

1.05. Technical terms and explanations

I have indicated any technical terms in **bold type** and included them in a glossary in appendix D.

2. The issues to be addressed and a statement of instructions

This report has been prepared on the instructions of Bonny Bernard, Solicitors, in a letter of instruction dated 9 September 2009.

2.01. The purpose of the report

I have been asked to prepare a fully detailed condition and prognosis report concerning Ms Blitzen's mental health problems.

2.02. Instructions

I have been asked to address the following questions:

- 2.02.01. What, if any, exacerbation of psychiatric injury has been caused as a "direct result" of the operations
 - 2.02.01.1. The nature of any psychiatric injury
 - 2.02.01.2. Previous psychiatric history
 - 2.02.01.3. Ongoing symptoms
 - 2.02.01.3.1. ability to carry out day-to-day tasks
 - 2.02.01.3.2. capacity to work
 - 2.02.01.3.3. impact upon daily living

- 2.02.02. Any treatment that may be available to assist Ms Blitzen
- 2.02.03. Private costings of available treatment

2.03. Documents provided

- 2.03.01. Statement of Donna Blitzen;
- 2.03.02. Paginated GP records;
- 2.03.03. Paginated St Swithins NHS Trust records;
- 2.03.04. Paginated St Elsewheres NHS Foundation Trust records;
- 2.03.05. Liability report of Mr Expert Plastic Surgeon
- 2.03.06. Condition and prognosis report of Mr Expert Plastic Surgeon

2.04. The issues to be addressed

I will address the following points...

- 2.04.01. Facts obtained from interview with Donna Blitzen and a summary of the notes.
- 2.04.02. Consideration of current psychiatric problems
- 2.04.03. A discussion of her past psychiatric history and any worsening since the operations
- 2.04.04. A review of potential treatments
- 2.04.05. An outline of costs associated with private treatments