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Our Ref: MPL/LER/150183.540/XC

Your Ref:

Maurice Kirk
34a Westgate Street
Taunton
TA1 4EY

Client Confidential

7 February 2022

Dear Mr Kirk,

Your claim against G4S Facilities Management

Accident Date: 04/12/2018

I write with reference to the above matter and enclose the costs budget of the defendant by way of service.

I confirm that a copy of the enclosed costs budget has been filed at Court.

I would invite you to agree our costs budget without challenge.

I would be grateful if you would confirm safe receipt and let me know your position.

Yours faithfully

BLM

BLM

Enc: Defendant's Cost Budget

Costs budget of the Defendant dated 7/2/22

In the: County Court at Bristol
 Parties: Maurice John Kirk BVSc v G4S Plc.
 Claim number: G00TA220

Work done / to be done	Incurred		Estimated		Total (£)
	Disbs (£)	Time costs (£)	Disbs (£)	Time costs	
Pre-action costs					
Issue / statements of case	3,255.00	3,645.00	2,500.00	2,250.00	11,650.00
CMC	1,750.00	1,269.00			3,019.00
Disclosure		2,907.00		4,500.00	7,407.00
Witness Statements				5,850.00	5,850.00
Expert Reports					
PTR			1,250.00	540.00	1,790.00
Trial Preparation			9,318.00	1,350.00	10,668.00
Trial			4,000.00	2,700.00	6,700.00
ADR / Settlement discussions		144.00	6,500.00	2,250.00	8,894.00
Contingency					
GRAND TOTAL (including both incurred costs and estimated costs)	5,005.00	7,965.00	23,568.00	19,440.00	55,978.00

This estimate excludes VAT (if applicable), success fees and ATE insurance premiums (if applicable), costs of detailed assessment, costs of any appeals and costs of enforcing any judgment.

Approved budget	£	55,978.00
Budget drafting	£	1,000.00
Budget process	£	1,119.56
Statement of Truth		

1% of approved budget or £1,000
 2%

This budget is a fair and accurate statement of incurred and estimated costs which it would be reasonable and proportionate for my client to incur in this litigation.

Signed

Position:



Partner

	RATE (per hour)	Pre-action costs				Issue / statements of case				CMC											
		Incurred Costs		Estimated Costs		Incurred Costs		Estimated Costs		Incurred Costs		Estimated Costs									
		£	Hours	£	Hours	£	Hours	£	Hours	£	Hours	£	Hours								
Fee Earner time																					
1	Grade A	90.00				81.00	5.00	450.00					90.00								
2	Grade B	90.00				90.00	15.00	1,350.00					855.00								
3	Grade C	90.00				3,456.00							54.00		54.00						
4	Grade D	90.00				18.00	5.00	450.00					270.00		270.00						
5	Time value (1 to 4)					3,645.00	25.00	2,250.00					1,269.00		414.00						
Expert's costs																					
6	Fees																				
7	Disbursements																				
Counsel's fees																					
8						3,000.00		2,500.00					1,750.00		1,750.00						
9																					
10	Court fees																				
11	Other Disbursements					255.00															
12	Total Disbursements (6 to 11)					3,255.00		2,500.00					1,750.00		1,750.00						
13	Total (5+ 12)					6,900.00		4,750.00					3,019.00		2,164.00						
										Assumptions: issue / statements of case			Assumptions: CMC								
										Further consideration will be given to the pleadings, issues and evidence in regards to liability, causation and quantum. The Claimant's Schedule of Loss will be considered and the Defendant will prepare their Counter Schedule. Counsel will assist						In accordance with Practice Direction 3E, the costs are claimed as incurred costs. Work includes: preparing Directions and Directions Questionnaire, considering the other parties' Directions Questionnaire and Directions; attempting to agree Directions, reviewing the CMC bundle, instructing Counsel to attend the CCMC and discussion of the outcome. It is assumed there will be one CCMC to be attended by Counsel on 4/3/22 claimed as incurred costs.					

	RATE (per hour)	Disclosure				Witness Statements							
		Incurring Costs		Estimated Costs		Incurring Costs		Estimated Costs					
		£	Hours	£	Hours	£	Hours	£	Hours				
Fee Earner time													
1	Grade A		10.00	900.00		10.00	900.00		10.00	900.00		900.00	
2	Grade B	72.00	20.00	1,800.00		30.00	2,700.00		30.00	2,700.00		2,700.00	
3	Grade C	2,835.00											
4	Grade D		20.00	1,800.00		25.00	2,250.00		25.00	2,250.00		2,250.00	
5	Time value (1 to 4)	2,907.00	50.00	4,500.00		65.00	5,850.00		65.00	5,850.00		5,850.00	
Expert's costs													
6	Fees												
7	Disbursements												
Counsel's fees													
8													
9													
10	Court fees												
11	Other Disbursements												
12	Total Disbursements (6 to 11)												
13	Total (5+ 12)	2,907.00		4,500.00			5,850.00			5,850.00		5,850.00	
Assumptions: Disclosure		There will be standard disclosure. The Defendant will obtain and consider their disclosure documents and prepare the list of disclosure documents and list. Disclosure is expected to be extensive with voluminous records to be obtained and considered.											
Assumptions: Witness evidence		The Defendant will obtain evidence from seven/eight witnesses. The Claimant will rely on his own statement and statements of three/four witnesses which will be considered.											

#REF!

		Expert Reports				Expert Report Fee Summary					
	RATE (per hour)	Incurring Costs		Estimated Costs		TOTAL	incurring	estimated report/P35	estimated conference	estimated joint stms	Total estimated
		£	Hours	£	£						
Fee Earner time											
1	Grade A										
2	Grade B										
3	Grade C										
4	Grade D										
5	Time value (1 to 4)										
Expert's costs											
6	Fees										
7	Disbursements										
Counsel's fees											
8											
9											
10	Court fees										
11	Other Disbursements										
12	Total Disbursements (6 to 11)										
13	Total (5+ 12)										

Drafting note: Completing this summary will populate totals for fees in table on left.

Assumptions: Expert evidence
There will be no expert evidence

Sub total

Total Expert Report fees (incurring and estimated)

	RATE (per hour)	PTR				Trial Preparation					
		Incurring Costs		Estimated Costs		Incurring Costs		Estimated Costs		TOTAL	
		£	Hours	£	Hours	£	Hours	£	Hours	£	Hours
Fee Earner time											
1	Grade A										
2	Grade B		2.00	180.00		10.00	900.00				900.00
3	Grade C										
4	Grade D		4.00	360.00		5.00	450.00				450.00
5	Time value (1 to 4)		6.00	540.00		15.00	1,350.00				1,350.00
Expert's costs											
6	Fees										
7	Disbursements										
Counsel's fees											
8				1,250.00			8,750.00				8,750.00
9											
10	Court fees						168.00				168.00
11	Other Disbursements						400.00				400.00
12	Total Disbursements (6 to 11)			1,250.00			9,318.00				9,318.00
13	Total (5+ 12)			1,790.00			10,668.00				10,668.00
Assumptions: PTR											
Assuming there will be a PTR to be held by telephone and to be attended by Counsel. There will be preparations for the same, availability will be ascertained and Pre-trial checklist filed. Consideration will be given to any further directions, case summary and chronology											
Assumptions: Trial Preparation											
There will be preparation for trial including Brief to Counsel, consideration of the trial bundle and skeleton argument. In accordance with PD 3E, Counsel's Brief fee is included within this phase.											

	RATE (per hour)	Trial				ADR / Settlement discussions				
		Incurred Costs		Estimated Costs		Incurred Costs		Estimated Costs		TOTAL
		£	Hours	£	Hours	£	Hours	£		
Fee Earner time										
1	Grade A						5.00	450.00		450.00
2	Grade B		30.00	2,700.00			15.00	1,350.00		1,350.00
3	Grade C								144.00	144.00
4	Grade D						5.00	450.00		450.00
5	Time value (1 to 4)		30.00	2,700.00			25.00	2,250.00		2,394.00
Expert's costs										
6	Fees									
7	Disbursements									
Counsel's fees										
8				4,000.00				6,500.00		6,500.00
9										
10	Court fees									
11	Other Disbursements									
12	Total Disbursements (6 to 11)			4,000.00				6,500.00		6,500.00
13	Total (5+ 12)			6,700.00				8,750.00		8,894.00

Assumptions: ADR / Settlement discussions
 Settlement to be assessed and offers made and considered. Counsel will advise and assist. Provision for a JSM.

Assumptions: Trial
 Assumes there will a three day trial with Counsel and Solicitor to attend. Witnesses to attend for one day.

	RATE (per hour)	Contingency				Contingency-			
		Incurred Costs £	Hours	Estimated Costs £	TOTAL	Incurred Costs £	Hours	Estimated Costs £	TOTAL
Fee Earner time									
1	Grade A	90.00							
2	Grade B	90.00							
3	Grade C	90.00							
4	Grade D	90.00							
5	Time value (1 to 4)								
Expert's costs									
6	Fees								
7	Disbursements								
Counsel's fees									
8									
9									
10	Court fees								
11	Other Disbursements								
12	Total Disbursements (6 to 11)								
13	Total (5+ 12)								
					Assumptions:				