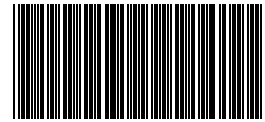




Filed: 2 March 2026 4:05 PM



D0002BLRRU

Form 40
UCPR 35.1

AFFIDAVIT OF Geoffrey John Potter - 2 March 2026

COURT DETAILS

Court	Supreme Court of New South Wales, Court of Appeal
List	Court of Appeal
Registry	Supreme Court Sydney
Case number	2025/00373479

TITLE OF PROCEEDINGS

First Appellant	Erin Nicole Briggs
First Respondent	Terence Hillier

FILING DETAILS

Filed for	Erin Nicole Briggs, Appellant 1
Legal representative	Geoffrey Potter
Legal representative reference	
Telephone	02 6933 6900
Your reference	GJP:355704

ATTACHMENT DETAILS

In accordance with Part 3 of the UCPR, this coversheet confirms that both the Affidavit (General) (e-Services), along with any other documents listed below, were filed by the Court.

-Geoffrey John Potter-02 Mar 2026 (AFFIDAVIT OF GEOFFREY JOHN POTTER 02.02.2026.pdf)

[attach.]

Form 40 (version 8)
UCPR 35.1

AFFIDAVIT OF GEOFFREY JOHN POTTER DATED 2 MARCH 2026

COURT DETAILS

Court	Supreme Court of New South Wales, Court of Appeal
Registry	Sydney
Case number	2025/373479

TITLE OF PROCEEDINGS

Appellant	ERIN NICOLE BRIGGS
Respondent	DR TERENCE HILLIER

PROCEEDINGS IN THE COURT BELOW

Title below	Erin Nicole Briggs v Terence Hillier
Court below	Supreme Court of New South Wales
Case number below	2020/356341
Date of hearing	24 June 2024 – 19 July 2024, 5-6 November 2024, 16-17 December 2024
Material date	8 September 2025
Decision of	Weinstein J

FILING DETAILS

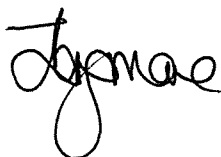
Filed for	Erin Nicole Briggs, appellant
Legal representative	Geoffrey John Potter Commings Hendriks Pty Ltd
Legal representative reference	GJP: 335704
Contact name and telephone	John Potter Tel. 02 6933 6900
Contact email	j.potter@chlaw.com.au

AFFIDAVIT

Name **Geoffrey John Potter**
 Address 23 Gurwood Street, Wagga Wagga NSW 2650
 Occupation Solicitor
 Date 2 March 2026

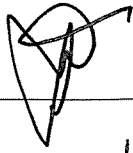
I say on Oath:

- 1 I am the solicitor on the record for the Appellant.
- 2 The contents of this affidavit are true and to the best of my knowledge, information and belief.
- 3 I make this affidavit in accordance with the Court's order made on 11 February 2026. Reference is made in this affidavit to the Red Book filed in these proceedings on 16 February 2026 in accordance with the order of the Court (**Red Book**).
- 4 I make this affidavit in support of the Notice of Appeal filed on 5 December 2025 to demonstrate that the amount in issue in this appeal exceeds the specified amount pursuant to UCPR r 51.22(3).
- 5 The Appellant appeals the whole of the of the decision below delivered on 8 September 2025 in proceedings numbered 2020/356341: *Briggs v Hillier* [2025] NSWSC 1021 (decision). A copy of the decision can be found commencing at page 32 of the Red Book.
- 6 The amount in issue in this appeal exceeds the amount of \$100,000.00, the "specified amount" in accordance with section 101(2)(r)(i) of the *Supreme Court Act* 1970 (NSW).
- 7 The material fact showing that the amount in issue exceeds the specified amount is:
 - a. In the judgment of the Court below damages were assessed and had the Appellant been successful damages awarded to her would have been \$809,040.22 [see Red Book at page 192].




SWORN at WAGGA WAGGA

Signature of deponent



Name of witness

Tonya Teresa Longmore

Address of witness

23 Gurwood Street Wagga Wagga NSW 2650

Capacity of witness

Solicitor

And as a witness, I certify the following matters concerning the person who made this affidavit (the **deponent**):

- 1 I saw the face of the deponent.
- 2 I have known the deponent for at least 12 months.

Signature of witness

