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Bell & Johnson solicitors

An Incorporated Legal Practice under the Legal Profession Act 1987

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OUR REF: RJB:RAS 080075
YOUR REF: 200801481:T3 Evangelos G Manollaras

29 April 2009

Attention: Evangelos G Manollaras
Crown Solicitor's Office
DX 19 SYDNEY

Dear Sir

RE: ANSWERS TO PARTICULARS – DOUGLAS BRUCE BILES

We note that the defendant has requested 113 particulars very similar to those of his sister, AIL [REDACTED]. The plaintiff replies to the request for particulars for Douglas Bruce Biles similar to those in reply to AIL [REDACTED] particulars insofar as they are common.

The areas where they differ are as follows:

In so far as the Defendant has used the word "her" in relation to Douglas Bruce Biles, we assume you mean "him" and reply as follows:

- The Plaintiff was born on [REDACTED] 1973
- The Plaintiff commenced living at Bethcar Farm at Brewarrina in or about 1975 when he was aged 2
- The Plaintiff moved to Orange in or about 1984
- The Plaintiff ran away from his foster parents in Orange and went to Wee Waa when he was about 14 years of age, ie in or about 1988. At age 16 he then returned to the care of his foster parents at Brewarrina with Bert and Edith Gordon where he completed his Year 10 School Certificate. Mr Biles alleges that he was a victim of extensive abuse whilst at Bethcar from both the Gordons and from his older foster brothers
- As to other injuries, the Plaintiff is aware that he thinks he had a cancer cut out of him twice at the age of 15, one being a lump in his leg requiring surgery and a lump cut out of his chest which he thinks was cancerous. His main injuries he states are psychological

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- As to past domestic assistance, the Plaintiff has been cared for by his family and friends since the age of 18 when he has suffered periods of depression. Statements will be provided in due course
- As to future commercial care, the Plaintiff has not entered into any agreement with anybody in relation to this but claims an amount to assist him when his family and friends cannot help and he will have to pay for paid commercial care
- The Plaintiff is in a de facto relationship at present
- In relation to injury, damages and ongoing disabilities, please refer to the report of Dr Natalie Green, dated 8 December 2008, served in these proceedings
- Medicare number **REDACTE**
- A copy of the Plaintiff's Notice of Charge is enclosed.

Yours faithfully

BELL & JOHNSON SOLICITORS

per.


RUSSELL BOOBY (Solicitor responsible)
Robyn Smith (Paralegal)

encl.