

**REPUBLIC OF TRINIDAD AND TOBAGO**

**IN THE HIGH COURT OF JUSTICE**

Claim No. **CV2016-04365**

BETWEEN

**THE SPORTS COMPANY OF TRINIDAD AND TOBAGO LIMITED**

Claimant

And

**SEBASTIAN PADDINGTON**

First Defendant

**CHELA LAMSEE-EBANKS**

Second Defendant

**REYNOLD BALA**

Third Defendant

**NORRIS BLANC**

Fourth Defendant

**NISA DASS**

Fifth Defendant

**ANYL GOPEESINGH**

Sixth Defendant

**SABRENAH KHAYYAM**

Seventh Defendant

**CHEEMATTEE MARTIN**

Eighth Defendant

**MATTHEW QUAMINA**

Ninth Defendant

**ANNAN RAMNANANSINGH**

Tenth Defendant

**KENT SAMLAL**

Eleventh Defendant

**HARNARINE SEERAM SINGH**

Twelfth Defendant

**MILTON SIBOO**

Thirteenth Defendant

**JOHN MOLLENTHIEL**

Fourteenth Defendant

**Before the Honourable Mr. Justice R. Rahim**

**Appearances:**

Mr. C. Kangaloo instructed by Ms. S. Moe for the Claimant

Mr. S. Sharma for the First, Second, Fifth and Ninth Defendants

Mr. R. Mungalsingh for the Third, Seventh, Tenth, Twelfth and Thirteenth Defendants

Mr. A. Viera and Mr. A. Maraj instructed by Ms. N. de Verteuil-Milne for the Fourth Defendant

Ms. S. Gopeesingh instructed by Ms. K. Persaud-Maraj for the Sixth Defendant

Mr. N. Bisnath for the Eighth Defendant

Mr. R. Jagai for the Eleventh Defendant

Mr. R. Dass and Mr. Punwasee for the Fourteenth Defendant

## **RULING ON BUDGETED COSTS APPLICATIONS**

1. These are reasons for the court's decision on several applications for budgeted costs brought by the 3<sup>rd</sup>, 4<sup>th</sup>, 6<sup>th</sup>, 7<sup>th</sup>, 10<sup>th</sup>, 12<sup>th</sup>, 13<sup>th</sup> and 14<sup>th</sup> defendants. There are four applications before the court, that of the 4<sup>th</sup> defendant filed on the 14<sup>th</sup> December 2017, two of the 3<sup>rd</sup> January 2018 by the 14<sup>th</sup> and 6<sup>th</sup> defendants respectively and one of the 4<sup>th</sup> January 2018 filed by the other applicants listed above. For the sake of convenience, the applications are referred to and dealt with in their chronological order.
2. The claim is one for 34 million dollars and is brought by a state enterprise against its entire former board of which the defendants were members. In total the claim is brought against 14 individuals and concerns the capabilities, responsibilities and duties of all 14 former directors. The claim contains a wide public interest component as the issues touch and concern the fiduciary duties of board members of state enterprises and by extension the expenditure of state funds. The court notes that it is the claimant's case that each of the defendants committed a breach of fiduciary duty by causing the claimant to enter into a contract to a company named eBeam Interact Limited and subsequently making payments under the said contract. eBeam was a company selected as a service provider for the purpose of implementation of the Life Sport Program throughout 33 communities within Trinidad and Tobago. The claimant alleges that in so doing the defendants are liable jointly and/or severally, for breach of statutory duty and/or breach of fiduciary duty, and/or the duty to exercise care, diligence and skill.
3. Prescribed costs calculated in accordance with Appendix B of Part 67.5, which is the measure of costs applicable in this case in the usual course of events amounts to the sum of \$404,000.00. It is to be noted that the applicants all retained at least one filing or instructing attorney, and one Junior Advocate on their behalf. Additionally, some of the defendants have retained a Senior Advocate. The court accepts that given the circumstances of this case, it is reasonable to have retained all three. The applicants all submit that the award of prescribed costs would be wholly unreasonable in the circumstances and that it would be fair and reasonable for the court to set a higher costs budget. To that end the

applicants have all attached to their respective applications, a schedule of a proposed budget for costs. I shall return to the sum proposed by each later on.

### The applications

4. The 4<sup>th</sup> defendant submits that the matter is novel and complex having regard to the defence raised by the 4<sup>th</sup> defendant and issues such as the lack of actual autonomy by the very board over the affairs of the state enterprise and the subordination of the will of the state enterprise to the will of the government. The court does not agree that this case is novel as there are other matters of a similar nature which are presently before these courts, a preliminary point on such matter in respect of limitation having been recently determined by Their Lordships of the Privy Council. The court agrees however that the case is likely to be complex having regard to the multiplicity of issues and parties involved, the volume of documents, applications likely to be filed and number of witnesses that are likely to be called. The 4<sup>th</sup> defendant therefore submits that the sum of **\$3,132,490.00** as set out in his proposed budget is fair and reasonable.
5. The 6<sup>th</sup> defendant submits that it is fair and reasonable that a costs budget be set higher than the prescribed costs as prescribed costs are grossly inadequate having regard to the nature and circumstances of the case, the issues to be determined and the work required. The 6<sup>th</sup> defendant has proposed a costs budget of **\$2,139,525.00**.
6. The 14<sup>th</sup> defendant was the Chief Executive Officer of the claimant. He submits that the claim raises several complex issues of mixed law and fact including the determination of the precise nature of the relationship between the GORTT and the MSYA and the SPORTT in relation to the LSP, whether the invitation to tender for and the award of the contract were subject to the control, management and discretion of the GORTT or the claimant, whether the 14<sup>th</sup> defendant was at the material times implementing the business and directives of the GORTT, the sole shareholder in the claimant along with several other issues. It should be noted that the tenor of the issues set out by the 14<sup>th</sup> defendant is not dissimilar to the defences raised by most if not all of the applicants, namely that the

SOPRTT was simply doing the bidding of the government to put it in an absolutely simple form. The issue is of course more complex than that expressed herein but the result is that this defendant's defence appears to be on par with the others and therefore there it is likely that there will be no need for submissions and consideration of wholly complex separate issues in relation to the 14<sup>th</sup> defendant by virtue of the fact that he was the CEO. The 14<sup>th</sup> defendant submitted that the sum of **\$1,563,037.50** is a fair and reasonable one for a costs budget.

7. The 3<sup>rd</sup>, 7<sup>th</sup>, 10<sup>th</sup>, 12<sup>th</sup> and 13<sup>th</sup> defendants together filed a joint application for budgeted costs. The terms of the application are almost identical to those filed by the 14<sup>th</sup> defendant and these defendants have also submitted that the sum of **\$1,563,037.50** is fair and reasonable. It should however be noted that despite setting out this figure in the application, the defendants set out a higher figure in their statement of proposed costs in the sum of **\$1,626,937.50**. The latter figure was also set out in the affidavit in support of the joint application.

#### Opposition to the applications

8. The claimant opposes the application of the 4<sup>th</sup> defendant on the basis that the sum proposed namely, \$3,132,490.00 is unreasonable, inflated and disproportionate having regard to the circumstances of the case. In relation to the other applications the claimant submits that prescribed costs is adequate and proportional with the complexity of the claim and the clear issues of fact and law raised therein which are not onerous and complex. In so doing the claimant prays in aid of its submissions the overriding objective of the CPR. Further, it argues that the issues in this case fall squarely within the law of directors and officers duties under the provisions of the Companies Act Chap 8:01. The breach of fiduciary duties and the common law in relation to the issues are standard and the relevant principles have long been established. Further, the issues raised are not novel. The claimant also submits that in respect of the application of the 6<sup>th</sup> defendant, other than a bald statement, no basis has been set out for the court to exercise its discretion to make an order for budgeted costs.

## The Law

9. In **Mukesh Sirju v The Attorney General of Trinidad and Tobago CV2014-03454 at paragraphs 13 & 14**, Justice Robin Mohammed stated the following in relation budgeted costs;

*“13. The rationale for budgeted costs, as conceptualized by Mr. Dick Greenslade, the initial draughtsman of the CPR, is documented in his report “Review of Civil Procedure” thus:*

*“The aim would be that the fixed costs regime, properly constructed, should cover some 85-90 percent of all litigation. However, there will be cases in which the low amount of the claim masks considerable complications of law and/or facts. These are mainly those types of cases which I describe as complex cases...In such cases the fixed costs might well not be appropriate. Hence my suggestion that the parties could agree, or one party could apply at the case management conference, for a budget to be fixed for the case.”*

*14. Therefore, according to Greenslade, parties may agree or one party may apply for a costs budget to be fixed once it is perceived that the recoverable costs would be disproportionately low vis-à-vis the complexity of the matter. It follows that Greenslade’s view is that budgeted costs may be applied for whenever a party holds the view that prescribed costs will not adequately represent recoverable costs of proceedings. Indeed, that appears to be the view adopted in National Insurance Board v. National Insurance Appeals Tribunal H.C.A. CV 2005-00748 by Stollmeyer J. To me, it appears that the logical conclusion of Greenslade’s view would be that in practically every instance, the purpose of an application for a costs budget would be to increase the sum of recoverable costs.”*

## Findings on the applications

10. In determining whether to order budgeted costs the court has considered the following factors which are not exhaustive;
- a. The issues to be decided by the court will more likely than not be the same in respect of all of the defendants save and except for the 14<sup>th</sup> defendant who is the former Chief Executive Officer of the claimant. In respect of this defendant,

there are likely to be additional issues and the evidence to be presented in respect of him by the claimant may require an additional witness or two. As a consequence should he choose to lead evidence he may choose to call additional witnesses. No such submission has been made but it is a reasonable inference to be drawn from the circumstances.

- b. The issues in respect of each defendant will have to be treated with by the court and given separate consideration.
- c. The proceedings are voluminous.
- d. Each defendant will be entitled to his own representation and to take whatever points of law he wishes to take. In this regard the court does not accept the submission of the claimant that the court should view the issue of costs in its totality, in that when all the proposed costs budgets are tallied, the figure is likely to exceed some 8 million dollars and the court should consider this sum to be disproportionate to the value of the claim. In this regard it is also noted that in the event the claimant is successful against the defendants each of them may be liable for the full sum of 34 million dollars. When view from that perspective, the submission of the claimant holds no merit in the court's view.
- e. Each defendant will be liable for costs separately from the others.
- f. The issues are likely to be complex not so much as a matter of complex legal principles (save and except perhaps in relation to the 14<sup>th</sup> defendant) but in relation to the number of issues that will likely be traversed before the court.
- g. The process of case management conferencing is likely to be protracted in this case.
- h. The process of evidential objections is likely to be a protracted one.
- i. The trial is likely to take up a substantive part of the court's schedule and will no doubt involve the participation of attorneys in a trial that is likely to last about two weeks. Attorneys fees are therefore to be way beyond that which will be recoverable under the prescribed costs regime.
- j. Closing submissions are likely to be extensive beyond that which usually prevails.

- k. The court is required to strike a balance in its decision with a view to ensuring that the parties are placed on an equal footing and that proportionality is applied when considering the importance of the case, the complexity of the issues, the amount of money involved and the financial position of each party.
11. The court finds that the facts of this case raise important public issues such as the accountability of state boards in relation to their duty to the state and to the public in the spending of public funds and the relationship between any given executive and the state board. Such matters at all times lie at the heart of the democratic process and their importance can never be understated. Further, the court considers that the allegations made against the defendants in their capacity of officers vested with a public function are very serious allegations which require full scrutiny and determination. In this regard that the very serious allegation involves what on any measure can be considered to be considerable amount of public funds namely some thirty-four million dollars.
12. The court also notes that whilst it is unaware of the financial position of the parties it can be reasonably presumed that the claimant may be in a financial position that is somewhat superior to most of the applicants having regard to the claimant's access to the resources of the state.
13. In all of the circumstances therefore the court finds that it is fair and reasonable to set a costs budget in respect of all of the applicants as prescribed costs in the sum set out above will be inadequate and unreasonable.
14. In relation to the application of the 4<sup>th</sup> defendant, the court accepts the argument that of the claimant that the proposed budget is wholly disproportionate to the circumstances of the case and in the court's view there is no proper reason to make such a wide distinction between the 4<sup>th</sup> defendant and the other applicants. Further, the court is of the view that the issues which touch and concern all of the defendants being the same in large measure (except in relation to the 14<sup>th</sup> defendant) there ought to be consistency in the budget set in keeping with the principles of fairness.



15. Additionally, the court is of the view that despite the fact that the 14<sup>th</sup> defendant may have an additional issue or additional issues to treat with, this by itself does not justify any increase in the costs budget above that which will be set by the court in relation to the other applicants. It is also to be noted that by **Part 67.10 CPR**, unless the approved costs budget specifies otherwise rule **67.7** applies to budgeted costs as it does to fixed costs. That rules specifies as follows;

*Prescribed costs include all work that is required to prepare the proceedings for trial including, in particular, the costs involved in instructing any expert, in considering and disclosing any report made by him or arranging his attendance at trial and for attendance and advocacy at the trial including attendance at any case management conference or pre-trial review but exclude*

—

*(a) the making or opposing of any application except at a case management conference or pre-trial review;*

*(b) expert's fees for preparing a report and attending any conference, hearing or trial; and*

*(c) costs incurred in enforcing any order (which are generally fixed in accordance with rule 67.4 but may, in certain cases, be assessed in accordance with rule 67.12).*

16. These courts have long since dispensed with taxed costs so that the figures set out by the 4<sup>th</sup> defendant in relation to filing fees and the like is that which would usually apply when a court is taxing costs on an item by item basis but that is not the function of this court. The court will however, allow a lumpsum figure that is reasonable for filing and miscellaneous matters.

17. Finally, the court has considered the submissions by the claimant in opposition on the figures in relation to each applicant in its assessment of that which is reasonable and fair. It is to be noted that the figure in respect of each applicant will be dependent on the number of years call of each advocate and instructing attorney. “Appendix 1” attached to these reasons shall stand as the costs budget and the order of the court shall therefore be as follows.

- a. The sums particularized at the appendix attached to this order shall stand as the Costs Budget set by this court in relation to the claims against the third, fourth, sixth, seventh, tenth, twelfth, thirteenth and fourteenth defendants respectively.

Dated the 30<sup>th</sup> day of April 2018

Ricky Rahim

Judge

**APPENDIX**

**THE FOURTH DEFENDANT**

**LEAD ADVOCATE'S COSTS AT THE RATE OF \$2,850.00 PER HOUR**

1. Receiving, reviewing and advising on the claimant's Fixed Date Claim Form, Amended Statement of Case (3 hours).

**\$8,550.00**
  
2. Receiving, reviewing and advising on instructions and voluminous documentation (25 hours).

**\$71,250.00**
  
3. Meetings with Instructing Attorney (8 hours).

**\$22,800.00**
  
4. Considering the law, analysis and evaluation of the case against the claimant (10 hours)

**\$28,500.00**
  
5. Settling the defendant's defence to the claim (10 hours)

**\$28,500.00**
  
6. Receiving, reviewing and advising on the defences of the other 13 defendants (6 hours)

**\$17,100.00**
  
7. Attendance at Case Management Conference (6 hours)

**\$17,100.00**

8. Receiving, reviewing and advising on the claimant's written submission in opposition (4 hours)	<b>\$11,400.00</b>
9. Settling the defendant's Reply to the claimant's written submissions (2 hours)	<b>\$5,700.00</b>
10. Settling the defendant's List of Documents (7 hours)	<b>\$19,950.00</b>
11. Receiving, reviewing and advising on the claimant's List of Documents (2 hours)	<b>\$5,700.00</b>
12. Receiving, reviewing and advising on the Lists of Documents filed on behalf of the other 13 defendants (3 hours)	<b>\$8,550.00</b>
13. Settling the un-agreed statement of issues (1.5 hours)	<b>\$4,275.00</b>
14. Reviewing and advising on the claimant's un-agreed statement of issues (1.5 hours)	<b>\$4,275.00</b>
15. Reviewing, advising on the other 13 defendants' un-agreed statement of issues (1.5 hours)	<b>\$4,275.00</b>
16. Settling an agreed statement of issues (2 hours)	<b>\$5,700.00</b>
17. Settling the witness statements (10 hours)	<b>\$28,500.00</b>
18. Receiving, considering and advising on the claimant's witness statements (7 hours)	<b>\$19,950.00</b>
19. Receiving, considering and advising on the other 13 defendant's witness statements (7 hours)	<b>\$19,950.00</b>
20. Pretrial preparation, client conferences, conferences with Instructing Attorney, preparation for cross-examination, analysis of law and evidence, etc. (15 hours)	<b>\$42,750.00</b>

21. Settling written submissions on the substantive claim and reviewing authorities in support thereof (15 hours)

**\$42,750.00**

22. Reviewing, considering and advising on the claimant's written submissions and authorities (5 hours)

**\$14,250.00**

23. Receiving, considering and advising on the other 13 defendants' written submission and authorities (5 hours)

**\$14,250.00**

24. Settling written submissions in reply (5 hours)

**\$14,250.00**

25. Refreshers at the rate of \$1,000.00 per hour for 2 weeks (40 hours)

**\$40,000.00**

26. Conferences with the client and/or instructing Attorney other than for the purpose of preparation for trial (7 hours)

**\$19,950.00**

**JUNIOR ADVOCATE'S COSTS AT THE RATE OF \$2,300.00 PER HOUR**

27. Receiving, reviewing and advising on the claimant's Fixed Date Claim Form, Amended Statement of Case relative to this action (3 hours).

**\$6,900.00**

28. Receiving, reviewing and advising on instructions and voluminous documentation (25 hours).

**\$57,500.00**

29. Meetings with Instructing Attorney (8 hours).

**\$18,400.00**

30. Considering the law, analysis and evaluation of the case against the claimant (10 hours)

	<b>\$23,000.00</b>
31. Settling the defendant's defence to the claim (10 hours)	<b>\$23,000.00</b>
32. Receiving, reviewing and advising on the defences of the other 13 defendants (6 hours)	<b>\$13,800.00</b>
33. Attendance at Case Management Conference (6 hours)	<b>\$13,800.00</b>
34. Receiving, reviewing and advising on the claimant's written submission in opposition thereto (4 hours)	<b>\$9,200.00</b>
35. Settling the defendant's Reply to the claimant's written submissions (2 hours)	<b>\$4,600.00</b>
36. Settling the defendant's List of Documents (7 hours)	<b>\$16,100.00</b>
37. Receiving, reviewing and advising on the claimant's List of Documents (2 hours)	<b>\$4,600.00</b>
38. Receiving, reviewing and advising on the Lists of Documents filed on behalf of the other 13 defendants (3 hours)	<b>\$6,900.00</b>
39. Settling the un-agreed statement of issues (1.5 hours)	<b>\$3,450.00</b>
40. Reviewing and advising on the claimant's un-agreed statement of issues (1.5 hours)	<b>\$3,450.00</b>
41. Reviewing, advising on the other 13 defendants' un-agreed statement of issues (1.5 hours)	<b>\$3,450.00</b>
42. Settling an agreed statement of issues (2 hours)	

	<b>\$4,600.00</b>
43. Settling the witness statements (10 hours)	
	<b>\$23,000.00</b>
44. Receiving, considering and advising on the claimant's witness statements (7 hours)	
	<b>\$16,100.00</b>
45. Receiving, considering and advising on the other 13 defendant's witness statements (7 hours)	
	<b>\$16,100.00</b>
46. Pretrial preparation, client conferences, conferences with Instructing Attorney, preparation for cross-examination, analysis of law and evidence, etc. (15 hours)	
	<b>\$34,500.00</b>
47. Settling written submissions on the substantive claim and reviewing authorities in support thereof (15 hours)	
	<b>\$34,500.00</b>
48. Reviewing, considering and advising on the claimant's written submissions and authorities (5 hours)	
	<b>\$11,500.00</b>
49. Receiving, considering and advising on the other 13 defendants' written submission and authorities (5 hours)	
	<b>\$11,500.00</b>
50. Settling written submissions in reply (5 hours)	
	<b>\$11,500.00</b>
51. Refreshers at the rate of \$1,000.00 per hour for 2 weeks (40 hours)	
	<b>\$40,000.00</b>
52. Conferences with the client and/or instructing Attorney other than for the purpose of preparation for trial (7 hours)	
	<b>\$16,100.00</b>
53. Preparation and court appearance for budgeted costs application (1 hour)	
	<b>2,300.00</b>

**INSTRUCTING ATTORNEY'S COSTS AT THE RATE OF \$2,600.00 PER HOUR**

54. Receiving, reviewing and advising on the claimant's Fixed Date Claim Form, Amended Statement of Case (3 hours)	<b>\$7,800.00</b>
55. Preparing and filing Appearance on behalf of the defendant (0.5 hours)	<b>\$1,300.00</b>
56. Conferences with client in order to obtain initial instructions (4 hours)	<b>\$10,400.00</b>
57. Receiving, reviewing and advising on instructions and documentation (8 hours)	<b>\$20,800.00</b>
58. Meetings with Counsel and the defendant (8 hours)	<b>\$20,800.00</b>
59. Considering the law, analysis and evaluation of the case against the claimant (5 hours)	<b>\$13,000.00</b>
60. Collaborating with Counsel in the preparation, filing and serving of the defendant's defence (5 hours)	<b>\$13,000.00</b>
61. Receiving, reviewing and forwarding to Counsel the defences filed on behalf of the other 13 defendants (3.5 hours)	<b>\$9,100.00</b>
62. Receiving, reviewing and forwarding to Counsel the claimant's written submission in opposition (2 hours)	<b>\$5,200.00</b>
63. Collaborating with Counsel in drafting the defendant's Reply to the claimant's written submissions, filing and serving same (2 hours)	<b>\$5,200.00</b>
64. Attendance at the Case Management Conferences (6 hours)	<b>\$15,600.00</b>
65. Collaborating with Counsel in drafting, filing and serving the defendant's List of Documents (5 hours)	<b>\$13,000.00</b>



66. Accepting service of, considering and forwarding to Counsel the claimant's List of documents (2 hours)  
**\$5,200.00**
67. Collaborating with Counsel in drafting, filing and serving the defendant's un-agreed statement of issues (1.5 hours)  
**\$3,900.00**
68. Accepting service of, considering and forwarding to Counsel the claimant's un-agreed statement of issues (1.5 hours)  
**\$3,900.00**
69. Collaborating with Counsel in compiling, filing and serving the defendant's un-agreed bundle of documents (3 hours)  
**\$7,800.00**
70. Accepting service of, considering and forwarding Counsel the claimant's un-agreed bundle of documents (1.5 hours)  
**\$3,900.00**
71. Accepting service of, considering and forwarding Counsel the other 13 defendants' un-agreed bundle of documents (1.5 hours)  
**\$3,900.00**
72. Collaborating with Counsel in the preparation of the defendant's un-agreed statement of issues (1.5 hours)  
**\$3,900.00**
73. Collaborating with Counsel in finalizing an agreed and un-agreed bundle of documents (3 hours)  
**\$7,800.00**
74. Collaborating with Counsel in drafting, filing and serving the defendant's witness statements (10 hours)  
**\$26,000.00**
75. Accepting service of, considering and forwarding Counsel the claimant's witness statements (7 hours)  
**\$18,200.00**

76. Accepting service of, considering and forwarding Counsel the other 13 defendants' witness statements (7 hours)	<b>\$18,200.00</b>
77. Attendance at the Pretrial review (1.5 hours)	<b>\$3,900.00</b>
78. Collaborating with Counsel in preparing the case for trial (15 hours)	<b>\$39,000.00</b>
79. Attendance with Counsel at trial at the rate of \$1,000.00 per hour for 40 hours	<b>\$40,000.00</b>
80. Collaborating with Counsel in drafting, filing and serving written submissions and bundles of authorities (5 hours)	<b>\$13,000.00</b>
81. Accepting service of, considering and forwarding to Counsel the claimant's written submission and authorities (5 hours)	<b>\$13,000.00</b>
82. Accepting service of, considering and forwarding to Counsel the other 13 defendants' written submission and authorities (5 hours)	<b>\$13,000.00</b>
83. Collaborating with Counsel in drafting, filing and serving written submissions in Reply (5 hours)	<b>\$13,000.00</b>
84. Letters, telephone calls, faxes and electronic mail for the purpose of taking instructions and providing progress reports to the client and for the purpose of corresponding with Counsel, Attorneys representing other parties in the proceedings, the Court Office and the Judicial Support Officer (10 hours)	<b>\$26,000.00</b>
85. Preparation and court appearance for budgeted costs application (2 hours)	<b>\$5,200.00</b>
86. Disbursements other than expert witness fees include;	
a. Filing fees	<b>\$1,000.00</b>
b. Photocopying, binding, and other Administrative Expenses	<b>\$20,000.00</b>

## Summary

A. Lead Advocate	\$520,225.00
B. Junior Advocate	\$429,850.00
C. Instructing Attorney	\$404,000.00
D. Disbursements and other charges	\$21,000.00
<b>Total</b>	<b>\$1,375,075.00</b>

**THE SIXTH DEFENDANT**

**LEAD ADVOCATE'S COSTS AT THE RATE OF \$2,300.00 PER HOUR**

1. Receiving, reviewing and advising on the claimant's Fixed Date Claim Form, Amended Statement of Case relative to this action (3 hours).  

**\$6,900.00**
  
2. Receiving, reviewing and advising on instructions and voluminous documentation (25 hours).  

**\$57,500.00**
  
3. Meetings with Instructing Attorney (8 hours).  

**\$18,400.00**
  
4. Considering the law, analysis and evaluation of the case against the claimant (10 hours)  

**\$23,000.00**
  
5. Settling the defendant's defence to the claim (10 hours)  

**\$23,000.00**
  
6. Receiving, reviewing and advising on the defences of the other 13 defendants (6 hours)  

**\$13,800.00**
  
7. Attendance at Case Management Conference (6 hours)  

**\$13,800.00**
  
8. Receiving, reviewing and advising on the claimant's written submission in opposition thereto (4 hours)  

**\$9,200.00**

9. Settling the defendant's Reply to the claimant's written submissions (2 hours)
 

**\$4,600.00**
10. Settling the defendant's List of Documents (7 hours)
 

**\$16,100.00**
11. Receiving, reviewing and advising on the claimant's List of Documents (2 hours)
 

**\$4,600.00**
12. Receiving, reviewing and advising on the Lists of Documents filed on behalf of the other 13 defendants (3 hours)
 

**\$6,900.00**
13. Settling the un-agreed statement of issues (1.5 hours)
 

**\$3,450.00**
14. Reviewing and advising on the claimant's un-agreed statement of issues (1.5 hours)
 

**\$3,450.00**
15. Reviewing, advising on the other 13 defendants' un-agreed statement of issues (1.5 hours)
 

**\$3,450.00**
16. Settling an agreed statement of issues (2 hours)
 

**\$4,600.00**
17. Settling the witness statements (10 hours)
 

**\$23,000.00**
18. Receiving, considering and advising on the claimant's witness statements (7 hours)
 

**\$16,100.00**
19. Receiving, considering and advising on the other 13 defendant's witness statements (7 hours)
 

**\$16,100.00**
20. Pretrial preparation, client conferences, conferences with Instructing Attorney, preparation for cross-examination, analysis of law and evidence, etc. (15 hours)
 

**\$34,500.00**
21. Settling written submissions on the substantive claim and reviewing authorities in support thereof (15 hours)
 

**\$34,500.00**

22. Reviewing, considering and advising on the claimant's written submissions and authorities (5 hours) **\$11,500.00**
23. Receiving, considering and advising on the other 13 defendants' written submission and authorities (5 hours) **\$11,500.00**
24. Settling written submissions in reply (5 hours) **\$11,500.00**
25. Refreshers at the rate of \$1,000.00 per hour for 2 weeks (40 hours) **\$40,000.00**
26. Conferences with the client and/or instructing Attorney other than for the purpose of preparation for trial (7 hours) **\$16,100.00**
27. Preparation and court appearance for budgeted costs application (1 hour) **2,300.00**

JUNIOR ADVOCATE'S COSTS AT THE RATE OF \$2,300.00 PER HOUR

28. Receiving, reviewing and advising on the claimant's Fixed Date Claim Form, Amended Statement of Case relative to this action (3 hours). **\$6,900.00**
29. Receiving, reviewing and advising on instructions and voluminous documentation (25 hours). **\$57,500.00**
30. Meetings with Instructing Attorney (8 hours). **\$18,400.00**
31. Considering the law, analysis and evaluation of the case against the claimant (10 hours) **\$23,000.00**

32. Settling the defendant's defence to the claim (10 hours)	<b>\$23,000.00</b>
33. Receiving, reviewing and advising on the defences of the other 13 defendants (6 hours)	<b>\$13,800.00</b>
34. Attendance at Case Management Conference (6 hours)	<b>\$13,800.00</b>
35. Receiving, reviewing and advising on the claimant's written submission in opposition thereto (4 hours)	<b>\$9,200.00</b>
36. Settling the defendant's Reply to the claimant's written submissions (2 hours)	<b>\$4,600.00</b>
37. Settling the defendant's List of Documents (7 hours)	<b>\$16,100.00</b>
38. Receiving, reviewing and advising on the claimant's List of Documents (2 hours)	<b>\$4,600.00</b>
39. Receiving, reviewing and advising on the Lists of Documents filed on behalf of the other 13 defendants (3 hours)	<b>\$6,900.00</b>
40. Settling the un-agreed statement of issues (1.5 hours)	<b>\$3,450.00</b>
41. Reviewing and advising on the claimant's un-agreed statement of issues (1.5 hours)	<b>\$3,450.00</b>
42. Reviewing, advising on the other 13 defendants' un-agreed statement of issues (1.5 hours)	<b>\$3,450.00</b>
43. Settling an agreed statement of issues (2 hours)	<b>\$4,600.00</b>

44. Settling the witness statements (10 hours)	<b>\$23,000.00</b>
45. Receiving, considering and advising on the claimant's witness statements (7 hours)	<b>\$16,100.00</b>
46. Receiving, considering and advising on the other 13 defendant's witness statements (7 hours)	<b>\$16,100.00</b>
47. Pretrial preparation, client conferences, conferences with Instructing Attorney, preparation for cross-examination, analysis of law and evidence, etc. (15 hours)	<b>\$34,500.00</b>
48. Settling written submissions on the substantive claim and reviewing authorities in support thereof (15 hours)	<b>\$34,500.00</b>
49. Reviewing, considering and advising on the claimant's written submissions and authorities (5 hours)	<b>\$11,500.00</b>
50. Receiving, considering and advising on the other 13 defendants' written submission and authorities (5 hours)	<b>\$11,500.00</b>
51. Settling written submissions in reply (5 hours)	<b>\$11,500.00</b>
52. Refreshers at the rate of \$1,000.00 per hour for 2 weeks (40 hours)	<b>\$40,000.00</b>
53. Conferences with the client and/or instructing Attorney other than for the purpose of preparation for trial (7 hours)	<b>\$16,100.00</b>
54. Preparation and court appearance for budgeted costs application (1 hour)	<b>2,300.00</b>



INSTRUCTING ATTORNEY'S COSTS AT THE RATE OF \$1,950.00 PER HOUR

55. Receiving, reviewing and advising on the claimant's Fixed Date Claim Form, Amended Statement of Case (3 hours)	<b>\$5,850.00</b>
56. Preparing and filing Appearance on behalf of the defendant (0.5 hours)	<b>\$975.00</b>
57. Conferences with client in order to obtain initial instructions (4 hours)	<b>\$7,800.00</b>
58. Receiving, reviewing and advising on instructions and documentation (8 hours)	<b>\$15,600.00</b>
59. Meetings with Counsel and the defendant (8 hours)	<b>\$15,600.00</b>
60. Considering the law, analysis and evaluation of the case against the claimant (5 hours)	<b>\$9,750.00</b>
61. Collaborating with Counsel in the preparation, filing and serving of the defendant's defence (5 hours)	<b>\$9,750.00</b>
62. Receiving, reviewing and forwarding to Counsel the defences filed on behalf of the other 13 defendants (3.5 hours)	<b>\$6,825.00</b>
63. Receiving, reviewing and forwarding to Counsel the claimant's written submission in opposition (2 hours)	<b>\$3,900.00</b>
64. Collaborating with Counsel in drafting the defendant's Reply to the claimant's written submissions, filing and serving same (2 hours)	<b>\$3,900.00</b>
65. Attendance at the Case Management Conferences (6 hours)	<b>\$11,700.00</b>
66. Collaborating with Counsel in drafting, filing and serving the defendant's List of Documents (5 hours)	<b>\$9,750.00</b>

67. Accepting service of, considering and forwarding to Counsel the claimant's List of documents (2 hours)
- \$3,900.00**
68. Collaborating with Counsel in drafting, filing and serving the defendant's un-agreed statement of issues (1.5 hours)
- \$2,925.00**
69. Accepting service of, considering and forwarding to Counsel the claimant's un-agreed statement of issues (1.5 hours)
- \$2,925.00**
70. Collaborating with Counsel in compiling, filing and serving the defendant's un-agreed bundle of documents (3 hours)
- \$5,850.00**
71. Accepting service of, considering and forwarding Counsel the claimant's un-agreed bundle of documents (1.5 hours)
- \$2,925.00**
72. Accepting service of, considering and forwarding Counsel the other 13 defendants' un-agreed bundle of documents (1.5 hours)
- \$2,925.00**
73. Collaborating with Counsel in the preparation of the defendant's un-agreed statement of issues (1.5 hours)
- \$2,925.00**
74. Collaborating with Counsel in finalizing an agreed and un-agreed bundle of documents (3 hours)
- \$5,850.00**
75. Collaborating with Counsel in drafting, filing and serving the defendant's witness statements (10 hours)
- \$19,500.00**
76. Accepting service of, considering and forwarding Counsel the claimant's witness statements (7 hours)
- \$13,650.00**

77. Accepting service of, considering and forwarding Counsel the other 13 defendants' witness statements (7 hours)	<b>\$13,650.00</b>
78. Attendance at the Pretrial review (1.5 hours)	<b>\$2,925.00</b>
79. Collaborating with Counsel in preparing the case for trial (15 hours)	<b>\$29,250.00</b>
80. Attendance with Counsel at trial at the rate of \$1,000.00 per hour for 40 hours	<b>\$40,000.00</b>
81. Collaborating with Counsel in drafting, filing and serving written submissions and bundles of authorities (5 hours)	<b>\$9,750.00</b>
82. Accepting service of, considering and forwarding to Counsel the claimant's written submission and authorities (5 hours)	<b>\$9,750.00</b>
83. Accepting service of, considering and forwarding to Counsel the other 13 defendants' written submission and authorities (5 hours)	<b>\$9,750.00</b>
84. Collaborating with Counsel in drafting, filing and serving written submissions in Reply (5 hours)	<b>\$9,750.00</b>
85. Letters, telephone calls, faxes and electronic mail for the purpose of taking instructions and providing progress reports to the client and for the purpose of corresponding with Counsel, Attorneys representing other parties in the proceedings, the Court Office and the Judicial Support Officer (10 hours)	<b>\$19,500.00</b>
86. Preparation and court appearance for budgeted costs application (2 hours)	<b>\$3,900.00</b>
87. Disbursements other than expert witness fees include;	
c. Filing fees	<b>\$1,000.00</b>

d. Photocopying, binding, and other Administrative Expenses **\$20,000.00**

**Summary**

A. Lead Advocate	\$429,850.00
B. Junior Advocate	\$429,850.00
C. Instructing Attorney	\$313,000.00
D. Disbursements and other charges	\$21,000.00
<b>Total</b>	<b>\$1,193,700.00</b>

**THE THIRD, SEVENTH, TENTH, TWELVETH AND THIRTEENTH DEFENDANTS**

**ADVOCATE'S COSTS AT THE RATE OF \$2,850.00 PER HOUR**

1. Receiving, reviewing and advising on the claimant's Fixed Date Claim Form, Amended Statement of Case relative to this action (3 hours).  

**\$8,550.00**
  
2. Receiving, reviewing and advising on instructions and voluminous documentation (25 hours).  

**\$71,250.00**
  
3. Meetings with Instructing Attorney (8 hours).  

**\$22,800.00**
  
4. Considering the law, analysis and evaluation of the case against the claimant (10 hours)  

**\$28,500.00**
  
5. Settling the defendant's defence to the claim (10 hours)  

**\$28,500.00**
  
6. Receiving, reviewing and advising on the defences of the other 13 defendants (6 hours)  

**\$17,100.00**
  
7. Attendance at Case Management Conference (6 hours)  

**\$17,100.00**
  
8. Receiving, reviewing and advising on the claimant's written submission in opposition thereto (4 hours)  

**\$11,400.00**

9. Settling the defendant's Reply to the claimant's written submissions (2 hours)
 

**\$5,700.00**
10. Settling the defendant's List of Documents (7 hours)
 

**\$19,950.00**
11. Receiving, reviewing and advising on the claimant's List of Documents (2 hours)
 

**\$5,700.00**
12. Receiving, reviewing and advising on the Lists of Documents filed on behalf of the other 13 defendants (3 hours)
 

**\$8,550.00**
13. Settling the un-agreed statement of issues (1.5 hours)
 

**\$4,275.00**
14. Reviewing and advising on the claimant's un-agreed statement of issues (1.5 hours)
 

**\$4,275.00**
15. Reviewing, advising on the other 13 defendants' un-agreed statement of issues (1.5 hours)
 

**\$4,275.00**
16. Settling an agreed statement of issues (2 hours)
 

**\$5,700.00**
17. Settling the witness statements (10 hours)
 

**\$28,500.00**
18. Receiving, considering and advising on the claimant's witness statements (7 hours)
 

**\$19,950.00**
19. Receiving, considering and advising on the other 13 defendant's witness statements (7 hours)
 

**\$19,950.00**
20. Pretrial preparation, client conferences, conferences with Instructing Attorney, preparation for cross-examination, analysis of law and evidence, etc. (15 hours)
 

**\$42,750.00**
21. Settling written submissions on the substantive claim and reviewing authorities in support thereof (15 hours)
 

**\$42,750.00**

22. Reviewing, considering and advising on the claimant's written submissions and authorities (5 hours) **\$14,250.00**
23. Receiving, considering and advising on the other 13 defendants' written submission and authorities (5 hours) **\$14,250.00**
24. Settling written submissions in reply (5 hours) **\$14,250.00**
25. Refreshers at the rate of \$1,000.00 per hour for 2 weeks (40 hours) **\$40,000.00**
26. Conferences with the client and/or instructing Attorney other than for the purpose of preparation for trial (7 hours) **\$19,950.00**
27. Preparation and court appearance for budgeted costs application (1 hour) **\$2,850.00**

**INSTRUCTING ATTORNEY'S COSTS AT THE RATE OF \$2,600.00 PER HOUR**

28. Receiving, reviewing and advising on the claimant's Fixed Date Claim Form, Amended Statement of Case (3 hours) **\$7,800.00**
29. Preparing and filing Appearance on behalf of the defendant (0.5 hours) **\$1,300.00**
30. Conferences with client in order to obtain initial instructions (4 hours) **\$10,400.00**
31. Receiving, reviewing and advising on instructions and documentation (8 hours) **\$20,800.00**
32. Meetings with Counsel and the defendant (8 hours) **\$20,800.00**
33. Considering the law, analysis and evaluation of the case against the claimant (5 hours) **\$13,000.00**

34. Collaborating with Counsel in the preparation, filing and serving of the defendant's defence (5 hours)
- \$13,000.00**
35. Receiving, reviewing and forwarding to Counsel the defences filed on behalf of the other 13 defendants (3.5 hours)
- \$9,100.00**
36. Receiving, reviewing and forwarding to Counsel the claimant's written submission in opposition (2 hours)
- \$5,200.00**
37. Collaborating with Counsel in drafting the defendant's Reply to the claimant's written submissions, filing and serving same (2 hours)
- \$5,200.00**
38. Attendance at the Case Management Conferences (6 hours)
- \$15,600.00**
39. Collaborating with Counsel in drafting, filing and serving the defendant's List of Documents (5 hours)
- \$13,000.00**
40. Accepting service of, considering and forwarding to Counsel the claimant's List of documents (2 hours)
- \$5,200.00**
41. Collaborating with Counsel in drafting, filing and serving the defendant's un-agreed statement of issues (1.5 hours)
- \$3,900.00**
42. Accepting service of, considering and forwarding to Counsel the claimant's un-agreed statement of issues (1.5 hours)
- \$3,900.00**
43. Collaborating with Counsel in compiling, filing and serving the defendant's un-agreed bundle of documents (3 hours)
- \$7,800.00**



44. Accepting service of, considering and forwarding Counsel the claimant's un-agreed bundle of documents (1.5 hours)  
**\$3,900.00**
45. Accepting service of, considering and forwarding Counsel the other 13 defendants' un-agreed bundle of documents (1.5 hours)  
**\$3,900.00**
46. Collaborating with Counsel in the preparation of the defendant's un-agreed statement of issues (1.5 hours)  
**\$3,900.00**
47. Collaborating with Counsel in finalizing an agreed and un-agreed bundle of documents (3 hours)  
**\$7,800.00**
48. Collaborating with Counsel in drafting, filing and serving the defendant's witness statements (10 hours)  
**\$26,000.00**
49. Accepting service of, considering and forwarding Counsel the claimant's witness statements (7 hours)  
**\$18,200.00**
50. Accepting service of, considering and forwarding Counsel the other 13 defendants' witness statements (7 hours)  
**\$18,200.00**
51. Attendance at the Pretrial review (1.5 hours)  
**\$3,900.00**
52. Collaborating with Counsel in preparing the case for trial (15 hours)  
**\$39,000.00**
53. Attendance with Counsel at trial at the rate of \$1,000.00 per hour for 40 hours  
**\$40,000.00**
54. Collaborating with Counsel in drafting, filing and serving written submissions and bundles of authorities (5 hours)  
**\$13,000.00**

55. Accepting service of, considering and forwarding to Counsel the claimant's written submission and authorities (5 hours)	<b>\$13,000.00</b>
56. Accepting service of, considering and forwarding to Counsel the other 13 defendants' written submission and authorities (5 hours)	<b>\$13,000.00</b>
57. Collaborating with Counsel in drafting, filing and serving written submissions in Reply (5 hours)	<b>\$13,000.00</b>
58. Letters, telephone calls, faxes and electronic mail for the purpose of taking instructions and providing progress reports to the client and for the purpose of corresponding with Counsel, Attorneys representing other parties in the proceedings, the Court Office and the Judicial Support Officer (10 hours)	<b>\$26,000.00</b>
59. Preparation and court appearance for budgeted costs application (2 hours)	<b>\$5,200.00</b>
60. Disbursements other than expert witness fees include;	
e. Filing fees	<b>\$1,000.00</b>
f. Photocopying, binding, and other Administrative Expenses	<b>\$20,000.00</b>

### **Summary**

A. Advocate	\$520,225.00
i. Value Added Tax	\$65,028.00
B. Instructing Attorney	\$404,000.00
i. Value Added Tax	\$50,500.00
C. Disbursements and other charges	\$21,000.00
<b>Total</b>	<b>\$1,060,753.00</b>

**THE FOURTEENTH DEFENDANT**

**JUNIOR ADVOCATE'S COSTS AT THE RATE OF \$2,300.00 PER HOUR**

1. Receiving, reviewing and advising on the claimant's Fixed Date Claim Form, Amended Statement of Case relative to this action (3 hours).  

**\$6,900.00**
  
2. Receiving, reviewing and advising on instructions and voluminous documentation (25 hours).  

**\$57,500.00**
  
3. Meetings with Instructing Attorney (8 hours).  

**\$18,400.00**
  
4. Considering the law, analysis and evaluation of the case against the claimant (10 hours)  

**\$23,000.00**
  
5. Settling the defendant's defence to the claim (10 hours)  

**\$23,000.00**
  
6. Receiving, reviewing and advising on the defences of the other 13 defendants (6 hours)  

**\$13,800.00**
  
7. Attendance at Case Management Conference (6 hours)  

**\$13,800.00**
  
8. Receiving, reviewing and advising on the claimant's written submission in opposition thereto (4 hours)  

**\$9,200.00**

9. Settling the defendant's Reply to the claimant's written submissions (2 hours)
 

**\$4,600.00**
10. Settling the defendant's List of Documents (7 hours)
 

**\$16,100.00**
11. Receiving, reviewing and advising on the claimant's List of Documents (2 hours)
 

**\$4,600.00**
12. Receiving, reviewing and advising on the Lists of Documents filed on behalf of the other 13 defendants (3 hours)
 

**\$6,900.00**
13. Settling the un-agreed statement of issues (1.5 hours)
 

**\$3,450.00**
14. Reviewing and advising on the claimant's un-agreed statement of issues (1.5 hours)
 

**\$3,450.00**
15. Reviewing, advising on the other 13 defendants' un-agreed statement of issues (1.5 hours)
 

**\$3,450.00**
16. Settling an agreed statement of issues (2 hours)
 

**\$4,600.00**
17. Settling the witness statements (10 hours)
 

**\$23,000.00**
18. Receiving, considering and advising on the claimant's witness statements (7 hours)
 

**\$16,100.00**
19. Receiving, considering and advising on the other 13 defendant's witness statements (7 hours)
 

**\$16,100.00**
20. Pretrial preparation, client conferences, conferences with Instructing Attorney, preparation for cross-examination, analysis of law and evidence, etc. (15 hours)
 

**\$34,500.00**
21. Settling written submissions on the substantive claim and reviewing authorities in support thereof (15 hours)
 

**\$34,500.00**

22. Reviewing, considering and advising on the claimant's written submissions and authorities (5 hours)	<b>\$11,500.00</b>
23. Receiving, considering and advising on the other 13 defendants' written submission and authorities (5 hours)	<b>\$11,500.00</b>
24. Settling written submissions in reply (5 hours)	<b>\$11,500.00</b>
25. Refreshers at the rate of \$1,000.00 per hour for 2 weeks (40 hours)	<b>\$40,000.00</b>
26. Conferences with the client and/or instructing Attorney other than for the purpose of preparation for trial (7 hours)	<b>\$16,100.00</b>
27. Preparation and court appearance for budgeted costs application (1 hour)	<b>2,300.00</b>

INSTRUCTING ATTORNEY'S COSTS AT THE RATE OF \$2,600.00 PER HOUR

28. Receiving, reviewing and advising on the claimant's Fixed Date Claim Form, Amended Statement of Case (3 hours)	<b>\$7,800.00</b>
29. Preparing and filing Appearance on behalf of the defendant (0.5 hours)	<b>\$1,300.00</b>
30. Conferences with client in order to obtain initial instructions (4 hours)	<b>\$10,400.00</b>
31. Receiving, reviewing and advising on instructions and documentation (8 hours)	<b>\$20,800.00</b>
32. Meetings with Counsel and the defendant (8 hours)	<b>\$20,800.00</b>
33. Considering the law, analysis and evaluation of the case against the claimant (5 hours)	<b>\$13,000.00</b>

34. Collaborating with Counsel in the preparation, filing and serving of the defendant's defence (5 hours)
- \$13,000.00**
35. Receiving, reviewing and forwarding to Counsel the defences filed on behalf of the other 13 defendants (3.5 hours)
- \$9,100.00**
36. Receiving, reviewing and forwarding to Counsel the claimant's written submission in opposition (2 hours)
- \$5,200.00**
37. Collaborating with Counsel in drafting the defendant's Reply to the claimant's written submissions, filing and serving same (2 hours)
- \$5,200.00**
38. Attendance at the Case Management Conferences (6 hours)
- \$15,600.00**
39. Collaborating with Counsel in drafting, filing and serving the defendant's List of Documents (5 hours)
- \$13,000.00**
40. Accepting service of, considering and forwarding to Counsel the claimant's List of documents (2 hours)
- \$5,200.00**
41. Collaborating with Counsel in drafting, filing and serving the defendant's un-agreed statement of issues (1.5 hours)
- \$3,900.00**
42. Accepting service of, considering and forwarding to Counsel the claimant's un-agreed statement of issues (1.5 hours)
- \$3,900.00**
43. Collaborating with Counsel in compiling, filing and serving the defendant's un-agreed bundle of documents (3 hours)
- \$7,800.00**

44. Accepting service of, considering and forwarding Counsel the claimant's un-agreed bundle of documents (1.5 hours)  
**\$3,900.00**
45. Accepting service of, considering and forwarding Counsel the other 13 defendants' un-agreed bundle of documents (1.5 hours)  
**\$3,900.00**
46. Collaborating with Counsel in the preparation of the defendant's un-agreed statement of issues (1.5 hours)  
**\$3,900.00**
47. Collaborating with Counsel in finalizing an agreed and un-agreed bundle of documents (3 hours)  
**\$7,800.00**
48. Collaborating with Counsel in drafting, filing and serving the defendant's witness statements (10 hours)  
**\$26,000.00**
49. Accepting service of, considering and forwarding Counsel the claimant's witness statements (7 hours)  
**\$18,200.00**
50. Accepting service of, considering and forwarding Counsel the other 13 defendants' witness statements (7 hours)  
**\$18,200.00**
51. Attendance at the Pretrial review (1.5 hours)  
**\$3,900.00**
52. Collaborating with Counsel in preparing the case for trial (15 hours)  
**\$39,000.00**
53. Attendance with Counsel at trial at the rate of \$1,000.00 per hour for 40 hours  
**\$40,000.00**
54. Collaborating with Counsel in drafting, filing and serving written submissions and bundles of authorities (5 hours)  
**\$13,000.00**

55. Accepting service of, considering and forwarding to Counsel the claimant's written submission and authorities (5 hours)	<b>\$13,000.00</b>
56. Accepting service of, considering and forwarding to Counsel the other 13 defendants' written submission and authorities (5 hours)	<b>\$13,000.00</b>
57. Collaborating with Counsel in drafting, filing and serving written submissions in Reply (5 hours)	<b>\$13,000.00</b>
58. Letters, telephone calls, faxes and electronic mail for the purpose of taking instructions and providing progress reports to the client and for the purpose of corresponding with Counsel, Attorneys representing other parties in the proceedings, the Court Office and the Judicial Support Officer (10 hours)	<b>\$26,000.00</b>
59. Preparation and court appearance for budgeted costs application (2 hours)	<b>\$5,200.00</b>
60. Disbursements other than expert witness fees include;	
g. Filing fees	<b>\$1,000.00</b>
h. Photocopying, binding, and other Administrative Expenses	<b>\$20,000.00</b>

### **Summary**

A. Junior Advocate	\$429,850.00
i. Value Added Tax	\$53,731.00
B. Instructing Attorney	\$404,000.00
ii. Value Added Tax	\$50,500.00
C. Disbursements and other charges	\$21,000.00
<b>Total</b>	<b>\$959,081.00</b>