

# District Court Litigation Workflow



# **DISTRICT COURT LITIGATION WORKFLOW**

Action	Action Description	Documents	Next
DCL01	Brief Counsel to settle Proceedings	DCL01A – Letter to Counsel with initial Brief DCL01B – Initial Brief to Counsel	DCL02 – 1 Months
DCL02	Check whether draft Proceedings received		DCL02 – 14 Days DCL03 – 1 Days
DCL03	Prepare documents to issue Proceedings	DCL03A – Letter to Client encl draft Proceedings DCL03B – Personal Injuries Summons DCL03C – Verifying Affidavit	DCL04 – 5 Days
DCL04	Client swears Affidavit of Verification	DCL04A – Memo to Clerk to issue Proceedings	DCL05 – 1 Days
DCL05	Issue Proceedings		DCL06 – 5 Days
DCL06	Serve Proceedings on Defendant	DCL06A – Letter to Defendant serving Proceedings DCL06B – Letter to Defendant's Solicitors encl Proceedings	DCL07 – 5 Weeks
DCL07	Check whether Defence received		DCL08 – 14 Days DCL10 – 3 Days
DCL08	Notice for Particulars received	DCL08A – Letter to Client re Particulars	DCL09 - 7 Days
DCL09	Send Replies to Particulars to Defendant's Solicitors	DCL09A – Letter to Solicitors with Replies to Particulars DCL09B – Replies to Notice for Particulars	DCL10 – 14 Days DCL12 – 1 Months
DCL10	Motions	DCL10A – Notice of Motion	DCL11 – 6 Weeks
DCL11	Take up Orders		
DCL12	Serve Notice of Terms	DCL12A – Letter to Solicitors encl Notice as to Terms DCL12B – Claimant Notice as to Terms	
DCL13	Take instructions on Lodgment or Offer ?	DCL13A – Letter to Client for Instructions on Offer	DCL14 – 7 Days DCL15 – 7 Days
DCL14	Settlement meeting	DCL14A – Letter to Client re Settlement Meeting DCL14B – Letter to Solicitor confirming Settlement Meeting DCL14C – Letter to Counsel re Settlement Meeting DCL14D – Brief to Counsel for Settlement Meeting	DCL15 – 7 Days DCL17 – 1 Days
DCL15	Preparation for Trial	DCL15A – Letter to Client with Trial Date DCL15B – Letter to Solicitor with Trial Date DCL15C – Letter to Counsel with Trial Date DCL15D – Brief to Counsel for Hearing DCL15E – Summons to Witness DCL15F – Letter to Witness with Summons DCL15G – Standby Letter to Experts	
DCL16	Hearing of Action		DCL17 – 1 Days DCL20 – 1 Months
DCL17	Case settled	DCL17A – Letter to Client following Settlement DCL17B – Client Authority to Accept Settlement	DCL18 – 1 Months

		DCL17C – Invoice Solicitor-Client costs on Settlement DCL17D – Letter to Counsel on Settlement DCL17E – Letter to Solicitor with Fee Note DCL17F – Party and Party Costs Fee Note DCL17G – Letter to Solicitor confirming Settlement	
DCL18	Check whether Settlement cheque received	DCL18A – Letter to Client encl Settlement cheque	DCL18 – 14 Days DCL19 – 14 Days
DCL19	Check whether Costs paid	DCL19A – Letter to Counsel paying Fees	DCL19 – 10 Days DCL20 – 21 Days
DCL20	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 €[UDF:PIABAssessment] 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,

1

[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]

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

#### **Private & Confidential**

[CNT:Name] [CNT:Address]

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

\_\_\_\_\_

[DATE:Today]

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.

#### AN CHÚIRT DÚICHE



#### THE DISTRICT COURT

[CAN:DistrictCourtArea.DisCourts#01]

[CAN:DistrictCourtDistrict.DisC ourts#01]

Record number:

Between

[CNT:Name]

Claimant

[CAN:Name.Defendant#@&]

Respondent

#### PERSONAL INJURIES SUMMONS

Civil Liability and Courts Act 2004, section 10

This personal injuries summons is issued at the request of the claimant(s), who makes a claim in the District Court to recover against the respondent damages not exceeding €15,000.

#### **Particulars of first claimant:**

Name	[CNT:Name]
Address	[CNT:LinearAddress]*(in the above Court *(area) and district)
Occupation	[CNT:Occupation]
PPSN (if none, state "none")	[CNT:RSINo]
*Solicitor	[SYS:CON:Name]
Address for service of documents	[DIA:SingleAddress]

{Repeat particulars for second and any subsequent claimant}

#### **Particulars of first respondent:**

Name	[CAN:Name.Defendant#01]
Address	[CAN:LinearAddress.Defendant#01] *(in the above Court *(area) and district)
Occupation (if known)	[CAN:Occupation.Defendant#01]
*Solicitor (if known)	
Address for service of documents (if known)	

#### **Particulars of second respondent:**

Name	[CAN:Name.Defendant#02]
Address	[CAN:LinearAddress.Defendant#02] *(in the above Court *(area) and district)
Occupation (if known)	[CAN:Occupation.Defendant#03]
*Solicitor (if known)	
Address for service of documents (if known)	

#### Particulars of third respondent:

Name	[CAN:Name.Defendant#03]
Address	[CAN:LinearAddress.Defendant#03] *(in the above Court *(area) and district)
Occupation (if known)	[CAN:Occupation.Defendant#04]
*Solicitor (if known)	
Address for service of documents (if known)	

#### STATEMENT OF CLAIM

#### 1. Description of Parties

The Plaintiff is a(n) [CNT:Occupation] and resides at [CNT:LinearAddress]. The Defendant is a [CAN:Occupation.Defendant#01] [CAN:ResidesAt.Defendant#01] at [CAN:AddressSingle.Defendant#01].

2. Wrong Alleged against the Defendant (or against Each Defendant)

On or about the [UDF:AccidentDate] {etc}

3. Particulars of the Acts of the Defendant (or of Each Defendant) Constituting the Wrong and of the Circumstances Relating to the Commission of the Wrong

(Full particulars should be set out)

4. Particulars of Each Instance of Negligence by the Defendant (or by Each Defendant)

(Full particulars should be set out)

- 5. Particulars of the Injuries to the Plaintiff Occasioned by the Wrong of the Defendant (or of Each Defendant)
- 6. Reliefs Claimed

And the Plaintiff claims

- (a) Damages not exceeding €15,000;
- (b) Interest pursuant to the Courts Act 1981;
- (c) Costs.
- 7. The bringing of these personal injuries proceedings requires to be authorised in accordance with \*section 14 \*section 17 \*section 32 \*section 36 \*section 49 \*rules under section 46(3) of the Personal Injuries Assessment Board Act 2003 and these personal injuries proceedings have been authorised by the Personal Injuries Assessment Board, under \*section 14 \*section 17 \*section 32 \*section 36 \*section 49 \*rules under section 46(3) by authorisation dated the [UDF:PIABAuthDate] under reference number [UDF:PIABAuthRef]

#### Schedule

#### PARTICULARS OF ITEMS OF SPECIAL DAMAGE

(Full particulars should be set out. Add additional sheets if necessary)] [If applicable, insert the particulars required by Order 39, rule 4 (1A)]

LIST OF CORRESPONDENCE AND OTHER DOCUMENTS ON WHICH THE CLAIMANT WILL RELY AT TRIAL

	Document	Date	Description
1			

- (A) IF YOU DISPUTE THE CLAIM and wish to defend the proceedings, then you must give, or send by post, to the claimant or claimant's solicitor at the address for service mentioned above an appearance and defence in Form 40A.02, Schedule C of the District Court Rules, not later than 28 days after the service on you of this claim notice, and at the same time file a copy of your appearance with the District Court Clerk at the address below.
- (B) IF YOU ADMIT THE CLAIM, you should contact the claimant or claimant's solicitor within 10 days after the service on you of this claim notice to make arrangement to agree payment of the claim and costs, all further proceedings will be stayed, you need not attend court and you will avoid further costs.

IF YOU DO NOT ACT IN ACCORDANCE WITH (A) OR (B) ABOVE you will be held to have admitted the claim and the claimant may apply for judgment to the District Court and if judgment is given, proceed to execution.

Signed: \_\_\_\_\_\_\_
[SYS:CON:Name]
Solicitor for Claimant
[DIA:Address]

day

To the respondent(s) at the address(es) given above
This personal injuries summons is issued at [CAN:LinearAddress.DisCourts#01] on the
of April 2014 by the District Court Clerk

assigned to the above Court area and district

\*Delete where inapplicable

# AN CHÚIRT DÚICHE THE DISTRICT COURT

Record No. [CSM:CsPlaintNo]

[CNT:Name]	Claimant
and	
[CAN:Name.Defendant#@&]	espondent
PERSONAL INJURIES SUMMONS	}

[SYS:CON:Name] Solicitors for the Claimant [DIA:Address]

[MAT:Code]/[MAT:FeCode]/[UDF:Sec Ref]

#### AN CHÚIRT DÚICHE



#### THE DISTRICT COURT

[CAN:DistrictCourtArea.DisCourts#01]

[CAN:DistrictCourtDistrict.DisC ourts#01]

Record number: [CSM:CsPlaintNo]

Between

[CNT:Name]

[CAN:Name.Defendant#@&]

Claimant

Respondent

#### **VERIFYING AFFIDAVIT**

Civil Liability and Courts Act 2004, section 14

I, [CNT:Name] of [CNT:LinearAddress], the claimant in the above proceedings, aged eighteen years and upwards MAKE OATH and say as follows:

- 1. I beg to refer to the contents of the personal injuries summons delivered herein on behalf of the claimant on the day of 2014 and upon a true copy of which marked "[SYS:sub(CNT:Name, 1, 1) & sub(CNT:Name, instring(' ', CNT:Name, 1) + 1, 1) & iif(instring(' ', sub(CNT:Name, instring(' ', CNT:Name, 1) + 1, 16)=0, ", sub(sub(CNT:Name, instring(' ', CNT:Name, 1) + 1, 16), instring(' ', sub(CNT:Name, instring(' ', CNT:Name, 1) + 1, 16), 1) + 1, 1) ]1" I have signed my name prior to the swearing hereof.
- 2. The assertions, allegations and information contained in the said personal injuries summons which are within my own knowledge are true. I honestly believe that the assertions, allegations and information contained in the said personal injuries 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 before me

at

in the County of

on the day of April 2014,

by the said [CNT:Name]

\*who is personally known to me

\*who is identified to me by who is personally known to me

\*whose identity has been established to me before the taking of this affidavit by the production to me of

†passport no. issued on the day of by the

authorities of , which is

an authority recognised by the Irish Government

†national identity card no issued on the day of by the authorities of which is

an EU Member State, the Swiss Confederation or a Contracting Party to the EEA Agreement

†Aliens Passport no. issued on the day of by the authorities of which is an authority recognised by the Irish Government

†refugee travel document no. issued on the day of by the Minister for Justice and Equality

† travel document (other than refugee travel

document) issued on the day of by the Minister

for Justice and Equality

#### Deponent

\*Commissioner for Oaths/ \*Practising Solicitor

This affidavit is filed with the District Court Clerk at [CAN:LinearAddress.DisCourts#01] on the day of April 2014 by [SYS:CON:Name] on behalf of the Claimant in the above proceedings.

<sup>\*</sup>Delete if inapplicable

<sup>†</sup>Where relevant, select appropriate option and delete others.

# AN CHÚIRT DÚICHE THE DISTRICT COURT

Record No. [CSM:CsPlaintNo]

[CNT:Name]	Claimant
and	
[CAN:Name.Defendant#@&]	Respondent
VERIFYING AFFIDAVIT	

[SYS:CON:Name] Solicitors for the Claimant [DIA:Address]

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

## **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 (District Court); 2. Affidavit of Verification; 3. Cheque in the sum of €		
Please arrange to stamp the documents and have issued.  Many thanks,		
[MAT:FeName] [SYS:CON:Name]		

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

[DA	LE: I	oday	_

[SYS:UpdateMatter()]

#### REGISTERED POST

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

RE: [CNT:Name] -v- [CAN:Name.Defendant#@&]
The District Court [CAN:DistrictCourtArea.DisCourts#01]
[CAN:DistrictCourtDistrict.DisCourts#01]
Record No. [CSM:CsPlaintNo]

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.

[DATE:Today] REGISTERED POST [CAN:Name.Solicitors#01] [CAN:Address.Solicitors#01] RE: [CNT:Name] -v- [CAN:Name.Defendant#@&] The District Court [CAN:DistrictCourtArea.DisCourts#01] [CAN:DistrictCourtDistrict.DisCourts#01] Record No. [CSM:CsPlaintNo] 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]
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]

[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 District Court [CAN:DistrictCourtArea.DisCourts#01] [CAN:DistrictCourtDistrict.DisCourts#01] Record No. [CSM:CsPlaintNo]
Dear Sirs,
We refer to recent correspondence herein. We now enclose herewith Replies to your Notice fo Particulars, with vouching documentation.
Yours faithfully,
[SYS:CON:Name] [MAT:FeEmail]
Encl.

# AN CHUIRT DUICHE THE DISTRICT COURT

## [CAN:DistrictCourtArea.DisCourts#01] [CAN:DistrictCourtDistrict.DisCourts#01]

Record No. [CSM:CsPlaintNo]

<b>BETWEEN:</b> [CNT:Name]					
PLAINTIFF					
			-and-		
		[CAN	:Name.Defen	dant#@&]	DEFENDANT
	<u>R</u>	EPLIES TO	NOTICE FO	R PARTICULARS	
TAKE NOT	ICE that we, as	Solicitors for	r the Plaintiff	in the above entitled p	roceedings, hereby reply
to your Notice	e for Particulars	dated the	day of	2014 as follow	'S:-
Dated this	day of	2014.			
Signed:	[SYS:CON:Na Solicitors for t [DIA:Address]	he Plaintiff	_		
To:	[CAN:Name.S Solicitors for t [CAN:Address	he Defendant			

# AN CHUIRT DUICHE THE DISTRICT COURT

## [CAN:DistrictCourtArea.DisCourts#01] [CAN:DistrictCourtDistrict.DisCourts#01]

Record No. [CSM:CsPlaintNo]

BETWEEN: [CNT:Name]		
PLAINTIFF		
	-and-	
	[CAN:Name.Defendant#@&]	
		DEFENDANT

#### **REPLIES TO NOTICE FOR PARTICULARS**

[SYS:CON:Name] Solicitors [DIA:Address] 40A.05 Schedule C O.40A. r. 9

#### AN CHÚIRT DÚICHE



#### THE DISTRICT COURT

[CAN:DistrictCourtArea.DisCourts#01]

[CAN:DistrictCourtDistrict.DisC ourts#01]

Record number: [CSM:CsPlaintNo]

Between

[CNT:Name] Claimant

[CAN:Name.Defendant#@&] Respondent

#### NOTICE OF MOTION

Civil Liability and Courts Act 2004

TAKE NOTICE that the above-named claimant will apply to the District Court sitting at [CAN:ConditionAdd.DisCourts#01] on the day of 2014 at a.m./p.m., for the following relief pursuant to the Civil Liability and Courts Act 2004 (hereinafter the "Act") or otherwise in personal injuries proceedings:

[SYS:dpopup('DCtMotion')]

The grounds for the application are as follows: {set out in summary the grounds of the application, e.g. the respondent has requested the claimant to provide information required to comply with section 10 of the Act on 2014 and the claimant has failed to provide it}.

Particular legal provisions relied on in the application {identify any particular legal provisions relied on in the application, e.g. the respondent relies on section 10 of the Act}.

The application is supported by the affidavit of [CAN:Name.Deponent#01] sworn on Signed

[SYS:CON:Name] Solicitor for the claimant [DIA:Address]

To: District Court Clerk at [CAN:Name.DisCourts#01]

[CAN:Address.DisCourts#01]

And: [CAN:Name.Solicitors#01] Solicitor for the respondent

of

[CAN:Address.Solicitors#01]

This notice of motion has been filed with the District Court Clerk at

[CAN:LinearAddress.DisCourts#01] and issued on the day of April 2014

# AN CHÚIRT DÚICHE THE DISTRICT COURT

Record No. [CSM:CsPlaintNo]

[CNT:Name]	Claimant
and	
[CAN:Name.Defendant#@&]	Respondent
NOTICE OF MOTION	

[SYS:CON:Name] Solicitors for the Claimant [DIA:Address]

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

[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 District Court [CAN:DistrictCourtArea.DisCourts#01] [CAN:DistrictCourtDistrict.DisCourts#01] Record No. [CSM:CsPlaintNo] Dear Sirs, We refer to recent correspondence herein. We now enclose the Plaintiff's Notice as to Terms pursuant to Civil Liability And Courts Act 2004, s. 17. If these terms are not acceptable to your client, please let us have the Defendant's notice within the next fourteen days. Yours faithfully, [SYS:CON:Name] [MAT:FeEmail]

Encl.

### AN CHÚIRT DÚICHE



#### THE DISTRICT COURT

[CAN:DistrictCourtArea.DisCourts#01]

[CAN:DistrictCourtDistrict.DisC ourts#01]

Record number: [CSM:CsPlaintNo]

Between

[CNT:Name] Claimant

[CAN:Name.Defendant#@&] Respondent

#### NOTICE AS TO TERMS

Civil Liability and Courts Act 2004, section 17

TAKE NOTICE that for the purposes of section 17 of the Civil Liability and Courts Act 2004 the claimant is willing to settle the above-entitled civil proceedings on the following terms: TERMS OTHER THAN THOSE AS TO COSTS:

TERMS AS TO COSTS:

Signed \_\_\_\_\_

[SYS:CON:Name]

Solicitor for the Plaintiff

[DIA:Address]

Date: [DATE:Today]

To: [CAN:Name.Solicitors#01]

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

And to: District Court Clerk at [CAN:Name.DisCourts#01] [CAN:Address.DisCourts#01]

# AN CHÚIRT DÚICHE THE DISTRICT COURT

Record No. [CSM:CsPlaintNo]

[CNT:Name]	Claimant
and	
[CAN:Name.Defendant#@&]	Respondent
NOTICE AS TO TERMS	

[SYS:CON:Name] Solicitors for the Claimant [DIA:Address]

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

[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] **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]

[Ca	V:SolRef.Solicitors#01]
[D.	TE:Today]
[CAN:Name.S [CAN:Address	
The Di [CAN:	ume] -v- [CAN:Name.Defendant#@&] rict Court [CAN:DistrictCourtArea.DisCourts#01] strictCourtDistrict.DisCourts#01] lo. [CSM:CsPlaintNo]
Dear,	
We refer to rec	nt correspondence herein.
We confirm [UDF:SettleM	the settlement meeting arranged for [UDF:SettleMeetingDate] next at tingTime] a.m./p.m. at the Law Library.
Yours faithful	
[SYS:CON:Na [MAT:FeEma	e]

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

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

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

RE: [MAT:Description]

The District Court [CAN:DistrictCourtArea.DisCourts#01] [CAN:DistrictCourtDistrict.DisCourts#01] Record No. [CSM:CsPlaintNo]

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.

[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		
В.	Pleadings		
D.	Medical Reports		
	<ol> <li>Report of dated</li> <li>Report of dated</li> </ol>		
E.	Miscellaneous		
	<ol> <li>Injuries Board Authorisation dated</li> <li>Locus Photographs</li> <li>List of Expenses and vouchers</li> <li>Company Registration Office Printout</li> </ol>		
F.	Correspondence		
Could Counsel please attend at settlement meeting.			
Dated	I this day of 2014.		

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

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 District 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]

[DATE:Today]

[DATE:Today] **REGISTERED POST** [CAN:Name.Solicitors#01] [CAN:Address.Solicitors#01] RE: [CNT:Name] -v- [CAN:Name.Defendant#@&] The District Court [CAN:DistrictCourtArea.DisCourts#01] [CAN:DistrictCourtDistrict.DisCourts#01] Record No. [CSM:CsPlaintNo] 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 District Court. Accordingly we enclose the following: We will await hearing from you. Yours faithfully, [SYS:CON:Name] [MAT:FeEmail] Encl.

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

[CAN:SolRef.Solicitors#01]

[DATE:Today]

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

RE: [MAT:Description]

The District Court [CAN:DistrictCourtArea.DisCourts#01] [CAN:DistrictCourtDistrict.DisCourts#01] Record No. [CSM:CsPlaintNo]

\_\_\_\_\_

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]

[CNT:Name]
------------

—v—

[CAN:Name.Defendant#@&]

# **BRIEF FOR COUNSEL**

[CAN:Name.Barristers#??] B.L.

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

Couns	el is s	ent herewith as	follows:-		
Α.	Corre	espondence with	n Counsel		
В.	Plead	lings			
G.	Medi	cal Reports			
	4. 5.	Report of			
H.	Misco	ellaneous			
		Injuries Board Au Locus Photograph List of Expenses a Company Registra	s and vouchers		
I.	Corre	espondence			
Dated	this	day of	2014.		
Signed	l <b>:</b>	[MAT:FeName] [SYS:CON:Nan			

# AN CHÚIRT DÚICHE



#### THE DISTRICT COURT

[CAN:DistrictCourtArea.DisCourts#01]

[CAN:DistrictCourtDistrict.DisC ourts#01]

Record number: [CSM:CsPlaintNo]

Between

[CNT:Name]

[CAN:Name.Defendant#@&]

Claimant

Respondent

#### WITNESS SUMMONS

YOU ARE HEREBY REQUIRED to attend and give evidence in these proceedings at the sitting of the District Court for the hearing of civil proceedings to be held at [CAN:ConditionAdd.DisCourts#01] on the [CAN:HearingDate18.Defendant#01] at [CAN:HearingTime.Defendant#01] am. and so from day to day until these proceedings are disposed of, and there to produce (*specify the documents to be produced, if any*)

on behalf of the Claimant

Dated this day of April 2014

Signed \_\_\_\_\_\_ Judge of the District Court/

Judge of the District Court/ District Court Clerk

To [CAN:Name.Witnesses#??]

of [CAN:Address.Witnesses#??]

# AN CHÚIRT DÚICHE THE DISTRICT COURT

Record No. [CSM:CsPlaintNo]

[CNT:Name]	
	Claimant
and	
[CAN:Name.Defendant#@&]	Respondent
	Respondent
WITNESS SUMMONS	

[SYS:CON:Name] Solicitors for the Claimant [DIA:Address]

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

[DATE:Today]

#### **REGISTERED POST**

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

RE: [CNT:Name] -v- [CAN:Name.Defendant#@&]

The District Court [CAN:DistrictCourtArea.DisCourts#01]

[CAN:DistrictCourtDistrict.DisCourts#01]

Record No. [CSM:CsPlaintNo]

\_\_\_\_

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]

[DATE:Today]

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

RE: [CNT:Name] -v- [CAN:Name.Defendant#@&]

The District Court [CAN:DistrictCourtArea.DisCourts#01]

[CAN:DistrictCourtDistrict.DisCourts#01]

Record No. [CSM:CsPlaintNo]

\_\_\_\_

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]

[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 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]

Re:- [MA]	Γ:Description]	1	
Dear [MAT:I	FeName],		
I confirm the	full and final s	settlement of this matter in the amount of €[UDF:u.settle.amount	t] <b>.</b>
•	•	verbal instructions authorising you to deduct the sum of € t of my case leaving a balance of € due to me.	from my
•	-	made payable A/C Payee only I hereby instruct and authorise you to deduct your said fees.	ou to endors
This letter ma	ay be furnished	I to the Bank as evidence of my instructions.	
Dated the	day of	2014.	
Signed:	[CNT:Name	 ]	

[SYS:CON:Name] Solicitors

[DIA:Address]

#### **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 District Court Record No. [CSM:CsPlaintNo], to include:-  Taking initial instructions from client.	
Fee for work done	€
V.A.T. @ 23%	€
Total:	€

Dated this day of April 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]

[DATE:Today]

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

RE: [MAT:Description]

The District Court [CAN:DistrictCourtArea.DisCourts#01] [CAN:DistrictCourtDistrict.DisCourts#01] Record No. [CSM:CsPlaintNo]

\_\_\_\_\_

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 District Court [CAN:DistrictCourtArea.DisCourts#01] [CAN:DistrictCourtDistrict.DisCourts#01] Record No. [CSM:CsPlaintNo] 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, [SYS:CON:Name]

[MAT:FeEmail]

#### **FEE NOTE**

**Invoice No:** 

[CNT:Name]

-to-

## [SYS:CON:Name]

PROFESSIONAL FEES for work done in relation to [CNT:Name] the case of [CAN:Name.Defendant#@&], The District Court Record No. [CSM:CsPlaintNo], 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**

€

 $\begin{array}{c} \in \\ \in \\ \in \\ \in \\ \in \\ \in \end{array}$ 

TOTAL: €

# Dated this day of April 2014.

Signed\_\_\_\_\_

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

THIS IS NOT A VAT INVOICE

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

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

[CAN:Address.Solicitors#01]

[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 District Court [CAN:DistrictCourtArea.DisCourts#01] [CAN:DistrictCourtDistrict.DisCourts#01] Record No. [CSM:CsPlaintNo] 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 District 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]

Encl.

[MAT:FeEmail]

[MAT:Code]/[MAT:FeCode]/[UDF:SecRef]
[DATE:Today]
[CAN:Name.Barristers#??] [CAN:Address.Barristers#??]
RE: [MAT:Description] The District Court [CAN:DistrictCourtArea.DisCourts#01] [CAN:DistrictCourtDistrict.DisCourts#01] Record No. [CSM:CsPlaintNo]
Dear [CAN:Salutation.Barristers#??],
I write in connection with the above.
I am pleased to enclose herewith cheque in the sum of $\in$ , 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,

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

[MAT:FeEmail]