

Form 12 (version 1)
Rule 15.12

DISTRICT COURT OF NEW
SOUTH WALES

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 Amy VILLAFLORES (aka GIBSON)

Number of Plaintiffs 1

First Defendant STATE OF NEW SOUTH WALES

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 JL:DH:B410/07

[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]
- a. Amy Gibson - Report of Ms Jacki Elphinstone, Clinical Psychologist, dated 25 May 2007.
 - b. Amy Gibson - Report of Ms Susan Hayes, Clinical Psychologist, Centre for Behavioural Sciences, Department of Medicine, University of Sydney, dated 14 August 2007.
- [REDACTED]

[REDACTED]

Signature

Janet 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 **Villaflor (aka Gibson)**

Given names **Amy Denise**

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