

Statement of Costs
(summary assessment)

(CPR PF44 9.5)

Judge

In the	
High Court of Justice King's Bench Division	
Case Reference	QB-2021-003576, 3626 and 3737

NATIONAL HIGHWAYS LIMITED

-and-

(1) PERSONS UNKNOWN CAUSING THE BLOCKING OF, ENDANGERING, OR PREVENTING THE FREE FLOW OF TRAFFIC ON THE M25 MOTORWAY, A2 A20 AND A2070 TRUNK ROADS AND M2 AND M20 MOTORWAY, A1(M), A3, A12, A13, A21, A23, A30, A414 AND A3113 TRUNK ROADS AND THE M1, M3, M4, M4 SPUR, M11, M26, M23 AND M40 MOTORWAYS FOR THE PURPOSE OF PROTESTING

Case Title

(2) MR ALEXANDER RODGER AND 132 OTHERS

Claimant's Statement of Costs for the hearing on 24 April 2023

Description of fee earners*

- (a) (name) (grade) (hourly rate claimed)
- (b) (name) (grade) (hourly rate claimed)
- (c) (name) (grade) (hourly rate claimed)
- (d) (name) (grade) (hourly rate claimed)

Petra Billing - Grade A - £349
Rob Shaw - Grade A - £315
Mary Barraclough - Grade A - £265
Laura Higson - Grade C - £230

Attendances on the Claimant

Personal attendances

(a) (number)		hours at £		£	
(b) (number)		hours at £		£	
(c) (number)		hours at £		£	
(d) (number)		hours at £		£	

Letters out/emails

(a) (number)	9.9	hours at £	349.00	£	3,455.10
(b) (number)	6.3	hours at £	315.00	£	1,984.50
(c) (number)	2.1	hours at £	265.00	£	556.50
(d) (number)	5.1	hours at £	230.00	£	1,173.00

Telephone

(a) (number)	2.7	hours at £	349.00	£	942.30
(b) (number)	0.7	hours at £	315.00	£	220.50
(c) (number)	0.5	hours at £	265.00	£	132.50
(d) (number)	2.5	hours at £	230.00	£	575.00

Attendances on opponents (including negotiations):

Personal attendances

(a) (number)		hours at £		£	
(b) (number)		hours at £		£	
(c) (number)		hours at £		£	
(d) (number)		hours at £		£	

Letters out/emails

(a) (number)	6.4	hours at £	349.00	£	2,233.60
(b) (number)	3.4	hours at £	315.00	£	1,071.00
(c) (number)	6.6	hours at £	265.00	£	1,749.00
(d) (number)	9.4	hours at £	230.00	£	2,162.00

Telephone

(a) (number)		hours at £		£	
(b) (number)		hours at £		£	
(c) (number)		hours at £		£	
(d) (number)		hours at £		£	

Attendances on others: (counsel, court, process servers, police)

Personal attendances

(a) (number)		hours at £		£	
(b) (number)		hours at £		£	
(c) (number)		hours at £		£	
(d) (number)		hours at £		£	

Letters out/emails

(a) (number)	4	hours at £	349.00	£	1,396.00
(b) (number)	3.5	hours at £	315.00	£	1,102.50
(c) (number)	1.6	hours at £	265.00	£	424.00
(d) (number)	3.1	hours at £	230.00	£	713.00

Telephone

(a) (number)	1.7	hours at £	349.00	£	593.30
(b) (number)	0.8	hours at £	315.00	£	252.00
(c) (number)		hours at £		£	
(d) (number)	1.8	hours at £	230.00	£	414.00

Site inspections etc.

(a) (number)		hours at £		£	
(b) (number)		hours at £		£	
(c) (number)		hours at £		£	
(d) (number)		hours at £		£	

Work done on documents, as set out in schedule:

£ **33,572.90**

Attendance at hearing

(a) (number)		hours at £		£	
(b) (number)	6	hours at £	315.00	£	1,890.00
(c) (number)		hours at £		£	
(d) (number)	6	hours at £	230.00	£	1,380.00
(e) Fixed costs				£	

(a) (number)		hours travel and waiting time at £		£	
(b) (number)	8	hours travel and waiting time at £	315.00	£	2520
(c) (number)		hours travel and waiting time at £		£	
(d) (number)	8	hours travel and waiting time at £	230.00	£	1840

Sub Total £ **62,352.70**

- (A) Solicitors and Chartered Legal Executives with over eight years post qualification experience including at least eight years litigation experience.
- (B) Solicitors and Chartered Legal Executives with over four years post qualification experience including at least four years litigation experience.
- (C) Other solicitors and Chartered Legal Executives and fee earners of equivalent experience.
- (D) Trainee solicitors, para legals and other fee earners.

"Chartered Legal Executive" means a Fellow of the Chartered Institute of Legal Executives (CILEx). Those who are not Fellows of CILEx are not entitled to call themselves Chartered Legal Executives and in principle are therefore not entitled to the same hourly rate as a Chartered Legal Executive.

Brought forward £ **62,352.70**

Counsel's fees	(name) (year of call)	Myriam Stacey KC (YOC 1998, Silk 2021)		
	Fee for advice		£	5,610.00
	Fee for hearing		£	4,500.00
	(name) (year of call)	Michael Fry (YOC 2011)		
	Fee for advice		£	5,006.67
	Fee for hearing		£	1,440.00

Other expenses

Court fees		£	275.00
Others (give brief description)	Transport and hotel charges for attendance at hearing Copying charges Courier and Postage charges	£	3,154.14
Total		£	75,891.84
Amount of VAT claimed	on solicitors and counsel's fees	£	0.00
	on other expenses	£	0.00
	Grand Total	£	75,891.84

The costs stated above do not exceed the costs which the Claimant is liable to pay in respect of the work which this statement covers.

Counsel's fees and other expenses have been incurred in the amounts stated above and will be paid to the persons stated.



Signed

20-Apr-23

Dated

Petra Billing

Name of Partner signing

DLA Piper UK LLP

Name of firm of solicitors

Schedule of work done on documents

Item	Description of work (one line only)	(A) hours	(B) hours	(C) hours	(D) hours	Total £
1	Dealing with all aspects of service	0.2	1	0.8	17	4506.80
2	Certificates of service				4	920.00
3	Planning tasks / evidence review	1.5	0.9	5.6	4.9	3418.00
4	Undertakings	1.4	1.8	4	12	4875.60
5	Preparation and filing of Application	1.4	1.2	5.3	36.2	10597.10
6	Skeleton argument	0.4	0.9	0.4	0.5	644.10
7	Hearing / Authorities Bundle	0.2	0.4	1.3	9.8	2794.30
8	This statement of costs	0.3	0.2	0.2	6	1600.70
9	Preparation for Hearing	4.2	4.1	1.6	4.5	4216.30
10						
11						
12						
Total						33,572.90