**IN THE NORTHAMPTON (CCMCC) COUNTY COURT CASE NO:**

**B E T W E E N:**

**MR UNNAMED PERSON**

**Claimant**

**AND**

**A FICTITIOUS CARE HOME COMPANY**

**Defendant**

**CLAIMANT’S SCHEDULE OF LOSS**

**Background:**

Assault date 1 March 2012

Liability Denied

Claimant’s Date of Birth 21 January 1950

Claimant’s age at date of assault 62 years

Claimant’s age at date of schedule 65 years

The Claimant claims damages for personal injury and associated losses incurred as a result of an assault at work on 1 March 2012.

The Claimant was employed by the Defendant as a care home assistant in a care home in a fictitious town in Southern England.

**PART A. GENERAL DAMAGES**

The Claimant submits that his right wrist injury falls within bracket 10 (H) (c) of the Judicial College Guidelines.

The Claimant’s medical expert, Mr Consultant, opined that the symptoms the Claimant now describes were accelerated by a period of 3 to 5 years as a result of the assault.

The Claimant has further suffered psychological injury as a result of the assault and, in particular, has suffered with anxiety and depression. The Claimant intends to obtain further medical evidence from Consultant Psychologist/Consultant Psychiatrist.

**Total General Damages TBA**

**PART B. SPECIAL DAMAGES**

**PAST LOSSES**

1. **Loss of Earnings**

The Claimant resigned from his employment on 1 March 2013, as he was unable to continue to work as a result of his injuries. The Claimant submits that he would have continued to work had the assault not occurred, until he was due to retire aged 68.

The Claimant’s earnings before the assault was x.

The Claimant’s post-assault earnings was y.

**Total Past Loss of Earnings: £20,000.00**

1. **Care and Assistance**

Care is claimed at reduced rates based on NJC rates to allow for the gratuitous nature of the care provided. In accordance with the NJC rate of £8.85 per hour reduced by 25% as per *Evans v Pontypridd Roofing Ltd* [[2001] EWCA Civ 1657, care is claimed at £6.64 per hour.

The Claimant claims for three hours care and assistance per day between 1 March 2012 and 1 September 2012. During this period, the Clamant had difficulties dressing himself and performing even the most basis of domestic and household chores. The Claimant’s wife provided him with care and assistance.

3 hours per day x 15? days x £6.64 per hour: **£3,067.68**

The Claimant claims for two and a half hours of care and assistance per day between 1 September 2012 and 1 December 2012. During this period, the Claimant was recovering from surgery and continued to have severely limited function in his right hand.

* 1. hours per day for 18? days at £6.64 per hour: **£2,988.00**

**Total Past Care and Assistance: £6,0?0.00**

1. **Past Travel Expenses**
2. *Mileage Expenses*

As a result of his assault-caused injuries the Claimant has incurred significant travel expenses. The Claimant has been required to attend a large number of medical appointments as a result of her injuries as set out below, claimed at a rate of £0.45 per mile:

The Claimant has attended a Hospital on 23 occasions, which was a round trip of 21.6 miles from his home.

23 attendances x 21.6 miles x £0.45 per mile = £223.56

The Claimant has attended his GP on 11 occasions, which is a round trip of 1.4 miles from his home.

11 attendances x 1.4 miles x £0.45 per mile = £6.16

On 1 March 2015 the Claimant attended an appointment with Mr Consultant Hand Surgeon at a hospital.

42.4 miles x £0.45 per mile = £19.08

1. *Parking Charges*

When the Claimant attended a Hospital and incurred parking charges of around £2.50 per visit.

23 visits x £2.50 = £57.50

**Total Past Travel Expenses £306.30**

**FUTURE LOSSES**

1. **Future Care and Assistance**

The Claimant continues to have difficulties carrying out certain domestic chores, for example, hanging out washing and preparing vegetables. The Claimant’s wife continues to provide him with care and assistance in this regard.

The Claimant claims for one hour of care and assistance per day for between 1 September 2017 and 1 March 2018.

The Claimant claims one hour per day for 170 days at £6.64 per hour.

**Total Future Care and Assistance: £1,1?8.80.**

1. **Future Travel Expenses TBA**

The Claimant will incur future travel expenses in relation to attending further medical appointments in relation to his injuries.

**Summary**

**GENERAL DAMAGES £TBA**

**PAST LOSSES**

1. **Past Loss of Earnings: £20,000.00**
2. **Care and Assistance: £6,000.00**
3. **Past Travel Expenses: £306.30**

**FUTURE LOSSES**

1. **Future Care and Assistance: £1,128.80**
2. **Future Travel Expenses: £TBA**

**GRAND TOTAL: £TBC**

**STATEMENT OF TRUTH**

I believe the facts stated in this Schedule of Loss are true to the best of my knowledge and belief.

Dated this day of 2018

Signed

**………………………………………………………………………………………..**

MR INJURED CLAIMANT

Truth Legal

6 Princes Square

Harrogate

HG1 1LX

Solicitors for the Claimant