

Plaintiff: [REDACTED] AIE  
 Defendant: State of New South Wales  
 Date of birth: [REDACTED] 1971 (age 42)

### **SCHEDULE OF DAMAGES**

Without prejudice and for the purposes of mediation only

**NON-ECONOMIC LOSS:**

Present maximum pursuant to s16 of the Civil Liability Act (\$551,550) – the Plaintiff claims 37% of a most extreme case

**\$ 204,000.00**

**PAST OUT-OF-POCKET EXPENSES:**

*To be provided*

**FUTURE OUT-OF-POCKET EXPENSES:**

- For counselling, psychiatric assessment and medication, allow a buffer

**\$ 10,000.00**

**TOTAL SCHEDULE OF DAMAGES'**

**\$ 214,000.00**

**+ past out-of-pocket expenses**

**Plus costs and disbursements**