



# **Circuit Court Litigation Workflow**

## CIRCUIT COURT LITIGATION WORKFLOW

Action	Action Description	Documents	Next
CCL01	Brief Counsel to settle Circuit Court Proceedings	CCL01A – Letter to Counsel with Initial Brief CCL01B – Initial Brief to Counsel	CCL02 – 1 Months
CCL02	Check whether draft Proceedings received		CCL02 – 14 Days CCL03 – 1 Days
CCL03	Prepare documents to issue Proceedings	CCL03A – Personal Injuries Summons CCL03B – Affidavit of Verification CCL03C – Letter to Client encl draft Proceedings	CCL04 – 7 Days
CCL04	Client swears Affidavit of Verification	CCL03D – Memo to Clerk to issue Proceedings	CCL05 – 1 Days
CCL05	Issue Proceedings		CCL06 – 5 Days
CCL06	Serve Proceedings on Defendant	CCL06A – Letter to Defendant serving Proceedings CCL06B – Letter to Defendant's Solicitors encl Proceedings	CCL07 – 1 Months
CCL07	Check whether Appearance entered	CCL07A – Letter to Solicitor Consent to Appearance Late Entry	CCL07 – 21 Days CCL09 – 14 Days DMC01 – 0 Now
CCL09	Take Client's Instructions on Notice for Particulars	CCL09A – Letter to Client re Particulars	CCL10 – 3 Days CCL11 – 30 Days
CCL10	Send Replies to Particulars to Defendant's Solicitors	CCL10A – Letter to Solicitors with Replies to Particulars CCL10B – Replies to Notice for Particulars	CCL11 – 1 Months
CCL11	Check whether Defence filed	CCL11A – Letter to Solicitor Consent to Defence Late Filing	CCL11 – 21 Days CCL12 – 5 Days DMC01 – 0 Now
CCL12	Brief Counsel re Discovery		CCL15 – 21 Days
CCL15	Request Voluntary Discovery	CCL15A – Letter to Solicitor requesting Voluntary Discovery	CCL16 – 21 Days
CCL13	Chase Defendant's Solicitor re Voluntary Discovery		CCL17 – 21 Days CCL19 – 21 Days
CCL17	Issue Motion for Discovery Order	CCL17A – Motion and Affidavit seeking Discovery Order CCL17B – Memo to Clerk with Motion for Discovery Order	CCL18 – 5 Days
CCL18	Serve Notice of Motion for Discovery Order	CCL18A – Letter to Solicitor encl Motion for Discovery Order	CCL19 – 21 Days
CCL19	Check whether Discovery received		CCL19 – 21 Days
CCL21	Tender Offer received – take Client's Instructions	CCL21A – Letter to Client on Tender Offer CCL21B – Letter to Counsel encl Brief on Tender Offer CCL21C – Brief to Counsel on Tender Offer	CCL22 – 7 Days CCL23 – 7 Days
CCL22	Settlement Meeting	CCL22A – Letter to Client re Settlement Meeting CCL22B – Letter to Solicitor confirming Settlement Meeting	CCL23 – 3 Days CCL27 – 1 Days

		CCL22C – Brief to Counsel for Settlement Meeting CCL22D – Letter to Counsel re Settlement Meeting	
CCL23	Send Warning Letter to Defendant's Solicitors	CCL23A – Letter to Solicitor – 14 day Warning	CCL24 – 15 Days
CCL24	Serve Notice of Trial	CCL24A – Notice of Trial CCL24B – Notice to Produce CCL24C – Letter to Court on filing Notice of Trial CCL24D – Memo to File Notices of Trial and to Produce CCL24E – Letter to Solicitors encl Notices of Trial and to Produce CCL24F – Notice of fixing Date for Trial	CCL25 – 10 Days
CCL25	Prepare for Trial	CCL25A – Letter to Counsel for Advice on Proofs CCL25B – Letter to Client with Trial Date CCL25C – Letter to Solicitor with Trial Date CCL25D – Letter to Counsel with Trial Date CCL25E – Brief to Counsel for Hearing CCL25F – Summons to Witness CCL25G – Standby Letter to Experts CCL25H – Schedule of Witnesses and Reports	CCL32 – 5 Days
CCL32	Serve Witness Summons	CCL32A – Letter to Witnesses with Summons	
CCL26	Trial hearing		CCL27 – 1 Days CCL30 – 1 Months
CCL27	Case settled	CCL27A – Letter to Client following Settlement CCL27B – Client Authority to Accept Settlement CCL27C – Invoice Solicitor-Client costs on Settlement CCL27D – Letter to Counsel on Settlement CCL27E – Letter to Solicitor with Fee Note CCL27F – Party and Party Costs Fee Note CCL27G – Letter to Solicitor confirming Settlement	CCL28 – 1 Months
CCL28	Check whether Settlement cheque received	CCL28A – Letter to Client encl Settlement Cheque	CCL28 – 14 Days CCL29 – 14 Days
CCL29	Check whether Costs paid	CCL29A – Letter to Counsel paying Fees	CCL29 – 14 Days CCL30 – 14 Days
CCL30	Close file		

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[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

[CAN:Name.Barristers#??]  
[CAN:Address.Barristers#??]

RE: **[MAT:Description]**

---

Dear [CAN:Salutation.Barristers#??],

I act for the above named client who was involved in a            accident on the [UDF:AccidentDate],  
thereby suffering personal injuries as a result.

PIAB assessed the claim in the amount of €            which was ultimately rejected by our client on  
the basis that he/she remains symptomatic as a result of the accident, having undergone  
investigations.

-or-

The Respondent declined to have the claim assessed by PIAB.

I enclose herewith Brief in the matter, and would be obliged if you would let me know if you are in  
a position to draft proceedings and advise on quantum.

I will await hearing from you.

Kind regards,

Yours sincerely,

---

[MAT:FeName]  
[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**

[CNT:Name]

—v—

[CAN:Name.Defendant#@&]

**BRIEF FOR COUNSEL**  
[CAN:Name.Barristers#??] **B.L.**

QUERIST: [CNT:Name]  
AGENT: [MAT:FeName], [SYS:CON:Name]

---

Counsel is sent herewith as follows:-

**A. Medical Reports**

1. Report of [CAN:Name.Doctors#@&] dated

**B. Miscellaneous**

1. Injuries Board Authorisation dated
2. Locus Photographs
3. List of Expenses and vouchers
4. Company Registration Office Printout

**C. Correspondence**

**History:**

Could Counsel please:-

1. Draft Proceedings;
2. Advise on quantum.

**Dated this        day of        2014.**

**Signed:**

\_\_\_\_\_  
[MAT:FeName]  
[SYS:CON:Name]

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

**Record No.**

**[CAN:COURTAREA.CIRCOURTS#01] CIRCUIT  
[CAN:NAME.CIRCOURTS#01]**

**COUNTY OF**

**BETWEEN:**

**[CNT:Name]**

**PLAINTIFF**

**AND**

**[CAN:Name.Defendant#@&]**

**DEFENDANT**

**PERSONAL INJURIES SUMMONS**

**YOU ARE HEREBY REQUIRED** within ten days after the service of this Civil Bill upon you, to enter, or cause to be entered, with the County Registrar, at his office at [CAN:AddressSingle.CirCourts#01], an Appearance to answer the claim of [CNT:Name] of [CNT:LinearAddress].

**AND TAKE NOTICE** that, if you do not enter an Appearance, you will be held to have admitted the said claim, and the Plaintiff may proceed therein and judgement may be given against you in your absence without further notice.

**AND FURTHER TAKE NOTICE** that, if you intend to defend the proceedings on any grounds, you must not only enter an Appearance as aforesaid, but also within ten days after Appearance deliver a statement in writing showing the nature and grounds of your Defence.

The Appearance and Defence may be entered by posting the same to the said Office, and by giving copies thereof to the Plaintiff or his/her Solicitor, by post.

**Dated** this        day of                    2014.

**Signed:** \_\_\_\_\_

**[SYS:CON:Name]**  
Solicitors for the Plaintiff  
**[DIA:Address]**

To:    **[CAN:Name.Defendant#??]**  
      **[CAN:Address.Defendant#??]**  
      Defendant

**INDORSEMENT OF CLAIM**

1. The above proceedings have been certified and authorised for release pursuant to Authorisation No.        on the        day of        2014 by the Personal Injuries Assessment Board.
2. The Plaintiff's claim is for
- 3.

**PARTICULARS OF WRONG:**

**PARTICULARS OF NEGLIGENCE:**

**PARTICULARS OF PERSONAL INJURIES:**

**PARTICULARS OF SPECIAL DAMAGE:**

Medical expenses:	€
Medication:	€
Physiotherapy:	€
PIAB Application fee:	€

**AND THE PLAINTIFF CLAIMS:**

1. Damages
2. Interest pursuant to the Courts Act, 1981
3. Costs.

**RELIEFS CLAIMED**

1. Damages limited to the jurisdiction of this Honourable Court;

2. Interest pursuant to the Courts Act;
3. Costs.

**SCHEDULE**

**Special Damages**

The Plaintiff reserves the right to furnish further particulars of special damage

[CAN:Name.Barristers#??]

To: [CAN:Name.Defendant#??]  
[CAN:Address.Defendant#??]

Defendant

-----

~~This Summons was issued by the Plaintiff~~

~~OR~~

This Summons was issued by [SYS:CON:Name], Solicitors for the Plaintiff, whose registered place of business is [DIA:SingleAddress].

The personal details of the Plaintiff are as follows:-

1. The address at which the Plaintiff ordinarily resides is: [CNT:LinearAddress]
2. The Plaintiff is a [CNT:Occupation]
3. The Plaintiff's date of birth is [CNT:DOB18]
4. The Plaintiff's personal Public Service Number is: [CNT:RSINO]

#### INDORSEMENT OF SERVICE

This summons was served by me at  
on the Defendant [CAN:Name.Defendant#@&] on        day the        day of        2014.

Indorsed the        day of        2014.

Signed: \_\_\_\_\_

Address: [DIA:SingleAddress]

**A AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

**Record No.**

**[CAN:COURTAREA.CIRCOURTS#01] CIRCUITCOUNTY OF [CAN:NAME.CIRCOURTS#01]**

**BETWEEN:**

**[CNT:Name]**

**PLAINTIFF**

**AND**

**[CAN:Name.Defendant#@&]**

**DEFENDANT**

**PERSONAL INJURIES SUMMONS**

**[SYS:CON:Name]  
Solicitors  
[DIA:Address]**

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

**Record No. [CAN:RecordNo.Defendant#01]**

**[CAN:COURTAREA.CIRCOURTS#01] CIRCUIT  
[CAN:NAME.CIRCOURTS#01]**

**COUNTY OF**

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**AND**

[CAN:Name.Defendant#@&]

*DEFENDANT*

**AFFIDAVIT OF VERIFICATION**

I, [CNT:Name] of [CNT:Address], aged 18 years and upwards **MAKE OATH** and say as follows:-

1. I am the Plaintiff in the above entitled Proceedings and I beg to refer to the contents of the Personal Injury Summons upon which marked with the letter "A" I have endorsed my name prior to the swearing hereof.
2. The assertions, allegations and information contained in the said Personal Injury Summons which are within my knowledge are true. I honestly believe that the assertions, allegations and information contained in the said Personal Injury Summons which are not within my own knowledge are true.
3. I am aware that it is an offence to make a Statement in this Affidavit that is false or misleading in any material respect and that I know to be false or misleading

**SWORN** by the said [CNT:Name]  
this            day of            20  
at [DIA:Address], before me a Commissioner for  
Oaths / Practising Solicitor. And I know  
the Deponent

---

Commissioner for Oaths/Practising  
Solicitor

**EXHIBIT “A”**

**SIGNED:** \_\_\_\_\_  
[CNT:Name]

**SIGNED:** \_\_\_\_\_  
**COMMISSIONER FOR OATHS/  
PRACTISING SOLICITOR**

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

**Record No. [CAN:RecordNo.Defendant#01]**

**[CAN:COURTAREA.CIRCOURTS#01] CIRCUITCOUNTY OF [CAN:NAME.CIRCOURTS#01]**

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**AND**

[CAN:Name.Defendant#@&]

*DEFENDANT*

**AFFIDAVIT OF VERIFICATION**

[SYS:CON:Name]

**Solicitors**

[DIA:Address]

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

**Private & Confidential**

[CNT:Name]

[CNT:Address]

RE: Claim against [CAN:Name.Defendant#@&]

---

Dear [CNT:Salut],

I refer to recent communications in connection with your accident. I recently received an Authorisation from the Personal Injuries Assessment Board enabling Court proceedings to be taken on your behalf. I instructed our barrister, [CAN:Name.Barristers#??], to prepare the draft proceedings and have now received same. I enclose herewith a copy of the Summons for perusal by you.

If you find same in order, I would be obliged if you could arrange to attend at the office to complete the Affidavit to ground the proceedings. You might telephone to make an appointment to call at your convenience.

Kind regards,

Yours sincerely,

---

[MAT:FeName]

[SYS:CON:Name]

[MAT:FeEmail]

**Encl.**

**MEMO TO**

**From:** [MAT:FeName]  
**Re:** [CNT:Name] –v- [CAN:Name.Defendant#@&]  
**Date** [DATE:Today]  
**Ref:** [MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

---

I attach the following:

1. PI Summons;
2. Affidavit of Verification;
3. Cheque in the sum of €

Please arrange to swear the affidavit and then stamp the documents and have issued.

Many thanks,

---

[MAT:FeName]  
**[SYS:CON:Name]**

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

**REGISTERED POST**

[CAN:Name.Defendant#??]

[CAN:Address.Defendant#??]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear Sir,

Please find enclosed herewith, under cover of registered post, true copy Personal Injuries Summons in the above matter, by way of service upon you.

Yours faithfully,

---

[SYS:CON:Name]

[MAT:FeEmail]

**Encl.**

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]  
[CAN:SolRef.Solicitors#01]  
[DATE:Today]

**REGISTERED POST**

[CAN:Name.Solicitors#01]  
[CAN:Address.Solicitors#01]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear Sirs,

We refer to the above.

We are instructed that you have authority to accept service of proceedings in this matter.

Accordingly, we enclose herewith, under cover of registered post, true copy Personal Injuries Summons and Affidavit of Verification, by way of service upon you.

We would be obliged if you would let us have your Entry of Appearance at your early convenience.

Yours faithfully,

---

[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]  
[CAN:SolRef.Solicitors#01]  
[DATE:Today]

[CAN:Name.Solicitors#01]  
[CAN:Address.Solicitors#01]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear Sirs,

We refer to recent correspondence herein, and note we have not yet received your Appearance herein. We enclose herewith letter of consent to late filing thereof. Unless same is received within the time frame specified, we are instructed to issue a Motion for Judgement in Default thereof. You might please note the position.

Yours faithfully,

---

[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

The Registrar  
Circuit Court Office  
[CAN:Address.CirCourts#01]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear Sir,

As Solicitors for the Plaintiff herein, we hereby consent to late filing of Appearance herein by [CAN:Name.Solicitors#01], Solicitors for the Defendant herein, for a period of twenty one days from the date hereof.

Yours faithfully,

---

[SYS:CON:Name]  
[MAT:FeEmail]

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

**Private & Confidential**

[CNT:Name]

[CNT:Address]

Re: [MAT:Description]

---

Dear [CNT:Salut],

I have now received a document from the Defendant's solicitors known as a Notice for Particulars. I enclose a copy for your reference. The purpose of the document is to allow the Defendant to ask questions to better understand the extent of the claim we are bringing on your behalf.

I would be grateful if you would read the Notice, and then telephone my office to make an appointment to call to see me in order that I can go through the questions with you and prepare suitable replies.

I will await hearing from you.

Kind regards,

Yours sincerely,

---

[MAT:FeName]

[SYS:CON:Name]

[MAT:FeEmail]

**Encl.**

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]  
[CAN:SolRef.Solicitors#01]  
[DATE:Today]

[CAN:Name.Solicitors#01]  
[CAN:Address.Solicitors#01]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear Sirs,

We refer to recent correspondence herein. We now enclose herewith Replies to your Notice for Particulars, with vouching documentation. We look forward to hearing from you with your Defence.

Yours faithfully,

---

[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

**Record No. [CAN:RecordNo.Defendant#01]**

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**-and-**

[CAN:Name.Defendant#@&]

**DEFENDANT**

**REPLIES TO NOTICE FOR PARTICULARS**

**TAKE NOTICE** that we, as Solicitors for the Plaintiff in the above entitled proceedings, hereby reply to your Notice for Particulars dated the            day of 2014 as follows:-

Dated this            day of            2014.

Signed:

\_\_\_\_\_  
[SYS:CON:Name]  
Solicitors for the Plaintiff  
[DIA:Address]

To:

[CAN:Name.Solicitors#01]  
Solicitors for the Defendant  
[CAN:Address.Solicitors#01]

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

Record No. [CAN:RecordNo.Defendant#01]

**BETWEEN:**  
[CNT:Name]

**PLAINTIFF**

**-and-**

[CAN:Name.Defendant#@&]

**DEFENDANT**

**REPLIES TO NOTICE FOR PARTICULARS**

[SYS:CON:Name]  
**Solicitors**  
[DIA:Address]

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]  
[CAN:SolRef.Solicitors#01]  
[DATE:Today]

[CAN:Name.Solicitors#01]  
[CAN:Address.Solicitors#01]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear Sirs,

We refer to recent correspondence herein, and note we have not yet received your Defence herein. We enclose herewith letter of consent to late filing thereof. Unless same is received within the time frame specified, we are instructed to issue a Motion for Judgement in Default thereof. You might please note the position.

Yours faithfully,

---

[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

The County Registrar  
Circuit Court Office  
[CAN:Address.CirCourts#01]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear Sir,

As Solicitors for the Plaintiff herein, we hereby consent to late filing of Defence herein by [CAN:Name.Solicitors#01], Solicitors for the Defendant herein, for a period of twenty one days from the date hereof.

Yours faithfully,

---

[SYS:CON:Name]  
[MAT:FeEmail]

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]  
[CAN:SolRef.Solicitors#01]  
[DATE:Today]

[CAN:Name.Solicitors#01]  
[CAN:Address.Solicitors#01]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear Sirs,

**TAKE NOTICE** that as Solicitors for the Plaintiff, and pursuant to Order 31 Rule 12 of the Rules of the Superior Courts, we hereby request that the Defendant agree to make Voluntary Discovery of the following categories of documents and records which are now or which ever have been within the Defendant's power, procurement and possession and specifically:-

(a)

The documents are necessary and are of relevance because

The Plaintiff is prepared to allow the Defendant 21 days for compliance with Voluntary Discovery. The Voluntary Discovery should be in like manner and form as if directed by Court, that is by way of Affidavit of Discovery. If Voluntary Discovery is not forthcoming, then an application will be brought to Court for Discovery by the Plaintiff and this letter will be produced by the Plaintiff to fix the Defendant with the costs of the application.

Yours faithfully,

---

[SYS:CON:Name]  
[MAT:FeEmail]

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

**Record No. [CAN:RecordNo.Defendant#01]**

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**-and-**

[CAN:Name.Defendant#@&]

**DEFENDANT**

**NOTICE OF MOTION**

**TAKE NOTICE** that on the            day of            2014 at 10.30 o'clock in the forenoon, or as soon thereafter as Counsel may be heard, Counsel on behalf of the Plaintiff intends to apply to this Honourable Court sitting at Court No.    , The Four Courts, Inn's Quay, Dublin 7, for the following Orders against the Defendant:-

- a) An Order directing the Defendant to make Discovery on Oath in terms of
- b) An Order directing the Defendant to make Discovery on Oath of the documents specified in
- c) An Order directing the Defendant to make Discovery on Oath of
- d) Such further or other Order as to this Honourable Court shall seem fit;
- e) The costs of the Application.

**AND FURTHER TAKE NOTICE** that the Application will be grounded upon the Notice of Motion herein and Affidavit of [MAT:FeName], Solicitor, the Affidavit of Service thereof, the Proceedings already had herein, when produced, the nature of the case

and the reasons to be offered.

**Dated** this        day of                    2014.

**SIGNED:** \_\_\_\_\_  
[SYS:CON:Name]  
Solicitors for the Plaintiff  
[DIA:Address]

**TO:**                    [CAN:Name.Solicitors#01]  
Solicitors for the Defendant  
[CAN:Address.Solicitors#01]

**AND:**                **THE COUNTY REGISTRAR**  
Circuit Court Office  
[CAN:Address.CirCourts#01]

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

Record No. [CAN:RecordNo.Defendant#01]

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**-and-**

[CAN:Name.Defendant#@&]

**DEFENDANT**

**NOTICE OF MOTION**

[SYS:CON:Name]

**Solicitors**

[DIA:Address]

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

Record No. [CAN:RecordNo.Defendant#01]

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**-and-**

[CAN:Name.Defendant#@&]

**DEFENDANT**

**AFFIDAVIT OF [MAT:FENAME]**

1, [MAT:FeName], Solicitor, of [SYS:CON:Name], Solicitors, [DIA:SingleAddress], aged eighteen years and upwards, **MAKE OATH** and say as follows:-

1. I am a Solicitor in the firm of [SYS:CON:Name], Solicitors, who are the solicitors on record for the Plaintiff herein. I have been instructed by the Plaintiff to make this Affidavit on his/her behalf, which I do from facts within my own knowledge save where otherwise appears and, where so appearing, I believe the same to be true.
2. I beg to refer to the proceedings issued herein when produced.
3. The categories of Discovery sought are necessary to fairly dispose of the issues between the parties particularly in circumstances where

4. I therefore pray this Honourable Court for the relief sought in the Notice of Motion herein.

**SWORN** by the said [MAT:FeName] at [DIA:SingleAddress], this        day of 2014 before me, a Commissioner for Oaths/Practising Solicitor. And I know the Deponent.

---

**COMMISSIONER FOR OATHS  
/PRACTISING SOLICITOR**

This Affidavit is filed on behalf of the Plaintiff by [SYS:CON:Name], Solicitors, [DIA:SingleAddress], this        day of        2014.

EXHIBIT "A"

**SIGNED:** \_\_\_\_\_  
[MAT:FeName]

**SIGNED:** \_\_\_\_\_  
**COMMISSIONER FOR OATHS/  
PRACTISING SOLICITOR**

EXHIBIT “B”

**SIGNED:** \_\_\_\_\_  
[MAT:FeName]

**SIGNED:** \_\_\_\_\_  
**COMMISSIONER FOR OATHS/  
PRACTISING SOLICITOR**

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

Record No. [CAN:RecordNo.Defendant#01]

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**-and-**

[CAN:Name.Defendant#@&]

**DEFENDANT**

**AFFIDAVIT OF [MAT:FENAME]**

[SYS:CON:Name]

**Solicitors**

[DIA:Address]

**MEMO TO**

**From:** [MAT:FeName]  
**Re:** [CNT:Name] –v- [CAN:Name.Defendant#@&]  
**Date** [DATE:Today]  
**Ref:** [MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

---

I attach the following:-

1. Motion and Grounding Affidavit;
2. Cheque for € .

Please arrange to swear the Affidavit and then have the documents stamped and issued.

Many thanks,

---

[MAT:FeName]  
[SYS:CON:Name]

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]  
[CAN:SolRef.Solicitors#01]  
[DATE:Today]

**REGISTERED POST**

[CAN:Name.Solicitors#01]  
[CAN:Address.Solicitors#01]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear Sirs,

We refer to recent correspondence herein, and now enclose herewith, under cover of registered post, true copy Notice of Motion seeking Discovery Order and Grounding Affidavit, by way of service upon you. You might please note the return date of the [UDF:ReturnDate].

Yours faithfully,

---

[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

**Private & Confidential**

[CNT:Name]

[CNT:Address]

RE: Your Accident

---

Dear [CNT:Salut],

I refer to recent correspondence herein. We have now received a Notice of Tender Offer from the Defendant's solicitors. I enclose a copy of same herewith for your attention.

In relation to the Tender Offer, the Defendants are stating that they do not believe that you will be compensated for a sum in excess of €[UDF:TenderAmt]. This is a very important situation re the costs of the case for the following reasons:-

1. If the case goes to hearing and you receive an award in excess of €[UDF:TenderAmt], you will receive all your costs as part of the award;
2. If you receive either €[UDF:TenderAmt] or less, then you will have to pay the Defendant's costs as and from the date of the Tender Offer. The costs would come out of your settlement.

I am forwarding the papers to our barrister seeking his advice on whether or not he thinks you should accept this Tender Offer. I will contact you again on hearing from him. In the meantime, if you have any queries on the matter, please do not hesitate to contact me.

Kind regards,

Yours sincerely,

---

[MAT:FeName]

[SYS:CON:Name]

[MAT:FeEmail]

**Encl.**

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

[CAN:Name.Barristers#??]  
[CAN:Address.Barristers#??]

RE: **[MAT:Description]**  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear [CAN:Salutation.Barristers#??],

I refer to previous correspondence herein.

I have now received a Tender Offer from the Defendant's solicitors tendering a sum of €[UDF:TenderAmt] as compensation. It would appear to me that the Tender is below the value of the claim, but I will bow to your expert knowledge should you disagree with my view.

I enclose herewith Brief to Counsel, and would be grateful if you could consider the papers and let me have your comments on the Tender Offer.

I will await hearing from you in early course.

Kind regards,

Yours sincerely

---

[MAT:FeName]  
[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**

[CNT:Name]

—v—

[CAN:Name.Defendant#@&]

**BRIEF FOR COUNSEL**  
[CAN:Name.Barristers#??] **B.L.**

**QUERIST: [CNT:Name]**  
**AGENT: [MAT:FeName], [SYS:CON:Name]**

---

Counsel is sent herewith as follows:-

**A. Correspondence with Counsel**

**B. Pleadings**

**D. Medical Reports**

2. Report of \_\_\_\_\_ dated
3. Report of \_\_\_\_\_ dated

**E. Miscellaneous**

5. Injuries Board Authorisation dated
6. Locus Photographs
7. List of Expenses and vouchers
8. Company Registration Office Printout

**F. Correspondence**

Could Counsel please advise on Tender Offer.

**Dated this        day of                    2014.**

**Signed:**

---

[MAT:FeName]  
[SYS:CON:Name]

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

**Private & Confidential**

[CNT:Name]

[CNT:Address]

RE: Your Accident

---

Dear [CNT:Salut],

I refer to recent discussions in relation to your case.

I write to advise that a settlement meeting has now been arranged for [UDF:SettleMeetingDate] next at [UDF:SettleMeetingTime] a.m./p.m. at the Law Library in the Four Courts. The Four Courts are on the quays in the city centre and you can only enter by the side gates, not through the main door which is on the quay. When you get inside the building, ask anybody where the round hall is and they will be able to direct you. I will meet you at the round hall at a.m./p.m. on the day.

Kind regards

Yours sincerely,

---

[MAT:FeName]

[SYS:CON:Name]

[MAT:FeEmail]

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]  
[CAN:SolRef.Solicitors#01]  
[DATE:Today]

[CAN:Name.Solicitors#01]  
[CAN:Address.Solicitors#01]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear ,

We refer to recent correspondence herein.

We confirm the settlement meeting arranged for [UDF:SettleMeetingDate] next at [UDF:SettleMeetingTime] a.m./p.m. at the Law Library.

Yours faithfully,

---

[SYS:CON:Name]  
[MAT:FeEmail]

[CNT:Name]

—v—

[CAN:Name.Defendant#@&]

**BRIEF FOR COUNSEL**  
[CAN:Name.Barristers#??] **B.L.**

**QUERIST: [CNT:Name]**  
**AGENT: [MAT:FeName], [SYS:CON:Name]**

---

Counsel is sent herewith as follows:-

**A. Correspondence with Counsel**

**B. Pleadings**

**G. Medical Reports**

4. Report of \_\_\_\_\_ dated
5. Report of \_\_\_\_\_ dated

**H. Miscellaneous**

9. Injuries Board Authorisation dated
10. Locus Photographs
11. List of Expenses and vouchers
12. Company Registration Office Printout

**I. Correspondence**

Could Counsel please attend at settlement meeting.

**Dated this        day of                    2014.**

**Signed:**

---

[MAT:FeName]  
[SYS:CON:Name]

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

[CAN:Name.Barristers#??]  
[CAN:Address.Barristers#??]

RE: **[MAT:Description]**  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear [CAN:Salutation.Barristers#??],

I write in connection with the above.

I write to advise that a settlement meeting has now been arranged for [UDF:SettleMeetingDate] at [UDF:SettleMeetingTime] a.m./p.m. at the Law Library. I would be obliged if you would make a note of this date in your diary.

I enclose herewith updated Brief for your attention.

Yours sincerely

---

[MAT:FeName]  
[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]  
[CAN:SolRef.Solicitors#01]  
[DATE:Today]

[CAN:Name.Solicitors#01]  
[CAN:Address.Solicitors#01]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear [CAN:Salutation.Solicitors#01],

We refer to previous correspondence herein.

As Solicitors for the Plaintiff, we hereby put you on notice that it is the Plaintiff's intention to serve Notice of Trial at the expiration of fourteen days from the date hereof. You might please note the position.

Yours faithfully,

---

[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

**Record No. [CAN:RecordNo.Defendant#01]**

**[CAN:COURTAREA.CIRCOURTS#01] CIRCUITCOUNTY OF [CAN:NAME.CIRCOURTS#01]**

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**AND**

[CAN:Name.Defendant#@&]

**DEFENDANT**

**NOTICE OF TRIAL**

---

**TAKE NOTICE** of the trial of this Action (or of the issues ordered to be tried as the case may be) for the        day of                    2014 next in Court No.        Four Courts, Dublin 7.

Dated this        day of                    2014.

**Signed**

\_\_\_\_\_  
[SYS:CON:Name]  
Solicitors for the Plaintiff  
[DIA:Address]

**TO: THE COUNTY REGISTRAR**  
Circuit Court Office  
[CAN:Address.CirCourts#01]

**AND:** [CAN:Name.Solicitors#01]  
Solicitors for the Defendant  
[CAN:Address.Solicitors#01]

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

**Record No. [CAN:RecordNo.Defendant#01]**

**[CAN:COURTAREA.CIRCOURTS#01] CIRCUITCOUNTY OF [CAN:NAME.CIRCOURTS#01]**

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**AND**

[CAN:Name.Defendant#@&]

**DEFENDANT**

**NOTICE OF TRIAL**

**[SYS:CON:Name]  
Solicitors  
[DIA:Address]**

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

**Record No. [CAN:RecordNo.Defendant#01]**

**[CAN:COURTAREA.CIRCOURTS#01] CIRCUITCOUNTY OF [CAN:NAME.CIRCOURTS#01]**

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**AND**

[CAN:Name.Defendant#@&]

**DEFENDANT**

**NOTICE TO PRODUCE**

---

**TAKE NOTICE** that you are hereby required to produce and show to the Court on the trial of this action all books, papers, letters, copies of letters and any other writings and documents in your custody, possession or power, containing any entry, memorandum or minute relating to the matter in question in this action.

Dated this        day of                    2014.

**Signed**

\_\_\_\_\_  
[SYS:CON:Name]  
Solicitors for the Plaintiff  
[DIA:Address]

**TO: THE COUNTY REGISTRAR**  
Circuit Court Office  
[CAN:Address.CirCourts#01]

**AND:** [CAN:Name.Solicitors#01]  
Solicitors for the Defendant  
[CAN:Address.Solicitors#01]

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

**Record No. [CAN:RecordNo.Defendant#01]**

**[CAN:COURTAREA.CIRCOURTS#01] CIRCUITCOUNTY OF [CAN:NAME.CIRCOURTS#01]**

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**AND**

[CAN:Name.Defendant#@&]

**DEFENDANT**

**NOTICE TO PRODUCE**

---

**[SYS:CON:Name]  
Solicitors  
[DIA:Address]**

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

The County Registrar  
Circuit Court Office  
[CAN:Address.CirCourts#01]

RE: [CNT:Name] –v– [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear Sirs,

We act on behalf of the Plaintiff in the above matter and would advise as follows:

- 1 This is a claim;
- 2 Liability is/is not in issue;
- 3 We anticipate the case will take hour;
- 4 We enclose copy letter sent to the Defendant's Solicitors informing them of our intention to call this case on for hearing.

We would be grateful if you could issue a hearing date.

Yours faithfully,

---

[SYS:CON:Name]  
[MAT:FeEmail]

***MEMO TO***

**From:** [MAT:FeName]  
**Re:** [CNT:Name] –v- [CAN:Name.Defendant#@&]  
**Date** [DATE:Today]  
**Ref:** [MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

---

I attach herewith the following:

1. Notice of Trial in triplicate
2. Notice to Produce in triplicate
3. Letter addressed to the Circuit Court Office
4. Copy Defence

I would be grateful if you could now arrange to stamp and file the documents in the Circuit Court Office.

Many thanks

---

[MAT:FeName]  
[SYS:CON:Name]

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]  
[CAN:SolRef.Solicitors#01]  
[DATE:Today]

**REGISTERED POST**

[CAN:Name.Solicitors#01]  
[CAN:Address.Solicitors#01]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear ,

We refer to the above.

Please find enclosed herewith Notice of Trial and Notice to Produce under cover of registered post, by way of service upon you.

Yours faithfully,

---

[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

**Record No. [CAN:RecordNo.Defendant#01]**

**[CAN:COURTAREA.CIRCOURTS#01] CIRCUITCOUNTY OF [CAN:NAME.CIRCOURTS#01]**

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**AND**

[CAN:Name.Defendant#@&]

**DEFENDANT**

**NOTICE OF THE FIXING OF A DATE FOR TRIAL**

---

**TAKE NOTICE** that a date will be fixed for the hearing of the Trial of this Action (or of the issues ordered to be tried as the case may be) on the            day of 2014 next in Court No.    Four Courts, Dublin 7.

Dated this            day of            2014.

**Signed**

\_\_\_\_\_  
[SYS:CON:Name]  
Solicitors for the Plaintiff  
[DIA:Address]

**TO: THE COUNTY REGISTRAR**  
Circuit Court Office  
[CAN:Address.CirCourts#01]

**AND:** [CAN:Name.Solicitors#01]  
Solicitors for the Defendant  
[CAN:Address.Solicitors#01]

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

**Record No. [CAN:RecordNo.Defendant#01]**

**[CAN:COURTAREA.CIRCOURTS#01] CIRCUITCOUNTY OF [CAN:NAME.CIRCOURTS#01]**

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**AND**

[CAN:Name.Defendant#@&]

**DEFENDANT**

**NOTICE OF THE FIXING OF A DATE FOR TRIAL**

**[SYS:CON:Name]  
Solicitors  
[DIA:Address]**

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

[CAN:Name.Barristers#??]  
[CAN:Address.Barristers#??]

RE: **[MAT:Description]**  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear [CAN:Salutation.Barristers#??],

I act for the above named [CNT:Name] who was injured in an accident on the [UDF:AccidentDate]. The case has now been set down for trial and accordingly I enclose herewith Brief and would be obliged if you would prepare and let me have your Advice on Proofs.

Liability is/is not in issue.

When you have had an opportunity to read the papers, I would be grateful for your Advice on Proofs.

Kind regards,

Yours sincerely,

---

[MAT:FeName]  
[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

**Private & Confidential**

[CNT:Name]

[CNT:Address]

RE: Your Accident

---

Dear [CNT:Salut],

I write in connection with your case.

I have now received a date for the hearing of your case. The matter will be heard in the Circuit Court on [CAN:HearingDate18.Defendant#01] next at [CAN:HearingTime.Defendant#01] a.m.

I would be obliged if you would telephone me to arrange a pre-trial consultation in order that we can prepare you for the hearing and inform you of the procedures involved.

I look forward to hearing from you.

Kind regards,

Yours sincerely,

---

[MAT:FeName]

[SYS:CON:Name]

[MAT:FeEmail]

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]  
[CAN:SolRef.Solicitors#01]  
[DATE:Today]

**REGISTERED POST**

[CAN:Name.Solicitors#01]  
[CAN:Address.Solicitors#01]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear [CAN:Salutation.Solicitors#01],

We refer to the above matter.

This matter has now been listed for hearing on [CAN:HearingDate18.Defendant#01] next in the Circuit Court. Accordingly we enclose herewith Notice to Produce for your attention.

We also enclose herewith Schedule of Reports and would be obliged if you would let us know whether you are in a position to admit our client's medical reports without the necessity for formal proof thereof.

We will await hearing from you.

Yours faithfully,

---

[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

[CAN:Name.Barristers#??]  
[CAN:Address.Barristers#??]

RE: **[MAT:Description]**  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear [CAN:Salutation.Barristers#??],

I write to advise that this matter has now been listed for hearing on [CAN:HearingDate18.Defendant#01] next. I enclose herewith Brief for the hearing of the matter.

You might confirm that you will be available for the hearing and also let me know if you wish to have a pre-trial consultation with the client on the morning of the hearing.

I will await hearing from you.

Kind regards,

Yours sincerely,

---

[MAT:FeName]  
[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**

[CNT:Name]

—v—

[CAN:Name.Defendant#@&]

**BRIEF FOR COUNSEL**  
[CAN:Name.Barristers#??] **B.L.**

**QUERIST: [CNT:Name]**  
**AGENT: [MAT:FeName], [SYS:CON:Name]**

---

Counsel is sent herewith as follows:-

**A. Correspondence with Counsel**

**B. Pleadings**

**J. Medical Reports**

- 6. Report of \_\_\_\_\_ dated
- 7. Report of \_\_\_\_\_ dated

**K. Miscellaneous**

- 13. Injuries Board Authorisation dated
- 14. Locus Photographs
- 15. List of Expenses and vouchers
- 16. Company Registration Office Printout

**L. Correspondence**

**Dated this        day of                2014.**

**Signed:**

\_\_\_\_\_  
[MAT:FeName]  
[SYS:CON:Name]

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

**Record No. [CAN:RecordNo.Defendant#01]**

**[CAN:COURTAREA.CIRCOURTS#01] CIRCUITCOUNTY OF [CAN:NAME.CIRCOURTS#01]**

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**AND**

[CAN:Name.Defendant#@&]

**DEFENDANT**

You are hereby required to appear in person before the Circuit Court at Court No. , Four Courts, Dublin 7, on the day of 2014 at the hour of 10.00 in the forenoon, and so on from day to day until these proceedings are disposed of to give evidence on behalf of [CNT:Name], the Plaintiff, and to bring with you and produce to the Court all relevant documents in your possession:

Dated this day of 2014.

---

County Registrar

To: [CAN:Name.Witnesses#??]  
[CAN:Address.Witnesses#??]

**INDORSEMENT ON SUMMONS TO WITNESS**

"If any person having been duly summoned to give evidence or required in manner prescribed to produce any books, papers or documents in his possession or under his control which the party requiring his attendance desires to show in evidence fails without lawful excuse, to attend or to give evidence or to produce such books, papers or documents, according to the summons or unless duly excused, fails to remain in attendance throughout the trial or the proceeding, the Court upon being satisfied that such person has been duly summoned and that his reasonable expenses have been tendered to him may attach him for contempt or may impose upon him such fine as to it shall appear just for his default and sentence him in default of payment thereof to imprisonment for a period not exceeding one month".

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

**Record No. [CAN:RecordNo.Defendant#01]**

**[CAN:COURTAREA.CIRCOURTS#01] CIRCUITCOUNTY OF [CAN:NAME.CIRCOURTS#01]**

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**AND**

[CAN:Name.Defendant#@&]

**DEFENDANT**

To The County Registrar  
The Circuit Court  
[CAN:Address.CirCourts#01]

I require the under-mentioned business performed, viz:

The issue of a witness summons for [CAN:Name.Witnesses#??],  
[CAN:AddressSingle.Witnesses#??] to attend at Court No.  
[CAN:CourtNo.CirCourts#01], [CAN:Address.CirCourts#01], on the day of  
2014 at the hour of 10.00 a.m. in the forenoon and so on from day to day until this  
proceeding is disposed of to give evidence on behalf of the Plaintiff.

Dated this day of 2014.

**SIGNED:**

\_\_\_\_\_  
[SYS:CON:Name]  
Solicitors for the Plaintiff  
[DIA:Address]

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

[CAN:Name.Doctors#??]  
[CAN:Address.Doctors#??]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear [CAN:Salutation.Doctors#??],

This case is listed for hearing on [CAN:HearingDate18.Defendant#01] next. I would be grateful if you would note same in your diary to be on stand-by.

I would be obliged if you could telephone my office to let me have your mobile number to enable me call you with as much notice as possible to ensure you will be in Court for the shortest time possible on the date of the hearing.

Yours sincerely,

---

[MAT:FeName]  
[SYS:CON:Name]  
[MAT:FeEmail]

**AN CHUIRT CHUARDA  
(THE CIRCUIT COURT)**

**Record No. [CAN:RecordNo.Defendant#01]**

**[CAN:COURTAREA.CIRCOURTS#01] CIRCUITCOUNTY OF [CAN:NAME.CIRCOURTS#01]**

**BETWEEN:**

[CNT:Name]

**PLAINTIFF**

**AND**

[CAN:Name.Defendant#@&]

**DEFENDANT**

**ORDER 39, RULE 46(1) AND (2)**

**SCHEDULE OF WITNESSES, EXPERT WITNESSES AND REPORTS**

**Witnesses as to the facts in the case pursuant to Section 45(1)(1)(iii) of the Courts and Court Officers Act, 1995**

1.

**Expert Witnesses:**

1.

**Schedule of Expert Reports:**

1.

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

**REGISTERED POST**

[CAN:Name.Witnesses#??]

[CAN:Address.Witnesses#??]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear [CAN:Salutation.Witnesses#??],

I refer to previous correspondence herein. I now enclose herewith Witness Summons in this matter.

I would be grateful if you would contact me at my office in order to arrange a time and place to meet in order to discuss the format of the hearing. I would also be grateful to receive your mobile number in case of any difficulties arising at the hearing.

Please note you will be entitled to your expenses for attending Court.

Yours sincerely,

---

[MAT:FeName]  
[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

**Private & Confidential**

[CNT:Name]

[CNT:Address]

RE: Your Accident

---

Dear [CNT:Salut],

I refer to our meeting at the Law Library on the      day of      when, after lengthy negotiation, we settled your claim in the sum of €[UDF:u.settle.amount].

I now enclose herewith form of settlement with invoice in respect of my fees. I would be grateful if you could sign the form of settlement and return it to my office in early course. I will deduct my fees from the settlement cheque when it comes to hand.

I would point out that the balance of my fees will be paid by the insurance company for the Defendant.

If you have any queries in the matter do not hesitate to contact me.

Kind regards,

Yours sincerely,

---

[MAT:FeName]

[SYS:CON:Name]

[MAT:FeEmail]

**Encl.**

[SYS:CON:Name]  
Solicitors  
[DIA:Address]

**Re:- My Claim**

---

Dear [MAT:FeName],

I confirm the full and final settlement of this matter in the amount of €[UDF:u.settle.amount].

I hereby also confirm my verbal instructions authorising you to deduct the sum of € from my settlement cheque in respect of my case leaving a balance of € due to me.

If my settlement cheque is made payable A/C Payee only I hereby instruct and authorise you to endorse the cheque on my behalf and to deduct your said fees.

This letter may be furnished to the Bank as evidence of my instructions.

Dated the        day of                    2014.

Signed: \_\_\_\_\_  
[CNT:Name]

**FEE NOTE**

**Invoice No:**

[CNT:Name]  
-to-  
[SYS:CON:Name], Solicitors

---

**PROFESSIONAL FEES** for work done in relation to the case of [CNT:Name] -v- [CAN:Name.Defendant#@&], The Circuit Court Record No. [CAN:RecordNo.Defendant#01], to include:-

Taking initial instructions from client.

Fee for work done	€
V.A.T. @ 23%	€
<b>Total:</b>	<b>€</b>

**Dated this      day of              2014.**

Signed \_\_\_\_\_  
[SYS:CON:Name]  
Solicitors  
[DIA:Address]

**THIS IS NOT A VAT INVOICE**

**REF: [MAT:Code] / [MAT:FeCode] / [UDF:SecRef]**

TO: [CNT:Name]  
[CNT:Address]

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

[CAN:Name.Barristers#??]  
[CAN:Address.Barristers#??]

RE: **[MAT:Description]**  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear [CAN:Salutation.Barristers#??],

I refer to the recent settlement meeting herein when the matter settled in the sum of €[UDF:u.settle.amount]. I am now in the process of preparing my bill of costs and would be obliged if you would let me have your fee note for inclusion therein at your early convenience.

I will await hearing from you.

Kind regards,

Yours sincerely

---

[MAT:FeName]  
[SYS:CON:Name]  
[MAT:FeEmail]

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]  
[CAN:SolRef.Solicitors#01]  
[DATE:Today]

[CAN:Name.Solicitors#01]  
[CAN:Address.Solicitors#01]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear Sirs,

We refer to recent correspondence in connection with the above case.

We now enclose herewith our bill of costs, and look forward to hearing from you thereon within 21 days, failing which we shall submit the bill for taxation.

Yours faithfully,

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[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**

**FEE NOTE**

**Invoice No:**

[CNT:Name]

**-to-**

[SYS:CON:Name]

**PROFESSIONAL FEES** for work done in relation to the case of [CNT:Name] -v- [CAN:Name.Defendant#@&], The Circuit Court Record No. [CAN:RecordNo.Defendant#01], to include:-

Taking initial instructions from client.

Fee for work done €

Postage, Telephone and other incidental expenses €

**Schedule 2 Items**

€

€

V.A.T @ 23% €

**OUTLAY NOT SUBJECT TO VAT**

€  
€  
€  
€  
€  
€  
€  
€

€



[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]  
[CAN:SolRef.Solicitors#01]  
[DATE:Today]

[CAN:Name.Solicitors#01]  
[CAN:Address.Solicitors#01]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

---

Dear Sirs,

We refer to the above matter.

We note this matter was settled on the \_\_\_\_\_ of \_\_\_\_\_ in \_\_\_\_\_ the sum of €[UDF:u.settle.amount] inclusive of special damages, together with costs and reserved costs on the Circuit Court scale to be taxed in default of agreement.

We are currently preparing our bill of costs, and will furnish you with a copy of same upon completion.

We look forward to receiving settlement cheque in the sum of €[UDF:u.settle.amount] at your earliest convenience.

We will await hearing from you.

Yours faithfully,

---

[SYS:CON:Name]  
[MAT:FeEmail]

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

**Private & Confidential**

[CNT:Name]

[CNT:Address]

RE: Your Accident

---

Dear [CNT:Salut],

I am pleased to inform you I have now received your settlement cheque, and accordingly enclose herewith a cheque in the sum of €        in full and final settlement of your claim.

I would like to thank you for instructing my firm in this matter, and hope you have been satisfied with the service given to you. If I can be of any assistance to you in the future, please do not hesitate to contact me.

Kind regards,

Yours sincerely,

---

[MAT:FeName]

[SYS:CON:Name]

[MAT:FeEmail]

**Encl.**

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

[DATE:Today]

[CAN:Name.Barristers#??]  
[CAN:Address.Barristers#??]

RE: **[MAT:Description]**  
The Circuit Court Record No. [CAN:RecordNo.Defendant#01]

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Dear [CAN:Salutation.Barristers#??],

I write in connection with the above.

I am pleased to enclose herewith cheque in the sum of € , being .the amount allowed to you by the insurance company in this matter. I trust that same is satisfactory to you.

As always, I would like to thank you for all your assistance in dealing with this case.

Kind regards,

Yours sincerely,

---

[MAT:FeName]  
[SYS:CON:Name]  
[MAT:FeEmail]

**Encl.**