Legal Services NSW,**  
**Principal Solicitor, Janet Loughman**

Address **PO Box 206, Lidcombe NSW 1825**

Telephone **(02) 9749 7700**

Fax **(02) 9749 4433**

Agrees to electronic service **yes**

**DEFENDANT**

Name **State of New South Wales**

Address **C/- The Crown Solicitor**  
**Crown Solicitor's Office**  
**60-70 Elizabeth Street**  
**SYDNEY NSW 2000**