

Task/ Tribunal Direction* <i>(*Directions and deadlines are subject to change)</i>	Estimate** <i>(plus VAT in addition to figure stated)</i>
Fees to date: £113,500 plus VAT Fees incurred for defence, preliminary stages (including ongoing DL's particularisation of the claim and reviewing and responding to the same) preparation for and attendance at three preliminary hearings, significant and detailed advice on: settlement, strategy and merits (including preliminary meetings with witnesses). Advising on internal proceedings and attendance at advisory and Council meetings.	
Settlement:	
Continued advice and communication with the other side (based on difficulty of interactions to date)	£5,000 - £10,000
Prepare and amend documents for settlement, if agreed in principle	£5,000
Preliminary hearing 9 August 2022:	
Preparation for PH (including response to C's additional particulars)	£5,000
Counsel's fee for preparation and attendance (Nigel Porter 11KBW instructed)	Approx. £15,000
M&R attendance at PH	£1,785
Redrafting Pleadings following PH (Including second claim) Counsel assistance will also be required.	£10,000
Disclosure and documents: (depending on scope and scale of documents)	
Disclosure and compiling list of documents (date TBC *)	£10,700 - £18,700
Review DL's list of documents and request copies (date TBC *)	£2,000 - £3,000
Supply requested copies of our documents to DL (date TBC *)	£2,000 - £3,000
Bundle (date TBC*)	£3,000 - £6,000
Witness Statements:	
Further witness meetings x8 (excluding travel time)	£10,000
8 Witness Statements (date TBC*)	£26,000
Exchange of statements and review of DL's witness evidence	£4,000
Final Hearing Preparation:	

Provision of documents to ET, preparation of chronology, briefing witnesses, timetable and attendance arrangements	£5,000
Pre-hearing conference with witnesses	£8,000
Final Hearing (date to be listed, based on a 5-week estimate):	
Daily attendance of a member of M&R (depending on seniority of lawyer in attendance)	£34,000- £51,000
Counsel fees: £150,000 on the brief and £3,500 daily refreshers (i.e £66,000 for 19 days)	£216,000

TOTAL: £362,485 - £397,485 plus VAT (excluding fees to date and any other disbursements e.g. travel, accommodation, printing)**

*Direction dates to be determined following August Preliminary Hearing

**Based on 2021/2022 rates, subject to increase