

Form 40 (version 1)
UCPR 35.1

FILED 2009

AFFIDAVIT OF JANET LOUGHMAN 6 FEBRUARY 2009

COURT DETAILS

Court District Court of New South Wales
Division
List
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
Filed in relation to Plaintiffs' claim 3199/08
Legal representative Janet Loughman
Principal Solicitor
Women's Legal Services NSW
Legal representative reference JL:DH:B410/07
Contact name and telephone Natalie Neumann (02) 9749 7700

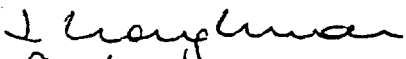

J. Loughman
N. Neumann

AFFIDAVIT

Name Janet Loughman
 Address PO Box 206 Lidcombe NSW 1825
 Occupation Solicitor
 Date 6 February 2009

I affirm:

- 1 I am the solicitor for the Plaintiffs.
- 2 Each of the Plaintiffs was the victim of sexual assault during the period between 1970 and 1989.
- 3 The Defendant's legal representatives have indicated that a defence will be raised under the *Limitations Act 1969*.
- 4 Consequently the Plaintiffs seek the orders set out in the Notice of Motion.
- 5 It will be necessary for me to now prepare, collate and file affidavit and other evidence in support of the orders sought although, given the number of plaintiffs involved, it is proposed to seek orders and/or agreement to efficiently manage the conduct of the application.

AFFIRMED at	35 Swete Street Lidcombe NSW
Signature of deponent	
Signature of witness	
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.