Legal Matters
Personal Injury and Insurance

plexus LAW
Part of the Parabis Group

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Our quarterly newsletter aims to highlight developments and recent case law in the areas of personal injury and insurance in a concise and readable style. We hope that you find it informative and useful.

Radical judgment on limitation from Court of Appeal

In November 2008 the Court of Appeal handed down Judgment in conjoined appeals on limitation and the exercise of discretion under section 33 of the Limitation Act 1980. In what has been described as a radical approach the Judgment states that the loss of a limitation defence is not a head of prejudice under section 33 of the Limitation Act 1980.

The Court of Appeal said that the Court should not take into account the financial prejudice caused to a defendant by the loss of a windfall limitation defence when considering how to exercise its discretion and that unless a defendant can show significant forensic prejudice in the application of section 33 the matter will be allowed to proceed out of time, regardless of the length of the delay.

This is a concern for defendants, their insurers and representatives and because of the implications for future cases a Petition to the House of Lords has been lodged by the Defendant in the McKay case.

In both cases the Claimant had been injured in a road traffic accident in respect of which liability had been admitted by the Defendant. In McKay the Claimant issued 14 months out of time as a result of solicitor's negligence. At first instance the Limitation Act was dis-applied and the case was allowed to proceed. In Cain the Claimant issued 1 day after limitation expired, again as a result of solicitor's negligence. The Judge refused to exercise his discretion under section 33 of the Limitation Act and struck out the claim. Both decisions were made in the same week in different courts and both claims are likely to be of significant value.

The Defendant appealed in McKay and the Claimant appealed in Cain. Lady Justice Smith conjoined the appeals as they were conflicting decisions from courts at the extreme ends of the spectrum saying "when Judges this experienced have reached opposite conclusions when exercising their discretion on similar facts because they took completely differing views of the prejudice effect on the Defendant of losing his limitation defence matters need clarification".

The Judgment in McKay has been upheld by the Court of Appeal, allowing the Claimant to continue with her action, and the Judgment in Cain has been overturned, thus allowing Mr Cain to now proceed with his action.

The Court of Appeal held that there should be consistency of approach on an issue as fundamental as whether the loss of a limitation defence amounts to real prejudice where the defendant has no defence on liability. The Court of Appeal in essence finds that unless a defendant can show significant forensic prejudice in the application of section

Continued on page 2…..

Special features:

"A new look to the Plexus Catastrophic Loss Team - see page 8"

Continued from page 1…..

33 the matter will be allowed to proceed out of time, regardless of the length of the delay or the value of the claim. If a defendant has had early notification of the claim and has had good opportunities to investigate some delay after expiry of limitation will have no prejudicial effect.

It was also held that the effect of the Claimant's claim against solicitors for negligence would make no difference in weighing the balance of prejudice.

The Court of Appeal did not deal with whether good conduct should be put into the scales when balancing prejudice and looking at what is fair and equitable.

Cogent Partnership, part of the Parabis Group, represented the Defendants in both cases.

Conjoined appeals – McKay v Hamlani & Direct Line Insurance together with Cain v Francis [2008] CA

Contact: Jo Pizzala, details on page 8.

Occupier's liability claim fails on obvious risk

This High Court judgment on 19 December 2008 illustrates the Court's continuing approach to those engaging in activities with obvious risk and follows the earlier cases of **Tomlinson v Congleton [2003] HL**, **Keown v Coventry Healthcare NHS Trust [2006] CA**, **Evans v Kosmar [2007] CA** and **Trustees of the Portsmouth Youth Activities' Committee v Poppleton [2008] CA** (see previous issues of this newsletter: Issue 1 2006, Issue 8 2008 and Issue 10 2008 respectively).

The Claimant was 14 years old when, on 13 July 2003, he climbed up a navigational beacon at the end of wooden groynes on the Defendant's beach as the tide was ebbing. The Claimant and his party had been spotted climbing up the beacon. One of the Defendant's lifeguards was on his way on a jet ski with a view to stopping the activity when the accident occurred. There was a dispute between the parties as to whether the Claimant and his party had been warned beforehand about jumping off wooden groynes.

The Claimant dived from the beacon and sustained injury to his neck and was rendered tetraplegic.

The accident occurred on a hot summer's day when there were up to 11,000 people on the beach.

The Claimant pursued his claim under the Occupier's Liability Act 1957 and maintained that the beacon was an allurement to children, that there should have been a warning sign prohibiting diving or jumping from the beacon and to warn of the under water danger of the beacon's metal legs. He also pleaded that the Defendant's lifeguards had failed in their common law duty of care to adequately supervise the Claimant.

The Defendant accepted that the Claimant was a lawful visitor to the beach but maintained that he was a trespasser to the beacon and that, even if a warning sign had been posted, it would have had no effect upon the Claimant. The Defendant further maintained that it had a reasonable system of supervision by way of a number of lifeguards and beach patrol staff.

The Judge held that the claim failed under the 1957 and 1984 Occupier's Liability Acts and at common law on the following grounds:

- although the Claimant was a lawful visitor to the beach, he was a trespasser to the beacon so the 1957 Act did not apply;
- the accident did not result from the state of the premises;
- there was no duty to warn against dangers that are perfectly obvious;
- at 14 years of age, the Claimant was reasonably aware. He failed to judge the depth of water in relation to the nature of the dive. A notice would have had no effect upon him;
- there was no undisclosed hazard or trap. The Claimant was aware of the construction of the beacon. The supervision provided by the Defendant was sufficient and appropriate to discharge their common law duty of care.

The Plexus Law Catastrophic Loss Team represented the Defendants.

Charles Baldacchino v West Wittering Estate Plc [2008]

Contact: Ashely Mahon, details on page 8.

Fraud - self amputation

The Plexus Fraud Team has recently been heavily involved with an unusual fraud case where we have contended that the policyholder (PH) on no less than 3 occasions over an 8 year period subjected himself to self amputation for monetary gain. On each occasion there were numerous Personal Accident (PA) policies in place and over £350,000 has been claimed in total.

The background to the claim is an accident in India on 11 September 2004. The policyholder reported the incident to AIG, his PA insurers along the following lines:

The accident occurred in Punjab, India. The tyre of the jeep being driven by the PH was damaged and as this was being replaced the jack slipped and the jeep fell on to the PH's left foot. The big toe and 2 little toes on the left foot were so badly crushed and damaged that the doctor said they could not be saved and had to be amputated.

On the claim form the PH indicated that PA cover was also held with 2 other insurers. This was surprising given that both the PH and his wife had been unemployed for the previous 6 years.

Extensive enquiries were originally carried out in India by Linden Management Company at the request of the AIG SCS Fraud Team. These resulted in a number of inconsistencies and discrepancies coming to light. A forensic engineer was instructed to examine the vehicle and he was of the view that the circumstances of the accident as described could not easily explain the injuries sustained. An independent medical report was obtained and the view of the Consultant Orthopaedic Surgeon was that the "course of treatment was unusual" and "seems to have been inappropriate". The PH was closely questioned regarding the numerous inconsistencies but maintained his version of events.

Examination of the PH's medical records revealed that he had been involved in 3 amputation claims over an 8 year period. There had been an accident in India in 1996 resulting in the loss of fingers of the left hand when his hand was allegedly caught in a farm machine. A further accident occurred in 1999 at the PH's home in Derby. On this occasion the hand was caught by the blade of a saw severing the left thumb and one of the remaining fingers. A very unlucky individual!

As a result of all the evidence that came to light throughout the investigation a robust stance was taken by AIG and Plexus Law and fraud was contended. Solicitors had been instructed to act on behalf of the PH but following a further firm denial of liability the case has been successfully repudiated. The Financial Ombudsman Service also supported the stance taken.

This case shows the benefit of very thorough investigations by dedicated fraud teams at the insurers and the partnership approach required with their lawyers to reach a satisfactory outcome.

Contact: Anthony Baker, details on page 8.

House of Lords affirms pragmatic approach to police powers

The Claimant took part in a demonstration in London in May 2001. Although planned, details had not been passed to the police. Several of the organisers had advocated violence and disruption. The demonstrators congregated in Oxford Circus and mingled with ordinary shoppers and passers by. Fearing a serious public order incident, the police cordoned off the entire area for a period of nearly 7 hours. There was no suspicion that the Claimant herself had committed any offence or was likely to. She argued that she had been falsely imprisoned and that her absolute right to liberty under Article 5(1) of the European Convention on Human Rights had been infringed.

At the House of Lords the false imprisonment allegation had been abandoned. It was accepted that everything turned on whether or not a restriction in movement amounted to a deprivation of liberty within the meaning of Article 5. The House of Lords held unanimously that it did not. Article 5 was not applicable.

The House was at pains to point out that each case depended very much on the individual facts. Whether Article 5 applied to any particular case was a question of the degree and intensity of the restriction of movement, and could take into account the purpose of the restriction. In this case, the police had acted in good faith and proportionately to a difficult situation, and the balance fell in their favour.

Lord Hope pointed out that the police do not necessarily need to rely on suspecting individuals of being likely to cause a breach of the peace. That would be highly impractical in the very sort of situations where such confrontations arise.

This Judgment is a sensible and pragmatic one which allows experienced Senior Officers to make appropriate decisions, during demanding and volatile situations, for the purpose of protecting society as a whole. In such situations an individual's rights to movement and liberty may be curtailed.

Austin v The Commissioner of Police of the Metropolis [2009] HL

Contact: Simon Hills, details on page 8.

Costs

The Jackson costs review

The Master of the Rolls, Sir Anthony Clarke, has appointed Lord Justice Jackson to conduct a fundamental review of the Civil Litigation Costs system. The aim is to promote access to justice at proportionate cost. The review is seen by some as the judiciary's response to the failure of the Woolf reforms to control the cost of civil litigation. It will look at all aspects of costs including CFAs, fixed costs, third party funding and contingency fees.

In conducting the review Lord Justice Jackson will establish how present costs rules operate and how they impact on the behaviour of the parties and the effect case management procedures have on costs and whether changes in process and/or procedure could bring about more proportionate costs. He is expected to seek the views of interested parties through informal consultation and public seminars and to compare the costs regime for England and Wales with those in other jurisdictions.

Commencing in January 2009 the review will take 12 months and will be conducted in 3 stages. Stage 1 will be preparation of a working paper, due to be completed by April 2009, stage 2 will be the consultation period and public seminars, due to be completed by July 2009, and the final stage will be preparation of the Final Report by 31 December 2009.

Justice Minister Bridget Prentice issued a statement saying: "I would like to make clear that the review is not intended to, and will not, delay progress on the various specific initiatives that are currently being taken forward on civil costs."

"Nor will the fact that a fundamental review is underway prevent implementation of any reforms of the costs system that might be appropriate."

His study will have regard to the report commissioned by the Civil Justice Council into the use of contingency fees in foreign jurisdictions by Senior Costs Judge Peter Hurst and Professor Richard Moorhead of Cardiff University and the academic review of 'no win, no fee' launched by the Ministry of Justice in June 2008 to examine the use of CFAs, also involving Professor Moorhead.

The report for the Civil Justice Council was published in November 2008 and looks at alternatives to the current system of conditional fee agreements and in particular at damages based contingency fees. It concludes that contingency fees could operate effectively in England and Wales and might improve access to justice in higher value cases although the opposite could be true for lower value cases. This report and the outcome of the CFA academic study will be taken into account by the Jackson review.

JUDICIARY OF ENGLAND AND WALES

Solicitors costs - interim guideline hourly rates

The Advisory Committee on Civil Costs issued updated guideline hourly rates to apply from 1 January 2009. These new rates are 'interim' due to unresolved issues including the extent of work done by solicitors outside the region in which they are located, the difference in rates charged by claimants' solicitors compared with defendants' solicitors and the extent to which referral fees account for this. It is hoped that these issues will be resolved by 2010, to coincide with the Costs Review currently underway.

The new rates, which reflect earnings inflation, apply to personal injury, clinical negligence and Chancery cases and are available at http://www.hmcourts-service.gov.uk/publications/guidance/scco/previous_rates.htm

Costs

Accident Line Protect (ALP) test cases heard

The Court of Appeal handed down judgment in December 2008 in what have generally been referred to as the Accident Line Protect (ALP) test cases, reported as **Tankard v John Fredericks Plastics Ltd.**

The decision follows the findings in **Garrett v Halton Borough Council [2006] CA** that the referral of work from a claims management company gave rise to a declarable interest under Regulation 4(2)(e)(ii) Conditional Fee Agreement (CFA) Regulations 2000, so that a failure to declare that interest rendered the CFA unenforceable.

In this case the Court of Appeal held that the Law Society endorsed After The Event (ATE) insurance product was not a declarable interest under the now repealed 2000 Conditional Fee Agreement Regulations on the basis that that solicitors joined the ALP panel because of the quality of the product rather than for work referrals, so the arrangement would not affect the advice given.

The crucial issue the Court of Appeal had to decide was what amounted to an 'interest' within the meaning of Regulation 4(2)(e)(ii). The Court concluded that the proper test was that "a solicitor has an interest if a reasonable person with knowledge of the relevant facts would think that the existence of the interest might affect the advice given by the solicitor to his client".

The Court confirmed:

- the ALP scheme does not automatically give rise to a declarable interest in every single case;
- exclusivity (which had already been held to be a legitimate feature of ATE schemes in **Rogers v Merthyr Tydfil [2006] CA**) will not, in the absence of anything else, such as referrals of work, give rise to a declarable interest;
- the ancillary services, described as 'odds and ends', do not give rise to a declarable interest;
- the provision of referrals may give rise to a declarable interest, depending on the facts.

The Court again expressed its hope that the end of satellite litigation over costs, and CFAs in particular, might be in sight but yet again it looks as if there is as much to argue about after the decision as there was before it but at least challenges to the ALP scheme have been diminished as a result of this judgment.

Tankard v John Fredericks Plastics Ltd [2008] CA

Contact: Andrew Proctor, details on page 8.

Fixed success fees in RTA claims

Fixed success fees apply to RTA claims where the accident occurred after 6 October 2003. CPR 45.16 states the success fee to be allowed is:

- 100% where the claim concludes at trial; or
- 12.5% where:
  - the claim concludes before a trial has commenced; or
  - the dispute is settled before a claim is issued.

The choice of words in this rule has led to disputes as to which success fee is recoverable. When does a trial commence? There is no binding authority but in **Dahele v Thomas Bates & Son [2007]** settlement on the day of the Trial resulted in 100% being allowed; in **Sitapuria v Khan [2008]** the lower 12.5% was allowed and the Court said in order to claim entitlement to a 100% success fee there had to have been a final contested hearing in relation to the matter and for a hearing to be contested the case had to have been opened and disputed at a trial. In **Styler v Ingham [2008]** the parties arrived at Court and requested further time to discuss settlement and finally produced a consent order for approval by the Judge. It was held that the consent order was not preceded by any trial or judicial decision and 12.5% was allowed.

It seems that if the case is opened and the trial actually starts then 100% success fee is recoverable. In other circumstances it will be 12.5%.

Contact: details as above.

Costs

Remedying defective CFA's

This is an important decision for receiving parties with potentially unenforceable CFA's. The main points arising are:

1. a post 1 November 2005 CFA can be entered into to replace a pre 1 November 2005 CFA and apply retrospectively to work done prior to 1 November 2005, thus avoiding all challenges under the Conditional Fee Regulations 2000;
2. if it transpires that the second CFA is invalid, the first CFA can still be relied upon as a retainer;
3. a CFA can contain a retrospective success fee - ie one that applies to work before the CFA was entered into and this is not contrary to public policy. This holds even if the original retainer or CFA contained no provision for a success fee;
4. in certain circumstances a CFA can be terminated and a new one entered into, with a higher success fee applicable to all work undertaken, if prospects for success diminish.

Challenges to CFA's are now dwindling as most post-date revocation of the CFA Regulations 2000. Subject to any appeal, this case is likely to result in even fewer challenges.

Birmingham City Council v Rose Forde [2009]

Contact: Andrew Proctor, details on page 8.

Success fees in high value RTA cases

The Court of Appeal decision in **C v W** is significant because it considers the level of recoverable success fee that is appropriate in a high value RTA case and will be relevant to other cases where fixed success fees do not apply because the accident is pre 6 October 2003 or where damages exceed £500,000 and discretion is sought to exceed the fixed 12.5%.

The principle challenge was that as liability had already been admitted at the time that the CFA was entered into there was no substantial risk that the claimant would fail to recover damages. The real issue for the Court was the Part 36 risk.

The Court found in this case that a reasonable assessment of the risk would be 17%, equating to a success fee of 20%, which they considered to be fair in the circumstances of the case.

C v W [2008] CA

Contact: details as above.

Chair collapse claim fails

The Claimant, Mr Langley, was employed by the Defendants, Stockton on Tees Borough Council, who provided him with a chair recently purchased from a well known supplier. Whilst using the chair 1 of the 5 legs to the chair fractured and Mr Langley fell suffering injury. Normally in such circumstances there would be little answer to allegations of negligence/breach of duty, in particular Employer Liability [Defective Equipment] Act 1969 and Provision & Use of Work Equipment Regulations 1998.

The Claimant's claim was dismissed at Trial on the basis that it was found that the Claimant had been swinging backwards and balancing all his weight on only 1 of the legs with the remaining 4 legs off the ground. Had he been using the chair correctly it was unlikely that the leg would have broken. Reasonable use rather than abuse of the chair would probably not have resulted in the accident.

This decision was founded on lay evidence alone. Although the Claimant's solicitors had obtained a technical report early on in the case this had never been allowed for in any of the directions. When the Claimant's solicitors sought to have this included, late in the day, the Judge refused.

There are a number of important features to this case, as detailed above, but it is particularly important to note that even in the face of such strict allegations a claim can be defeated if it can be shown that had proper use of the equipment provided been followed it would not have failed, or alternatively, that the cause was improper use adding unforeseen stresses upon the equipment for which it might not have been designed.

Plexus Law represented the Defendants.

Langley v Stockton on Tees Borough Council [2008]

Contact: Stephen Boyce, details on page 8.

Plexus Law successfully defends diabetic driver against conviction

The Defendant, a known type 1 insulin treated diabetic, suffered a hypoglycaemic episode of a severity which he had never previously experienced whilst driving which resulted in his blood sugar falling to a very low level. He consequently lost control of his car and collided with 2 other vehicles and a pedestrian, who was unfortunately killed.

The Defendant was charged with causing death by dangerous driving on the grounds that he drove dangerously because he knew or could be reasonably expected to have known that he was suffering a hypoglycaemic attack but nevertheless ignored the warning symptoms despite knowing the danger that he posed.

The Defendant allegedly remarked in the immediate aftermath that he had experienced recent problems with low blood sugar and that he had started to feel faint and hungry when driving. During the police interview, which took place whilst he was still in hospital, and when he was not legally represented, it was claimed (the interview not having been tape recorded) that he also stated that he had been looking for a shop to buy a chocolate bar.

The Prosecution obtained medical evidence from an emeritus professor of clinical biochemistry who is claimed to be one of the world's leading authorities on the subject of hypoglycaemia. His opinion was that, at the time of the accident, the Defendant was conscious that he was suffering from hypoglycaemia but continued to drive and that he ought not to have driven or at least should have tested his blood sugar level and/or eaten some carbohydrate rich food. He also concluded that the Defendant was unlikely to still be suffering cognitive impairment upon his admission to hospital.

Plexus Law obtained medical evidence from a consultant physician specialising in diabetes. His view was that it is possible for a person with the Defendant's condition to suffer a hypoglycaemic attack without being aware of the onset of symptoms. The Defendant would have had no reason to be concerned about the onset of hypoglycaemia as he had not omitted to do anything which he should have done with regard to treating his condition. Anything which the Defendant said after his hypoglycaemic episode was not reliable until his brain had fully recovered which, in some cases, could take days or months.

The 2 medical experts agreed at Court that all of the statements made by the Defendant post accident were unreliable. They also agreed that a sufferer could be unaware of his hypoglycaemic state before it disabled him. They also agreed that it would not necessarily be obvious to a careful and competent person suffering from the Defendant's condition that to drive without testing his blood before undertaking any journey, or that to drive without carrying any readily absorbable carbohydrate, would be dangerous.

There was no evidence that the Defendant had been advised to check his blood sugar level before driving and/or carry a form of fast acting carbohydrate in his vehicle.

In the circumstances, the Crown Prosecution Service offered no evidence and the Judge asked for a not guilty verdict to be recorded with an order that Defence costs be paid out of central funds.

The DVLA produces a guide to insulin treated diabetes which advises that blood sugar levels should be tested before driving and an emergency supply of carbohydrate be kept within easy reach when driving. This case highlighted the fact that they do not routinely send this to known diabetic drivers, save on request.

The 2 medical experts involved in this case have between them experience of 10 other similar cases which resulted in a conviction and custodial sentence for the respective Defendants.

Given the number of drivers who suffer from diabetes in the UK we intend to produce a joint article with the medical experts involved in this case and Counsel, for publication in medico legal journals in an effort to raise awareness of this issue.

Regina v James Higgs [2008]

Contact: Paul Dunn, details on page 8.

Contributory negligence of 15% for failure to wear seatbelt

The Claimant was the front seat passenger in a car involved in a road traffic accident that left her with severe injuries including head injuries. She had not been wearing a seatbelt at the time. The Court was asked to consider whether the Claimant would have sustained greater injuries if she had worn a seatbelt and whether her damages should be reduced at all or by only a small amount by reason of her failure to wear one. The Judge rejected the Claimant's argument that it was inevitable that she would have suffered greater injuries and reduced her damages by 15% following the previous decisions in **Froom v Butcher [1976] CA, Patience v Andrews [1983]** and **Traynor v Donovan [1978].**

Sophie Elizabeth Palmer v Christopher Kitley [2008]

Partner Perspective

Andrew McDougall, Partner in the Parabis Group, comments on the consolidation of the defendant businesses.

Following the consolidation of the defendant businesses we have decided to use Plexus Law as our brand name for all our defendant work so the names Praxis Partners, GW Law and Badhams Law have all been replaced by Plexus Law. Other than this there will be no changes whatsoever.

With a well established insurance market reputation, the range of services and levels of expertise within Plexus Law will be further enhanced through the creation of a single defendant brand.

It is particularly pleasing for me as one of the founding Partners of Praxis Partners to see how our business has grown and expanded and how the rebranding and integration of the Parabis Group will see Plexus Law become one of the largest defendant insurance businesses in the country. We now provide full national coverage, servicing all the legal insurance market, across both personal and non personal injury claims.

The new Plexus Law Catastrophic Loss Team is evidence of our strength in depth and of our intention to continue to provide innovative solutions to the insurance market. The Team of 11, including leading industry specialists, will be deployed across 4 locations in London, Leeds, Colchester and Croydon, ensuring a swift and effective response appropriate to the unique nature of these claims. Every catastrophic incident requires a bespoke, holistic approach to the claim which Plexus, as part of the multi – disciplinary Parabis Group, will be well positioned to deliver.

The Group will continue to provide a range of professional services to the insurance industry through its Argent brands – Argent Liability Adjusters, Argent Rehabilitation and Argent Health and Safety. Completing the Group's suite of offerings will be Parabis Limited, which provides outsourced claims handling solutions.

Our position as a large and specialist insurance law business means that we are able to attract the best talent when undertaking any recruitment exercise.

Throughout the consolidation process and beyond we remain totally focused on ensuring continued and enhanced service delivery to our clients. We are confident that the changes we are making will place the Group in a robust position to forge ahead with further growth and innovation.

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The content of this newsletter is merely informative and should not be relied upon as a substitute for legal advice.

We hope you have enjoyed this issue of Legal Matters. However, if you do not wish to continue receiving the publication, please email : anna.pickles@parabis.co.uk providing your name, company name and address.