

XXX COUNTY COURT

CASE NO:

BETWEEN

AAA

Claimant

V

BBB

Defendant

**BILL OF COSTS OF THE CLAIMANT TO BE ASSESSED ON A STANDARD BASIS
AND PAID BY THE DEFENDANT PURSUANT TO THE ORDER DATED**

VAT REGISTRATION NUMBER:

Instructions for Hearing to act on behalf of the Claimant in respect of taking proceedings against the Defendant for damages, loss and personal injuries.

On 16th April 2000 the Claimant was riding his Kawasaki motorcycle along CCC Lane, DDD in EEE when the Defendant, who was driving his Land Rover Discovery motor vehicle, exited from his home at DDD Lodge and was turning right into CCC Lane into the path of the Claimant resulting in the Claimant striking the front offside corner of the Defendant's vehicle. In light of the collision both the Claimant and his motorcycle slid under the front of the Land Rover Discovery resulting in a rupture to the motorcycle's fuel tank which subsequently burst into flames. The ensuing fire effectively destroyed both motor vehicles and after the Claimant was pulled out from under the Defendant's motor vehicle by the Defendant himself it became apparent the Claimant had suffered horrendous burn injuries although he had suffered no significant impact type injuries such as broken bones.

Following the accident the Emergency Services were called to the scene and the Claimant was taken to the Accident and Emergency Department at FFF Hospital and after initial assessment he was diagnosed as having suffered serious burns to 25% of his body surface area namely his face, arms, hands, chest, and legs and although he was fully conscious he could not remember the accident. Resuscitation was commenced and the Claimant was later transferred to the Burns Centre where his burns were cleaned and dressed and on 21st April 2000, under general anaesthetic, the burns of the Claimant's legs were largely excised and splint skin grafts applied from both the back and the side of his chest. In light of the grafts, dressings were changed every 6 days until most of the grafts had taken and thereafter dressings were changed every 2 – 3 days. The Claimant thereafter underwent a further general anaesthetic on 2nd May 2000 when skin was harvested from his thigh and grafted to his legs, arms and chest which it was established, some 5 days later upon inspection, that the graft had in fact been 50 – 60% successful. The Claimant thereafter underwent a further skin grafting procedure on 15th May 2000 when the remaining unhealed areas were grafted and after continued treatment at the Burns Centre the Claimant was considered fit enough to be discharged from hospital on 22nd May 2000.

In the months after his discharge from the Burns Centre the Claimant attended at the hospital as an out patient where his dressings were replaced and the wounds cleaned. On 24th April 2001, concerns were raised regarding scars behind the Claimant's knees that seemed to be breaking down as well as tight scars on both his left elbow and the first web space of the left hand resulting in the Claimant being admitted to hospital on 4th June 2001 and, under general anaesthetic, scar tissue of his right popliteal fossa was excised and the defect covered with integral dermal substitute. The scars of both his elbow and hand were at the same time released using local skin flaps. Unfortunately however the integral became infected necessitating a further surgical procedure and under general anaesthetic on 6th July 2001 the infected portions of integra were excised and the whole area skin grafted and upon examination on 10th July 2001 it was noted that such grafts had taken very well.

The Claimant again underwent considerable dressing exchange over the forthcoming months as an outpatient and in light of the success of the graft behind the right knee a decision was made to release the scarring behind the left knee and on 4th March 2002 the Claimant was admitted to hospital again and under further general anaesthetic such scar tissue behind the right knee was excised and integra dermal substitute applied. On 29th March 2002, the Claimant again underwent harvesting from his back and skin grafts were applied over the vascularised integra and although the graft dressing appeared, on 5th April 2002, to be taking well it was noted on 12th April 2002 that the graft had been completely lost resulting in the Claimant again being admitted to hospital on 15th April 2002 and on 19th April 2002 the raw wound behind the left knee was cleaned and a further skin graft applied. Such skin graft was examined on 24th April 2002 and appeared to have been 90% successful ultimately resulting in the Claimant being discharged from hospital on 26th April 2002. Further graft loss necessitated another skin graft on 5th July 2002 and again the Claimant underwent considerable dressing exchanges over the forthcoming months. In an attempt to assist the scars in maturing the Claimant was required to wear tight elasticised pressure garments and after the instruction of GGG Solicitors on 18th April 2000, correspondence and negotiations were entered into between the parties Solicitors and Insurers in an attempt to settle matters, however liability was vehemently denied by the Defendant ultimately resulting in considerable time being expended in this respect.

Mr HHH (Consultant Plastic Surgeon) was thereafter instructed to prepare a report in support of the Claimant's claim detailing all such injuries as had been sustained by the Claimant and in his report of 18th December 2002 it became apparent that the Claimant was suffering significant stiffening and skin tightening where the skin grafts had taken place, tingling in his legs, itching skin, and reduced movement of the left thumb. It was also noted from such reports that the skin pigmentation and elasticity were lost with considerable wrinkling giving the appearance of the Claimant being older than he was and that significant burns to his trunk had distorted the areola shape of both his nipples and that in light of the harvesting and grafting considerable scar tissue was visible to the Claimant's face, trunk, right arm, left arm, legs and the dorsum of his feet. Dr HHH was also of the opinion that although the Claimant was not complaining of the pain suffered during and throughout the skin grafts and exchanges of the dressings there was no doubt the Claimant had experienced considerable pain as a result and further that such pain would have been extremely intense particularly in the first week following surgery, especially given the size of the burnt areas. From his initial examination Dr HHH was of the opinion that the injury sustained would considerably reduce the Claimant's prospects of long term employment particularly in his field of motorcycle maintenance and further that the Claimant would no longer be able to participate in his hobby of playing football with particular care being taken in order to reduce his exposure to sunlight thereby reducing and limiting his holiday opportunities. It became apparent from such medical report that the restricted movement in the Claimant's left thumb was likely to remain permanent as too was the considerable scarring on the Claimant and that as a result of the considerable harvesting and grafting which had taken place even minor knocks would result in wound breakdown and lengthy healing periods. It was Dr HHH's opinion that any further surgery was unlikely to benefit the Claimant and despite the very disturbing and devastating cosmetic disfiguration to the Claimant

he was in fact coping extremely well but that there was unlikely to be any treatment that would improve such disfiguration.

In light of the parties being unable to reach appropriate settlement as to liability or contributory negligence and having regard for the limitation period proceedings were duly issued on 7th February 2003 after instruction had been taken from the Claimant in respect of the devastating effect the accident had upon the Claimant's future prospects of employment, lost educational qualifications as well as past and future loss. A defence and counter claim was eventually filed on 30th March 2003 and it should be noted at this that no costs relating to the Defence of the Counterclaim have been included within this bill of costs. In the Defendant's Defence the Defendant acknowledged that he had erroneously entered the road into the Claimant's path thereby causing the accident, however he did claim that the Claimant was travelling at excessive speed along CCC Lane thereby contributing to the accident and injuries sustained. Following the completion by both parties of allocation questionnaires the matter was allocated to the Multitrack on 23rd May 2003 and directions were given in relation to disclosure and both Expert and Witness evidence although Engineering Experts instruction was refused. The matter was also transferred from the ZZZ County Court to XXX County Court. Following application by the Defendant on 20th June 2003 an order was made on 7th July 2003 granting both parties permission to instruct a Reconstruction/ Engineering Expert and giving all parties involved directions as to disclosure, obtaining of Medical and Witness Evidence and filing of schedules and counter schedules of losses and damages. Disclosure took place by way of list of document on 8th October 2003. In light of the directions obtained from the Court, Accident Reconstruction Experts were instructed by both parties; Mr III on behalf of the Defendant and Mr JJJ on behalf of the Claimant with reports being prepared on 14th August 2003 and 16th December 2003 respectively. In his report of 16th December 2003 Mr JJJ was able to calculate, upon the length of the skid marks generated by the motor cycle at the time of the accident, that the Claimant was in fact travelling well below the speed of 40 mph at the time and that at the time the impact took place the Defendant's vehicle was in fact stationary and that although an impact did in fact take place such impact was in no way significant. Of greater importance however was the fact that Mr JJJ was of the view that at the time the Defendant was executing his right turn manoeuvre the Claimant was well within his vision but that as a result of the Defendant's neglect the Defendant did not see the Claimant ultimately resulting in the accident taking place and that there was no evidence to show that the Claimant had not taken prompt and appropriate action prior to the accident.

The Defendant's Expert on the other hand, Mr III, was of the firm belief that although the Defendant had manoeuvred his motor vehicle into the path of the Claimant thereby causing the accident, the Claimant was travelling at a speed in excess of 42 mph basing his calculations on the fact that the Claimant's motorcycle would have experienced a period of braking before the skid marks had appeared on the road surface and that whilst travelling along CCC Lane the Claimant would have seen the front end of the Defendant's motor vehicle emerging from the Defendant's driveway much earlier than the Defendant would have seen the Claimant approaching on his motorcycle thereby placing a degree of contributory negligence on the Claimant's head but concluded that the precise circumstances surrounding the accident and the degree of contributory negligence should be left to the Court in the event the parties were unable to settle the matter.

In light of the parties inability to abide by the directions and time scales provided in the Directions Order the Defendant made an application on 17th December 2003 requesting that the case be vacated from the Trial window of 9th January 2004 and further that the matter be listed for a case management conference in order to allow the parties to properly assess all work and evidence required and after the parties filed a listing questionnaire on 18th December 2003 the matter was listed for hearing on 11th February 2004. Unfortunately issues as to liability could not be settled and at the Hearing on 11th February 2004 it was ordered by the Court that the issues of liability be tried as a preliminary issue at Trial and that the issue of damages be tried separately. It was also ordered that the accident reconstruction Experts acting on behalf of both parties arrange a meeting between themselves in order to identify and narrow the issues in respect of the same with

a summary of agreed and disagreed issues being filed and served by no later than 31st March 2004. A Trial date in respect of the preliminary issue was set for 29th June 2004 and after some deliberation between both Party's Accident Reconstruction Experts a joint statement was prepared on 6th May 2004 in which neither Expert disputed the layout of the accident site at the time of the accident, however there was a dispute between them as to the measurement of the relevant field of view but that such differences were of no importance and that although there was an estimated probable speed at which the Claimant was travelling of between 32 and 42 mph it was likely that such speed was towards the upper range but that there was no physical evidence to suggest the Claimant was approaching the accident site at any excessive speed. It was however agreed that the Defendant's field of view allowed for the Defendant to have sufficient time and notice of the Claimant's presence and that the Claimant's ability to avoid the accident was dependant upon the Claimant's approaching speed and his perception of action required in order to avoid such impact but that at the time of gaining sight of the Defendant's motor vehicle he would have considered it reasonable for the Defendant to have completed his right turn manoeuvre before he had reached the impact site but that in light of the Defendant bringing his motor vehicle to a stop the Claimant was left with no option but to effect emergency steps thereby applying his brakes and sliding into the Defendant's vehicle.

Having obtained such evidence from the Experts the parties again attempted negotiation as to liability and contributory negligence and after detailed and thorough discussions an order was consented to between the parties on 15th July 2004 that issues as to liability be dealt with as to 85% in favour of the Claimant and 15% in favour of the Defendant.

It then fell to the Claimant's Solicitors to calculate and establish the exact loss and damage suffered by the Claimant and at the Hearing on 31st August 2004 further directions were given as to the same. A Trial Hearing date was obtained on 17th February 2005 for 14th April 2005 and after discussing with and obtaining instructions from a number of witnesses the Claimant drafted statements on their behalf and an amendment was made to the Trial Hearing date thereby allowing for the Trial to take place on 3rd May 2005 with discovery taking place as to damages on 3rd March 2005 by way of listed documents.

Investigation was then undertaken to establish the exact qualifications obtained from the various educational institutions attended by the Claimant and to assess his potential of carrying on in his chosen profession as a motorcycle mechanic at a reputable motorcycle co. In light of the considerable evidence that was relied upon by the Claimant in this respect a number of witnesses were summoned to attend at the Trial and after the Defendant filed a counter schedule of past and future loss and damage they made a payment into Court in the sum of £210,000 which after careful consideration by the Claimant and after having obtained Counsel's advice as to quantum was duly rejected but resulted in the Claimant making a counter offer of £300,000 on 22nd April 2005. The Defendant rejected the Claimant's offer of £300,000 resulting in the matter proceeding to Trial when on 3rd May 2005 the matter settled on the steps of the Court when the Claimant agreed to accept the sum of £260,000 inclusive of CRU payments of £15,000 together with reasonable costs to be paid by the Defendant on the Standard Basis and further that the Defendant make an interim payment on account of costs in the sum of £15,000 before 24th May 2005.

**Part One - Costs payable by the
Defendant to GGG Solicitors from the
outset of the matter to 10th January
2005**

Rates Utilised

Partner

Hourly Rate:	£190.00
Telephone Calls:	£ 19.00
Letters Out:	£ 19.00

Assistant Solicitor

Hourly Rate:	£190.00
Telephone Calls:	£ 19.00
Letters Out:	£ 19.00

Chronology of Proceedings

2000

15th April

Letter of Action sent to the
Defendant

5th May

Defendant's Insurers admit liability
during telephone conversation with
Instructed Solicitors

15th May

Assessors Report

18th May

Defendant's Insurers retract liability
and deny the same

20th May

Defendant's Insurers formally deny
liability in open correspondence

2002

18th December

Plastic Surgeon's Report prepared
by Dr. HHH on behalf of the
Claimant

2003

7th February

	Request for Issue of Summons	
1	Paid Court fee	500 00
	Particulars of Claim	
	Schedule of Loss and Damage	

10th February

Notice of Issue of Proceedings

31st March

Defence and Counterclaim

1st May

Unless Order made of the Court's own motion in respect of both Party's Allocation Questionnaires

8th May

Defendant's Allocation Questionnaire

9th May

	Claimant's Allocation Questionnaire	
2	Paid Court fee	80 00

23rd May

Order made of the Courts own motion that the matter be allocated to the multi-Track, Directions given generally, Claimant's request to deduce Engineering Evidence refused and that the matter be transferred to the Birmingham County Court

2nd June

Notice of Allocation to the Multi-Track

Notice of Transfer of Proceedings
from ZZZ County Court to the XXX
County Court

20th June

Defendant's Application for an Order
to Amend Directions Order of 23rd
May 2003

7th July

Order made after consideration of
the Application and perusal of the
Claimant's correspondence
amending the Order of 23rd May
2003

6th August

Claimant instructs Accident
Reconstruction Expert ()

14th August

Accident Reconstruction Report
prepared by () on the Claimant's
behalf

15th August

Defendant's List of Documents

8th October

Claimant's List of Documents

18th November

Notice of Date for Returning of
Listing Questionnaires for the 17th
December 2003

17th December

Defendant's Application for an Order
that the matter be vacated from the
present Trial Window and that there
be a Case Management Conference

Listing Questionnaire on behalf of
the Defendant

18th December

	Listing Questionnaire on behalf of the Claimant		
3	Paid Court fee		400 00
	<u>2004</u>		
	<u>13th January</u>		
	Order made that a Listing Hearing take place on 11th February 2004		
	<u>4th February</u>		
	Claimant discloses Accident Reconstruction Report		
	<u>9th February</u>		
	Case Summary on behalf of the Claimant		
	Instructions to Counsel to attend Listing Hearing		
	<u>11th February</u>		
	Counsel, Mr. KKK, attended Listing Hearing when Order made giving Directions as to issues of liability, Expert evidence and generally		
4	Paid fee to Counsel	105 00	600 00
	<u>26th February</u>		
	Defendant offers 50/50 split on liability		
	<u>3rd March</u>		
	Notice of Liability Trial Hearing date for 29th June 2004		
	<u>10th March</u>		
	Witness Summons in respect of Mr. on behalf of the Claimant		
5	Paid Court fee		30 00
	<u>2nd April</u>		

Defendant's Offer on liability
rejected by the Claimant in open
correspondence

23rd April

Defendant's Offer to settle liability
on a 1/3rd and 2/3rd's basis

6th May

Joint Statement on behalf of the
Accident Reconstructions Experts

18th May

Instructions to Counsel to advise in
Conference

24th May

Assistant Solicitor

Attending Conference with Counsel
to discuss liability, contributory
negligence, risk and prospects of
success, Medical Report and
evidence, Police evidence, Part 36
Offer, accident and matter generally

	Conference: 1 hour	£190.00		
	Travelling: 4 hours	£760.00		
	Waiting: 10 minutes	<u>£ 31.67</u>		
6		£981.67	171 79	
7	Paid fee to Counsel		145 25	830 00

26th May

Claimant's Part 36 Offer in respect
of liability at to 85%/15%

1st June

Statement on behalf of the
Claimant's Mother disclosed to the
Defendant

Defendant rejects Claimant's Part
36 Offer in respect of liability

4th June

Claimant discloses his Second
Statement to the Defendant

15th June

Witness Summons in respect of PC
SSS

8

Paid Court fee

30 00

11th June

Witness Statement of PC SSS
disclosed to the Defendant

23rd June

Contributory negligence agreed at
85%/15% in favour of the Claimant
by way of telephone conversation

Defendant's Part 36 Offer on liability
as to 75%/25% in the Claimant's
favour

30th June

Paid Counsel, Mr. KKK, to advise by
telephone

9

Paid fee to Counsel

10 50

60 00

15th July

Order made that on the issue of
liability there be judgment on the
claim for the Claimant as to 85%
with the Defendant to pay 85% of
the Claimant's damages, on the
issue of liability there be judgment
on the counterclaim for the
Defendant as to 15% with the
Claimant to pay 15% of the
Defendant's damages, the
Defendant pay the Claimant's costs
of the issues relating to liability on
the Standard basis if not agreed, the
Claimant pay the Defendant's costs
of the Counterclaim on the issue of
liability on the Standard Basis if not
agreed and that there be a Case
Management Conference listed for
31st August 2004

19th August

Interim Payment made by the
Defendant on behalf of Damages in
the sum of £10,638.02

26th August

Brief to Counsel

31st August

Counsel, Mr. KKK, attended Case
Management Conference when
Order made giving Directions as to
Disclosure, Witness evidence and
Medical evidence

10	Paid fee to Counsel	48 13	275 00
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Attendances Upon and Correspondence

With:

Claimant

Partner

1 personal
attendance:

08/12/2000 Taking
instructions,
discussing injuries
sustained, accident,
liability, treatment
undertaken and to be
undergone, loss, site
visit and further action
required - 3 hours

£570.00

14 long telephone
calls

See schedule 1

Engaged 7 hours 51
minutes -

£1491.50

26 telephone calls:

£494.00

52 letters out:

£988.00

08/12/2000 - Travel
time incurred in
attending Claimant
and site for
inspection: 6 hours

£1140.00

£4683.50

11	Paid travel expenses; 138 miles @ £0.45 per mile	10 87	62 10
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**Defendant, Defendant's Insurers
and Defendant's Solicitors**

Partner

12 long telephone
calls

See schedule 2

Engaged 2 hours 36
minutes -

£494.00

25 telephone calls:

£475.00

50 letters out:

£950.00

£1919.00

Court

Partner

4 telephone calls:

£ 76.00

14 letters out:

£266.00

£342.00

Counsel

Partner

2 long telephone calls
25/05/2004

Discussing witness
evidence, Statements
and Part 36 Offers -

12 minutes

23/06/2004

Discussing
contributory
negligence and
further action required
- 18 minutes

Engaged 30 minutes -

£ 95.00

8 telephone calls:

£152.00

7 letters out:

£133.00

£380.00

Police

Partner

4 long telephone calls

05/05/2000

Discussing Accident
Report and witnesses
- 12 minutes

29/04/2004

Discussing interview
with PC RRR - 12
minutes

05/04/2000

Discussing interview
with PC RRR - 12
minutes

	09/06/2004			
	Discussing and taking Statement of PC SSS and Trial - 24 minutes			
	Engaged 1 hour -	£190.00		
	23 telephone calls:	£437.00		
	8 letters out:	£152.00		
		£779.00		
12	Paid fee for Police Interview			100 00
	<u>PPP Garage (Claimant's Motorcycle stored here)</u>			
	<u>Partner</u>			
	6 telephone calls:	£114.00		
	3 letters out:	£ 57.00		
		£171.00		
	<u>DDD Hospital</u>			
	<u>Partner</u>			
	4 telephone calls:	£ 76.00		
	<u>Medico-Legal Reporting</u>			
	<u>Partner</u>			
	1 long telephone call 17/05/2002			
	Discussing Expert instruction - 12 minutes	£ 38.00		
	16 telephone calls:	£304.00		
	9 letters out:	£171.00		
		£513.00		
13	18.12.02: Paid Dr. HHH for Consultation and Medical Report Fee			690 00
14	17.11.04: Paid Fee for Medical Photographs		52 50	300 00
	<u>Hospital</u>			
	<u>Partner</u>			
	2 telephone calls:	£ 38.00		
	2 letters out:	£ 38.00		
		£ 76.00		
15	Paid fee for copy medical records			50 00
	<u>Health Centre (Claimant's GP)</u>			

	<u>Partner</u>		
	2 telephone calls:	£ 38.00	
	1 letter out:	<u>£ 19.00</u>	
		£ 57.00	
16	Paid fee for medical records		25 24
	<u>Miscellaneous Expenses</u>		
17	27.11.00: Paid Fee for Assessors Report		10 50 60 00
	<u>Witnesses (YYY)</u>		
	<u>Partner</u>		
	1 personal attendance:		
	24/05/2004 Taking Statement of Claimant's Mother - 30 minutes	£ 95.00	
	4 letters out:	<u>£ 76.00</u>	
		£171.00	
	<u>(Accident Reconstruction Expert)</u>		
	<u>Partner</u>		
	1 long telephone call 09/10/2003 Discussing accident and urgency of the Report - 12 minutes	£ 38.00	
	10 telephone calls:	£190.00	
	13 letters out:	<u>£247.00</u>	
		£475.00	
18	17.12.03: Paid fee for Site Inspection and Accident Report		476 67 2723 82
19	06.05.04: Paid fee for Joint Expert Report		85 31 487 50
	<u>HM Inspector of Taxes</u>		
	<u>Partner</u>		
	1 letter out:	<u>£ 19.00</u>	
	<u>(Engineers)</u>		
	<u>Partner</u>		
	2 telephone calls:	£ 38.00	
	1 letter out:	<u>£ 19.00</u>	
		£ 57.00	

Documents

See schedule 3

Partner Engaged: 29 hours 54 minutes	£5681.00
Assistant Solicitor Engaged: 11 hours 33 minutes	<u>£2194.50</u>
	£7875.50

20	Total Costs:	£17,594.00	3078 95
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4195 46	7303 66
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Part two - Costs payable by the Defendant to GGG& Company from 10th January 2005 to conclusion of the matter

Rates Utilised

<u>Partner</u>	
Hourly Rate:	£220.00
Telephone Calls:	£ 22.00
Letters Out:	£ 22.00

<u>Assistant Solicitor</u>	
Hourly Rate:	£220.00
Telephone Calls:	£ 22.00
Letters Out:	£ 22.00

<u>Costs Draftsman</u>	
Hourly Rate:	£110.00
Telephone Calls:	£ 11.00
Letters Out:	£ 11.00

Chronology of Proceedings

2005

10th February

Bundles of Claimant's Medical
Records and Notes disclosed to the
Defendant

15th February

Instructions to Counsel regarding
Conference

17th February

Partner

Attended Conference with Counsel
and Claimant to discuss,
employment history, employment
prospects, loss of earnings, pain
and suffering, care, treatment
undertaken and to be undergone,
Statement, contraction of MRSA
and Quantum generally

Conference: 3 hours
Travelling: 5 hours

£660.00
£1100.00
£1760.00

21

308 00

22

Paid fee to Counsel

236 25

1350 00

Notice of Trial Hearing date for the
14th April 2005

1st March

Amended Notice of Trial Date for
3rd May 2005

25th February

Disclosing Claimant's Third
Statement and his Mother's Second
Statement to the Defendant

Witness Statement of YYY
disclosed to the Defendant

Updated Schedule of Documents on
behalf of the Claimant

Updated Schedule of Documents
disclosed to the Defendant

4th March

Report of (Engineers) disclosed to Defendant showing the value of the Claimant's motorcycle at £2,350.00 prior to the accident

Statements of Mr. TTT and TTT disclosed to the Defendant

6th March

Paid Counsel, Mr.KKK, to consider voluminous papers and evidence, advise by telephone and draft Schedule of Damages

23

Paid fee to Counsel

135 63

775 00

7th March

Claimant's updated Schedule of Loss disclosed to the Defendant

15th March

Disclosure and List of Documents on behalf of the Claimant

11th April

Preparing Witness Summons in respect of YYY
Preparing Witness Summons in respect of YYY
Preparing Witness Summons in respect of YYY
Preparing Witness Summons in respect of YYY

24

Paid Court fee

120 00

8th April

Updated GP Notes disclosed to the Defendant

12th April

Counter Schedule of Past and Future Loss and Damage settled by the Defendant

Defendant's Part 36 Offer in the sum of £209,591.30

Statement of YYYdisclosed the
Defendant

19th April

Notice of Payment into Court in the
sum of £195,000.00

Instructions to Counsel in respect of
Conference

Application for an Order in respect
of evidence to be adduced by Mr.
YYY

25	Paid Court fee			60 00
	Claimant rejects Defendant's Part 36 Offer			
	Consent Order in respect of the Counterclaim (Not claimed for within the Bill of Costs)			

21st April

Partner

Attended Conference with Counsel
and Claimant in Chambers to
discuss Quantum, Part 36 Offers,
Schedule of Past and Future Loss
and Damage, Witness Evidence and
further action required

	Conference: 1 hour			
	30 minutes	£330.00		
	Travelling: 5 hours	£1100.00		
	Waiting: 30 minutes	<u>£110.00</u>		
26		£1540.00	269 50	
27	Paid fee to Counsel		117 25	670 00
28	Paid Taxi Fares		1 40	8 00
29	Paid Train Fares		6 11	34 90

22nd April

Claimant's further Part 36 Offer of
£300,00.00

26th April

Notice of Hearing Date for the
Claimant's Application for 3rd May
2005

Claimant rejects the Defendant's
Offer of settlement in the sum of
£210,000.00

27th April

Defendant rejects the Claimant's
Offer of £300,000.00

28th April

Defendant's Skeleton Argument

29th April

Claimant's Skeleton Argument
settled by Counsel

Defendant discloses Skeleton
Argument

3rd May

Partner

Attended 1st Day of Trial when
Order made that there be Judgment
for the Claimant in the sum of
£260,000.00 to be inclusive of CRU
payments and interim payments
totalling £15,000.00, The Defendant
pay the Claimant's Costs of the
action to be assessed on a
Standard Basis and further that the
Defendant make a further payment
on account of costs in the sum of
payable £15,000.00 by 24th May
2005

Conference: 2 hours

30 minutes

£550.00

Trial 12 minutes

£ 44.00

Travelling: 5 hours 12
minutes

£1144.00

Waiting: 18 minutes

£ 66.00

30

£1804.00

315 70

31

Paid fee to Counsel

612 50

3500 00

32	Paid Taxi Fares	3 50	20 00
33	Paid Train Fares	30 10	172 00
34	Paid Witness Fees (Mr. YYY)		100 00
35	Paid Witness Fees (Mr. YYY)		100 00
36	Paid Witness Fees (Ms. YYY)		100 00
36A	Paid Witness Fee (Ms YYY)		100 00

Attendances Upon and Correspondence

With:

Claimant

Partner

1 personal
attendance:

03/05/2005

Discussing matter at
Court - 6 minutes

£ 22.00

9 long telephone calls
21/02/2005

Discussing earnings,
accounts and
qualifications - 12
minutes

23/02/0005

Discussing statement,
injuries and Damages
- 18 minutes

02/03/2005

Discussing witnesses,
evidence generally,
employment and
further action required
- 12 minutes

02/03/2005

Discussing
employment, losses,
witnesses and
statements- 12
minutes

07/03/2005

Discussing witness
evidence and
employment - 18
minutes

07/03/2005

Discussing statement
of Mr. YYY, updated
Schedule of Damages

and offers - 1 hour 30 minutes	
22/03/2005	
Discussing quantum, Part 36 Offer and witness evidence - 18 minutes	
14/04/2005	
Discussing medical condition, offers and Trial - 24 minutes	
29/04/2005	
Discussing offers, witness evidence and Trial - 12 minutes	
Engaged 3 hours 36 minutes -	£792.00
17 telephone calls:	£374.00
41 letters out:	<u>£902.00</u>
	£2090.00

Defendant, Defendant's Insurers and Defendant's Solicitors

<u>Partner</u>	
1 long telephone call	
25/04/2005	
Discussing Trial Bundles, offers of settlement and Trial - 12 minutes	£ 44.00
11 telephone calls:	£242.00
56 letters out:	<u>£1232.00</u>
	£1518.00

Court

<u>Partner</u>	
4 telephone calls:	£ 88.00
9 letters out:	<u>£198.00</u>
	£286.00

Counsel

Partner
2 long telephone calls
04/03/2005
Discussing witness evidence, employment and loss - 18 minutes
19/04/2005
Discussing Conference, witness evidence and Counter

Schedule of Special Damages - 30 minutes Engaged 48 minutes -	£176.00
24 telephone calls:	£528.00
16 letters out:	<u>£352.00</u>
	£1056.00

Health Centre (Claimant's GP)

<u>Partner</u> 2 letters out:	<u>£ 44.00</u>
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37

03.03.05: Paid fee for copy
medical records

30 68

Witnesses (YYY)

<u>Partner</u> 9 long telephone calls 25/02/2005 Discussing and amending Claimant's Mother's Statement - 24 minutes 02/03/2005 Taking Statement of YYY - 42 minutes 28/02/2005 Taking Statement of YYY - 48 minutes 02/03/2005 Taking Statement of YYY - 30 minutes 18/03/2005 Taking Statement of YYY - 12 minutes 21/03/2005 Taking fuller Statement of YYY - 1 hour 05/04/2005 Discussing Claimant's attendance at college with YYY - 18 minutes 14/04/2005 Discussing Statements and Trial - 18 minutes 29/04/2005 Discussing Trial and evidence with YYY - 12 minutes Engaged 4 hours 24 minutes -	£968.00
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34 telephone calls:	£748.00
34 letters out:	<u>£748.00</u>
	£2464.00

(Engineers)

<u>Partner</u>	
3 telephone calls:	£ 66.00
2 letters out:	<u>£ 44.00</u>
	£110.00

38	02.03.05: Paid Fee for preparation of Loss Report		11 90	68 00
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(Colleges attended by the Claimant)

<u>Partner</u>	
1 long telephone call	
14/03/2005	
Discussing Claimant's educational history -	
12 minutes	£ 44.00
10 telephone calls:	<u>£220.00</u>
3 letters out:	<u>£ 66.00</u>
	£330.00

Documents

See schedule 4

Partner Engaged: 73 hours 12 minutes	<u>£16,104.00</u>
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39	Total Costs:	£24,002.00	4200 35
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Costs Of Assessment

09.08.05: Partner perusing file and documents, noting further action required and thereafter collating all papers to be sent to Costs	
Draftsman: 3 hours 30 minutes (Partner)	£770.00
Perusing and considering file and papers, noting instructions and	

40

further action required
and drafting and
checking Bill of Costs:
29 hours 12 minutes
(Costs Draftsman)

£3212.00
£3982.00

696 85

6945 04

7208 58

SUMMARY

Part one

4195 47

7303 66

Part two

6945 04

7208 58

11,140 51

14,512 24

Bill Breakdown

Profit Costs:	51,663.67
VAT thereon:	9041.14
Counsel's fees:	8060.00
VAT thereon:	1410.51
Other Disbursements:	6452.24
VAT thereon:	688.85
	<hr/>
	£77,316.41
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Schedule of Work Done

<u>Date</u>	<u>Description of work done</u>	<u>Time</u>
<u>Schedule 1: Part 1 - Long telephone calls with Claimant (Partner)</u>		
18/04/2000	Discussing instructions, accident, injuries and further action required	0:30
12/05/2000	Discussing operations, injuries and treatment	0:18
31/08/2001	Discussing treatment, injuries, operations and Police Accident Report	0:24
16/01/2002	Discussing operations and medical evidence generally	0:12
17/05/2002	Discussing employment, injuries, and photographs	0:36
13/11/2002	Discussing employment and issue of proceedings	0:30
18/11/2002	Discussing liability, issue of proceedings and evidence generally	0:12
11/02/2003	Discussing medical evidence, Schedule of Damages and further action required	0:12
29/01/2004	Taking Statement	0:18
04/02/2004	Discussing Claimant's Statement and liability	0:18
23/04/2004	Discussing Conference with Counsel	0:12
23/06/2004	Discussing contributory negligence and further action required	0:12
06/07/2004	Discussing liability, loss and employment	0:12
10/11/2004	Discussing and taking Statement relating to Quantum	3:45
	Engaged:	7:51
<u>Schedule 2: Part 1 - Long telephone calls with Defendant, Defendant's Insurers and Defendant Solicitors (Partner)</u>		
05/05/2000	Discussing details and further action required	0:12
05/05/2000	Discussing recoverability and recovery charges	0:12
05/05/2000	Discussing recovery charges	0:12
08/05/2000	Discussing fire damages and recovery	0:12
18/05/2003	Discussing liability	0:12
29/01/2004	Discussing exchange of Witness Evidence	0:12
23/06/2004	Discussing Index to Trial Bundle	0:12
23/06/2004	Discussing and agreeing Contributory negligence	0:12
24/06/2004	Discussing Consent Order and Costs	0:12
19/08/2004	Discussing Witness Evidence, injuries, medical evidence and quantum	0:24
25/08/2004	Discussing Case Summary and Directions	0:12
19/11/2004	Discussing Case Management Conference and witness evidence	0:12
	Engaged:	2:36
<u>Schedule 3: Part 1 - Documents</u>		
18/04/2000	Noting instructions received, considering further action required, drafting and checking Rule 15 Letter and thereafter preparing letter of advice (Partner)	0:24

18/04/2000	Preparing Form of Authority (Partner)	0:06
20/04/2000	Noting the Claimant was not in possession of an MOT Certificate at the time of the accident, considering the impact of the same upon the Claimant's claim and drafting letter of advice to the Claimant (Partner)	0:06
08/05/2000	Perusing file, noting position and further action required and drafting and checking lengthy correspondence to the Defendant's Insurers regarding liability and the accident and thereafter preparing correspondence to the Claimant regarding matters generally (Partner)	0:24
16/05/2000	Perusing correspondence from the Claimant regarding losses incurred and updating file (Partner)	0:06
31/05/2000	Drafting and checking lengthy letter of update and advice to the Claimant regarding the Defendant retracting liability and advising generally (Partner)	0:12
02/11/2000	Perusing photographs received from Claimant and updating file (Partner)	0:12
16/11/2000	Perusing and considering Police Accident Report and updating file (Partner)	0:30
08/12/2000	Perusing file and preparing for attendance upon the Claimant (Partner)	0:18
02/12/2001	Perusing and considering sketch and photographs supplied by the Police and updating both file and Claimant (Partner)	0:18
14/01/2002	Noting Defendant's failure to return with details as to liability and thereafter drafting and checking lengthy correspondence to the Claimant and to the Defendant as to the same (Partner)	0:24
18/01/2002	Noting that Defendant's Insurers are still denying liability and thereafter updating file (Partner)	0:12
17/05/2002	Perusing further information supplied by the Police, checking details recently provided by the Claimant as to loss of earnings and review of details from Medico-Legal Reporting as to suitable Experts to instruct for the preparation of Medical Reports (Partner)	1:00
17/05/2002	Checking internet to determine details as to Plastic Surgeons and treatment (Partner)	0:12
20/05/2002	Comprehensive review of all medical evidence obtained to date, noting position and further action required, drafting and checking letter of instruction to	

	Dr. HHH to prepare a Medical Report and collating all necessary enclosures (Partner)	0:18
21/05/2002	Drafting and checking very lengthy correspondence to the Claimant regarding loss, earnings details, damages, medical evidence, qualifications, employment and further action required (Partner)	0:24
17/09/2002	Generally perusing file and updating (Partner)	0:12
18/11/2002	Drafting and checking lengthy correspondence to the Claimant as to liability, issue of proceedings, medical evidence, Expert instruction and loss of earnings, (Partner)	0:18
05/02/2003	Perusing Medical Report received from Dr. HHH (Plastic Surgeon), noting future prognosis and treatment to be undertaken, drafting Claim Form, preparing Schedule of Loss and Damage, preparing Particulars of Claim and thereafter drafting, checking, amending and finalising very lengthy letter of update and advice to the Claimant (Partner)	4:12
18/02/2003	Perusing file and noting date for filing of the Defence (Partner)	0:06
23/02/2003	Perusing Pay slip received from Claimant and noting details and amounts contained therein (Partner)	0:06
11/04/2003	Perusing and considering Defence and noting Defendant's comments regarding the Claimant's Schedule of Special Damages (Partner)	0:48
16/04/2003	Perusing CRU Certificate and updating both file and Claimant (Partner)	0:12
09/05/2003	Completing Allocation Questionnaire and drafting and checking proposed Directions (Partner)	0:30
17/05/2003	Perusing Defendant's Allocation Questionnaire and proposed Directions, comparing the same with the Claimant's and preparing attendance note (Partner)	0:12
23/06/2003	Perusing and considering Defendant's Application for an Order to vary the Order of 23rd May 2005 (Partner)	0:12
06/10/2003	Discussing matter with colleague in light of his inability to undertake work on this matter due to his involvement in a Trial on another matter (Assistant Solicitor)	0:30
06/10/2003	Noting position and drafting and checking letter of instruction to Accident Reconstruction Expert (Assistant Solicitor)	0:30

06/10/2003	Considering all evidence, pleading's and accident report and generally updating (Assistant Solicitor)	0:15
07/10/2003	Drafting and checking List of Documents (Assistant Solicitor)	1:00
08/10/2003	Checking, amending and finalising letter of instruction to Accident Reconstruction Expert and List of Documents (Assistant Solicitor)	0:30
09/10/2003	Collating enclosures to be sent to Accident Reconstruction Expert and paginating (Assistant Solicitor)	0:30
19/12/2003	Perusing Defendant's Listing Questionnaire (Partner)	0:12
19/12/2003	Completing Listing Questionnaire (Partner)	0:12
04/02/2004	Perusing Accident Reconstruction Report received from JJJ & Company together with enclosures, sketches and photographs and updating file (Partner)	1:30
04/02/2004	Noting instruction, considering further action required and starting to draft Statement (Partner)	1:12
06/02/2004	Preparing Core Bundles and checking the same (Partner)	0:48
06/02/2004	Perusing Statement received from Defendant and comparing the same to the Claimant's Statement (Partner)	0:54
06/02/2004	Preparation of minutes of lengthy telephone conversation with Defendant's Solicitors (Partner)	0:06
09/02/2004	Preparing Case Summary and drafting Directions (Partner)	0:48
09/02/2004	Drafting and checking Instructions to Counsel and collating enclosures (Partner)	0:42
25/02/2004	Noting availability dates and drafting and checking correspondence to the Court regarding the same (Partner)	0:06
25/02/2004	Perusing Statement of Mr. ZZZ and considering matter generally (Partner)	0:30
25/02/2004	Perusing Defendant's Statement and updating (Partner)	0:30
25/02/2004	Perusing Report of Mr. III and thereafter preparing attendance notes (Partner)	1:12

25/02/2004	Perusing both Party's Experts Report and comparing the same (Partner)	0:36
25/02/2004	Drafting and checking lengthy correspondence to Mr. JJJ in light of receipt of the Defendant's Expert's Report (Partner)	0:12
25/02/2004	Drafting and checking very lengthy correspondence to the Claimant in light of receipt of the Defendant's witness and Expert Report (Partner)	0:18
03/03/2004	Considering proposal of 50/50 on liability and updating (Partner)	0:24
08/03/2004	Preparing Witness Summons on behalf of Mr. JJJ (Partner)	0:06
08/03/2004	Review of correspondence from the Claimant relating to the Defendant's evidence and updating file (Partner)	0:24
10/03/2004	Drafting and checking lengthy correspondence to Mr. JJJ regarding the Defendant's allegation and noting further action required (Partner)	0:12
02/04/2004	Considering all evidence as to whether or not the Defendant would have been capable of completing the manoeuvre he was attempting in entering the road and noting the impact the same would have upon the Claimant's claim (Partner)	0:24
16/04/2004	Collating and paginating documents requested from the Claimant's List of Documents by the Defendant's Solicitors (Partner)	0:18
28/04/2004	Noting Defendant's offer to settle liability on a 1/3rd and 2/3rd basis and drafting and checking letter of update and advice to Claimant in this respect (Partner)	0:12
29/04/2004	Review of Police Accident Report to check circumstances in light of forthcoming interview with PC RRR (Partner)	0:12
18/05/2004	Perusing Joint statement prepared by Accident Reconstruction Experts and updating file (Assistant Solicitor)	0:48
18/05/2004	Considering further action and evidence required, drafting and checking Instructions to Counsel and collating enclosures (Assistant Solicitor)	0:30
20/05/2004	Comprehensive review of entire file, considering matter at great length and preparing for Conference with Counsel (Assistant Solicitor)	3:00

24/05/2004	Drafting and checking Statement on behalf of the Claimant (Assistant Solicitor)	0:18
24/05/2004	Drafting and checking minutes and memorandum of Conference with Counsel and Claimant (Assistant Solicitor)	0:30
25/05/2004	Perusing and considering Joint Statement in light of Conference with Counsel (Partner)	0:18
25/05/2004	Drafting and checking lengthy letter of advice to Claimant regarding Part 36 Offers in light of Conference with Counsel (Partner)	0:12
01/06/2004	Noting position and instructions and drafting and checking Statement on the Claimant's behalf (Partner)	0:48
09/06/2004	Noting details received from PC SSS and thereafter drafting and checking lengthy correspondence to him regarding the same (Partner)	0:24
11/06/2004	Perusing Statement received from PC SSS (Partner)	0:12
11/06/2004	Preparation of Witness Summons of PC SSS (Partner)	0:06
22/06/2004	Reviewing entire file in order to prepare Bundle for Trial and updating (Assistant Solicitor)	1:00
22/06/2004	Checking, amending and finalising Trial Bundle before sending the same to Counsel (Assistant Solicitor)	0:18
22/06/2004	Perusing further Witness evidence received from Defendant (Assistant Solicitor)	0:12
23/06/2004	Continuing to amend Trial Bundle in light of further disclosure from the Defendant (Partner)	0:12
23/06/2004	Noting Defendant's request for further disclosure and thereafter going through entire file to locate and collate the same for the purposes of sending the same to the Defendant (Partner)	1:12
23/06/2004	Review of file and considering aspect relating to Interim Payment in respect of Costs and thereafter drafting and checking Consent Order (Partner)	0:24
23/06/2004	Drafting and checking lengthy letter of Advice to the Claimant's Insurers updating them as to issues relating to liability (Partner)	0:18
25/06/2004	Amending the Order in line with the Defendant's suggestions (Partner)	0:12

23/07/2004	Calculating costs incurred to date and updating for the purposes of obtaining an interim payment on behalf of costs from the Defendant (Partner)	0:06
23/07/2004	Considering offer of Interim Payment from the Defendant, considering Certificate of recoverable benefits and drafting and checking lengthy letter of advice to Claimant (Partner)	0:18
20/08/2004	Perusing file, noting position regarding cheque received from Defendant and noting Interim Payment (Partner)	0:12
23/08/2004	Drafting brief summary and Schedule of Issues (Partner)	0:18
19/08/2004	Noting further action required and drafting and checking Note and Memorandum (Partner)	0:24
25/08/2004	Drafting and checking Instructions to Counsel and collating enclosures (Assistant Solicitor)	0:30
25/08/2004	Perusing draft Directions received from the Defendant, noting minor amendments to the Case Summary and updating file (Assistant Solicitor)	0:30
24/09/2004	Considering issues as to disclosure, checking documents disclosed to date and thereafter drafting and checking List (Assistant Solicitor)	0:42
24/09/2004	Drafting Form of Authority for release of the Claimant's Tax Records (Partner)	0:06
22/10/2004	Perusing correspondence and Pay slips received from the Claimant and updating file (Partner)	0:06
22/10/2004	Drafting and checking lengthy letter of instruction to Engineers (Partner)	0:12
	Partner Engaged:	29:54
	Assistant Solicitor Engaged:	11:33

Schedule 4: Part 2 - Documents

07/02/2005	Perusing and considering instructions from the Claimant regarding his Statement, noting position and further action required and starting to draft and check the Claimant's Statement as to Quantum (Partner)	3:00
07/02/2005	Considering timetable and Order, noting Directions and drafting and checking lengthy correspondence to the Defendant regarding the same (Partner)	0:24

08/02/2005	Reviewing all medical evidence so far collected to date, incorporating aspects as to the same within the Claimant's Statement, paginating all such evidence and generally updating file (Partner)	5:12
08/02/2005	Perusing medical evidence received from Mr. HHH, collating the same within evidence collected so far to date, perusing operation notes and paginating (Partner)	3:30
10/02/2005	Preparation of Index to Bundle of Medical Records and Notes (Partner)	0:06
10/02/2005	Perusing further earnings details obtained from the Claimant, collating the same and noting which documents had already been disclosed (Partner)	1:48
10/02/2005	Reviewing yet further documents received from the Claimant and collating the same (Partner)	1:12
09/02/2005	Perusing GP Notes received and adding these to the Bundle (Partner)	0:24
14/02/2005	Preparing Schedule showing Claimant's pre- and post accident earnings from all documentation to hand (Partner)	3:30
14/02/2005	Checking List of Documents (Partner)	0:24
14/02/2005	Drafting and checking Brief to Counsel and collating enclosures (Partner)	1:12
14/02/2005	Review of e-mail from Claimant regarding earnings and loss (Partner)	0:06
16/02/2005	Preparing further draft 3rd Statement on behalf of the Claimant incorporating work history and checking position generally as to the Claimant's ability to carry out necessary work (Partner)	2:00
17/02/2005	Perusing file and preparing for Conference with Counsel (Partner)	1:00
21/02/2005	Drafting and checking very lengthy correspondence to the Defendant setting out the Claimant's Claim (Partner)	0:18
21/02/2005	Diarising Trial date (Partner)	0:06
21/02/2005	Perusing Claimant's Bank Statements and additional pay slips and incorporating the same within the Bundle in support of the Claimant's Claim (Partner)	0:24
21/02/2005	Perusing and considering lengthy handwritten notes following Conference with Counsel, amending the	

	Claimant's Statement in light of the same, checking medical records for references to MRSA and thereafter checking and finalising the same (Partner)	3:30
23/02/2005	Perusing file and continuing to draft and amend the Claimant's Statement (Partner)	1:12
23/02/2005	Amending Claimant's Statement further in light of further instructions (Partner)	0:12
24/02/2005	Noting Claimant's Mother's comments regarding her Statement and making necessary amendments in light of the same (Partner)	0:30
24/02/2005	Preparing Diary of appointments, physiotherapy sessions, travel time and caring time, referring to the Claimant's Statement in order to complete this, making necessary calculations to ensure the same was absolutely correct, particularly in relation to travel calculations and thereafter generally updating file (Partner)	4:30
25/02/2005	Making final amendments to spreadsheet showing mileage etc and to Claimant's Mother's Statement (Partner)	0:24
28/02/2005	Carrying out necessary research on the internet as to (**) and updating file (Partner)	0:36
28/02/2005	Reviewing and researching website of Witness (YYY) on the Internet (Partner)	0:36
28/02/2005	Drafting and checking Statement of Witness (YYY) (Partner)	0:30
28/02/2005	Amending Witness Statement of YYY (Partner)	0:12
28/02/2005	Adding additional documents to Claimant's Schedule of Documents (Partner)	0:30
01/03/2005	Drafting and checking Instructions to Counsel and collating enclosures (Partner)	0:48
02/03/2005	Perusing and considering Report received from ()and updating file (Partner)	0:12
02/03/2005	Drafting and checking Statement on behalf of Witness YYY (Partner)	0:24
02/03/2005	Drafting and checking Statement on behalf of YYY (Partner)	0:30
02/03/2005	Drafting Statement of YYY (Partner)	0:18

02/03/2005	Amending and checking draft Statement of YYY (Partner)	0:12
02/03/2005	Amending Statement of YYY (Partner)	0:06
04/03/2005	Drafting and checking Statement of GGG (Partner)	0:12
04/03/2005	Amending Statement of YYY (Partner)	0:06
07/03/2005	Checking Claimant's draft Updated Schedule of Losses against Statements and other information (Partner)	1:30
07/03/2005	Preparing Summary of Claimant's earnings to date, amending detailed list of Claimant's earnings and thereafter inputting the same into Claimant's Updated Schedule of Loss (Partner)	1:24
08/03/2005	Preparing all Forms of Authority (Partner)	0:18
08/03/2005	Perusing website of Tamworth and Lichfield College (Partner)	0:06
10/03/2005	Comprehensive review of entire file in light of Defendant's recent correspondence and thereafter drafting and checking reply to the same (Partner)	0:30
16/03/2005	Drafting and checking lengthy letter of update and advice to the Claimant in respect of appropriate Part 36 Offers to put to the Defendant (Partner)	0:24
16/03/2005	Drafting Form of Authority (Partner)	0:06
22/03/2005	Perusing correspondence from the Claimant relating to earlier correspondence regarding Part 36 Offers (Partner)	0:06
22/03/2005	Drafting and checking Statement of YYY (Partner)	1:12
31/03/2005	Perusing incoming correspondence from the Claimant as to possible Part 36 Offers (Partner)	0:12
05/04/2005	Reviewing CMC Bikes Website (Partner)	0:06
05/04/2005	Preparing Form of Authority (Partner)	0:06
05/04/2005	Noting instructions from Mr. YYY and amending his Statement accordingly (Partner)	0:18
06/04/2005	Calculating costs to be paid for Witness Summons and checking their travel expenses (Partner)	0:12
06/04/2005	Noting Mr. YYY's further comments regarding his Statement and making final amendments in line with his instructions (Partner)	0:18

06/04/2005	Preparing Witness Summons in respect of YYY (Partner)	0:06
06/04/2005	Preparing Witness Summons in respect of YYY (Partner)	0:06
06/04/2005	Preparing Witness Summons in respect of YYY (Partner)	0:06
06/04/2005	Preparing Witness Summons in respect of YYY (Partner)	0:06
07/04/2005	Undertaking research to establish the whereabouts of YYY's Transport and updating file (Partner)	0:12
07/04/2005	Searching Companies House for YYY's Transport (Partner)	0:12
07/04/2005	Perusing updated Certificate of Recoverable Benefits (Partner)	0:06
07/04/2005	Perusing updated Medical Records received from the GP and thereafter updating the earnings Spreadsheet (Partner)	0:30
12/04/2005	Perusing attendance records and documents relating to the Claimant's attendance at College and updating file (Partner)	0:24
12/04/2005	Perusing Counter Schedule of Past and Future Loss and Damage received from the Defendant and updating file (Partner)	0:42
12/04/2005	Carrying out necessary research in order to establish position regarding Part 36 Offers which are within 21 days of Trial and procedures to be followed in this respect (Partner)	0:12
12/04/2005	Drafting and checking very lengthy letter of Advice to the Claimant in respect of the Defendant's Part 36 Offer and considering further action required (Partner)	0:18
19/04/2005	Perusing and considering file and documents, considering father action required , drafting and checking Instructions to Counsel and collation of enclosures (Partner)	1:12
19/04/2005	Drafting and checking very lengthy correspondence to Witness, YYY, regarding the providing of evidence at Trial (Partner)	0:18
19/04/2005	Drafting and checking lengthy correspondence to the Defendant regarding offers and Trial (Partner)	0:18

19/04/2005	Perusing file and drafting Application in respect of Witness evidence (Partner)	0:06
19/04/2005	Comprehensive review of file, documents and evidence, noting position and further action required and thereafter drafting and checking Index to Trial Bundle (Partner)	0:48
20/04/2005	Collating further documentation for the purposes of the forthcoming Conference (Partner)	0:30
21/04/2005	Comprehensive review of file, documents and evidence noting position regarding Quantum and updating file (Partner)	1:30
25/04/2005	Comprehensive review of entire file for the purposes of preparing for Trial, collating papers and documents for Trial Bundle and thereafter paginating and numbering Master Set of Papers (Partner)	2:30
25/04/2005	Continuing to collate papers and documents for the Trial Bundle, arranging the same in Chronological order, paginating and numbering the same and thereafter amending the Trial Bundle Index (Partner)	2:48
26/04/2005	Drafting and checking Claimant's Statement in support of the Application, collating relevant Exhibits and updating file (Partner)	2:30
26/04/2005	Checking and amending Statement in support of the Application (Partner)	0:24
26/04/2005	Checking the Trial Bundles thoroughly prior to despatching the same (Partner)	1:30
27/04/2005	Noting Defendant's comments regarding law and Part 36 Offers and thereafter considering CPR prior to drafting and checking lengthy correspondence to the Defendant regarding the same (Partner)	0:18
28/04/2005	Perusing, considering Skeleton Argument settled by Counsel and approving the same (Partner)	0:48
03/05/2005	Perusing papers and documents prior to Trial, sorting out Court Bundle in preparation of the same (Partner)	3:18
05/05/2005	Comprehensive review of file and documents and calculating disbursements incurred to date (Partner)	0:30
05/05/2005	Perusing Order received from the Court and noting that an error had been made (Partner)	0:06
05/05/2005	Noting travel expenses incurred by the Claimant's parents and updating (Partner)	0:06

11/05/2005	Checking Order and noting it's contents regarding payment out of Court (Partner)	0:06
09/08/2005	Collating all papers and documents for the purposes of sending the file to the Costs Draftsman and for them to draft a Bill of Costs in line with the Defendant's request for a Formal Bill of Costs (Partner)	3:30
09/08/2005	Preparing letter of instruction to Costs Draftsman (Partner)	0:12
	Partner Engaged:	73:12