

**IN THE HIGH COURT OF JUSTICE  
QUEEN'S BENCH DIVISION**

**Claim No. HQ05X02706**

**BETWEEN:**

**POST OFFICE LIMITED**

**Claimant/Part 20  
Defendant**

**- and -**

**LEE CASTLETON**

**Defendant/Part 20  
Claimant**

**ESTIMATE OF CLAIMANT/PART 20 DEFENDANT'S COSTS  
DATED 20 NOVEMBER 2006**

**Fee Earners**

Tom Beezer, Partner, Grade A (over 8 years post qualification experience)	£165 per hour until 31 October 2006, thereafter £238.50 per hour
Julian Summerhayes, Associate Grade B (over 4 years post qualification experience)	£150 per hour
Stephen Dilley, Solicitor Grade B (over 4 years post qualification experience)	£110 per hour per hour until 31 October 2006, thereafter £175.50 per hour
Denise Gammack Grade C (under 4 years post qualification experience)	£110 per hour
Laura Peto, Paralegal Grade D	£85 per hour
Trainee Solicitor Grade D	£50 per hour until 31 October 2006, thereafter £90 per hour

**PART A: CLAIMANT/PART 20 DEFENDANT'S BASE COSTS ALREADY  
INCURRED UNTIL 31 OCTOBER 2006**

Telephone conversations and correspondence with Client

Tom Beezer, Partner	3 hours at £165	£495
Julian Summerhayes, Associate	0.7 hours at £150	£105
Stephen Dilley, Solicitor	38.8 hours at £110	£4,268
Denise Gammack, Solicitor	3.8 hours at £110	£418
Laura Peto, Paralegal	2.1 hours at £85	£178.50
Trainee Solicitor	1.3 hours at £50	£65

Telephone conversations and correspondence with Defendant/Part 20 Claimant's  
solicitors

Tom Beezer, Partner	1.0 hours at £165	£165
Stephen Dilley, Solicitor	36.1 hours at £110	£3,971
Denise Gammack, Solicitor	2.5 hours at £110	£275
Laura Peto, Paralegal	2.1 hours at £85	£178.50

Trainee Solicitor	0.3 hours at £50	£15
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Telephone conversations and correspondence with Court

Stephen Dilley, Solicitor	2.4 hours at £110	£264
Denise Gammack, Solicitor	0.7 hours at £110	£77
Trainee Solicitor	0.2 hours at £50	£10

Telephone conversations and correspondence with Counsel

Tom Beezer, Partner	1.2 hours at £165	£198
Stephen Dilley, Solicitor	22.1 hours at £110	£2,431
Denise Gammack, Solicitor	0.1 hours at £110	£11

Telephone conversations and correspondence with others

Tom Beezer, Partner	0.4 hours at £165	£66
Stephen Dilley, Solicitor	6.8 hours at £110	£748
Laura Peto, Paralegal	0.2 hours at £85	£17

Reviewing, perusing and/or collating documents

Tom Beezer, Partner	0.6 hours at £165	£99
Julian Summerhayes, Associate	0.3 hours at £150	£105
Stephen Dilley, Solicitor	16.5 hours at £110	£1,815
Denise Gammack, Solicitor	3.8 hours at £110	£418
Laura Peto, Paralegal	5.0 hours at £85	£425
Trainee Solicitor	14.7 hours at £50	£735

Discussion with colleagues

Tom Beezer, Partner	4.7 hours at £165	£775.50
Julian Summerhayes, Associate	1.0 hours at £150	£150
Stephen Dilley, Solicitor	11.6 hours at £110	£1,276
Denise Gammack, Solicitor	1.5 hours at £110	£165
Laura Peto, Paralegal	0.4 hours at £85	£34
Trainee Solicitor	2.5 hours at £50	£125

Preparing Claim Form and Particulars of Claim

Laura Peto, Paralegal	2 hours at £85	£170
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Reviewing Defence and Counterclaim

Denise Gammack, Solicitor	0.6 hours at £110	£66
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Preparing Allocation Questionnaire

Denise Gammack, Solicitor	0.6 hours at £110	£66
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Preparing Reply to Defence and Defence to Counterclaim

Julian Summerhayes, Associate	0.5 hours at £150	£75
Trainee Solicitor	1.0 hours at £50	£50

Preparing First Witness Statements of Catherine Oglesby, John Jones and Helen Rose

Julian Summerhayes, Associate	0.5 hours at £150	£75
Stephen Dilley, Solicitor	28.5 hours at £110	£3,135

Drafting Instructions to Counsel

Stephen Dilley, Solicitor	4.1 hours at £110	£451
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Drafting consent order for CMC hearing on 9 March 2006

Stephen Dilley, Solicitor	0.5 hours at £110	£55
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Drafting Directions

Stephen Dilley, Solicitor	0.3 hours at £110	£33
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Preparing CPR Part 18 Request

Julian Summerhayes, Associate	1.4 hours at £150	£210
Stephen Dilley, Solicitor	1.0 hours at £110	£110

Reviewing CPR Part 18 Replies

Stephen Dilley, Solicitor	1.6 hours at £110	£176
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Disclosure

Tom Beezer, Partner	0.7 hours at £165	£115.50
Stephen Dilley, Solicitor	12.8 hours at £110	£1,408
Trainee	24.9 hours at £50	£1,245

Inspection of Defendant's Documents

Tom Beezer, Partner	0.2 hours at £165	£33
Stephen Dilley, Solicitor	1.6 hours at £110	£176
Trainee	5.3 hours at £50	£265

Drafting and amending consent order of 25 August 2006

Tom Beezer, Partner	0.2 hours at £165	£33
Stephen Dilley, Solicitor	0.9 hours at £110	£99
Trainee	0.5 hours at £50	£25

Conferences with Counsel on 16 August, 11 September and 23 October 2006

Tom Beezer, Partner	10.8 hours at £165	£1,782
Stephen Dilley, Solicitor	20.8 hours at £110	£2,288
Trainee	11.6 hours at £50	£580

Meeting and interviewing witnesses and drafting 15 witness statements for trial

To include travel, interviews, drafting, correspondence and telephone conversations with witnesses to prepare their statements

Tom Beezer, Partner	10.1 hours at £165	£1,666.50
Stephen Dilley, Solicitor	143.8 hours at £110	£15,818
Trainee	31.6 hours at £50	£1,580

Liaising with and instructing Experts

Tom Beezer, Partner	1.2 hours at £165	£198
Stephen Dilley, Solicitor	11.5 hours at £110	£1,265
Trainee	5.4 hours at £50	£270

Reviewing Amended Particulars of Claim and Amended Reply to Defence and Defence to Counterclaim

Stephen Dilley, Solicitor	0.2 hours at £110	£22
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Preparing Application for second Case Management Conference on 23 October 2006 and draft Order

Tom Beezer, Partner	0.6 hours at £165	£99
Stephen Dilley, Solicitor	0.5 hours at £110	£55

Preparing Second witness statement of Stephen John Dilley

Stephen Dilley, Solicitor	3.8 hours at £110	£418
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Reviewing and commenting on Counsel's skeleton argument for the hearing on 23 October 2006

Tom Beezer, Partner	0.2 hours at £165	£33
Stephen Dilley, Solicitor	0.3 hours at £110	£33

Preparation of bundle for CMC hearing on 23 October 2006

Tom Beezer, Partner	2.2 hours at £165	£363
Stephen Dilley, Solicitor	3.8 hours at £110	£418

Travel to and from CMC hearing on 23 October 2006

Stephen Dilley, Solicitor	8.9 hours at £110	£979
Trainee	8.9 hours at £50	£445

Attending CMC hearing on 23 October 2006

Stephen Dilley, Solicitor	1 hour at £110	£110
Trainee	1 hour at £50	£50

Review of Defendant's First Witness Statement

Stephen Dilley, Solicitor	0.4 hours at £110	£44
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General preparation and Case Management

Tom Beezer, Partner	3.6 hours at £165	£594
Stephen Dilley, Solicitor	6 hours at £110	£660
Trainee	1.6 hours at £50	£80

Preparation of Trial Bundle

Stephen Dilley, Solicitor	1.3 hours at £110	£143
Trainee	1.8 hours at £50	£90

Preparation of First Statements of Costs

Stephen Dilley, Solicitor	4 hours at £110	£440
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Sub-total solicitors fees up to 31 October 2006	£58,675.50
VAT on Solicitors fees up to 31 October 2006	£10,268.21

Counsel's invoiced fees up to 31 October 2006	£23,925
VAT on Counsel's Fees	£4,186.88

Other Expenses incurred up to 31 October 2006

Court Fees	£150
Travel costs	£1,497.81
Photocopying charges	£1,447.67
Other expenses	£71.87
VAT on other expenses (where chargeable)	£528.04

<b>Part A: Total Claimant/Part 20 Defendant's costs to 31 October 2006</b>	<b>£100,750.98<sup>1</sup></b>
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**PART B: CLAIMANT/PART 20 DEFENDANT'S BASE COSTS ALREADY INCURRED FROM 1 TO 20 NOVEMBER 2006**Telephone conversations and correspondence with Client

Tom Beezer, Partner	1.8 hours at £238.50	£429.30
Stephen Dilley, Solicitor	8.4 hours at £175.50	£1474.20

Telephone conversations and correspondence with Defendant/Part 20 Claimant

Tom Beezer, Partner	0.9 hours at £238.50	£214.65
Stephen Dilley, Solicitor	8.1 hours at £175.50	£1421.55

Telephone conversations and correspondence with Counsel

Tom Beezer, Partner	0.2 hours at £238.50	£47.7
Stephen Dilley, Solicitor	8.4 hours at £175.50	£1474.20

Telephone conversation and correspondence with expert

Tom Beezer, Partner	0.4 hours at £238.50	£95.40
Stephen Dilley, Solicitor	2.4 hours at £175.50	£421.20

Telephone conversation and correspondence with others

Tom Beezer, Partner	0.3 hours at £238.50	£71.55
Stephen Dilley, Solicitor	2.2 hours at £175.50	£386.10

Discussion with colleagues

Tom Beezer, Partner	0.5 hours at £238.50	£119.25
Stephen Dilley, Solicitor	0.6 hours at £175.50	£105.30

Drafting second witness statement for one witness

Stephen Dilley, Solicitor	1.6 hours at £175.50	280.80
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Review of Amended Defence and Counterclaim

<sup>1</sup> This sum excludes the Claimant/Part 20 Defendant's costs of and occasioned by the Application dated 17 November 2005 up to 18 November 2005, excluded pursuant to the Order dated 8 February 2006

Stephen Dilley, Solicitor	0.2 hours at £175.50	£35.10
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Preparing supplemental disclosure list

Stephen Dilley, Solicitor	0.9 hours at £175.50	£157.95
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Trial Preparation (assuming 10 day hearing)

Tom Beezer, Partner	3.4 hours at £238.50	£810.90
Stephen Dilley, Solicitor	2.5 hours at £175.50	£438.75
Trainee	8.7 hours at £90	£783

Sub-total solicitors fees from 1 to 20 November 2006	£8,766.90
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VAT on Solicitors fees from 1 to 20 November 2006	£1,534.21
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Apportionment of Counsel's Brief Fee already deemed delivered	£25,000
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VAT on Counsel's Fee already deemed delivered	£4,375
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Expert's Fees	£17,937.05
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VAT on Expert's Fees	£3,138.98
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<b>Part B: Total Claimant/Part 20 Defendant's costs to from 1 to 20 November 2006</b>	<b>£60,752.14</b>
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**PART C: ESTIMATE OF CLAIMANT/PART 20 DEFENDANT'S BASE COSTS  
TO BE INCURRED FROM 21 NOVEMBER 2006 TO TRIAL**

Telephone conversations and correspondence with Client

Tom Beezer, Partner	5 hours at £238.50	£1192.50
Stephen Dilley, Solicitor	10 hours at £175.50	£1755
Trainee Solicitor	10 hours at £90	£900

Telephone conversations and correspondence with Defendant/Part 20 Claimant

Stephen Dilley, Solicitor	10 hours at £175.50	£1755
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Telephone conversations and correspondence with Court

Stephen Dilley, Solicitor	1 hours at £175.50	£1755
Trainee Solicitor	2 hours at £90	£180

Telephone conversations and correspondence with Counsel

Tom Beezer, Partner	1 hours at £238.50	£238.50
Stephen Dilley, Solicitor	5 hours at £175.50	£877.50

General Case Management/Routine Correspondence and Telephone Calls

Tom Beezer, Partner	2 hours at £238.50	£477
Stephen Dilley, Solicitor	10 hours at £175.50	£1755
Trainee	12 hours at £90	£1080

Continuing preparation of supplemental disclosure list



Stephen Dilley, Solicitor	2 hours at £175.50	£351
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Considering Defendant/Part 20 Claimant's Witness Statements (assuming 4 witnesses)

Tom Beezer, Partner	6 hours at £238.50	£1,431
Stephen Dilley, Solicitor	10 hours at £175.50	£2,106

Reviewing expert's report (assuming 1 Expert for Claimant)

Tom Beezer, Partner	1 hours at £238.50	£238.50
Stephen Dilley, Solicitor	5 hours at £175.50	£877.50
Trainee	1 hours at £90	£90

Attendance and Preparation for Pre Trial Review (including travel)

Stephen Dilley, Solicitor	11 hours at £175.50	£1,903.50
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Preparing Brief to Counsel

Stephen Dilley, Solicitor	2 hours at £175.50	£351
Trainee	6 hours at £90	£540

Further Trial Preparation (assuming 10 day hearing)

Tom Beezer, Partner	2 hours at £238.50	£477
Stephen Dilley, Solicitor	20 hours at £175.50	£3,510
Trainee	30 hours at £90	£2,700

Attendance at trial (assuming 10 day hearing)

Stephen Dilley, Solicitor	65 hours at £175.50	£11,407.50
Trainee	65 hours at £90	£5,850

Travel to and from trial (assuming 10 day hearing)

Stephen Dilley, Solicitor	18 hours at £175.50	£3,159
Trainee	18 hours at £90	£1,620

Trial work after each day's hearing<sup>2</sup>

Stephen Dilley, Solicitor	20 hours at £175.50	£3,510
Trainee	20 hours at £90	£1,800

Part C sub total estimated Solicitor's fees from 21 November 2006 to trial	£53,887.50
VAT on estimated Solicitor's fees from 21 November 2006 to trial	£9,430.31

Anticipated Expenses from 21 November 2006 to trial

Counsel's Fees

Balance of Brief Fee not yet deemed delivered	£20,000
Refreshers £2,500 per day (9 days)	£22,500
VAT on Counsel's Fees	£7,437.50

<sup>2</sup> This is during the evening and weekend during the trial when the Court is not sitting and does not relate to enforcement of any judgment or order post trial

Other Expenses

Photocopying, faxes couriers and general disbursements, say	£3,000
Accountancy Expert, say	£12,062.95
VAT on other Expenses	£2,636.02

**Part C: Total estimated costs from 21 November 2006 to trial** £132,854.28<sup>3</sup>

**GRAND TOTAL PARTS A, B AND C:** £294,357.40

The costs estimated above do not exceed the costs which the Claimant/Part 20 Defendant is liable to pay in respect of the work which this estimate covers.

Dated 20 November 2006

Signed

Tom Beezer  
Partner

**GRO**

Name of firm of solicitors – Bond Pearce LLP

Solicitors for the Claimant/Part 20 Defendant

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<sup>3</sup> This assumes that the trial will start on 4 December 2006. In the event of any adjournment, this is likely to significantly increase the overall costs.



**IN THE HIGH COURT OF JUSTICE  
QUEEN'S BENCH DIVISION  
BETWEEN:**

**Claim No. HQ05X02706**

**POST OFFICE LIMITED**

**Claimant/Part 20  
Defendant**

**- and -**

**LEE CASTLETON**

**Defendant/Part 20  
Claimant**

**ESTIMATE OF CLAIMANT/PART 20 DEFENDANT'S COSTS  
DATED 20 NOVEMBER 2006**

**BOND PEARCE LLP**

Ballard House  
West Hoe Road  
Plymouth PL1 3AE

GRO

DX 8251 Plymouth  
Ref: SJD3/348035.134

**Solicitors for the Claimant/Part 20  
Defendant**