**IN THE HIGH COURT OF JUSTICE CLAIM NO:**

**QUEEN’S BENCH DIVISION**

**MASTER COOK**

**BETWEEN:**

**AAA**

**Claimant**

**- and -**

**BBB**

**Defendant**

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**CLAIMANT’S EXPLANATION OF PRE-ACTION AND**

**ISSUE/STATEMENTS OF CASE COSTS**

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**Pre-Action Costs**

*May 2011 to January 2012*

1. Taking instructions, conference with Counsel and experts, reviewing case papers collated by previous solicitors, seeking further case papers, dealing with funding arrangements, reviewing and updating witness statements, drafting and sending the Letter of Claim.

*February 2012 to January 2013*

Seeking updates to medical records, collating and reviewing medical records received, arranging for medical records to be photocopied and provided to the Defendant, *inter partes* correspondence (agreeing extension of time for Letter of Response), requesting updates to medical and educational records, receiving Letter of Response.

**Issue/Statements of Case Costs**

*February 2013 to January 2014*

1. Collating and reviewing medical records, reviewing Letter of Response, seeking experts’ comments on Letter of Response, dealing with funding arrangements, holding conference with Counsel and experts.

*February 2014 to July 2014*

1. Considering updates to experts’ reports, drafting and serving the Claim Form, Particulars of Claim, Schedule of Loss and Condition and Prognosis Report, considering funding arrangements, *inter partes* correspondence (agreeing extension of time for service of Defence), liaising with client’s litigation friend to organise visit by the Defendant’s expert.

*August 2014 to November 2014*

1. Seeking updates to medical records, considering the Defence, seeking experts’ views on the Defence, *inter partes* correspondence (medical records), seeking and obtaining extension of time to file draft directions, preparing draft directions and seeking and obtaining Defendant’s agreement to directions, reviewing experts’ comments upon the Defence, seeking and instructing additional experts, filing Directions at Court, providing medical records to the Defendant, *inter partes* correspondence (arranging visit of the Defendant’s expert).

*December 2014 to February 2015*

1. Correspondence with the Court in regards to the filed directions, *inter partes* correspondence (medical records), seeking outstanding client records, preparing refresher instructions to Counsel, holding conference with Counsel and experts.

*March 2015*

1. Updating proposed directions and seeking and obtaining Defendant’s agreement thereto, drafting the Case Summary and Chronology and then seeking and obtaining the Defendant’s agreement thereto, updating the Directions Questionnaire for service, preparing the Costs Budget, preparing CCMC bundle, seeking outstanding client records.

**Dated this**