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NO. 7731 P. 4

DISTRICT COURT OF NSW  
FILED  
AT SYDNEY

on -4 DEC 2009

Form 14 (version 1)  
UCPR 15.12

**AMENDED STATEMENT OF PARTICULARS  
PERSONAL INJURY PROCEEDINGS**

**COURT DETAILS**

Court District Court of New South Wales  
Division  
List  
Registry Sydney  
Case number 2218/08

**TITLE OF PROCEEDINGS**

Plaintiff **AIL**  
Number of plaintiffs 1  
First Defendant **STATE OF NEW SOUTH WALES**  
Number of defendants 1

**FILING DETAILS / ADDRESS FOR SERVICE**

Filed for **AIL**, Plaintiff  
#Legal representative Gregory Johnson, BELL & JOHNSON, 51 Maitland Road Narrabri NSW 2390  
#Legal representative reference GOJ:RAS 080075  
Contact name and telephone Gregory Johnson, 0267921200

**PARTICULARS OF INJURY**

1. All of the The Plaintiffs have has suffered severe depression and anxiety and Post Traumatic Stress Disorder
2. Chronic alcohol abuse
3. Insomnia
4. Flashbacks with nightmares
5. Suicidal ideations
6. Agoraphobia
7. Compulsive obsessive disorder

**PARTICULARS OF ONGOING DISABILITIES**

- a. ~~All of the~~ The Plaintiffs ~~have~~ has suffered significant psychiatric injury and continues to suffer Post Traumatic Stress Disorder
- b. ~~All of the~~ The Plaintiffs ~~have~~ has been affected in ~~their~~ her capacity to maintain a normal lifestyle and ~~has~~ resorted to alcohol and drug abuse
- c. The Plaintiffs ~~have~~ has been incapable of maintaining a ~~relationships~~ relationships with ~~their~~ her partners and ~~have~~ has found it difficult, if not impossible, to maintain a sexual relationship with ~~their~~ her partners
- d. The Plaintiffs ~~have~~ has been incapable of maintaining a normal lifestyle or of looking after children and some of the Plaintiffs' children have been put into the care of other people because of the Plaintiffs' own inability to render assistance to ~~their~~ her children
- e. The Plaintiffs because of ~~their~~ her psychiatric illness, ~~have~~ has not been capable of maintaining a steady lifestyle and ~~have~~ has changed places of abode on many occasions
- f. Lack of education
- g. Lack of self esteem
- h. Incapacity to control her life or family life
- i. The Plaintiff continues to suffer from increased anxiety and avoids venturing out in public
- j. The Plaintiff has a dependency on alcohol and drugs to help her survive
- k. Conduct disorder in adulthood
- l. The Plaintiff suffers from significant traits of obsessive compulsive disorder, particularly around cleanliness and order

#### **PARTICULARS OF ECONOMIC LOSS**

~~None of the~~ The Plaintiffs does not pursue a claim for economic loss

#### **PARTICULARS OF PAST DOMESTIC ASSISTANCE**

~~All of the~~ Plaintiffs, on turning ~~18~~ years of age have required significant assistance in their day to day lives. ~~Each~~ Plaintiffs claims domestic assistance of ~~20 hours per week since turning 18 to date~~

The Plaintiff does not claim for past domestic assistance

#### **PARTICULARS OF FUTURE DOMESTIC ASSISTANCE**

~~Each~~ Plaintiffs claims ~~20 hours per week either domestic assistance or paid commercial care for the remainder of their life expectancy~~

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The Plaintiff does not claim for future domestic assistance

#### **PARTICULARS OF CONTINUING OUT-OF-POCKET EXPENSES OF THE PLAINTIFF**

Particulars of future out of pocket expenses will be provided

The Plaintiff is unaware of any out of pockets to date and is awaiting a Notice of Charge from Medicare details of which will be provided if relevant

#### **PARTICULARS OF CLAIM FOR PAST TREATMENT EXPENSES**

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

#### **PARTICULARS OF CLAIM FOR FUTURE TREATMENT EXPENSES**

Each 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

Based on the report of Dr Natalie Green dated 7 October 2008 the Plaintiff requires a buffer for future psychiatric treatment in the sum of \$10,000.00

#### **LIST OF DOCUMENTS SERVED IN SUPPORT OF CLAIM FOR SPECIAL DAMAGE AND ECONOMIC LOSS**

- a. Report of Ms Chris Southwell, Counsellor, Namoi Family Support Services, dated 18 April 2007

#### **LIST OF ANY ADDITIONAL SERVED DOCUMENTS**

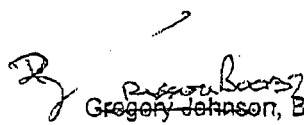
#### **SIGNATURE**

Signature

Name

Capacity

Date

  
 Gregory Johnson, BELL & JOHNSON, 51 Maitland Road Narrabri  
 NSW 2390

**Solicitor for the Plaintiff**

27/11/09