

Sample Solicitors  
Address 1  
Address 2  
Address 3  
Postcode

Date: 26 February 2010

Your ref: ABC/DEF/12/345

Our Ref: ACC5432

Inspector: Jack Bowyer

Claim Technician: Gary Jones

**“Client interviewed”**

Dear Sirs

**Re: Your Client – Joe Bloggs  
Accident – 21 July 2009**

We are pleased to confirm that we have that we have interviewed your client enabling us to report as follows:

**CLIENT**

Joe Bloggs is 39 years of age. He is a Driver employed by ABC Taxi's. He lives with his wife and three children.

His English was not good, though an interpreter did assist when required.

As a result of the language difficulties his account is not overburdened with detail but it did seem plausible enough when describing how he was stationary and hit whilst at Heathrow Airport.

He would need an interpreter if matters were to proceed towards a Court hearing and this is not inconceivable that your opponent could raise causation issues given it is alleged there was minimal damage to your clients vehicle. Indeed he states that there is no claim for vehicle repair as a friend simply “knocked the dent out”.

## **CLEINTS EVIDENCE**

We refer you to the statement attached, the main points of which are as follows:

### **a. Accident Circumstances**

- He had just dropped off three passengers off at Heathrow, Terminal 3 and he was in the drop off lay by when he was hit from behind.
- He states the impact was hard and it knocked him forwards.
- He had been hit by a Porsche and the occupant apparently tried to blame him but he was adamant that he was stationary.
- Heathrow Airport Police just told them to exchange details and those details have since been sent to you.

### **b. Quantum**

- He states he had pains across his back and headaches which affected his sleep from the first night.
- He saw his Doctor three/four days after and was given painkillers.
- He was unable to work due to the pain he was suffering and took forty five days off losing £2000 in earnings.
- He used to swim three times per week but has not done so since the incident.
- He states he still suffers from odd pains especially when he wakes up in the morning and his blood pressure has increased.
- The incident was not reported to the vehicles insurers Sample Insurers as the car only had a dent which a friend repaired for free by knocking it out.

## **OPINION/RECOMMENDATION**

It was regrettable that we have not been presented with details of any witnesses and it is not inconceivable that your opponents may raise causation issues given the minimal damage to your client's vehicle.

We are a little perturbed that your client states that the occupants of the other vehicle attempted to blame him at the accident scene although he was adamant that he was stationary when hit.

At present we have no evidence to contradict his assertions. Similarly we have no reason to suppose that his account is inherently unreliable at this stage although clearly the interview was a little disjointed and problematic due to the language difficulties experienced.

## **TIMESHEET**

We have been engaged upon this file as follows:

- File administration – 45 minutes
- Travel to, and interview with, your client – 180 minutes
- Technical compilation - 40 minutes
- Finalisation -20 minutes

## **ENCLOSURES**

We enclose the following:

- A note of our fee for your information.
- Typed version of the draft statement taken.

Yours faithfully