

HODGE JONES & ALLEN

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By email: josiehinton@bdbpitmans.com

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Our ref: 1046571.0001/ALG
Your ref: JSS/MAS/165443.0012

31 August 2022

Dear Sirs,

R (Jennifer Dawes) v Secretary of State for Transport (IP) Riveroak Strategic Partners Ltd - CO/2917/2020

Following the transfer of Harrison Grant to Hodge Jones and Allen, we now act for Ms Dawes in the above case.

Further to your letter of 16 August 2021:

1. We enclose Counsel's fee note as requested.
2. Please see enclosed as requested further detail on work on the documents.
3. We have incurred further costs since providing the schedule of costs of 2.5 hours x £300 plus VAT.

In relation to Counsel's fees, in an effort to draw a line under this and in the spirit of compromise, our client is prepared to reduce the amount payable by the IP from £13,500 plus VAT to £8,500 plus VAT.

If we cannot agree costs, then we will need to commence detailed assessment proceedings, which will of course mean further expense, including the costs draftsman's fee estimated at £1,500 plus VAT for drafting the bill of costs together with our further costs and a court fee of £743.

As you know, the general rule is that the costs of the detailed assessment will be awarded to the receiving party.

Given the above, we would suggest it is in your client's interests to agree costs without further delay.

Yours faithfully,
Hodge Jones & Allen

Hodge Jones & Allen LLP

Professional Fees of Mr Paul Stinchcombe Q.C.

VAT Registration No: 864773775

 Harrison Grant
 115 Castlehaven Road
 London
 NW1 8SJ
 United Kingdom

 Your Ref: **Kate Harrison / Susan Ring / Alice**
Goodenough

 Our Ref: **258263**

Purchase Order No:

Date: 23/11/2020

Manston Airport DCO - R (Jennifer Dawes) v Secretary of State for Transport (IP) Riveroak Strategic Partners Ltd

Court: Administrative Court

Court Ref No: CO/2917/2020

Date	Description	Amount	Vat%	Vat
10/10/2020	Work from 6 October - Drafting Skeleton Argument (10 Hours)	£5,000.00	20.0%	£1,000.00
22/11/2020	Work From 20 November - Reviewing IP Detailed Grounds of Defence, Witness Statement and Exhibits. Reviewing further comments of JD and Jones-Hall on the Detailed IP's Grounds of Defence; summary of JD comments on the IP's Detailed Grounds of Defence and Witness Statement; Comparing document containing the differences between the IP's Summary Grounds and the IP's Detailed Grounds; Reviewing Alice Goodenough's detailed comments on the Witness Statement; Reviewing IP's Summary Grounds Further and Drafting Reply (17 Hours)	£8,500.00	20.0%	£1,700.00

VAT SUMMARY 20.0% (FEE) Amount: £13,500.00, VAT: £2,700.00	Total Fees	£13,500.00
	Total VAT	£2,700.00
	Total Due	£16,200.00

Previously rendered on 18/08/2020, 13/10/2020, 23/11/2020, 23/11/2020, 22/01/2021, 22/01/2021, 26/04/2021, 04/08/2021, 22/09/2021, 26/01/2022, 21/02/2022, 28/04/2022

** Valid only when received - This is not a tax invoice **

PAYMENT

By BACS to: 39 Essex Chambers LLP

Sort Code: 40-02-07 Account number: 31513974 Swift Code HBUKGB4B IBAN: GB73HBUK40020731513974

We also accept payment by cheque payable to Mr Paul Stinchcombe Q.C.

 Remittance advices, quoting the case reference 258263, should be sent to: accounts@39essex.com

Item	Description of Work	Susan Ring	Harry Campbell	Alice Goodenough	Total £
	1 Perusing and Considering IP's acknowledgment of service	0.2	0.6	0.5	£308.60
	2 Perusing and Considering IP's Detailed Grounds and Evidence	0.6	0	4.7	£1,242.20
	3 Work on Consent Order occasioned by IP	0.7	0	0	£210.00
	4 Drafting statement of costs		0.8	0	£180.80
Total		1.5	1.4	5.2	£1,941.60