



High Court Litigation Workflow

HIGH COURT LITIGATION WORKFLOW

Action	Action Description	Documents	Next
HCL01	Brief Counsel to settle High Court Proceedings	HCL01A – Letter to Counsel encl Initial Brief HCL01B – Brief to Counsel to settle Proceedings	HCL02 – 1 Months
HCL02	Check whether draft Proceedings received		HCL02 – 14 Days HCL03 – 1 Days
HCL03	Prepare documents to issue Proceedings	HCL03A – Personal Injuries Summons HCL03B – Affidavit of Verification HCL03C – Letter to Client encl draft Proceedings	HCL05 – 7 Days
HCL05	Affidavit of Verification sworn – issue Proceedings	HCL05A – Memo to Clerk to issue Proceedings	HCL06 – 5 Days
HCL06	Serve Proceedings on Defendant	HCL06A – Letter to Defendant serving Proceedings HCL06B – Letter to Defendant's Solicitors encl Proceedings	HCL07 – 1 Months
HCL07	Check whether Appearance entered	HCL07A – Letter to Solicitor Consent to Appearance Late Entry	DMH01 – 1 Days HCL07 – 21 Days HCL08 – 14 Days
HCL08	Draft Replies to Particulars	HCL08A – Letter to Client to complete Particulars	HCL10 – 7 Days
HCL10	Send Replies and Verifying Affidavit to Client	HCL10A – Replies to Notice for Particulars HCL10C – Verifying Affidavit for Replies to Particulars HCL10D – Letter to Client encl Replies and Verifying Affidavit	HCL11 – 7 Days
HCL11	Send Replies to Particulars to Defendant's Solicitors	HCL10A – Replies to Notice for Particulars HCL10B – Letter to Solicitor encl Replies to Particulars	HCL12 – 30 Days
HCL12	Check whether Defence filed	HCL12A – Letter to Solicitor Consent to Defence Late Filing	DMH01 – 1 Days HCL12 – 21 Days HCL15 – 7 Days
HCL15	Instruct Counsel to draft Discovery request		HCL16 – 1 Months
HCL16	Request Voluntary Discovery	HCL16A – Letter to Solicitors requesting Voluntary Discovery	HCL17 – 21 Days
HCL17	If no Voluntary Discovery issue Motion for Discovery	HCL17A – Motion and Affidavit for Discovery Order HCL17B – Memo to stamp and issue Motion	HCL18 – 5 Days
HCL18	Serve Notice of Motion for Discovery on Defendant	HCL18A – Letter to Solicitors encl Motion for Discovery	HCL19 – 21 Days
HCL19	Check whether Discovery complied with		HCL19 – 21 Days
HCL20	Tender Offer received – take Client's Instructions	HCL20A – Letter to Client on Tender Offer HCL20B – Letter to Counsel encl Brief on Tender Offer HCL20C – Brief to Counsel on Tender Offer	HCL21 – 5 Days HCL22 – 5 Days
HCL21	Settlement Meeting	HCL21A – Letter to Client re Settlement Meeting HCL21B – Letter to Solicitors confirming Settlement Meeting	HCL22 – 5 Days HCL32 – 1 Days

		HCL21C – Letter to Counsel encl Brief for Settlement Meeting HCL21D – Brief to Counsel for Settlement Meeting	
HCL22	Send Warning Letter to Defendant's Solicitors	HCL22A – Letter to Solicitors 14 day Warning	HCL23 – 15 Days
HCL23	Serve Notice of Trial	HCL23A – Notice of Trial HCL23B – Notice to Produce HCL23C – Memo to stamp and file Notice of Trial HCL23D – Letter to Solicitor encl Notices of Trial and to Produce	HCL24 – 7 Days
HCL24	Set Case Down for Hearing	HCL24A – Setting Down Docket	HCL13 – 3 Days
HCL13	Brief Senior Counsel to advise on Proofs	HCL13A – Letter to Senior Counsel for Advice on Proofs	HCL14 – 1 Months
HCL14	Check whether Advice on Proofs received		HCL14 – 14 Days HCL25 – 5 Days
HCL25	Prepare and Serve Schedule of Witnesses and Reports		HCL26 – 7 Days
HCL26	Check whether Defendant's Schedule of Witnesses received		HCL37 – 7 Days
HCL27	Apply for Hearing Date		HCL28 – 1 Months
HCL28	Preparation for Trial	HCL28A – Letter to Client with Trial Date HCL28B – Letters to Junior and Senior Counsel with Trial Date HCL28C – Brief to Junior and Senior Counsel for Hearing HCL28D – Letter to Solicitor with Trial Date HCL28E – Witness Summons HCL28F – Standby Letter to Experts	HCL29 – 5 Days
HCL29	Serve Witness Summons	HCL29A – Letter to Witness encl Witness Summons	HCL30 – 1 Weeks
HCL30	Prepare Trial Booklets		
HCL31	Trial Hearing		HCL32 – 1 Days
HCL32	Case settled or determined	HCL32A – Letter to Client following Settlement HCL32B – Client Authority to accept Settlement HCL32C – Letter to Counsel on Settlement HCL32D – Letter to Solicitor confirming Settlement HCL32E – Letter to Solicitor with Fee Note HCL32F – Party and Party Costs Fee Note HCL32G – Solicitor and Client Costs Invoice HCL32H – Letter to Counsel for note of Fees	HCL33 – 1 Months
HCL33	Check whether Settlement monies received	HCL33A – Letter to Client encl Settlement Cheque	HCL33 – 14 Days HCL34 – 30 Days
HCL34	Check whether Costs paid	HCL34A – Letter to Counsel paying Fees	HCL34 – 30 Days HCL35 – 30 Days
HCL35	Close file		

Index to Documents

HCL01A - Letter to Counsel encl Initial Brief	1
HCL01B - Brief to Counsel to settle Proceedings	2
HCL03A - Personal Injuries Summons	5
HCL03B - Affidavit of Verification	10
HCL03C - Letter to Client encl draft Proceedings	13
HCL05A - Memo to Clerk to issue Proceedings	14
HCL06A - Letter to Defendant serving Proceedings	15
HCL06B - Letter to Defendant's Solicitors encl Proceedings	16
HCL07A - Letter to Solicitor Consent to Appearance Late Entry	17
HCL08A - Letter to Client to complete Particulars	19
HCL10A - Replies to Notice for Particulars	20
HCL10C - Verifying Affidavit for Replies to Particulars	22
HCL10D - Letter to Client encl Replies and Verifying Affidavit	25
HCL10A - Replies to Notice for Particulars	26
HCL10B - Letter to Solicitor encl Replies to Particulars	28
HCL12A - Letter to Solicitor Consent to Defence Late Filing	29
HCL16A - Letter to Solicitors requesting Voluntary Discovery	31
HCL17A - Motion and Affidavit for Discovery Order	32
HCL17B - Memo to stamp and issue Motion	38
HCL18A - Letter to Solicitors encl Motion for Discovery	39
HCL20A - Letter to Client on Tender Offer	40
HCL20B - Letter to Counsel encl Brief on Tender Offer	42
HCL20C - Brief to Counsel on Tender Offer	43
HCL21A - Letter to Client re Settlement Meeting	46
HCL21B - Letter to Solicitors confirming Settlement Meeting	47
HCL21C - Letter to Counsel encl Brief for Settlement Meeting	48
HCL21D - Brief to Counsel for Settlement Meeting	49
HCL22A - Letter to Solicitors 14 day Warning	52

HCL23A - Notice of Trial	53
HCL23B - Notice to Produce	54
HCL23C - Memo to stamp and file Notice of Trial	55
HCL23D - Letter to Solicitor encl Notices of Trial and to Produce	56
HCL24A - Setting Down Docket	57
HCL13A - Letter to Senior Counsel for Advice on Proofs	59
HCL28A - Letter to Client with Trial Date	60
HCL28B - Letters to Junior and Senior Counsel with Trial Date	61
HCL28C - Brief to Junior and Senior Counsel for Hearing	62
HCL28D - Letter to Solicitor with Trial Date	64
HCL28E - Witness Summons	65
HCL28F - Standby Letter to Experts	67
HCL29A - Letter to Witness encl Witness Summons	68
HCL32A - Letter to Client following Settlement	69
HCL32B - Client Authority to accept Settlement	70
HCL32C - Letter to Counsel on Settlement	71
HCL32D - Letter to Solicitor confirming Settlement	72
HCL32E - Letter to Solicitor with Fee Note	73
HCL32F - Party and Party Costs Fee Note	74
HCL32G - Solicitor and Client Costs Invoice	76
HCL32H - Letter to Counsel for note of Fees	77
HCL33A - Letter to Client encl Settlement Cheque	78
HCL34A - Letter to Counsel paying Fees	79

[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 2013.

Signed:

[MAT:FeName]

[SYS:CON:Name]

THE HIGH COURT

RECORD NO.

BETWEEN:

[CNT:Name]

PLAINTIFF

-and-

[CAN:Name.Defendant#@&]

DEFENDANT

PERSONAL INJURIES SUMMONS

To the Defendant: [CAN:Name.Defendant#@&] of [CAN:AddressSingle.Defendant#@&]

This Personal Injuries Summons is to require that within eight days after the service thereof upon you (exclusive of the day of such service) you in person, or by Solicitor, do enter an Appearance in the Central Office, Four Courts, Dublin 7, in the above action; **AND TAKE NOTICE** that in default of your so doing, the Plaintiff may proceed therein and Judgement may be given in your absence.

BY ORDER – THE HONOURABLE

CHIEF JUSTICE OF IRELAND the day of Two thousand and
thirteen

N.B. This Summons is to be served within TWELVE Calendar Months from the date hereof or, if renewed, within SIX Calendar Months from the date of the last renewal, including the day of such date, and not afterwards.

The Defendant may appear hereto by entering an Appearance either personally, or by Solicitor, at the Central Office, Four Courts, Dublin 7.

INDORSEMENT OF CLAIM

1. The above proceedings have been authorised for release pursuant to Authorisation No. _____ on the _____ day of _____ 2013.
2. The Plaintiff resides at [CNT:LinearAddress].
3. The Defendant resides at [CAN:AddressSingle.Defendant#@&].
4. On or about the _____ day of _____ 2013, the Plaintiff

PARTICULARS OF WRONG:

PARTICULARS OF NEGLIGENCE:

PARTICULARS OF PERSONAL INJURIES:

PARTICULARS OF SPECIAL DAMAGE:

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

The personal details of the Plaintiff are as follows:-

1. The address at which the Plaintiff ordinarily resides is:-
[CNT:Address]

2. The Plaintiff is a [CNT:Occupation] by occupation.
3. The Plaintiff's date of birth is the day of
4. The Plaintiff's PPS Number is

AND THE PLAINTIFF CLAIMS:

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

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

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

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:Address].

INDORSEMENT OF SERVICE

This Summons was served by me at
on the Defendant on day the day of 2013.

Indorsed the day of 2013.

Signed: _____

Address:

THE HIGH COURT

RECORD NO.

BETWEEN:

[CNT:Name]

PLAINTIFF

-and-

[CAN:Name.Defendant#@&]

DEFENDANT

PERSONAL INJURIES SUMMONS

[SYS:CON:Name]

Solicitors

[DIA:Address]

THE HIGH COURT

RECORD NO. [CAN:RecordNo.Defendant#01]

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 herein.
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
2013 at [DIA:Address], before me a Commissioner for
Oaths / Practising Solicitor. And I know the Deponent

Commissioner for Oaths/Practising
Solicitor

THE HIGH COURT

BETWEEN:

RECORD NO.

[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 High 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 High 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 High 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
Central Office
Four Courts
Dublin 7

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

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.

THE HIGH 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 2013 as follows:-

Dated this day of 2013.

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

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

THE HIGH 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]**

THE HIGH COURT

RECORD NO. [CAN:RecordNo.Defendant#01]

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 my Replies dated the day of 2013 to the Defendant's Notice for Particulars herein.
2. The assertions, allegations and information contained in the said Replies to Notice for Particulars which are within my knowledge are true. I honestly believe that the assertions, allegations and information contained in the said Replies to Notice for Particulars 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
2013 at [DIA:Address], before me a Commissioner for
Oaths / Practising Solicitor. And I know the Deponent

Commissioner for Oaths/Practising
Solicitor

THE HIGH COURT

BETWEEN:

RECORD NO.

[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 our recent discussion of the Defendant's Notice for Particulars. I now enclose the Replies which I have drawn up on the basis of your instructions, together with an Affidavit to verify the replies. When you complete it, you will swear to your belief in the truth of your replies.

If you find these replies in order, please telephone for an appointment to attend at the office to complete the Affidavit, so that I can send the replies to the Defendant's solicitors.

Kind regards,

Yours sincerely,

[MAT:FeName]

[SYS:CON:Name]

[MAT:FeEmail]

Encl.

THE HIGH 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 2013 as follows:-

Dated this day of 2013.

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

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

THE HIGH 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 High 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.

[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 High 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 Registrar
Central Office
Four Courts
Dublin 7

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

THE HIGH 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 2013 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 The Masters Court, 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 2013.

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 CHIEF REGISTRAR
The High Court
Central Office
Four Courts
Dublin 7

THE HIGH 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]12

THE HIGH 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:Address], 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:Address], this day of 2013 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:Address], this day of 2013.

THE HIGH 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]12

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 High 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 High 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 2013.

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 the [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 High Court Record No. [CAN:RecordNo.Defendant#01]

Dear Sirs,

We refer to recent correspondence herein.

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

Yours faithfully,

[SYS:CON:Name]

[MAT:FeEmail]

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

[DATE:Today]

[CAN:Name.Barristers#??]

[CAN:Address.Barristers#??]

RE: **[MAT:Description]**

The High 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 the [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

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 2013.

Signed: _____
[MAT:FeName]

[SYS:CON:Name]

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

Dear Sirs,

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.

THE HIGH COURT

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

BETWEEN:

[CNT:Name]

PLAINTIFF

-and-

[CAN:Name.Defendant#@&]

DEFENDANT

NOTICE OF TRIAL

TAKE NOTICE of the trial of this Action by a Judge sitting without a Jury in the County of the City of Dublin for the day of 2013.

Dated this day of 2013.

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 CHIEF REGISTRAR
High Court
Central Office
Four Courts
Dublin 7

THE HIGH COURT

Record No. [CAN:RecordNo.Defendant#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 2013.

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 CHIEF REGISTRAR
High Court
Central Office
Four Courts
Dublin 7

MEMO TO

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

,

I attach hereto:-

1. Notice of Trial (x3);
2. Cheque for € in respect of stamp duty.

Please stamp and file same in the Central Office at your next opportunity.

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 High Court Record No. [UDF:RecordNo]

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.

THE HIGH COURT

RECORD NO. [CAN:RecordNo.Defendant#01]

SETTING DOWN FOR TRIAL

BETWEEN:

[CNT:Name]

Plaintiff

-and-

[CAN:Name.Defendant#@&]

Defendant

SIR,

I request you will enter this Action for Trial on the day of 2013 in the County of
the City of Dublin before a Judge sitting without a Jury.

[SYS:CON:Name]

Solicitors for the Plaintiff

[DIA:Address].

To: **THE CHIEF REGISTRAR**
High Court
Central Office
Four Courts
Dublin 7

SETTING DOWN FOR TRIAL

THE HIGH COURT

For Trial on the day of 2013.

**Before a Judge sitting without a Jury in the
County of the City of Dublin**

THE HIGH COURT

RECORD NO. [CAN:RecordNo.Defendant#01]

BETWEEN:

[CNT:Name]
Plaintiff

-and-

[CAN:Name.Defendant#@&]
Defendant

Number, Letter and Year of Action [CAN:RecordNo.Defendant#01]
Date when Notice of Trial was served: day of 2013.

Cause of Action: Personal Injuries

Plaintiff's Solicitor:
[SYS:CON:Name]
[DIA:Address]

Telephone: 4561155/4561163
Reference: [MAT:Code]/[MAT:FeCode]/[UDF:SecRef]

Defendant's Solicitor:

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

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

[DATE:Today]

[CAN:Name.Barristers#??]

[CAN:Address.Barristers#??]

RE: **[MAT:Description]**

The High 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 before the High Court on [CAN:HearingDate18.Defendant#01] 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]

[CAN:Name.Barristers#??]

[CAN:Address.Barristers#??]

RE: **[MAT:Description]**

The High 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 the [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#??] **BL/SC**

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 2013.

Signed: _____
[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 High Court Record No. [CAN:RecordNo.Defendant#01]

Dear Sirs,

We refer to the above matter.

This matter has now been listed for hearing on [CAN:HearingDate18.Defendant#01] next in the High 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.

PRAECIPE FOR SUBPOENA

THE HIGH COURT

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

BETWEEN:

[CNT:Name]

PLAINTIFF

-and-

[CAN:Name.Defendant#@&]

DEFENDANT

Seal a Subpoena Ad Testificandum directed to:-

[CAN:Name.Witnesses#??]

[CAN:Address.Witnesses#??]

for day, the day of 2013 at 11.00 a.m.

Dated the day of 2013.

SIGNED:_____

[SYS:CON:Name]

Solicitors for the Plaintiff

[DIA:Address]

SUBPOENA AD TESTIFICANDUM

THE HIGH COURT

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

BETWEEN:
[CNT:Name]

PLAINTIFF

-and-

[CAN:Name.Defendant#@&]

DEFENDANT

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

GREETING, YOU ARE HEREBY COMMANDED to attend before a Judge and Jury of the High Court at the Four Courts, Dublin on day the day of 2013 at the hour of 11.00 o'clock in the forenoon, and so from day to day until the above case is tried, to give evidence on behalf of the Plaintiff.

BY ORDER - The Honourable , Chief Justice of Ireland, the day of , in the year of our Lord Two thousand and .

Issued by: [SYS:CON:Name],
Solicitors for the Plaintiff
[DIA:Address]

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

Telephone: [DIA:Telephone]

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

[DATE:Today]

[CAN:Name.Doctors#??]

[CAN:Address.Doctors#??]

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

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

[DATE:Today]

REGISTERED POST

[CAN:Name.Witnesses#??]

[CAN:Address.Witnesses#??]

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

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

We refer to the above matter. We enclose herewith Court signed and stamped Subpoena Ad Testificandum for the hearing of the above matter on [CAN:HearingDate18.Defendant#01] next.

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 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 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 2013.

Signed: _____
 [CNT:Name]

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

[DATE:Today]

[CAN:Name.Barristers#??]

[CAN:Address.Barristers#??]

RE: **[MAT:Description]**

The High 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 High 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 High 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]

[CAN:SolRef.Solicitors#01]

[DATE:Today]

[CAN:Name.Solicitors#01]

[CAN:Address.Solicitors#01]

RE: [CNT:Name] –v- [CAN:Name.Defendant#@&]
The High 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,

[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 High 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

€

€

€

€

€

€

€

€

€

TOTAL: €

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

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

75

INVOICE

Invoice No:

[CNT:Name]

-to-

[SYS:CON:Name]

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

1. Taking initial instructions from client on

Fee for work done €

V.A.T. @ 23% €

TOTAL: €

Dated this day of 2013.

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

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

I write in connection with the settlement of the above case.

I am now preparing my fee note in the matter. For this purpose, I would be obliged if you would let me have a note of your fees for inclusion therein at your early convenience.

Kind regards,

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

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.