

## ***Vasser & Taylor-Black* [2010] FamCAFC 36 (11 March 2010) – Full Court of the Family Court of Australia**

‘Parenting orders’ – ‘Re F: litigants in person guidelines’ – ‘Self-represented litigants’

Proceedings: Appeal against parenting orders.

Facts: This was an appeal by the mother from parenting orders that challenged part of the process followed and some of the rulings made during the conduct of the trial. On the final day of the hearing, the self-represented mother sought to tender a 52 page document in response to the report of an expert witness.

Issue/s: One of the grounds of appeal was that trial judge failed to provide the mother with procedural fairness in not ascertaining the reason behind the preparation of this document and in not advising her that she may wish to seek legal advice before tendering the particular document, contrary to the litigants in person guidelines: *Re F: Litigants in Person Guidelines* [2001] FamCA 348 (4 June 2001).

Reasoning/Decision: The appeal was dismissed as the mother here was not the victim of unfairness. Although this appeal did not relate to family violence, the Court relevantly observed that the *Litigant in Person Guidelines* were no more than guidelines.

See *Re F: Litigants in Person Guidelines* [2001] FamCA 348 (4 June 2001).