

REGISTRATION OF NEW
SOUTH WALES
ATTORNEY GENERAL

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 Natalie Neumann
(02) 9749 7700

[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 35 Swete Street, Lidcombe, NSW
 Signature of deponent *J. Loughman*
 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.