

DEKA
CHAMBERS

Avoiding Common Litigation Pitfalls

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Witness Statements

Form of witness statement

CPR 32.8 A witness statement must comply with the requirements set out in Practice Direction 32

Part 22 requires a witness statement to be verified by a statement of truth

CPR PD57AC contains additional requirements for witness statements in the Business and Property Courts



Getting it Wrong?

CPR PD32 para.25

25.1 Where:

- (1) an affidavit,*
- (2) a witness statement, or*
- (3) an exhibit to either an affidavit or a witness statement,*

does not comply with Part 32 or this practice direction in relation to its form, the court may refuse to admit it as evidence and may refuse to allow the costs arising from its preparation.

25.2 Permission to file a defective affidavit or witness statement or to use a defective exhibit may be obtained from a judge in the court where the case is proceeding.



How Does That Work?

[Lifestyle Equities CV & Anor v Royal County of Berkshire Polo Club Ltd & Ors \[2022\] EWHC 1244 \(Ch\)](#)

[98]... in my view PD57AC should not be taken as a weapon with which to fillet from a witness statement either two or three words at various points or essentially insignificant failures to comply with PD57AC in a witness statement. Furthermore, in my view, before an application is brought seeking to strike out passages in a witness statement based on PD57AC, careful consideration should be given as to proportionality and whether such an application is really necessary. Indeed, in my view, an application is warranted only where there is a substantial breach of PD57A



How Does That Work?

But:

[Cumbria Zoo Company Ltd v The Zoo Investment Company Ltd \[2022\] EWHC 3379 \(Ch\)](#)

[53] The parties should be careful about the proportionality of taking objection to minor non compliance with PD57AC. However, this was not such a case. The non compliance in Ms Kemp's statement was substantial and flagrant.

[57] there was a significant prospect that the Defendant would have been refused permission to rely on the statement. It might in fact be the case that would have made no difference to the outcome of the case, but it is an indication of the risks that parties take if they do not comply with the Practice Direction.

How Does That Work?

Even if you can get away with amendments:

[McKinney Plant & Safety Ltd v Construction Industry Training Board \[2022\] EWHC 2361 \(Ch\)](#)

[26] In my view the seriousness of the breach and the Claimant's refusal to engage with it until I raised the point does take this case well outside the norm and does merit an award of indemnity costs.

In Practice?

There are a large number of less important requirements. Non-compliance with these should not be taken as a point unless in the context of other, more serious problems.

There are more serious requirements- most importantly, relating to witness statements in foreign languages. Non-compliance here would likely be an expensive mistake.

Other important problems would be inappropriate content of statements in the Business and Property Courts and compliance with the Statement of Truth requirements.



What are the Requirements?

CPR PD32 para.17

17.1 The witness statement should be headed with the title of the proceedings....

17.2 At the top right hand corner of the first page there should be clearly written:

- (1) the party on whose behalf it is made,*
- (2) the initials and surname of the witness,*
- (3) the number of the statement in relation to that witness,*
- (4) the identifying initials and number of each exhibit referred to,*
- (5) the date the statement was made; and*
- (6) the date of any translation.***

What are the Requirements?

CPR PD32 para.18

*18.1 The witness statement must, if practicable, be in the intended witness's own words **and must in any event be drafted in their own language**, the statement should be expressed in the first person and should also state:*

(1) the full name of the witness,

(2) his place of residence or, if he is making the statement in his professional, business or other occupational capacity, the address at which he works, the position he holds and the name of his firm or employer,

(3) his occupation, or if he has none, his description,

(4) the fact that he is a party to the proceedings or is the employee of such a party if it be the case; and

(5) the process by which it has been prepared, for example, face-to-face, over the telephone, and/or through an interpreter.

What are the Requirements?

CPR PD32 para.18

18.2 A witness statement must indicate:

- (1) which of the statements in it are made from the witness's own knowledge and which are matters of information or belief, and*
- (2) the source for any matters of information or belief.*

18.3 An exhibit used in conjunction with a witness statement should be verified and identified by the witness and remain separate from the witness statement.

18.4 Where a witness refers to an exhibit or exhibits, he should state 'I refer to the (description of exhibit) marked '...''.

18.5 The provisions of paragraphs 11.3 to 15.4 (exhibits) apply similarly to witness statements as they do to affidavits.

18.6 Where a witness makes more than one witness statement to which there are exhibits, in the same proceedings, the numbering of the exhibits should run consecutively throughout and not start again with each witness statement.



What are the Requirements?

CPR PD32 para.19:

19.1 A witness statement should:

- (1) be produced on durable quality A4 paper with a 3.5cm margin,*
- (2) be fully legible and should normally be typed on one side of the paper only,*
- (3) where possible, be bound securely in a manner which would not hamper filing, or otherwise each page should be endorsed with the case number and should bear the initials of the witness,*
- (4) have the pages numbered consecutively as a separate statement (or as one of several statements contained in a file),*
- (5) be divided into numbered paragraphs,*
- (6) have all numbers, including dates, expressed in figures,*
- (7) give the reference to any document or documents mentioned either in the margin or in bold text in the body of the statement ; and*
- (8) be drafted in the witness's own language.**

19.2 It is usually convenient for a witness statement to follow the chronological sequence of the events or matters dealt with, each paragraph of a witness statement should as far as possible be confined to a distinct portion of the subject.



What are the Requirements?

CPR PD32 para.22

Alterations to witness statements

22.1 Any alteration to a witness statement must be initialled by the person making the statement or by the authorised person where appropriate (see paragraph 21).

22.2 A witness statement which contains an alteration that has not been initialled may be used in evidence only with the permission of the court.

Business and Property Courts

CPR PD57AC para.3

3.2 A trial witness statement must set out only matters of fact of which the witness has personal knowledge that are relevant to the case, and must identify by list what documents, if any, the witness has referred to or been referred to for the purpose of providing the evidence set out in their trial witness statement. The requirement to identify documents the witness has referred to or been referred to does not affect any privilege that may exist in relation to any of those documents.

3.3 A trial witness statement must comply with paragraphs 18.1 and 18.2 of Practice Direction 32, and for that purpose a witness's own language includes any language in which the witness is sufficiently fluent to give oral evidence (including under cross-examination) if required, and is not limited to a witness's first or native language.

3.4 Trial witness statements should be prepared in accordance with –

(1) the Statement of Best Practice contained in the Appendix to this Practice Direction, and

(2) any relevant court guide, for which purpose, in the event of any inconsistency, the Statement of Best Practice takes precedence over any court guide.

Business and Property Courts

CPR PD57AC para.4

4.1 A trial witness statement must be verified by a statement of truth as required by rule 22.1(c) and paragraph 20.2 of Practice Direction 32 and, unless the court otherwise orders, must also include the following confirmation, signed by the witness:

“ I understand that the purpose of this witness statement is to set out matters of fact of which I have personal knowledge.

I understand that it is not my function to argue the case, either generally or on particular points, or to take the court through the documents in the case.

This witness statement sets out only my personal knowledge and recollection, in my own words.

On points that I understand to be important in the case, I have stated honestly (a) how well I recall matters and (b) whether my memory has been refreshed by considering documents, if so how and when.

I have not been asked or encouraged by anyone to include in this statement anything that is not my own account, to the best of my ability and recollection, of events I witnessed or matters of which I have personal knowledge. ”

(Paragraph 3.2 of Practice Direction 22 provides that the statement of truth is to be signed by the witness; paragraph 3A of that Practice Direction applies if the witness is unable to read or sign a witness statement other than by reason of language alone.)

4.2 Any application for permission to vary or depart from the requirement to include the statement set out in paragraph 4.1 above may be made, and generally should be made, without notice, for determination without a hearing.

Business and Property Courts

CPR PD57AC para.4

4.3 A trial witness statement must be endorsed with a certificate of compliance in the following form, signed by the relevant legal representative, unless the statement is signed when the relevant party is a litigant in person or the court orders otherwise:

“I hereby certify that:

1.I am the relevant legal representative within the meaning of Practice Direction 57AC.

2.I am satisfied that the purpose and proper content of trial witness statements, and proper practice in relation to their preparation, including the witness confirmation required by paragraph 4.1 of Practice Direction 57AC, have been discussed with and explained to [name of witness].

3.I believe this trial witness statement complies with Practice Direction 57AC and paragraphs 18.1 and 18.2 of Practice Direction 32, and that it has been prepared in accordance with the Statement of Best Practice contained in the Appendix to Practice Direction 57AC.

Name:

Position:

Date:.....”

4.4 Any application to dispense with the certificate of compliance referred to in paragraph 4.3 above, or for permission to vary or depart from the form for it there set out, may be made, and generally should be made, without notice, for determination without a hearing.

Business and Property Courts

CPR PD57AC para.5

5. Sanctions

5.1 The court retains its full powers of case management and the full range of sanctions available to it and nothing in paragraph 5.2 or paragraph 5.3 below confines either.

5.2 If a party fails to comply with any part of this Practice Direction, the court may, upon application by any other party or of its own motion, do one or more of the following –

(1) refuse to give or withdraw permission to rely on, or strike out, part or all of a trial witness statement,

(2) order that a trial witness statement be re-drafted in accordance with this Practice Direction or as may be directed by the court,

(3) make an adverse costs order against the non-complying party,

(4) order a witness to give some or all of their evidence in chief orally.

5.3 The court may, upon application by any other party or of its own motion, strike out a trial witness statement not endorsed with a certificate of compliance pursuant to paragraph 4.3 above if there is reason to consider that the relevant party was acting in person when it was signed in order to avoid the application of paragraph 4.3 above to the statement.

Business and Property Courts

There is a Statement of Best Practice at Appendix to Practice Direction 57AC

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- (1) refuse to give or withdraw permission to rely on, or strike out, part or all of a trial witness statement,*
- (2) order that a trial witness statement be re-drafted in accordance with this Practice Direction or as may be directed by the court,*
- (3) make an adverse costs order against the non-complying party,*
- (4) order a witness to give some or all of their evidence in chief orally.*

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Statement of Truth

CPR PD32 para.20

20.1 A witness statement is the equivalent of the oral evidence which that witness would, if called, give in evidence; it must include a statement by the intended witness in their own language that they believe the facts in it are true.



Statement of Truth

CPR 22.1(1):

(1) The following documents must be verified by a statement of truth ...

(c) a witness statement;

CPR 22.3:

22.3 If the maker of a witness statement fails to verify the witness statement by a statement of truth the court may direct that it shall not be admissible as evidence.



Statement of Truth

CPR PD22 para.2.2:

2.2 The form of the statement of truth verifying a witness statement should be as follows (and provided in the language of the witness statement):

'I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.'



Statement of Truth

CPR PD22 para.2:

2.4 The statement of truth verifying a witness statement must be in the witness's own language.

2.5 A statement of truth must be dated with the date on which it was signed.

CPR PD22 para.3.2

3.2 A statement of truth verifying a witness statement must be signed by the witness.

Language Requirements

CPR PD32 para.23

23.1 If the court directs that a witness statement is to be filed¹⁴, it must be filed in the court or Division, or Office or Registry of the court or Division where the action in which it was or is to be used, is proceeding or will proceed.

23.2 Where a witness statement is in a foreign language—

(a) the party wishing to rely on it must—

(i) have it translated; and

(ii) file the foreign language witness statement with the court; and

(b) the translator must sign the original statement and must certify that the translation is accurate.



Language Requirements

In short:

- 1) If the witness does not speak sufficient English (or Welsh in Wales) to be cross examined in that language, the witness statement must be prepared **in their own language** including the **statement of truth**.
- 2) It must then be translated with the translation signed and dated.
- 3) Both must be filed.



Language Requirements

The courts take this seriously.

Don't try to get away with it, even when that seems pretty reasonable



Language Requirements

[Correia v Williams \[2022\] EWHC 2824 \(KB\)](#)

[12] The judge immediately raised concern about the statement of the Appellant. That witness statement was written in English. At paragraph 10 of that statement the following appears:

"Whilst I can understand and speak English I am not wholly fluent and rely on the assistance of a translator during court proceedings. I am able to make this statement in English because the principal solicitor of Harris da Silva solicitors speaks fluent Portuguese."

[13] The witness statement, which runs to some 126 paragraphs over 36 pages, ends with a statement of truth, in English, and a "Certificate of Translation" which reads:

"I, Charles da Silva, hereby certify that I am proficient in Portuguese and English. I translated the foregoing statement and read it back to Jose Carlos Marquez Correia in its entirety in Portuguese (European) on 15 December 2021."

[14] The statement of truth was signed by the Appellant himself and the certificate of translation by Mr da Silva.



Language Requirements

[21] While not immediately applicable in these County Court proceedings it is of interest to note what the Kings Bench Division and the Chancery Division guides say on the topic of witness statements from witnesses who are not fluent in English.

[22] The King's Bench Guide [2016] provides at paragraph 10.61: If a witness is not sufficiently fluent in English to give their evidence in English, the witness statement should be in the witness's own language and the translation provided.

[23] The Chancery Guide says at 19.13: If a witness is not sufficiently fluent in English to give his or her evidence in English, the witness statement should be in the witness's own language and a translation provided. If the witness is not fluent in English but can make himself or herself understood in broken English and can understand written English, the statement need not be in his or her own words provided that these matters are indicated in the statement itself it must however be written so as to express as accurately as possible the substance of his or her evidence.



Language Requirements

[46] The Appellant sought that permission in accordance with CPR25.2, as the judge made clear at [30]. Contrary to the judge's view, the statement was not inadmissible per se but it was inadmissible without the judge's permission. Had the judge simply refused to admit the statement without considering the circumstances and the merits of the application before him, his decision would have been open to criticism. But he did not. He made it clear at [30] that if he was wrong to regard the statement as inadmissible per se, he would not "be prepared in this case to allow the waiver, as it were, of these defects". The critical question therefore is whether the judge was entitled to exercise his discretion to refuse to admit the statement.



Language Requirements

[47] In my judgment, he was. In all the respects identified by the judge, this witness statement failed to meet the requirements of the rules. The rules about the provision of witness statements by those who are not fluent in English provides an important discipline for litigants and their advisers and are not lightly to be ignored. The judge correctly identified the reasons why to have allowed this witness statement to be admitted would have been grossly unfair. In particular, the Respondent had provided a witness statement which complied with the rules, and, as a result, the Appellant knew the evidence to which he has to respond. By contrast, the Respondent had only the account of events drafted by the Appellant's solicitor, in a language in which the Appellant was not fluent. The difficulties that would have faced the Respondent's counsel in cross examination on such a witness statement are obvious. As the judge observed, one of the purposes of requiring the service in advance of trial of witness statements are to tie the witness down to one account of events; to have allowed in this statement would have enabled the Appellant to escape that constraint.



In Summary

The language/translation requirements are absolutely crucial and can be determinative.

It is easy to get the statement of truth avoidably wrong.

In the Business and Property Courts, there is a lot of focus on inappropriate content in witness statements.

Everything else is really a matter of good practice, but it's best to avoid mistakes in case a more serious problem arises.

Disclosure in the Business & Property Courts

On 1st October 2022 the ‘Disclosure Pilot Scheme’ took effect permanently as PD57AD.

The editorial introduction:

“The pilot scheme was intended to remedy the various problems with disclosure, and not least to ensure that a new, proportionate, culture of disclosure was embedded into the litigation process. It was intended to operate “along different lines driven by reasonableness and proportionality”... Under the pilot, disclosure was to be focused on the key Issues for Disclosure In this way it was intended to strike a better balance between wider disclosure, where and only where that is appropriate, and the aim of reducing the amount of unnecessary documentary disclosure, either because it is irrelevant or peripheral to the issues in dispute. To effect the necessary culture change the court was required to take a more pro-active approach to the case management of the disclosure process and parties had to ensure that they acted consistently with the Disclosure Duties contained in pilot scheme. The pilot scheme was subject to a number of significant revisions aimed at improving its operation. Practice Direction 57AD is expected to operate consistently with the approach taken to the pilot scheme’s operation, i.e. to maintain the more proportionate and targeted approach to disclosure effected by the scheme.”

CPR 57AD: when does it apply?

CPR 57AD para 1.2:

“The Commencement Date is 1 October 2022. This Practice Direction applies to existing and new proceedings in the Business and Property Courts of England and Wales and the Business and Property Courts in Birmingham, Bristol, Cardiff, Leeds, Liverpool, Manchester and Newcastle. For the avoidance of doubt, it does not apply in the County Court.”

CPR 57AD para 1.3:

“This Practice Direction shall not disturb an order for disclosure made before the Commencement Date or before the transfer of proceedings into a Business and Property Court, unless that order is varied or set aside. If proceedings are transferred out of one of the Business and Property Courts into a court that is not one of the Business and Property Courts, any order for disclosure made under this Practice Direction will stand unless and until any other order is made by the transferee court.”

CPR 57AD: interaction with other rules

CPR 57AD, para 1.6:

“For the purposes of this Practice Direction, where its provisions conflict with other provisions of the rules or other Practice Directions, this Practice Direction shall take precedence.”

What about power to order specific disclosure?

White Winston Select Asset Funds LLC v Mahon [2019] EWHC 1014 (Ch) at [11]-[13]

Revenue and Customs Commissioners v IGE USA Investments Ltd [2020] EWHC 1716 (Ch) at [25]-[31]

CPR 57AD, para 1.8:

Save for those provisions of [CPR Part 31](#) that are set out in Section II, and the related provisions of Practice Directions 31A and 31B, [CPR Part 31](#) and Practice Directions 31A and 31B shall not apply to any proceedings falling within this Practice Direction.

CPR 57AD: the duties

The duties on the party include, inter alia, a duty to preserve documents which may be relevant; a duty to comply with any order for disclosure; a duty to undertake a search in a reasonable and conscientious manner; and duty to act honestly in relation to the process for giving disclosure; and a duty to avoid providing documents that have no relevance to the Issues for Disclosure: see para 3.1

Significantly, similar duties are imposed on legal representatives: see para 3.2. Including a duty to use technology to ensure cost-effective disclosure practices ... !

CPR 57AD: Initial Disclosure

CPR 57AD para 5.1:

Save as provided below, and save in the case of a [Part 7](#) claim form without particulars of claim, each party must provide to all other parties at the same time as its statement of case an Initial Disclosure List of Documents that lists and is accompanied by copies of—

(1) the key documents on which it has relied (expressly or otherwise) in support of the claims or defences advanced in its statement of case (and including the documents referred to in that statement of case); and

(2) the key documents that are necessary to enable the other parties to understand the claim or defence they have to meet.

The meaning of ‘key documents’: see, e.g., Breitenbach v Canaccord Genuity Financial Planning Ltd [2020] EWHC 1355 (Ch) and Qatar v Banque Havilland SA [2020] EWHC 1248 (Comm) at [16].

But, not required in circumstances described in para 5.3.

CPR 57AD: Extended Disclosure

CPR 57AD, para 6.1:

A party wishing to seek disclosure of documents in addition to, or as an alternative to, Initial Disclosure must request Extended Disclosure. No application notice is required. However, the parties will be expected to have completed the Disclosure Review Document pursuant to paragraphs 7 and following below.

Para 6.4 embeds the overriding objective in the discretion of whether to make an order for Extended Disclosure.

There are additional requirements in respect of search-based Extended Disclosure (that is, Models C, D and/or E).

Highly customisable - important to understand which option best suits your client and the circumstances of the given case.



Disclosure Models: Model A

Model A:

“The court may order that the only disclosure required in relation to some or all of the Issues for Disclosure is of known adverse documents in accordance with the (continuing) duty under paragraph 3.1(2) above.”

Disclosure Models: Model B

(1) The court may order the parties to disclose (where and to the extent that they have not already done so by way of Initial Disclosure, and without limit as to quantity)—
(a) the key documents on which they have relied (expressly or otherwise) in support of the claims or defences advanced in their statement(s) of case; and
(b) the key documents that are necessary to enable the other parties to understand the claim or defence they have to meet;
and in addition to disclose known adverse documents in accordance with their (continuing) duty under paragraph 3.1(2) above.

(2) A party giving Model B Disclosure is under no obligation to undertake a search for documents beyond any search already conducted for the purposes of obtaining advice on its claim or defence or preparing its statement(s) of case. Where it does undertake a search however then the (continuing) duty under paragraph 3.1(2) will apply.

Disclosure Models: Model C

(1)The court may order a party to give disclosure of particular documents or narrow classes of documents relating to a particular Issue for Disclosure, by reference to requests set out in or to be set out in Section 1B of the Disclosure Review Document or otherwise defined by the court.

(2)If the parties cannot agree that disclosure should be given, or the disclosure to be given, pursuant to a request, then the requesting party must raise the request at the case management conference. The court will determine whether the request is reasonable and proportionate and may either order the disclosing party to search for the documents requested, refuse the request, or order the disclosing party to search for a narrower class of documents than that requested. Any appropriate limits to the scope of the searches to be undertaken will be determined by the court using the information provided in the Disclosure Review Document. A party may address Model C requests not only to the other party or parties, but also propose that Model C be used in respect of documents which it may propose searching for and disclosing.”

Disclosure Model: Model D

(1) Under Model D, a party shall disclose documents which are likely to support or adversely affect its claim or defence or that of another party in relation to one or more of the Issues for Disclosure.

(2) Each party is required to undertake a reasonable and proportionate search in relation to the Issues for Disclosure for which Model D disclosure has been ordered. Any appropriate limits to the scope of the searches to be undertaken will be determined by the court using the information provided in the Disclosure Review Document.

*(3) The court may order the parties to include or exclude **Narrative Documents**. In the absence of an order, the parties are encouraged to take reasonable steps to exclude Narrative Documents where it is reasonable and proportionate to do so with a view to reducing the overall volume and the cost of any subsequent review by the party receiving the disclosure.*

(4) For the avoidance of doubt, a party giving Model D Disclosure must still comply with the duty under paragraph 3.1(2) above to disclose known adverse documents; these will include any arising from the search directed by the court.

Disclosure Models: Model E

*(1) Under Model E, a party shall disclose documents which are likely to support or adversely affect its claim or defence or that of another party in relation to one or more of the Issues for Disclosure or **which may lead to a train of inquiry which may then result in the identification of other documents for disclosure** (because those other documents are likely to support or adversely affect the party's own claim or defence or that of another party in relation to one or more of the Issues for Disclosure).*

*(2) **Model E is only to be ordered in an exceptional case.***

*(3) **Each party is required to undertake a reasonable and proportionate search in relation to the Issues for Disclosure for which Model E Disclosure has been ordered. The scope of the search will be determined by the court using the information provided in the Disclosure Review Document and is likely to be broader than that ordered for Model D Disclosure.***

*(4) **Narrative Documents must also be searched for and disclosed, unless the court otherwise orders.***

The Disclosure Review Document

The DRD = the document by which the parties identify, discuss and seek to agree the scope of any Extended Disclosure sought of Model C, D or E, and provide that information in due course to the court.

Step 1 - state within **28 days** of final statement of case whether search-based disclosure (models C, D or E) is likely in one or more issues of disclosure

Step 2 - C to file and serve a draft list of issues for disclosure within **42 days** from final statement of case

Step 3 - the party served with the draft List of Issues has **21 days from service** to indicate, using section 1A (or, if applicable, section 1B) of the DRD, whether it agrees with the proposals. If it does not agree, alternative proposals should be set out.

Step 4 - not later than **14 days** from first CMC the parties should prepare and exchange drafts of Section 2 of the DRD.

Step 5 - not later than **5 days** before CMC a single joint DRD should be filed by C.

Step 6 - not later than **2 days** before CMC a Certificate of Compliance should be filed by each party independently.

CPR 57AD: Issue Identification

“Issues for Disclosure” means for the purposes of disclosure only those key issues in dispute, which the parties consider will need to be determined by the court with some reference to contemporaneous documents in order for there to be a fair resolution of the proceedings. It does not extend to every issue which is disputed in the statements of case by denial or non-admission

See:

- McParland & Partners Ltd v Whitehead [2020] EWHC 298 (Ch) at [44]-[49]
- Lonestar Communications Corp LLC v Kaye [2020] EWHC 1890 (Comm) at [32]
- Performing Right Society Ltd v Qatar Airways Group QCSC [2021] EWHC 869 (Ch) at [33]

Less complex claims procedure

For claims under £1m but value alone not determinative of whether procedure should be followed. CPR PD57AD expands the scope of the 'less complex' claims procedure.

Key points:

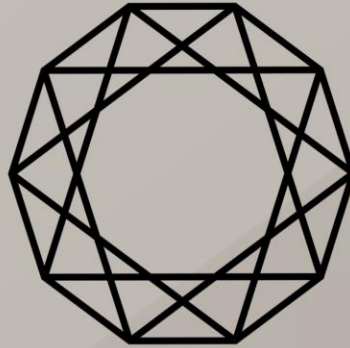
- Extended disclosure given using only Models A, B or D. Models C and E are not available (para 10.1)
- Use the DRD in Appendix 6 (same timetable) (para 10.2)
- However, no requirement to identify the Issues for Disclosure or to complete a DRD if only Models A and/or B used (para 10.3)
- All provisions relating to Known Adverse Documents apply



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Thank you for your attention.

Questions?



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