

CLAIM NO: J1QZ6Q6V

In the County Court Business Centre

BETWEEN:

HARRISON CLARK RICKERBYS LIMITED

Claimant

- and -

MS.RAQUEL MARIA ROSARIO SANCHEZ

Defendant

WITNESS STATEMENT OF MS. RAQUEL MARIA ROSARIO SÁNCHEZ

I, Ms. Raquel Maria Rosario Sánchez of [REDACTED]
[REDACTED] will say as follows :

1. I make this statement from my own knowledge and believe the contents to be true. Where any part of this statement is not from my own knowledge, I identify the source of that knowledge and they are true to the best of my knowledge and belief.
2. There is now produced and shown to me marked **RMRS1** a paginated bundle of copy documents to which I shall refer in this witness statement. Numbers in this format **[RMSR1/XX]** are references to the page numbers in that exhibit.
3. Although the Claimant appears to have pursued a simple money claim, there is a long history to this matter. Along with others I instructed the Claimant to act as my solicitors in proceedings concerning the Bristol Student Union sanctioning a feminist society from using the single-sex exemptions contained within the Equality Act 2010, which allows women-only gatherings and associations. The matter has since been resolved favourably to us, with the Bristol Student Union amending their

policies to enable single-sex societies to exist and women-only meetings to take place without the risk of being sanctioned for using the law.

4. These proceedings were financed by crowd funding rather than by either myself or my co-claimants. This was a factor of which the Claimant company was well aware and meant that money we raised from the public belonged to the clients but was allocated directly to the Claimant's account
5. The total amount charged by the Claimant that has already been paid was in the region of £34,000. What they have obtained judgment for is just the unpaid element.
6. There is an ongoing complaint about both fees and service that is being actively considered by the Legal Ombudsman, despite the Claimant's unsuccessful attempt in April 2023 to challenge the Ombudsman's decision. I shall return to some more detail of the position with the Ombudsman complaint in a moment however it was only as a result of it being mentioned in the Ombudsman's letter to the Defendant of 18th May 2023 **[RMRS1/3]** that I became aware of this judgment and indeed this claim.
7. I wrote to the Claimant on 9th and 16th June **[RMRS1/7]** asking for copies of the judgment and the documents that they had lodged at court. These documents were not provided to me and I still have not seen the actual judgment in this matter.
8. Matters escalated when I received the Notice of Enforcement from High Court Enforcement Officers dated 26th June 2023 **[RMRS1/9]**
9. I contacted my current solicitors on 7th July 2023 and, following a period of being unwell, caused by the stress of all this, I was able to provide relevant documents to them on 18th July and was then able to agree with them an arrangement to fund my representation, which was completed on 27th July.
10. I understand from my solicitors that on 27th July they immediately filed and served Notice of Acting on my behalf and wrote to the Claimant on the same day **[RMRS1/11]** (sending their letter by email), pointing out why in their view the entry of a default judgment for a fixed sum was not something to which the Claimant would have been entitled even if all other aspects of the claim had been correct.

11. I also understand from my solicitors that the Claimant responded by email on 31st July asking for some additional time in which to respond [RMRS1/13]. Further that on 2nd August the Claimant asked for some more time so that matters could be considered by the appropriate person in their Finance Team.
12. I understand from my solicitors that an agreement was then reached in emails dated 4th August [RMRS1/16] that there would be an additional amount of time in which to consider matters, and that during that period the Claimant would call off its High Court Enforcement Officers.
13. I understand from my solicitors that they chased the Claimant for a substantive response and that the Claimant said that they would respond by 25th August [RMRS1/21] .
14. I understand from my solicitors that they wrote on 29th August to the Claimant indicating that an application to set aside would now be issued and asking for documentation, and confirmation as to how it was said that the Claimant had delivered to me the bills upon which it had sued [RMRS1/27]. As of today I understand there has been no substantive response to that so I have still not seen the sealed Claim Form and Particulars, or the judgment, nor do I know how the Claimant says that it effected delivery of these bills to me.
15. On 1 September 2023, my solicitors filed on my behalf an application to set aside the default judgment entered against me. On 18 September 2023, the Court returned my application on the basis that a writ of control had been issued against me [RMRS1/38]. Thus far I have not been served with the writ of control and if it wasn't for the Court's message, I would still be unaware of its existence.

Issues

16. I have a number of concerns as to how the Claimant has billed for this litigation, which I have raised in a complaint to the Claimant and subsequently a complaint to the Legal Ombudsman.

17. The Claimant knew full well that I was complaining about fees (amongst other things). I raised a formal complaint on 15th July 2022 [RMRS1/28] which was clear that it would be escalated to the Ombudsman if not upheld. The Claimant responded to my formal complaint with a decision on 12th August 2022 [RMRS1/31] dismissing the substance of my concerns. In that letter the Claimant asked if I intended referring the matter to the Legal Ombudsman because if I did they would arrange for my file to be retained. On 9th September 2022 I sent an email asking them to retain the file [RMRS1/36]. They could not have been in any doubt that there was going to be a complaint to the Legal Ombudsman.
18. I did not receive the Claim Form and any Particulars of Claim when they were issued. I still do not have sealed copies of them, despite a number of requests. This may well be because I changed address in May 2022 so that I could start a new job opportunity in [REDACTED] which was after the Claimant had ceased to represent me.
19. Whilst I accept that I did not notify them of my change of address I did not feel that there was any need to do so. They knew that I had complained about fees, amongst other things, and that the Ombudsman was or would be seized of my complaint. In my view, as the Ombudsman's decision would be binding unless I rejected it, they would only need my new address if the Ombudsman dismissed my concerns at the start of their process, or if in due course the Ombudsman found against me but I did not accept the decision.
20. As will, I hope, be clear from the Ombudsman's letter to the Claimant of 18th May 2023 [RMRS1/3] the Claimant has tried to actively remove my complaint from the Ombudsman jurisdiction on grounds that there has already been a court determination. The Ombudsman quotes the Claimant in that letter as saying that the court had decided that "*the evidence and information given to Ms. Sanchez was sufficient and Judgment for the full costs given in our favour*", and then goes on to find that was not right.
21. It is a matter of real concern to me that having quite properly invited me to pursue my complaint via the Ombudsman, the Claimant has sought to avoid all scrutiny by disputing jurisdiction and standing behind a default judgment that was only available

to it because the court proceedings – if they were valid at all, which I shall deal with next - did not come to my attention.

22. I understand from my solicitors that a prerequisite for a solicitor to issue proceedings for non-payment of fees is valid delivery of a bill under s.69 Solicitors Act 1974. Bills were, to the best of my recollection, only ever sent to me by email. I understand that delivery by that method does not satisfy s.69 unless I expressly indicated that I was willing to accept delivery of bills in that manner, which I did not. I add that bills were only sent to me after costs had already been incurred. There was no prior consultation with me about what costs would be incurred, or what costs were estimated.
23. I also understand from my solicitors that there are a number of technicalities arising from case law that a bill is required to meet if it is to count as a valid bill for the purposes of s.69 of the Solicitors Act, even if it has been validly delivered. I understand from them that these technical requirements are supposed to offer a degree of consumer protection, and that there are a number of ways in which these bills fall short.
24. I understand from my solicitors that even if all of these technical requirements are met, and the bills and proceedings are validly delivered and served, the law is that a solicitor is not entitled to a default judgment for the full amount of the bill. As I understand it in the lead case on the point the Court of Appeal held that, because a solicitor is only entitled to reasonable costs, then there must be an assessment by the court as to a reasonable amount in any event.

Impact of the Judgment on Me

25. The impact of this matter on me has been severe. I have explained many times to the Claimant that these were issues that must be properly investigated by the Legal Ombudsman, yet they have pursued me relentlessly for over a year. I am in the process of finishing my PhD, yet the immense stress and anxiety of this matter has meant that I cannot concentrate on my studies or my work. I have been forced to suspend my studies for months due to the sudden and blindsiding nature of this

judgment. I have been signed off sick from my workplace at a women's service twice, so far.

26. This default judgment, obtained without me being informed this litigation was even taking place, has damaged my economic credit score, and it will take years for me to recover from that.
27. When applying for study or work visas, the UK government asks if you have "Criminal or Civil Offences" stating they include: "A civil court judgment against you, for example for non-payment of debt, bankruptcy proceedings or anti-social behaviour", so when the time comes for me to apply for a Work Visa or an extension of my current Student Visa, which I will have to do due to the stress caused by the Claimant's aggressive conduct, I could be detrimentally impacted by this Default Judgment which was obtained illegitimately, not least through the Claimant not even informing me I was being sued.
28. When I found out about this default judgment, through the Legal Ombudsman having rejected the challenge by HRC, I became distraught. I did not understand how I could be sued without being informed about it beforehand and I struggled to find specialist solicitors who could help because the matter is so complex. All the stress, anxiety, and impact that this matter has had on me has been unnecessary and it is affecting me at the worst possible time in my academic career when all my focus should be on finishing my PhD thesis.
29. Finally, for the past few years, I have acted as Trustee on the board of the UK-based feminist charity FiLiA. Among other things, we organise the largest, annual grassroots feminist conference in Europe. I stepped back from the position this year so I could focus on finishing my PhD. Another detriment of the default judgment HCR obtained without my knowledge at time is that I would not be able to hold the role of Trustee again in the future because people with Civil Court judgment against them are deemed unsuitable for the role. I would like to go back to my position as Trustee of this feminist charity in the future, which is another reason why this situation has been unfair

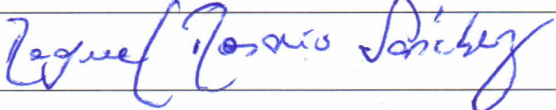
Conclusion

30. I ask the Court to set aside the default judgment. It has yet to be demonstrated by the Claimant that the judgment was obtained regularly. Even if it was then, for the reasons that my solicitors have set out in correspondence a default judgment for the full amount was not something that was available to the Claimant in any event. Judgment should, at most, have been judgment for an amount to be determined by way of assessment.
31. Furthermore this is a case that is actively being considered by the Legal Ombudsman, who have decided – correctly – that they have jurisdiction to consider and determine the level of fees because this is not a case in which the court has considered the merits.
32. I understand from my solicitors that under the Ombudsman scheme rules, specifically rule 5.49, any determination made by the Ombudsman that I have been overcharged would be binding on the Claimant. I cannot see how it could make sense for the judgment to remain in force and enforceable, while there is a separate and ongoing statutory process that could render it both redundant and unenforceable.
33. Additionally, I understand from my solicitors that pursuant to Civil Procedure Rule 83.7(4)(a), the Court may order a stay of the execution of the judgment if satisfied that there are special circumstances which render it inexpedient to enforce the judgment. On that basis, I ask the Court to stay the writ of control issued against me pending the hearing of my application to set the judgment aside.

STATEMENT OF TRUTH

I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

I believe that the facts stated in this witness statement are true.

| | |
|---------|--|
| Signed: |  |
| Name : | Ms. Raquel Maria Rosario Sánchez |

Statement made on behalf of the Defendant
Witness Name: Ms. Raquel Rosario Sánchez
Statement Number: 1
Statement Date: 20 September 2023

| | |
|--------|-------------------|
| Date : | 24 September 2023 |
|--------|-------------------|

Legal Ombudsman
PO Box 6806
Wolverhampton
WV1 9WJ
T 0300 555 0333
www.legalombudsman.org.uk

Private and Confidential

Ms R Rosario Sanchez



18 May 2023

File Reference: F147979

Dear Ms Rosario Sanchez

Your complaint about HCR Legal LLP

I am writing further to my colleague's letter of 19 April 2023. This was following a challenge that the firm made of 12 April regarding this office's jurisdiction to investigate your complaint.

The firm has challenged this office's jurisdiction to investigate the complaints under Rule 5.4c) of this office's Scheme Rules (SRs). I have copied this Rule below:

5.4 If the authorised person claims that all or part of the complaint:

- a) is not covered by the Legal Ombudsman under chapter two; or*
- b) is out-of-time under chapter four; or*
- c) should be dismissed under paragraph 5.7;*

an ombudsman will give all parties an opportunity to make representations before deciding.

I have been asked to consider whether this complaint should be dismissed under SR 5.7, on the following grounds:


LEGAL
OMBUDSMAN

Legal Ombudsman

5.7 An Ombudsman may (but does not have to) dismiss or discontinue all or part of a complaint if, in his/her opinion:

e) a comparable independent complaints (or costs-assessment) scheme or a court has already dealt with the same issue; or

n) there are other compelling reasons why it is inappropriate for the issue to be dealt with by the Legal Ombudsman

I have decided the complaint should not be dismissed under SR 5.7e) and n) for the reasons presented by the firm.

I have provided a copy of my letter to the firm which explains the reasons for my decision in more detail.

Our assessment of the complaints will now continue, and you will be contacted by Ella Beresford shortly.

Yours sincerely



Graeme McGrath
Ombudsman

Legal Ombudsman
Phone: 0300 555 0333
Email: decisions@legalombudsman.org.uk
www.legalombudsman.org.uk

Legal Ombudsman
PO Box 6806
Wolverhampton
WV1 9WJ
T 0300 555 0333
www.legalombudsman.org.uk

Private and confidential

Ms Hadley-Hall
HCR Legal LLP
By email only
5 Deansway
Worcester
Worcs
WR1 2JG

18 May 2023

File Reference: F147979

Your reference: LH05.HCR0005-0328.TS

Dear Ms Hadley-Hall,

Complaint by Ms Raquel Rosario Sanchez

I am writing further to my colleague's letter of 19 April 2023. This was following a challenge that you made of 12 April regarding this office's jurisdiction to investigate Ms Sanchez's complaint.

You have stated that you wish to challenge this office's jurisdiction to investigate the complaints under Rule 5.4c) of this office's Scheme Rules (SRs). I have copied this Rule below:

5.4 If the authorised person claims that all or part of the complaint:

- a) is not covered by the Legal Ombudsman under chapter two; or*
- b) is out-of-time under chapter four; or*
- c) should be dismissed under paragraph 5.7;*


LEGAL
OMBUDSMAN

an ombudsman will give all parties an opportunity to make representations before deciding.

I have been asked to consider whether this complaint should be dismissed under SR 5.7, on the following grounds:

5.7 An Ombudsman may (but does not have to) dismiss or discontinue all or part of a complaint if, in his/her opinion:

e) a comparable independent complaints (or costs-assessment) scheme or a court has already dealt with the same issue; or

n) there are other compelling reasons why it is inappropriate for the issue to be dealt with by the Legal Ombudsman

I understand that Ms Sanchez instructed the firm to act on her behalf in relation to an employment matter in September 2021.

My colleague has discussed Ms Sanchez's complaints with her and understands them to be as follows:

- 1. The firm did not provide Ms Rosario Sanchez with cost estimates when the work began, or throughout the work being completed;*
- 2. The firm did not provide Ms Rosario Sanchez with a client care letter before the work began;*
- 3. The firm charged Ms Rosario Sanchez for the work of two lawyers, that could have been done by one lawyer;*
- 4. The firm provided poor complaints handling and became aggressive with Ms Rosario Sanchez; and*
- 5. The firm only asked Ms Rosario Sanchez for the outstanding fees, when there were three claimants liable to pay.*

Ms Sanchez also appears to have asked for additional complaints to be considered within her response to my colleague's letter, however.

If there are any complaints that have not yet been made to the firm, that Ms Sanchez wants this office to investigate, then she will need to discuss these with my colleague who can advise her of the process she will need to follow.

Should you wish to make a further challenge of this office's SRs on any complaints that have not yet been raised to your firm then this is open for you to do so. However, it's clear that the basis of the firm's challenge is whether our office can investigate Ms Sanchez's complaint as they predominantly relate to concerns about excessive costs/cost information. I have therefore addressed this challenge within this decision.

You have challenged this office's jurisdiction under SR 5.7e) on the basis that the thrust of Ms Sanchez's complaints are cost complaints and these have already been considered by the courts. I consider I am able to make a decision about this office's jurisdiction in respect of the argument that has been presented.

As touched upon, you have said that the thrust of the complaints raised are about costs as Ms Sanchez wants to dispute the bills issued to her, as well as those she has paid. You say that the firm took debt recovery proceedings against her which have been considered by the court. You say that it has been decided that 'the evidence and information given to Ms Sanchez was sufficient and Judgment for the full costs given in our favour'.

You have also challenged this office's jurisdiction under SR 5.7n). You have suggested the further compelling reason is because Ms Sanchez is trying to use the services of this office to further avoid the payment of the firm's invoices.

I have considered the evidence you have provided to support your challenge. Specifically, I note that a judgement has been issued by the court on 9 January 2023. You have not provided an actual copy of this judgement, however, so I have not seen the specific detail of what was considered by the court, however, your 'Request for judgement' confirms that your firm applied for a default judgement on the basis that Ms Sanchez had not responded to the claim. That means that judgement was given because Ms Sanchez did not file a defence, without consideration of the merits of the claim.

On this basis, then logically the court cannot have considered the specific issues that she has raised within her complaints.

In any event, even if the claim had proceeded, the court was very unlikely to have considered any service issues raised within any defence raised by Ms Sanchez as it is usually only concerned with whether a bill is legally owed. It is usually the case that the courts will advise complainants to refer their concerns about service to our office.

On this basis, I consider the service complaints Ms Sanchez has raised about costs should not be dismissed under SRs 5.7e) and n). I am not satisfied from the

evidence provided that the court has considered the service issues that Ms Sanchez has raised within her complaints.

I also note that complaints 2 and 4 that Ms Sanchez has raised are not about costs, albeit I accept that the detriment Ms Sanchez alleges in respect of complaint 2, does relate to not being provided cost information at the outset.

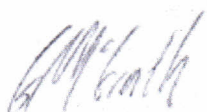
Ms Sanchez has also raised further complaints that are not cost related. These complaints have not yet been assessed by this office and my colleague will need to take this step and discuss these additional complaints with Ms Sanchez and the firm.

I have therefore decided the complaint should not be dismissed under SR 5.7e) and n) for the reasons presented by the firm.

I should add here that it is my role to consider the firm's challenge under SR 5.4 only, and I have not made any findings regarding the service provided by your firm to Ms Sanchez.

Our assessment of the complaints will now continue, and you will be contacted by Ella Beresford shortly.

Yours sincerely



Graeme McGrath
Ombudsman

Legal Ombudsman
Phone: 0300 555 0333
Email: decisions@legalombudsman.org.uk
www.legalombudsman.org.uk



Raquel Rosario Sánchez

Ombudsman Decision - 5.4 challenge - F147979 ERef:00010101991

Raquel Rosario Sánchez

16 de junio de 2023, 10:44

Para: decisions@legalombudsman.org.uk, complaints@ncrlaw.com

CCO: Andrea Thomas <athomas@hcrilaw.com>, Chris Mayers <cmayers@hcrilaw.com>

Dear Decisions team and HCR,

Hope you are well.

I am writing in regards to a decision made by a member of your team, Mr Graeme McGrath, on 18 May 2023 about a challenge raised by HCR. It included a letter sent from the Legal Ombudsman in response to a 5.4 challenge. The letter said that HCR has argued they launched legal proceedings against me, that this was already considered by a court and that these proceedings resulted in a judgment in HCR favour.

1. The Legal Ombudsman letter on 18 May 2023 is the first time I have heard about any legal proceedings against me. I have received no communication about this matter. I don't know what court this is in or what reference number the case has, so there is nothing I could do to address it. Because I have not been provided any documentation about this matter, I don't even know what the claims or allegations are.
2. Please can the Legal Ombudsman provide a copy of the judgment referred to in their letter.
3. Please can HCR provide me a copy of all documents relating to the claim they argue they lodged against me, including the claim form, particulars of claim, any correspondence between HCR and the court, any certificates of service and any other document that may be relevant.

Please let me know when you can.

Thank you,
Raquel

El vie, 9 jun 2023 a la(s) 11:00, Raquel Rosario Sánchez escribió:

Dear Decisions team,

Hope you are well.

I am writing in regards to a decision made by a member of your team, Mr Graeme McGrath, on 18 May 2023. It included a letter sent from the Legal Ombudsman in response to a 5.4 challenge. The letter said that HCR has argued they launched legal proceedings against me, that this was already considered by a court and that these proceedings resulted in a judgment in HCR favour.

1. The Legal Ombudsman letter on 18 May 2023 is the first time I have heard about any legal proceedings against me. I have received no communication about this matter. I don't know what court this is in or what reference number the case has, so there is nothing I could do to address it. Because I have not been provided any documentation about this matter, I don't even know what the claims or allegations are.
2. Please can the Legal Ombudsman provide a copy of the judgment referred to in their letter.
3. Please can HCR provide me a copy of all documents relating to the claim they argue they lodged against me, including the claim form, particulars of claim, any correspondence between HCR and the court, any certificates of service and any other document that may be relevant.

Please let me know when you can.

Thank you,

Raquel

HIGH COURT ENFORCEMENT GROUP LIMITED

Vaughan Thomas House, 141 Walter Road, Swansea, SA1 5RW

NOTICE OF ENFORCEMENT

Please read this notice - it is important

Ms Raquel Maria Rosario Sanchez

(Ref: HIG327570)

(Name of Debtor)

(Address)

Date notice issued: 26/06/2023

Enforcement Agent Reference number(s): HIG327570

1000 5095 1852 26 (Unique Payment ID No)

About this notice

You have been sent this notice of enforcement because you have not paid money that you owe

Who you owe the money to

Harrison Clark Rickerbys Limited

The amount you owe them

£7,144.13

Their ref / account no. (if applicable) RW/HAR0410-1196

Enforcement details

Details of the court judgment or order or enforcement power by virtue of which the debt is enforceable

The amount shown on this notice includes interest payable to the date of the notice. Interest continues to accrue at the rate of £1.49 per day until payment in full is received by cleared funds. You must therefore calculate interest payable up until the day payment is received.

Under a Writ of Control, issued through Liverpool District Registry. High Court Number: issued to Richard Hooper an Authorised High Court Enforcement Officer.

Judgment Date: 09 January 2023, County Court Claim Number: J1QZ6Q6V

County Court Name: Northampton County Court Business Centre

Sum Outstanding

Debt

£6,892.32

Interest

£261.81

Compliance stage fee

£75.00

Total sum outstanding**£7,219.13** (as at the date of this notice)

You must pay, or agree a payment arrangement with the enforcement agent, by

When to make payment

Date

08/07/2023

Time: 23:59 hours

If you do not pay

If you do not pay or agree a payment arrangement by the date above, an enforcement agent will visit you and may seize your belongings - this is called 'taking control'. These belongings may then be sold to pay the money you owe. These actions will increase the costs of enforcement and these costs will be added to the amount already owed.

Possible additional fees and expenses of enforcement

If the sum outstanding remains unpaid or you have not agreed a payment arrangement by the date and time above you may be charged the following (enforcement agent to detail further possible fees and expenses)

This debt is in relation to a writ issued in High Court for enforcement and whilst we may enter into a payment arrangement this is subject to circumstances and the claimant's agreement. We need to inform you that such an arrangement will require a personal visit from one of our officers. An explanation and reason for the visit is outlined under Item 7.3 of the Explanatory Memorandum to the Taking Control of Goods (Fees) Regulations 2014

http://www.legislation.gov.uk/uksi/2014/1/pdfs/uksiem_20140001_en.pdf

In addition to the Compliance Fee of £75.00 noted overleaf:

| Fee Stage | Fixed Fee + Percentage of sum exceeding £1,000 | |
|--------------------------|--|------|
| First Enforcement Stage | £190.00 | 7.5% |
| Second Enforcement Stage | £495.00 | 0% |
| Sale or Disposal Stage | £525.00 | 7.5% |

The costs of storing goods, the cost of hiring a locksmith, the cost of court fees in relation to any application under The Taking Control of Goods (Fees) Regulations 2014 (TCG Regs) and auction commission, expenses and costs as per the TCG Regs.

How to pay what you owe

How to pay including opening hours and days

Payment may be made by using your debit card 24 hours a day / 7 days a week using our secure third party web payment facility at www.pay-hcegroup.co.uk. You will need your Unique Payment ID No which can be found at the top of this notice. Payment must be made by cleared funds, cheques are not accepted at this stage. You may also pay at any Post Office by contacting the office number provided below and requesting a Barcoded letter.

We will also accept payment by bankers draft or postal order made payable to 'High Court Enforcement Group Limited' at Vaughan Thomas House, 141 Walter Road, Swansea, SA1 5RW or by bank transfer using the details below. When making a bank transfer you must e-mail accountsqueries@hcegroup.co.uk to advise us of the payment made. Always quote the reference number noted on the previous page when making the transfer.

Bank: Lloyds Bank, Sort Code: 30-93-53, A/C No: 03053781, A/C Name: High Court Enforcement Group Limited

How you can contact the enforcement agent or the enforcement agent's office

| | |
|-----------|--|
| Telephone | 01792 466771 - Our lines are open 9.00am to 5.00pm Monday to Thursday, 9.00am to 4.45pm Friday |
| Address | Vaughan Thomas House 141 Walter Road Swansea SA1 5RW |

e-mail: enforcement@hcegroup.co.uk

Opening hours and days: Monday to Thursday 9.00am to 5.30pm, Friday 9.00am to 5.00pm.

You can seek free advice and information from:

Citizens Advice at www.citizensadvice.org.uk or for England call 03444 111 444 for Wales call 03444 77 20 20

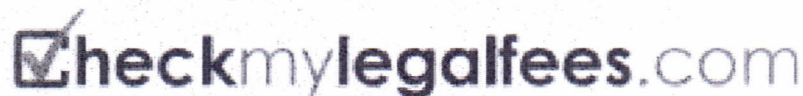
Adviceuk at www.adviceuk.org.uk/find-a-member

National Debtline at www.nationaldebtline.com or 0808 808 4000

Money Advice Service at www.moneyadviceservice.org.uk or on 0300 500 5000

Gov.uk at www.gov.uk

Other free advice is available.



13 Gray's Inn Square
London
WC1R 5JD
Tel : 0203 6428881

Harrison Clark Rickerbys Limited
5 Deansway
Worcester
Worcestershire
WR1 2JG

Our ref : MC/20191/001

Your ref :

27 July 2023

Dear Sirs,

Re : Harrison Clark Rickerbys v Raquel Rosario Sanchez
Claim No : J1QZ6Q6V

We have been instructed by Ms.Roasario Sanchez and enclose by way of service a copy of a Notice of Acting that will be filed with the Court today.

We note that you have obtained a default judgment based, as far as we have been able to ascertain, on two invoices dated 29th March 2022 and 27th April 2022 and are seeking to enforce payment via High Court Enforcement Officers.

The invoices are labelled "*Interim Statute Invoice*" however your terms of business do not contain the wording necessary for them to be properly construed as interim statute bills. See *Richard Slade and Company plc v Erlam* [2022] All ER (D) 98 (Feb)[2022] EWHC 325 (QB). At best the proper construction of your bills is that they are part of a series of bills, incorporating all earlier bills, and constituting a single statute bill dated as per the last in the series. See *Chamberlain v Boodle and King* [1982] 3 All ER 188, [1982] 1 WLR 1443, 125 Sol Jo 257.

Without prejudice to any other arguments that our client may wish to raise, including whether these were bills properly delivered as statute or interim statute bills, or indeed a Chamberlain series, in compliance with s.69 Solicitors Act 1974 (which is a prerequisite for you to sue), the entry of a default judgment for the amount of the bills is a remedy to which you were simply not entitled.

Checkmylegalfees.com
is a trading style of **Richard Slade & Company Limited**
a company registered in England & Wales under company number: 02624852

Richard Slade & Company Limited is authorised and regulated by the Solicitors Regulation Authority
under SRA number 510176.

This is because a solicitor's bill to a client is not a liquidated sum. See *Thomas Watts & Co v Smith* [1997] and *Turner & Co v Palomo SA* [1999] 4 All ER 353, CA, both of which are binding Court of Appeal authorities. As in *Turner*, the appropriate remedy was for entry of judgment for a sum to be determined via assessment.

We invite you agree to an order setting aside default judgment. Should you not do so by close of business tomorrow, we have instructions to issue an application to set aside.

In any event please let us have copies of the Claim Form, Particulars, Request and Judgement by return.

If the judgment were set aside, whether by agreement or otherwise, and court proceedings were to continue thereafter, we would suggest that the appropriate directions would be for the totality of your bills to be referred to assessment as a Chamberlain series. We note however that the Legal Ombudsman is currently engaged in reviewing your charges and in the circumstances the pragmatic and proportionate direction, procedurally, would be just to provide for a stay pending the Ombudsman's final decision. Please confirm your position in that regard.

We look forward to hearing from you.

Yours faithfully,

Mark Carlisle

checkmylegalfees.com

Email : mark.carlisle@checkmylegalfees.com

Direct dial : 07432884472

Checkmylegalfees.com
Mark Carlisle
Email Detail

Printed by: Mark Carlisle

Date: 02 August 2023 10:30
From: Sophie Hadley-Hall - shadley-hall@hclaw.com
To: Mark Carlisle - mark.carlisle@checkmylegalfees.com
Cc: Lesley-Ann Hamlyn - LAHamlyn@hclaw.com
Bcc: -
Subject: RE: Rosario Sanchez, Raquel (Harrison Clark Rickerbys) [HCRLAW-LIVE.FID11081166]
Urgent: No
Associated File(s): Rosario Sanchez, Raquel (Harrison Clark Rickerbys) - 20191/001

Dear Mr Carlisle,

I apologise for my lack of response yesterday. I have passed this to the appropriate internal person within our Finance Team to consider and they will respond to you in due course – I would hope by the end of this week.

Kind regards,
Sophie

Sophie Hadley-Hall
Risk Manager (Non-Solicitor)
Risk Management Team



For and on behalf of Harrison Clark Rickerbys Limited

T: 01905 953 760 | M: 07509 919 513 | E: shadley-hall@hclaw.com

Harrison Clark Rickerbys Limited, 5 Deansway, Worcester, Worcestershire WR1 2JG, United Kingdom

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.

Birmingham | Cambridge | Cardiff | Central England | Cheltenham | Hereford | London | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment, via Zoom, FaceTime or Teams, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alert: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collett, immediately on 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.

From: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Sent: Monday, July 31, 2023 9:58 AM
To: Sophie Hadley-Hall <shadley-hall@hclaw.com>
Subject: RE: Rosario Sanchez, Raquel (Harrison Clark Rickerbys) [HCRLAW-LIVE.FID11081166]

Dear Sophie,

Thanks for your response.

I appreciate that I asked for a very quick response but this is a case where my client has High Court Enforcement Officers attempting to enforce a judgment that – in my view – was wrongly obtained.

Could I please ask for a response by tomorrow lunch time, failing which I will need to issue an application to set aside the judgment?

Kind regards

Mark Carlisle
Costs Draftsman



a trading style of

Richard Slade and Company
13 Gray's Inn Square | London WC1R 5JD
Tel 0203 6428881 | Fax 020 7806 8267 | Mobile 07432884472

<http://www.checkmylegalfees.com>
<http://www.richardslade.com>

Authorised and regulated by the Solicitors Regulation Authority, No. 510176
Richard Slade and Company Limited, Registered in England No. 02624852

From: Sophie Hadley-Hall <shadley-hall@hclaw.com>
Sent: 31 July 2023 09:51
To: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Cc: Thanchanok Srisuk <tsrisuk@hclaw.com>; Lesley-Ann Hamlyn <LAHamlyn@hclaw.com>

Subject: RE: Roasario Sanchez, Raquel (Harrison Clark Rickerbys) [HCRLAW-LIVE.FID11081166]

Dear Mr Carlisle,

Thank you for your email below which has been passed to me as the Complaints Manager, for review and response.

Unfortunately I was out of the office on my non-working day at the end of last week and so have only seen your email this morning. It will not be possible for me to consider and respond in such a short and unrealistic time frame. I will however, endeavour to respond as early as possible this week.

Kind regards,
Sophie

Sophie Hadley-Hall
Risk Manager (Non-Solicitor)
Risk Management Team



For and on behalf of Harrison Clark Rickerbys Limited

T: 01905 953 760 | M: 07909 919 513 | E: shadley-hall@hcrclaw.com

Harrison Clark Rickerbys Limited, 5 Deansway, Worcester, Worcestershire WR1 2JG, United Kingdom

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.

Birmingham | Cambridge | Cardiff | Central England | Cheltenham | Hereford | London | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment, via Zoom, FaceTime or Teams, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alert: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collett, immediately on 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.

From: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Sent: Thursday, July 27, 2023 12:11 PM
To: Thanchanok Srisuk <tsrisuk@hcrclaw.com>
Subject: Roasario Sanchez, Raquel (Harrison Clark Rickerbys)

Dear Sirs,

Please see the attached.

Kind regards

Mark Carlisle
Costs Draftsman



a trading style of

Richard Slade and Company
13 Gray's Inn Square | London WC1R 5JD
Tel 0203 6428881 | Fax 020 7806 8267 | Mobile 07432884472

<http://www.checkmylegalfees.com>
<http://www.richardslade.com>

Authorised and regulated by the Solicitors Regulation Authority, No. 510176
Richard Slade and Company Limited, Registered in England No. 02624852

Warning: Copyright Harrison Clark Rickerbys Limited. Where the content of this e-mail and/or attachment includes materials prepared by Harrison Clark Rickerbys Limited the use of those materials is subject exclusively to the conditions of engagement between the practice and its client. Harrison Clark Rickerbys Limited do not accept service of documents or proceedings by email unless consent has been given. This communication is confidential and may contain legally privileged information. By the use of e-mail over the internet Harrison Clark Rickerbys Limited is not waiving either confidentiality of, or legal privilege in, the content of the e-mail and of any attachments. Harrison Clark Rickerbys Limited are committed to protecting and respecting your privacy. Click [here](#) to access our Privacy policy. If you have received this e-mail in error please contact Harrison Clark Rickerbys Limited on telephone number 01905 612001 or e-mail gdpr@hcrclaw.com. Harrison Clark Rickerbys Limited will communicate with you by e-mail, however, the practice cannot guarantee the confidentiality, reliability or speed of these communications, or of any attached documents. If you wish to send to the practice any urgent, critical or encrypted e-mail communication please notify the addressee first by telephone on 01905 612001. The preferred format for receiving word-processed documents is Microsoft Word. Regulatory information: Harrison Clark Rickerbys, Harrison Clark Rickerbys Inc Shawcross, Harrison Clark Rickerbys Inc Gordon Lutton, Harrison Clark Rickerbys Inc Sprecher Grier, HCR Hewitsons, HCR Hewitsons Inc Houlden Sweeney, Safe from harm, Eagle HR and walls at work are all trading names of Harrison Clark Rickerbys Limited. Harrison Clark Rickerbys Limited is a limited company incorporated in England under 7033248 and practising English Law. A list of directors is open to inspection at the registered office which is at 5 Deansway, Worcester, WR1 2JG. All directors are solicitors or barristers. The term "Partner" is used for directors and also senior members of staff who may be either lawyers of England and Wales or professionals other than lawyers. The firm is authorised and regulated by the Solicitors Regulation Authority (SRA number 520892). A copy of the Authority's rules is available at <https://www.sra.org.uk/solicitors/standards-regulations>. Address: 5 Deansway, Worcester, WR1 2JG. Telephone: 01905 612001 Email: lawyers@hcrclaw.com VAT registration number: GB 979 9180 43

Warning: Copyright Harrison Clark Rickerbys Limited. Where the content of this e-mail and/or attachment includes materials prepared by Harrison Clark Rickerbys Limited the use of those materials is subject exclusively to the conditions of engagement between the practice and its client. Harrison Clark Rickerbys Limited do not accept service of documents or proceedings by email unless consent has been given. This communication is confidential and may contain legally privileged information. By the use of e-mail over the internet Harrison Clark Rickerbys Limited is not waiving either confidentiality of, or legal privilege in, the content of the e-mail and of any attachments. Harrison Clark Rickerbys Limited are committed to protecting and respecting your privacy. Click [here](#) to access our Privacy policy. If you have received this e-mail in error please contact Harrison Clark Rickerbys Limited on telephone number 01905 612001 or e-mail gdpr@hcrclaw.com. Harrison Clark Rickerbys Limited will communicate with you by e-mail, however, the practice cannot guarantee the confidentiality, reliability or speed of these communications, or of any attached documents. If you wish to send to the practice any urgent, critical or encrypted e-mail communication please notify the addressee first by telephone on 01905 612001. The preferred format for receiving word-processed documents is Microsoft Word. Regulatory information: Harrison Clark Rickerbys,

Harrison Clark Rickerbys Inc Shawcross, Harrison Clark Rickerbys Inc Gordon Lutton, Harrison Clark Rickerbys Inc Sprecher Grier, HCR Hewitsons, HCR Hewitsons Inc Houlden Sweeney, Safe from harm, Eagle HR and wills at work are all trading names of Harrison Clark Rickerbys Limited. Harrison Clark Rickerbys Limited is a limited company incorporated in England under 7033248 and practising English Law. A list of directors is open to inspection at the registered office which is at 5 Deansway, Worcester, WR1 2JG. All directors are solicitors or barristers. The term "Partner" is used for directors and also senior members of staff who may be either lawyers of England and Wales or professionals other than lawyers. The firm is authorised and regulated by the Solicitors Regulation Authority (SRA number 520892). A copy of the Authority's rules is available at <https://www.sra.org.uk/solicitors/standards-regulations> Address: 5 Deansway, Worcester, WR1 2JG. Telephone: 01905 612001 Email: lawyers@hcrlaw.com VAT registration number: GB 979 9180 43

Outstanding:

Dealt With:

Yes

Attachments:

Checkmylegalfees.com
Mark Carlisle
Email Detail

Printed by: Mark Carlisle

Date: 04 August 2023 09:05
From: Adam Collett - acollett@hcrlaw.com
To: Mark Carlisle - mark.carlisle@checkmylegalfees.com
Cc: -
Bcc: -
Subject: RE: Rosario Sanchez, Raquel (Harrison Clark Rickerbys)
Urgent: No
Associated File(s): Rosario Sanchez, Raquel (Harrison Clark Rickerbys) - 20191/001

Dear Mark,

I can confirm that we have requested that HCE suspend their activities.

Kind regards,

Adam

Adam Collett
Finance Director
Finance

For and on behalf of Harrison Clark Rickerbys Limited

T: 01905 744 879 | M: 07919 367 108 | E: acollett@hcrlaw.com

Harrison Clark Rickerbys Limited, 5 Deansway, Worcester, Worcestershire WR1 2JG, United Kingdom

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.

Birmingham | Cambridge | Cardiff | Central England | Cheltenham | Hereford | London | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment, via Zoom, FaceTime or Teams, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alert: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collett, immediately on 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.

From: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Sent: Friday, August 4, 2023 7:02 AM
To: Adam Collett <acollett@hcrlaw.com>
Subject: RE: Rosario Sanchez, Raquel (Harrison Clark Rickerbys)

Dear Adam,

Yes, we can agree to holding off the application for one week so that – hopefully – we can make some progress by consent.

Please confirm that the HCEO activity is suspended for the same period.

Kind regards

Mark Carlisle
Costs Draftsman



a trading style of

Richard Slade and Company
13 Gray's Inn Square | London WC1R 5JD
Tel 0203 6428881 | Fax 020 7806 8267 | Mobile 07432884472

<http://www.checkmylegalfees.com>
<http://www.richardslade.com>

Authorised and regulated by the Solicitors Regulation Authority, No. 510176
Richard Slade and Company Limited, Registered in England No. 02624852

From: Adam Collett <acollett@hcrlaw.com>
Sent: 03 August 2023 15:34
To: Sophie Hadley-Hall <shadley-hall@hcrlaw.com>; Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Cc: Lesley-Ann Hamlyn <LAHamlyn@hcrlaw.com>
Subject: RE: Rosario Sanchez, Raquel (Harrison Clark Rickerbys)

Dear Mr Carlisle,

Has the client agreed to hold off on making an application to set aside?

If so I will suspend HCE activity.

Kind regards,
Adam

Adam Collett
Finance Director
Finance



For and on behalf of Harrison Clark Rickerbys Limited

T: 01905 744 879 | M: 07919 367 108 | E: acollett@hcrclaw.com

Harrison Clark Rickerbys Limited, 5 Deansway, Worcester, Worcestershire WR1 2JG, United Kingdom

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.

Birmingham | Cambridge | Cardiff | Central England | Cheltenham | Hereford | London | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment, via Zoom, FaceTime or Teams, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alert: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collett, immediately on 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.

From: Sophie Hadley-Hall <shadley-hall@hcrclaw.com>
Sent: Wednesday, August 2, 2023 12:02 PM
To: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Cc: Lesley-Ann Hamlyn <LAHamlyn@hcrclaw.com>; Adam Collett <acollett@hcrclaw.com>
Subject: RE: Rosario Sanchez, Raquel (Harrison Clark Rickerbys) [HCRLAW-LIVE.FID11081166]

Dear Mr Carlisle,

We are prepared to pause the activity of HCE, with regards to the client, if the client is prepared to hold off making an application to set aside.

My colleague Adam Collett (acollett@hcrclaw.com) will be your contact for any further queries relating to this matter as he will be able to assist from the Finance Team side. If you have any further queries regarding the complaint or complaints handling, then please do let me know and I am happy to assist where needed.

Kind regards,
Sophie

Sophie Hadley-Hall
Risk Manager (Non-Solicitor)
Risk Management Team



For and on behalf of Harrison Clark Rickerbys Limited

T: 01905 953 760 | M: 07909 919 513 | E: shadley-hall@hcrclaw.com

Harrison Clark Rickerbys Limited, 5 Deansway, Worcester, Worcestershire WR1 2JG, United Kingdom

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.

Birmingham | Cambridge | Cardiff | Central England | Cheltenham | Hereford | London | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment, via Zoom, FaceTime or Teams, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alert: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collett, immediately on 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.

From: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Sent: Wednesday, August 2, 2023 10:40 AM
To: Sophie Hadley-Hall <shadley-hall@hcrclaw.com>
Cc: Lesley-Ann Hamlyn <LAHamlyn@hcrclaw.com>
Subject: RE: Rosario Sanchez, Raquel (Harrison Clark Rickerbys) [HCRLAW-LIVE.FID11081166]

Dear Sophie / Lesley-Ann,

Thanks for your response.

Would you be prepared to call off the HCEOs while your finance team considers?

If so, I will take my client's instructions as to whether or not she is prepared to hold off making an application to set aside, because I did have that in my diary to do today, but rather than troubling the court unnecessarily I would much rather deal with these things by agreement if at all possible.

Kind regards

Mark Carlisle
Costs Draftsman



a trading style of

Richard Slade and Company
13 Gray's Inn Square | London WC1R 5JD
Tel 0203 6428881 | Fax 020 7806 8267 | Mobile 07432884472

<http://www.checkmylegalfees.com>
<http://www.richardslade.com>

Authorised and regulated by the Solicitors Regulation Authority, No. 510176
Richard Slade and Company Limited, Registered in England No. 02624852

From: Sophie Hadley-Hall <shadley-hall@hcrlaw.com>
Sent: 02 August 2023 10:30
To: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Cc: Lesley-Ann Hamlyn <LAHamlyn@hcrlaw.com>
Subject: RE: Roasario Sanchez, Raquel (Harrison Clark Rickerbys) [HCRLAW-LIVE.FID11081166]

Dear Mr Carlisle,

I apologise for my lack of response yesterday. I have passed this to the appropriate internal person within our Finance Team to consider and they will respond to you in due course – I would hope by the end of this week.

Kind regards,
Sophie

Sophie Hadley-Hall
Risk Manager (Non-Solicitor)
Risk Management Team



For and on behalf of Harrison Clark Rickerbys Limited

T: 01905 953 760 | M: 07909 919 513 | E: shadley-hall@hcrlaw.com

Harrison Clark Rickerbys Limited, 5 Deansway, Worcester, Worcestershire WR1 2JG, United Kingdom

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.

Birmingham | Cambridge | Cardiff | Central England | Cheltenham | Hereford | London | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment, via Zoom, FaceTime or Teams, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alert: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collett, immediately on 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.

From: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Sent: Monday, July 31, 2023 9:58 AM
To: Sophie Hadley-Hall <shadley-hall@hcrlaw.com>
Subject: RE: Roasario Sanchez, Raquel (Harrison Clark Rickerbys) [HCRLAW-LIVE.FID11081166]

Dear Sophie,

Thanks for your response.

I appreciate that I asked for a very quick response but this is a case where my client has High Court Enforcement Officers attempting to enforce a judgment that – in my view – was wrongly obtained.

Could I please ask for a response by tomorrow lunch time, failing which I will need to issue an application to set aside the judgment?

Kind regards

Mark Carlisle
Costs Draftsman



a trading style of

Richard Slade and Company
13 Gray's Inn Square | London WC1R 5JD
Tel 0203 6428881 | Fax 020 7806 8267 | Mobile 07432884472

<http://www.checkmylegalfees.com>
<http://www.richardslade.com>

Authorised and regulated by the Solicitors Regulation Authority, No. 510176
Richard Slade and Company Limited, Registered in England No. 02624852

From: Sophie Hadley-Hall <shadley-hall@hclaw.com>
Sent: 31 July 2023 09:51
To: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Cc: Thanchanok Srisuk <tsrisuk@hclaw.com>; Lesley-Ann Hamlyn <LAHamlyn@hclaw.com>
Subject: RE: Roasario Sanchez, Raquel (Harrison Clark Rickerbys) [HCLAW-LIVE.FID11081166]

Dear Mr Carlisle,

Thank you for your email below which has been passed to me as the Complaints Manager, for review and response.

Unfortunately I was out of the office on my non-working day at the end of last week and so have only seen your email this morning. It will not be possible for me to consider and respond in such a short and unrealistic time frame. I will however, endeavour to respond as early as possible this week.

Kind regards,
Sophie

Sophie Hadley-Hall
Risk Manager (Non-Solicitor)
Risk Management Team



For and on behalf of Harrison Clark Rickerbys Limited

T: 01905 953 760 | M: 07909 919 513 | E: shadley-hall@hclaw.com

Harrison Clark Rickerbys Limited, 5 Deansway, Worcester, Worcestershire WR1 2JG, United Kingdom

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.

Birmingham | Cambridge | Cardiff | Central England | Cheltenham | Hereford | London | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment, via Zoom, FaceTime or Teams, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alert: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collett, immediately on 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.

From: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Sent: Thursday, July 27, 2023 12:11 PM
To: Thanchanok Srisuk <tsrisuk@hclaw.com>
Subject: Roasario Sanchez, Raquel (Harrison Clark Rickerbys)

Dear Sirs,

Please see the attached.

Kind regards

Mark Carlisle
Costs Draftsman



a trading style of

Richard Slade and Company
13 Gray's Inn Square | London WC1R 5JD
Tel 0203 6428881 | Fax 020 7806 8267 | Mobile 07432884472

<http://www.checkmylegalfees.com>
<http://www.richardslade.com>

Authorised and regulated by the Solicitors Regulation Authority, No. 510176
Richard Slade and Company Limited, Registered in England No. 02624852

Warning: Copyright Harrison Clark Rickerbys Limited. Where the content of this e-mail and/or attachment includes materials prepared by Harrison Clark Rickerbys Limited the use of those materials is subject exclusively to the conditions of engagement between the practice and its client. Harrison Clark Rickerbys Limited do not accept service of documents or proceedings by email unless consent has been given. This communication is confidential and may contain legally privileged information. By the use of e-mail over the Internet Harrison Clark Rickerbys Limited is not waiving either confidentiality of, or legal privilege in, the content of the e-mail and of any attachments. Harrison Clark Rickerbys Limited are committed to protecting and respecting your privacy. Click [here](#) to access our Privacy policy. If you have received this e-mail in error please contact Harrison Clark Rickerbys Limited on telephone number 01905 612001 or e-mail gdpr@hclaw.com. Harrison Clark Rickerbys Limited will communicate with you by e-mail, however, the practice cannot guarantee the confidentiality, reliability or speed of these communications, or of any attached documents. If you wish to send to the practice any urgent, critical or encrypted e-mail communication please notify the addressee first by telephone on 01905 612001. The preferred format for receiving word-processed documents is Microsoft Word. Regulatory information: Harrison Clark Rickerbys, Harrison Clark Rickerbys Inc Shewcross, Harrison Clark Rickerbys Inc Gordon Lutton, Harrison Clark Rickerbys Inc Sprecher Grier, HCR Hewitsons, HCR Hewitsons Inc Houlden Sweeney, Safe from harm, Eagle HR and wills at work are all trading names of Harrison Clark Rickerbys Limited. Harrison Clark Rickerbys Limited is a limited company incorporated in England under 7033248 and practising English Law. A list of directors is open to inspection at the registered office which is at 5 Deansway, Worcester, WR1 2JG. All directors are solicitors or

barristers. The term "Partner" is used for directors and also senior members of staff who may be either lawyers of England and Wales or professionals other than lawyers. The firm is authorised and regulated by the Solicitors Regulation Authority (SRA number 520892). A copy of the Authority's rules is available at <https://www.sra.org.uk/solicitors/standards-regulations> Address: 5 Deansway, Worcester, WR1 2JG. Telephone: 01905 612001 Email: lawyers@hcrlaw.com VAT registration number: GB 979 9180 43

Warning: Copyright Harrison Clark Rickerbys Limited. Where the content of this e-mail and/or attachment includes materials prepared by Harrison Clark Rickerbys Limited the use of those materials is subject exclusively to the conditions of engagement between the practice and its client. Harrison Clark Rickerbys Limited do not accept service of documents or proceedings by email unless consent has been given. This communication is confidential and may contain legally privileged information. By the use of e-mail over the internet Harrison Clark Rickerbys Limited is not waiving either confidentiality of, or legal privilege in, the content of the e-mail and of any attachments. Harrison Clark Rickerbys Limited are committed to protecting and respecting your privacy. Click [here](#) to access our Privacy policy. If you have received this e-mail in error please contact Harrison Clark Rickerbys Limited on telephone number 01905 612001 or e-mail gdpr@hcrlaw.com. Harrison Clark Rickerbys Limited will communicate with you by e-mail, however, the practice cannot guarantee the confidentiality, reliability or speed of these communications, or of any attached documents. If you wish to send to the practice any urgent, critical or encrypted e-mail communication please notify the addressee first by telephone on 01905 612001. The preferred format for receiving word-processed documents is Microsoft Word. Regulatory information: Harrison Clark Rickerbys, Harrison Clark Rickerbys inc Shewcross, Harrison Clark Rickerbys inc Gordon Lutton, Harrison Clark Rickerbys inc Sprecher Grier, HCR Hewitsons, HCR Hewitsons inc Houlden Sweeney, Safe from harm, Eagle HR and wills at work are all trading names of Harrison Clark Rickerbys Limited. Harrison Clark Rickerbys Limited is a limited company incorporated in England under 7033248 and practising English Law. A list of directors is open to inspection at the registered office which is at 5 Deansway, Worcester, WR1 2JG. All directors are solicitors or barristers. The term "Partner" is used for directors and also senior members of staff who may be either lawyers of England and Wales or professionals other than lawyers. The firm is authorised and regulated by the Solicitors Regulation Authority (SRA number 520892). A copy of the Authority's rules is available at <https://www.sra.org.uk/solicitors/standards-regulations> Address: 5 Deansway, Worcester, WR1 2JG. Telephone: 01905 612001 Email: lawyers@hcrlaw.com VAT registration number: GB 979 9180 43

Warning: Copyright Harrison Clark Rickerbys Limited. Where the content of this e-mail and/or attachment includes materials prepared by Harrison Clark Rickerbys Limited the use of those materials is subject exclusively to the conditions of engagement between the practice and its client. Harrison Clark Rickerbys Limited do not accept service of documents or proceedings by email unless consent has been given. This communication is confidential and may contain legally privileged information. By the use of e-mail over the internet Harrison Clark Rickerbys Limited is not waiving either confidentiality of, or legal privilege in, the content of the e-mail and of any attachments. Harrison Clark Rickerbys Limited are committed to protecting and respecting your privacy. Click [here](#) to access our Privacy policy. If you have received this e-mail in error please contact Harrison Clark Rickerbys Limited on telephone number 01905 612001 or e-mail gdpr@hcrlaw.com. Harrison Clark Rickerbys Limited will communicate with you by e-mail, however, the practice cannot guarantee the confidentiality, reliability or speed of these communications, or of any attached documents. If you wish to send to the practice any urgent, critical or encrypted e-mail communication please notify the addressee first by telephone on 01905 612001. The preferred format for receiving word-processed documents is Microsoft Word. Regulatory information: Harrison Clark Rickerbys, Harrison Clark Rickerbys inc Shewcross, Harrison Clark Rickerbys inc Gordon Lutton, Harrison Clark Rickerbys inc Sprecher Grier, HCR Hewitsons, HCR Hewitsons inc Houlden Sweeney, Safe from harm, Eagle HR and wills at work are all trading names of Harrison Clark Rickerbys Limited. Harrison Clark Rickerbys Limited is a limited company incorporated in England under 7033248 and practising English Law. A list of directors is open to inspection at the registered office which is at 5 Deansway, Worcester, WR1 2JG. All directors are solicitors or barristers. The term "Partner" is used for directors and also senior members of staff who may be either lawyers of England and Wales or professionals other than lawyers. The firm is authorised and regulated by the Solicitors Regulation Authority (SRA number 520892). A copy of the Authority's rules is available at <https://www.sra.org.uk/solicitors/standards-regulations> Address: 5 Deansway, Worcester, WR1 2JG. Telephone: 01905 612001 Email: lawyers@hcrlaw.com VAT registration number: GB 979 9180 43

Warning: Copyright Harrison Clark Rickerbys Limited. Where the content of this e-mail and/or attachment includes materials prepared by Harrison Clark Rickerbys Limited the use of those materials is subject exclusively to the conditions of engagement between the practice and its client. Harrison Clark Rickerbys Limited do not accept service of documents or proceedings by email unless consent has been given. This communication is confidential and may contain legally privileged information. By the use of e-mail over the internet Harrison Clark Rickerbys Limited is not waiving either confidentiality of, or legal privilege in, the content of the e-mail and of any attachments. Harrison Clark Rickerbys Limited are committed to protecting and respecting your privacy. Click [here](#) to access our Privacy policy. If you have received this e-mail in error please contact Harrison Clark Rickerbys Limited on telephone number 01905 612001 or e-mail gdpr@hcrlaw.com. Harrison Clark Rickerbys Limited will communicate with you by e-mail, however, the practice cannot guarantee the confidentiality, reliability or speed of these communications, or of any attached documents. If you wish to send to the practice any urgent, critical or encrypted e-mail communication please notify the addressee first by telephone on 01905 612001. The preferred format for receiving word-processed documents is Microsoft Word. Regulatory information: Harrison Clark Rickerbys, Harrison Clark Rickerbys inc Shewcross, Harrison Clark Rickerbys inc Gordon Lutton, Harrison Clark Rickerbys inc Sprecher Grier, HCR Hewitsons, HCR Hewitsons inc Houlden Sweeney, Safe from harm, Eagle HR and wills at work are all trading names of Harrison Clark Rickerbys Limited. Harrison Clark Rickerbys Limited is a limited company incorporated in England under 7033248 and practising English Law. A list of directors is open to inspection at the registered office which is at 5 Deansway, Worcester, WR1 2JG. All directors are solicitors or barristers. The term "Partner" is used for directors and also senior members of staff who may be either lawyers of England and Wales or professionals other than lawyers. The firm is authorised and regulated by the Solicitors Regulation Authority (SRA number 520892). A copy of the Authority's rules is available at <https://www.sra.org.uk/solicitors/standards-regulations> Address: 5 Deansway, Worcester, WR1 2JG. Telephone: 01905 612001 Email: lawyers@hcrlaw.com VAT registration number: GB 979 9180 43

Outstanding:
Dealt With: Yes
Attachments:

Checkmylegalfees.com
Mark Carlisle
Email Detail

Printed by: Mark Carlisle

Date: 16 August 2023 08:50
From: Adam Collett - acollett@hcrlaw.com
To: Mark Carlisle - mark.carlisle@checkmylegalfees.com
Cc: -
Bcc: -
Subject: RE: Rosario Sanchez, Raquel (Harrison Clark Rickerbys)
Urgent: No
Associated File(s): Rosario Sanchez, Raquel (Harrison Clark Rickerbys) - 20191/001

Dear Mark,

I will come back to you by 25th August.

Adam

Adam Collett
Finance Director
Finance



For and on behalf of Harrison Clark Rickerbys Limited

T: 01905 744 879 | M: 07919 367 108 | E: acollett@hcrlaw.com

Harrison Clark Rickerbys Limited, 5 Deansway, Worcester, Worcestershire WR1 2JG, United Kingdom

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.

Birmingham | Cambridge | Cardiff | Central England | Cheltenham | Hereford | London | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment or virtually via Teams or FaceTime, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alert: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collett, immediately on 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.

From: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Sent: Monday, August 14, 2023 10:48 AM
To: Adam Collett <acollett@hcrlaw.com>
Subject: RE: Rosario Sanchez, Raquel (Harrison Clark Rickerbys)

Dear Adam,

Could you let me know when you anticipate providing your substantive response on this please?

Unless you are going to agree to set aside the default judgment, we are going to need to press on with an application.

Kind regards

Mark Carlisle
Costs Draftsman



a trading style of

Richard Slade and Company
13 Gray's Inn Square | London WC1R 5JD
Tel 0203 6428881 | Fax 020 7806 8267 | Mobile 07432884472

<http://www.checkmylegalfees.com>
<http://www.richardslade.com>

Authorised and regulated by the Solicitors Regulation Authority, No. 510176
Richard Slade and Company Limited, Registered in England No. 02624852

From: Adam Collett <acollett@hcrlaw.com>
Sent: 04 August 2023 09:05
To: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Subject: RE: Rosario Sanchez, Raquel (Harrison Clark Rickerbys)

Dear Mark,

I can confirm that we have requested that HCE suspend their activities.

Kind regards,

Adam

Adam Collett
Finance Director
Finance



For and on behalf of Harrison Clark Rickerbys Limited

T: 01905 744 879 | M: 07919 367 106 | E: acollett@hcrclaw.com

Harrison Clark Rickerbys Limited, 5 Deansway, Worcester, Worcestershire WR1 2JG, United Kingdom

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.

Birmingham | Cambridge | Cardiff | Central England | Cheltenham | Hereford | London | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment, via Zoom, FaceTime or Teams, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alert: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collett, immediately on 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.

From: Mark Carlisle <mark.carlisle@checkmylegalfees.com>

Sent: Friday, August 4, 2023 7:02 AM

To: Adam Collett <acollett@hcrclaw.com>

Subject: RE: Rosario Sanchez, Raquel (Harrison Clark Rickerbys)

Dear Adam,

Yes, we can agree to holding off the application for one week so that – hopefully – we can make some progress by consent.

Please confirm that the HCEO activity is suspended for the same period.

Kind regards

Mark Carlisle
Costs Draftsman



a trading style of

Richard Slade and Company
13 Gray's Inn Square | London WC1R 5JD
Tel 0203 6428881 | Fax 020 7806 8267 | Mobile 07432884472

<http://www.checkmylegalfees.com>
<http://www.richardslade.com>

Authorised and regulated by the Solicitors Regulation Authority, No. 510176
Richard Slade and Company Limited, Registered in England No. 02624852

From: Adam Collett <acollett@hcrclaw.com>

Sent: 03 August 2023 15:34

To: Sophie Hadley-Hall <shadley-hall@hcrclaw.com>; Mark Carlisle <mark.carlisle@checkmylegalfees.com>

Cc: Lesley-Ann Hamlyn <LAHamlyn@hcrclaw.com>

Subject: RE: Rosario Sanchez, Raquel (Harrison Clark Rickerbys)

Dear Mr Carlisle,

Has the client agreed to hold off on making an application to set aside?

If so I will suspend HCE activity.

Kind regards,
Adam

Adam Collett
Finance Director
Finance



For and on behalf of Harrison Clark Rickerbys Limited

T: 01905 744 879 | M: 07919 367 106 | E: acollett@hcrclaw.com

Harrison Clark Rickerbys Limited, 5 Deansway, Worcester, Worcestershire WR1 2JG, United Kingdom

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.

Birmingham | Cambridge | Cardiff | Central England | Cheltenham | Hereford | London | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment, via Zoom, FaceTime or Teams, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alert: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collett, immediately on 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.

From: Sophie Hadley-Hall <shadley-hall@hcrlaw.com>
Sent: Wednesday, August 2, 2023 12:02 PM
To: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Cc: Lesley-Ann Hamlyn <LAHamlyn@hcrlaw.com>; Adam Collett <acollett@hcrlaw.com>
Subject: RE: Roasario Sanchez, Raquel (Harrison Clark Rickerbys) [HCRLAW-LIVE.FID11081166]

Dear Mr Carlisle,

We are prepared to pause the activity of HCE, with regards to the client, if the client is prepared to hold off making an application to set aside.

My colleague Adam Collett (acollett@hcrlaw.com) will be your contact for any further queries relating to this matter as he will be able to assist from the Finance Team side. If you have any further queries regarding the complaint or complaints handling, then please do let me know and I am happy to assist where needed.

Kind regards,
 Sophie

Sophie Hadley-Hall
Risk Manager (Non-Solicitor)
Risk Management Team



For and on behalf of Harrison Clark Rickerbys Limited

T: 01905 953 760 | M: 07909 919 513 | E: shadley-ha@hcrlaw.com

Harrison Clark Rickerbys Limited, 5 Deansway, Worcester, Worcestershire WR1 2JG, United Kingdom

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.

Birmingham | Cambridge | Cardiff | Central England | Cheltenham | Hereford | London | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment, via Zoom, FaceTime or Teams, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alert: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collett, immediately on 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.

From: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Sent: Wednesday, August 2, 2023 10:40 AM
To: Sophie Hadley-Hall <shadley-hall@hcrlaw.com>
Cc: Lesley-Ann Hamlyn <LAHamlyn@hcrlaw.com>
Subject: RE: Roasario Sanchez, Raquel (Harrison Clark Rickerbys) [HCRLAW-LIVE.FID11081166]

Dear Sophie / Lesley-Ann,

Thanks for your response.

Would you be prepared to call off the HCEOs while your finance team considers?

If so, I will take my client's instructions as to whether or not she is prepared to hold off making an application to set aside, because I did have that in my diary to do today, but rather than troubling the court unnecessarily I would much rather deal with these things by agreement if at all possible.

Kind regards

Mark Carlisle
 Costs Draftsman



a trading style of

Richard Slade and Company
 13 Gray's Inn Square | London WC1R 5JD
 Tel 0203 6428881 | Fax 020 7806 8267 | Mobile 07432884472

<http://www.checkmylegalfees.com>
<http://www.richardslade.com>

Authorised and regulated by the Solicitors Regulation Authority, No. 510176
 Richard Slade and Company Limited, Registered in England No. 02624852

From: Sophie Hadley-Hall <shadley-hall@hcrlaw.com>
 Sent: 02 August 2023 10:30
 To: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
 Cc: Lesley-Ann Hamlyn <LAHamlyn@hcrlaw.com>
 Subject: RE: Roasario Sanchez, Raquel (Harrison Clark Rickerbys) [HCRLAW-LIVE.FID11081166]

Dear Mr Carlisle,

I apologise for my lack of response yesterday. I have passed this to the appropriate internal person within our Finance Team to consider and they will respond to you in due course – I would hope by the end of this week.

Kind regards,
 Sophie

Sophie Hadley-Hall
Risk Manager (Non-Solicitor)
Risk Management Team



For and on behalf of Harrison Clark Rickerbys Limited

T: 01905 953 760 | M: 07909 919 513 | E: shadley-hall@hcrlaw.com

Harrison Clark Rickerbys Limited, 5 Deansway, Worcester, Worcestershire WR1 2JG, United Kingdom

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.

Birmingham | Cambridge | Cardiff | Central England | Cheltenham | Hereford | London | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment, via Zoom, FaceTime or Teams, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alert: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collett, immediately on 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.

From: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
 Sent: Monday, July 31, 2023 9:58 AM
 To: Sophie Hadley-Hall <shadley-hall@hcrlaw.com>
 Subject: RE: Roasario Sanchez, Raquel (Harrison Clark Rickerbys) [HCRLAW-LIVE.FID11081166]

Dear Sophie,

Thanks for your response.

I appreciate that I asked for a very quick response but this is a case where my client has High Court Enforcement Officers attempting to enforce a judgment that – in my view – was wrongly obtained.

Could I please ask for a response by tomorrow lunch time, failing which I will need to issue an application to set aside the judgment?

Kind regards

Mark Carlisle
 Costs Draftsman



a trading style of

Richard Slade and Company
 13 Gray's Inn Square | London WC1R 5JD
 Tel 0203 6428881 | Fax 020 7806 8267 | Mobile 07432884472

<http://www.checkmylegalfees.com>
<http://www.richardslade.com>

Authorised and regulated by the Solicitors Regulation Authority, No. 510176
 Richard Slade and Company Limited, Registered in England No. 02624852

From: Sophie Hadley-Hall <shadley-hall@hcrlaw.com>
 Sent: 31 July 2023 09:51
 To: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
 Cc: Thanchanok Srisuk <tsrisuk@hcrlaw.com>; Lesley-Ann Hamlyn <LAHamlyn@hcrlaw.com>
 Subject: RE: Roasario Sanchez, Raquel (Harrison Clark Rickerbys) [HCRLAW-LIVE.FID11081166]

Dear Mr Carlisle,

Thank you for your email below which has been passed to me as the Complaints Manager, for review and response.

Unfortunately I was out of the office on my non-working day at the end of last week and so have only seen your email this morning. It will not be possible for me to

consider and respond in such a short and unrealistic time frame. I will however, endeavour to respond as early as possible this week.

Kind regards,
Sophie

Sophie Hadley-Hall
Risk Manager (Non-Solicitor)
Risk Management Team



For and on behalf of Harrison Clark Rickerbys Limited

T: 01905 953 760 | M: 07909 919 513 | E: shadley-ha@hclaw.com

Harrison Clark Rickerbys Limited, 5 Deansway, Worcester, Worcestershire WR1 2JG, United Kingdom

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.

Birmingham | Cambridge | Cardiff | Central England | Cheltenham | Hereford | London | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment, via Zoom, FaceTime or Teams, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alert: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collett, immediately on: 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.

From: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Sent: Thursday, July 27, 2023 12:11 PM
To: Thanchanok Srisuk <tsrisuk@hclaw.com>
Subject: Rosario Sanchez, Raquel (Harrison Clark Rickerbys)

Dear Sirs,

Please see the attached.

Kind regards

Mark Carlisle
Costs Draftsman



a trading style of

Richard Slade and Company
13 Gray's Inn Square | London WC1R 5JD
Tel 0203 6428881 | Fax 020 7806 8267 | Mobile 07432884472

<http://www.checkmylegalfees.com>
<http://www.richardslade.com>

Authorised and regulated by the Solicitors Regulation Authority, No. 510176
Richard Slade and Company Limited, Registered in England No. 02624852

Warning: Copyright Harrison Clark Rickerbys Limited. Where the content of this e-mail and/or attachment includes materials prepared by Harrison Clark Rickerbys Limited the use of those materials is subject exclusively to the conditions of engagement between the practice and its client. Harrison Clark Rickerbys Limited do not accept service of documents or proceedings by email unless consent has been given. This communication is confidential and may contain legally privileged information. By the use of e-mail over the Internet Harrison Clark Rickerbys Limited is not waiving either confidentiality of, or legal privilege in, the content of the e-mail and of any attachments. Harrison Clark Rickerbys Limited are committed to protecting and respecting your privacy. Click [here](#) to access our Privacy policy. If you have received this e-mail in error please contact Harrison Clark Rickerbys Limited on telephone number 01905 612001 or e-mail gdp@hclaw.com. Harrison Clark Rickerbys Limited will communicate with you by e-mail, however, the practice cannot guarantee the confidentiality, reliability or speed of these communications, or of any attached documents. If you wish to send to the practice any urgent, critical or encrypted e-mail communication please notify the addressee first by telephone on 01905 612001. The preferred format for receiving word-processed documents is Microsoft Word. Regulatory information: Harrison Clark Rickerbys, Harrison Clark Rickerbys Inc Shawcross, Harrison Clark Rickerbys Inc Gordon Lutton, Harrison Clark Rickerbys Inc Sprecher Grier, HCR Hewitsons, HCR Hewitsons Inc Houlden Sweeney, Safe from harm, Eagle HR and wills at work are all trading names of Harrison Clark Rickerbys Limited. Harrison Clark Rickerbys Limited is a limited company incorporated in England under 7033248 and practising English Law. A list of directors is open to inspection at the registered office which is at 5 Deansway, Worcester, WR1 2JG. All directors are solicitors or barristers. The term "Partner" is used for directors and also senior members of staff who may be either lawyers of England and Wales or professionals other than lawyers. The firm is authorised and regulated by the Solicitors Regulation Authority (SRA number 520892). A copy of the Authority's rules is available at <https://www.sra.org.uk/solicitors/standards-regulations> Address: 5 Deansway, Worcester, WR1 2JG. Telephone: 01905 612001 Email: lawyers@hclaw.com VAT registration number: GB 979 9180 43

Warning: Copyright Harrison Clark Rickerbys Limited. Where the content of this e-mail and/or attachment includes materials prepared by Harrison Clark Rickerbys Limited the use of those materials is subject exclusively to the conditions of engagement between the practice and its client. Harrison Clark Rickerbys Limited do not accept service of documents or proceedings by email unless consent has been given. This communication is confidential and may contain legally privileged information. By the use of e-mail over the Internet Harrison Clark Rickerbys Limited is not waiving either confidentiality of, or legal privilege in, the content of the e-mail and of any attachments. Harrison Clark Rickerbys Limited are committed to protecting and respecting your privacy. Click [here](#) to access our Privacy policy. If you have received this e-mail in error please contact Harrison Clark Rickerbys Limited on telephone number 01905 612001 or e-mail gdp@hclaw.com. Harrison Clark Rickerbys Limited will communicate with you by e-mail, however, the practice cannot guarantee the confidentiality, reliability or speed of these communications, or of any attached documents. If you wish to send to the practice any urgent, critical or encrypted e-mail communication please notify the addressee first by telephone on 01905 612001. The preferred format for receiving word-processed documents is Microsoft Word. Regulatory information: Harrison Clark Rickerbys, Harrison Clark Rickerbys Inc Shawcross, Harrison Clark Rickerbys Inc Gordon Lutton, Harrison Clark Rickerbys Inc Sprecher Grier, HCR Hewitsons, HCR Hewitsons Inc Houlden Sweeney, Safe from harm, Eagle HR and wills at work are all trading names of Harrison Clark Rickerbys Limited. Harrison Clark Rickerbys Limited is a limited company incorporated in England under 7033248 and practising English Law. A list of directors is open to inspection at the registered office which is at 5 Deansway, Worcester, WR1 2JG. All directors are solicitors or barristers. The term "Partner" is used for directors and also senior members of staff who may be either lawyers of England and Wales or professionals other than lawyers. The firm is authorised and regulated by the Solicitors Regulation Authority (SRA number 520892). A copy of the Authority's rules is available at <https://www.sra.org.uk/solicitors/standards-regulations> Address: 5 Deansway, Worcester, WR1 2JG. Telephone: 01905 612001 Email: lawyers@hclaw.com VAT registration number: GB 979 9180 43

Warning: Copyright Harrison Clark Rickerbys Limited. Where the content of this e-mail and/or attachment includes materials prepared by Harrison Clark Rickerbys Limited the use of those materials is subject exclusively to the conditions of engagement between the practice and its client. Harrison Clark Rickerbys Limited do not accept service of documents or proceedings by email unless consent has been given. This communication is confidential and may contain legally privileged information. By the use of e-mail over the Internet Harrison Clark Rickerbys Limited is not waiving either confidentiality of, or legal privilege in, the content of the e-mail and of any attachments. Harrison Clark Rickerbys Limited are committed to protecting and respecting your privacy. Click [here](#) to access our Privacy policy. If you have received this e-mail in error please contact Harrison Clark Rickerbys Limited on telephone number 01905 612001 or e-mail gdpr@hcrclaw.com. Harrison Clark Rickerbys Limited will communicate with you by e-mail, however, the practice cannot guarantee the confidentiality, reliability or speed of these communications, or of any attached documents. If you wish to send to the practice any urgent, critical or encrypted e-mail communication please notify the addressee first by telephone on 01905 612001. The preferred format for receiving word-processed documents is Microsoft Word. Regulatory information: Harrison Clark Rickerbys, Harrison Clark Rickerbys Inc Shawcross, Harrison Clark Rickerbys Inc Gordon Lutton, Harrison Clark Rickerbys Inc Sprecher Grier, HCR Hewitsons, HCR Hewitsons Inc Houlden Sweeney, Safe from harm, Eagle HR and wills at work are all trading names of Harrison Clark Rickerbys Limited. Harrison Clark Rickerbys Limited is a limited company incorporated in England under 7033248 and practising English Law. A list of directors is open to inspection at the registered office which is at 5 Deansway, Worcester, WR1 2JG. All directors are solicitors or barristers. The term "Partner" is used for directors and also senior members of staff who may be either lawyers of England and Wales or professionals other than lawyers. The firm is authorised and regulated by the Solicitors Regulation Authority (SRA number 520892). A copy of the Authority's rules is available at <https://www.sra.org.uk/solicitors/standards-regulations> Address: 5 Deansway, Worcester, WR1 2JG. Telephone: 01905 612001 Email: lawyers@hcrclaw.com VAT registration number: GB 979 9180 43

Warning: Copyright Harrison Clark Rickerbys Limited. Where the content of this e-mail and/or attachment includes materials prepared by Harrison Clark Rickerbys Limited the use of those materials is subject exclusively to the conditions of engagement between the practice and its client. Harrison Clark Rickerbys Limited do not accept service of documents or proceedings by email unless consent has been given. This communication is confidential and may contain legally privileged information. By the use of e-mail over the Internet Harrison Clark Rickerbys Limited is not waiving either confidentiality of, or legal privilege in, the content of the e-mail and of any attachments. Harrison Clark Rickerbys Limited are committed to protecting and respecting your privacy. Click [here](#) to access our Privacy policy. If you have received this e-mail in error please contact Harrison Clark Rickerbys Limited on telephone number 01905 612001 or e-mail gdpr@hcrclaw.com. Harrison Clark Rickerbys Limited will communicate with you by e-mail, however, the practice cannot guarantee the confidentiality, reliability or speed of these communications, or of any attached documents. If you wish to send to the practice any urgent, critical or encrypted e-mail communication please notify the addressee first by telephone on 01905 612001. The preferred format for receiving word-processed documents is Microsoft Word. Regulatory information: Harrison Clark Rickerbys, Harrison Clark Rickerbys Inc Shawcross, Harrison Clark Rickerbys Inc Gordon Lutton, Harrison Clark Rickerbys Inc Sprecher Grier, HCR Hewitsons, HCR Hewitsons Inc Houlden Sweeney, Safe from harm, Eagle HR and wills at work are all trading names of Harrison Clark Rickerbys Limited. Harrison Clark Rickerbys Limited is a limited company incorporated in England under 7033248 and practising English Law. A list of directors is open to inspection at the registered office which is at 5 Deansway, Worcester, WR1 2JG. All directors are solicitors or barristers. The term "Partner" is used for directors and also senior members of staff who may be either lawyers of England and Wales or professionals other than lawyers. The firm is authorised and regulated by the Solicitors Regulation Authority (SRA number 520892). A copy of the Authority's rules is available at <https://www.sra.org.uk/solicitors/standards-regulations> Address: 5 Deansway, Worcester, WR1 2JG. Telephone: 01905 612001 Email: lawyers@hcrclaw.com VAT registration number: GB 979 9180 43

Warning: Copyright Harrison Clark Rickerbys Limited. Where the content of this e-mail and/or attachment includes materials prepared by Harrison Clark Rickerbys Limited the use of those materials is subject exclusively to the conditions of engagement between the practice and its client. Harrison Clark Rickerbys Limited do not accept service of documents or proceedings by email unless consent has been given. This communication is confidential and may contain legally privileged information. By the use of e-mail over the Internet Harrison Clark Rickerbys Limited is not waiving either confidentiality of, or legal privilege in, the content of the e-mail and of any attachments. Harrison Clark Rickerbys Limited are committed to protecting and respecting your privacy. Click [here](#) to access our Privacy policy. If you have received this e-mail in error please contact Harrison Clark Rickerbys Limited on telephone number 01905 612001 or e-mail gdpr@hcrclaw.com. Harrison Clark Rickerbys Limited will communicate with you by e-mail, however, the practice cannot guarantee the confidentiality, reliability or speed of these communications, or of any attached documents. If you wish to send to the practice any urgent, critical or encrypted e-mail communication please notify the addressee first by telephone on 01905 612001. The preferred format for receiving word-processed documents is Microsoft Word. Regulatory information: Harrison Clark Rickerbys, Harrison Clark Rickerbys Inc Shawcross, Harrison Clark Rickerbys Inc Gordon Lutton, Harrison Clark Rickerbys Inc Sprecher Grier, HCR Hewitsons, HCR Hewitsons Inc Houlden Sweeney, Safe from harm, Eagle HR and wills at work are all trading names of Harrison Clark Rickerbys Limited. Harrison Clark Rickerbys Limited is a limited company incorporated in England under 7033248 and practising English Law. A list of directors is open to inspection at the registered office which is at 5 Deansway, Worcester, WR1 2JG. All directors are solicitors or barristers. The term "Partner" is used for directors and also senior members of staff who may be either lawyers of England and Wales or professionals other than lawyers. The firm is authorised and regulated by the Solicitors Regulation Authority (SRA number 520892). A copy of the Authority's rules is available at <https://www.sra.org.uk/solicitors/standards-regulations> Address: 5 Deansway, Worcester, WR1 2JG. Telephone: 01905 612001 Email: lawyers@hcrclaw.com VAT registration number: GB 979 9180 43

Outstanding:

Dealt With:

Attachments:

Yes

Checkmylegalfees.com
Mark Carlisle
Email Detail

Printed by: Mark Carlisle

Date: 29 August 2023 14:47
From: Mark Carlisle - mark.carlisle@checkmylegalfees.com
To: Adam Collett - acollett@hcrfaw.com
Cc: -
Bcc: -
Subject: Rosario Sanchez, Raquel (Harrison Clark Rickerbys)
Urgent: No
Associated File(s): Rosario Sanchez, Raquel (Harrison Clark Rickerbys) - 20191/001

Dear Adam,

I refer to my letter of 27th July on behalf of my above-named client.

Whilst we agreed to defer an application to set aside / enforcement by HCEOs so that we could establish whether matters could be dealt with without recourse to the court, it has now become apparent that that will not be possible.

We will be issuing an application to set aside Default Judgment tomorrow.

Please could I have, by return, copies of the following documents as filed at court -

1. Claim Form,
2. Particulars of Claim and any attachments
3. Request for Judgment

Please also confirm the method of purported delivery of your bills to my client.

Kind regards

Mark Carlisle
Costs Draftsman



a trading style of

Richard Slade and Company
13 Gray's Inn Square | London WC1R 5JD
Tel 0203 6428881 | Fax 020 7806 8267 | Mobile 07432884472

<http://www.checkmylegalfees.com>
<http://www.richardslade.com>

Authorised and regulated by the Solicitors Regulation Authority, No. 510176
Richard Slade and Company Limited, Registered in England No. 02624852

Outstanding:
Dealt With: Yes
Attachments:

From: Raquel Rosario Sánchez [REDACTED]
 To: Mark Carls
 Subject: Fwd: Private & Confidential; Statement of Account; Harrison Clark Rickerbys - ROS0307 [HCRLAW-LIVE.FID331511]
 Date: 30 August 2023 11:26:24
 Attachments: 10 June.pdf
 7 July.pdf
 555C-422060709382_0017.pdf

----- Forwarded message -----

De: **Raquel Rosario Sánchez** <[REDACTED]>
 Date: vic, 15 jul 2022 a la(s) 13:05
 Subject: Fwd: FW: Private & Confidential; Statement of Account; Harrison Clark Rickerbys - ROS0307 [HCRLAW-LIVE.FID331511]
 To: <complaints@hcrlaw.com>, Andrea Thomas <athomas@hcrlaw.com>
 Cc: Chris Mayers <cmayers@hcrlaw.com>, <mmills@hcrlaw.com>, Greg Kolodziejczyk <gkolo@hcrlaw.com>

Dear Andrea,

I am extremely upset and distressed by your conduct. This issue has caused me months of unnecessary stress. You have admitted that there was no written retainer in place. You were litigating on our behalf in a cost jurisdiction. If we had won our case, your failure to provide us with a written retainer would have prevented us from recovering the costs to which we would have been entitled.

All of your billing is disputed. This includes the bills that you have been paid for, as well as the bills that you are now chasing me for. You have not given us fee estimates in advance of incurring work, as you are required to provide. You also did not update the fee estimates, which you were also required to do. In the absence of a written retainer, I cannot see how you can assert either a) that I am personally liable for anything, or b) that there is any basis for you to have billed us for anything at all.

Secondly, the money that you are chasing me for is not reasonable fees reasonably incurred. By way of example, you put two lawyers on our case who were duplicating their work throughout. We were paying twice. When you originally took the case, we had one lawyer and she was perfectly capable of conducting the matter on her own. The explanation that you gave us for two lawyers becoming involved was that this was required in case one was unavailable. You did not say to us that we would be charged for two lawyers to do one lawyer's job, and we never gave our permission for that.

Thirdly, we have looked at the breakdown of all the fees that you have charged us, including the sums that you have been paid and we do not believe that all of the work that you have done was necessary. Therefore, even if you had complied with your regulatory obligations and even if these were reasonable fees reasonably incurred, then your bills would still need to be subject to detailed assessment. Please can you now conduct an assessment of all the billing on this matter.

In all the circumstances, you have not complied with your regulatory obligations and the bills are not enforceable. Please treat this as a formal complaint. The specific grounds of the complaints are the issues I have numbered above, and a further issue which is that you have misrepresented the outstanding bills as being enforceable when this is, in fact, not the case.

We want you to reimburse all of the money that you have billed back into the Crowdjustice account. For clarity, I don't want it and the other women don't want it either. But the public paid for us to challenge a threat to the single-sex exemptions in the Equality Act, and are entitled to expect that the lawyers instructed in the case would comply with their basic regulatory obligations. HCR has failed to do so.

I am attaching to this email two emails I have sent to HCR requesting the correspondence in which I was given estimates in advance of these fees being incurred. One dates from 10 June 2022 and the other from 7 July 2022. I have not received this correspondence yet.

Please know that it is my intention to escalate this to the Legal Ombudsman and the SRA in the event that this complaint is not upheld by you in full.

My full name is: Raquel Maria Rosario Sanchez
 My contact details are: [REDACTED]
 My file reference number is: ROS0307 [HCRLAW-LIVE.FID331511]

Best,
 Raquel

El jue, 14 jul 2022 a la(s) 12:39, Andrea Thomas (athomas@hcrlaw.com) escribió:

Dear Raquel

I write further to your email below and subsequent correspondence with our credit control team. I apologise for the delay in responding whilst I have been looking into your query.

I understand that our two last bills in relation to this matter remain outstanding and you have asked why you are personally liable for these fees and whether you were given a cost estimate in advance of the fees being incurred.

These are matters which would normally be dealt with in our client care letter. As you will be aware, you initially instructed Liz McGlone to deal with your claim and she would have dealt with matters such as file opening and sending out a client care letter, which is normally done at the outset of a matter. Unfortunately, I have not been able to ascertain whether Liz sent you a client care letter. If Liz did send you a client care letter then please do let me know.

In the absence of a written retainer (which would normally take the form of a signed client care letter), a retainer will be implied where a relationship of solicitor and client existed. It is clear from the correspondence between you and Liz, and subsequently between you, Chris and myself, that you intended to instruct this firm to act as your solicitors and this is also clear from your Crowd Justice page. It clearly cannot be disputed that a retainer was in existence.

In terms of the cost estimate, as I have said, this is something that is usually covered in the client care letter, although is often provided subsequently. I note from the original Crowd Justice page that it is stated that legal costs could be up to £75,000. I am aware that both Liz and Amanda had a great deal of input into the text for this page. When Chris and I took over the case during Liz' maternity leave, you were provided with copies of our invoices and a time breakdown each time any money was drawn down from the money held on account. You did not raise any issue with our costs at that stage (or at any time until you terminated your retainer with this firm).

You were kept regularly apprised of the costs that were being incurred. We also made you aware when the money held on account was coming to an end and that we would need to raise further funds before we could progress the case. This is evidenced by the various emails we exchanged in readiness for a further fund raising drive, particularly when the decision was taken to change counsel and by emails whereby I informed you that we could not instruct counsel until additional funds were raised. Notwithstanding this, you instructed us to undertake further work at that stage, including making approaches to various counsel, which would inevitably have led to further costs being incurred.

With regard to your query as to whether you are personally liable for the outstanding bills, you adopted the role of lead claimant and were our main point of contact. However, proceedings were also issued on behalf of [REDACTED] who expressly agreed that they should also be named as claimants. Proceedings

were also issued in the name of Women Talk Back, an unincorporated association. We are therefore of the view that liability for costs would be joint and several, so could be enforced against all or any one of you.

The outstanding bills are payable and enforceable and our credit control department will be in touch to discuss this with you. As we have said previously, we would prefer not to have to take enforcement action and we would therefore be grateful for your proposals for the payment of our outstanding costs.

Regards

Andrea Thomas
Partner
Employment & Immigration Team

For and on behalf of Harrison Clark Rickerbys Limited

T: 029 2274 9192 | M: 07725 240 233 | E: athomas@hcrlaw.com

Harrison Clark Rickerbys Limited, Ground Floor
Unit B
Copse Walk
Cardiff Gate Business Park, Cardiff, CF23 8RB, United Kingdom

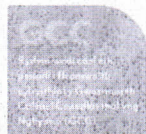
hcr
harrison clark
rickerbys solicitors

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.

Birmingham | Cambridge | Cardiff | Cheltenham | Hereford | London | Milton Keynes | Northampton | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment, via Zoom, FaceTime or Teams, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alert: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collett, immediately on 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.



From: Raquel Rosario Sánchez <[REDACTED]>
Sent: 10 June 2022 19:18
To: Greg Kolodziejczyk <gkololo@hcrlaw.com>
Subject: Fwd: Private & Confidential; Statement of Account; Harrison Clark Rickerbys - ROS0307

Dear Greg,

Hope you are well.

Can you please show me the basis in which I am being made personally liable for these fees (as opposed to the other claimants in this matter) and also, can you please provide me with the correspondence in which I was given estimates in advance of these fees being incurred?

Let me know when you can, please.

Best,

Raquel

----- Forwarded message -----

De: Statements <statements@hcrlaw.com>
Date: mar, 7 jun 2022 a la(s) 11:08
Subject: Private & Confidential; Statement of Account; Harrison Clark Rickerbys - ROS0307
To: [REDACTED]

Please find attached your statement of account.

Kind regards

Revenue Management

For and on behalf of Harrison Clark Rickerbys Limited

T: 01212 246 466 | E: statements@hcr-law.com

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.



Birmingham | Cambridge | Cardiff | Cheltenham | Hereford | London | Milton Keynes | Northampton | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment, via Zoom, FaceTime or Teams, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alert: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collatt, immediately on 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.

Warning: Copyright Harrison Clark Rickerbys Limited. Where the content of this e-mail and/or attachment includes materials prepared by Harrison Clark Rickerbys Limited the use of those materials is subject exclusively to the conditions of engagement between the practice and its client. Harrison Clark Rickerbys Limited do not accept service of documents or proceedings by email unless consent has been given. This communication is confidential and may contain legally privileged information. By the use of e-mail over the internet Harrison Clark Rickerbys Limited is not waiving either confidentiality of, or legal privilege in, the content of the e-mail and of any attachments. Harrison Clark Rickerbys Limited are committed to protecting and respecting your privacy. Click [here](#) to access our Privacy policy. If you have received this e-mail in error please contact Harrison Clark Rickerbys Limited on telephone number 01905 612001 or e-mail gdp@hcr-law.com. Harrison Clark Rickerbys Limited will communicate with you by e-mail, however, the practice cannot guarantee the confidentiality, reliability or speed of these communications, or of any attached documents. If you wish to send to the practice any urgent, critical or encrypted e-mail communication please notify the addressee first by telephone on 01905 612001. The preferred format for receiving word-processed documents is Microsoft Word. Regulatory information: Harrison Clark Rickerbys, Harrison Clark Rickerbys inc Shawcross, Harrison Clark Rickerbys inc Gordon Lutton, Harrison Clark Rickerbys inc Sprecher Grier, HCR Hewitsons, HCR Hewitsons inc Houlden Sweeney, Safe from harm, Eagle HR and wills at work are all trading names of Harrison Clark Rickerbys Limited. Harrison Clark Rickerbys Limited is a limited company incorporated in England under 7033248 and practising English Law. A list of directors is open to inspection at the registered office which is at 5 Deansway, Worcester, WR1 2JG. All directors are solicitors or barristers. The term "Partner" is used for directors and also senior members of staff who may be either lawyers of England and Wales or professionals other than lawyers. The firm is authorised and regulated by the Solicitors Regulation Authority (SRA number 520892). A copy of the Authority's rules is available at <https://www.sra.org.uk/solicitors/standards-regulations> Address: 5 Deansway, Worcester, WR1 2JG. Telephone: 01905 612001 Email: lawyers@hcr-law.com VAT registration number: GB 979 9180 43

Warning: Copyright Harrison Clark Rickerbys Limited. Where the content of this e-mail and/or attachment includes materials prepared by Harrison Clark Rickerbys Limited the use of those materials is subject exclusively to the conditions of engagement between the practice and its client. Harrison Clark Rickerbys Limited do not accept service of documents or proceedings by email unless consent has been given. This communication is confidential and may contain legally privileged information. By the use of e-mail over the internet Harrison Clark Rickerbys Limited is not waiving either confidentiality of, or legal privilege in, the content of the e-mail and of any attachments. Harrison Clark Rickerbys Limited are committed to protecting and respecting your privacy. Click [here](#) to access our Privacy policy. If you have received this e-mail in error please contact Harrison Clark Rickerbys Limited on telephone number 01905 612001 or e-mail gdp@hcr-law.com. Harrison Clark Rickerbys Limited will communicate with you by e-mail, however, the practice cannot guarantee the confidentiality, reliability or speed of these communications, or of any attached documents. If you wish to send to the practice any urgent, critical or encrypted e-mail communication please notify the addressee first by telephone on 01905 612001. The preferred format for receiving word-processed documents is Microsoft Word. Regulatory information: Harrison Clark Rickerbys, Harrison Clark Rickerbys inc Shawcross, Harrison Clark Rickerbys inc Gordon Lutton, Harrison Clark Rickerbys inc Sprecher Grier, HCR Hewitsons, HCR Hewitsons inc Houlden Sweeney, Safe from harm, Eagle HR and wills at work are all trading names of Harrison Clark Rickerbys Limited. Harrison Clark Rickerbys Limited is a limited company incorporated in England under 7033248 and practising English Law. A list of directors is open to inspection at the registered office which is at 5 Deansway, Worcester, WR1 2JG. All directors are solicitors or barristers. The term "Partner" is used for directors and also senior members of staff who may be either lawyers of England and Wales or professionals other than lawyers. The firm is authorised and regulated by the Solicitors Regulation Authority (SRA number 520892). A copy of the Authority's rules is available at <https://www.sra.org.uk/solicitors/standards-regulations> Address: 5 Deansway, Worcester, WR1 2JG. Telephone: 01905 612001 Email: lawyers@hcr-law.com VAT registration number: GB 979 9180 43

Your reference:

Our reference: LH05.HCR0005-0328.TS

Direct email: MStokes@hcrlaw.com

12 August 2022



Private and Confidential
Ms R Rosario Sánchez

**5 Deansway
Worcester
WR1 2JG**

Telephone: 01905 612 001

Fax: 01905 744 990

DX: 716260 Worcester 1

Direct Line: 01905 678 545

EMPLOYMENT DEPARTMENT

BY EMAIL ONLY

Dear Ms Rosario Sánchez

Your Complaint dated 15 July 2022

I would firstly like to say that I am very sorry you feel that your experience of our service has left you feeling dissatisfied and apologise for any inconvenience you feel you have suffered.

As the Head of Employment and in accordance with our Complaints Handling Procedure, I have now had an opportunity to investigate, review your file and discuss matters with Andrea Thomas and Chris Mayers.

I would summarise your complaint as follows:

1. That there was no written retainer in place, and this may have prevented you from recovering your costs in the event that the case is successful.
2. That no costs estimates were provided
3. That the fees we are seeking to recover are not reasonable fees, reasonably incurred. In particular, you feel that there was duplication as two lawyers were involved with your case.
4. You do not believe that all of the work that we have done was necessary.

As a result of the above you are seeking reimbursement of all the costs incurred and paid.

Background / Chronology

As you will be aware, you initially instructed Liz McGlone to deal with this matter on your behalf. You already had counsel instructed, being Amanda Jones of Great James Chambers. Liz made you aware that she would shortly be going on maternity leave and colleagues would have to cover the case in her absence. Liz also made you aware that she was not a civil litigator and was reliant upon counsel to

| | | | | | |
|------------------|------------------|------------------|------------------|------------------|------------------|
| Birmingham | Cambridge | Cardiff | Cheltenham | Hereford | London |
| T: 0121 454 0739 | T: 01223 461155 | T: 02922 749 200 | T: 01242 224 422 | T: 01432 349 670 | T: 0207 489 6320 |
| F: 0121 455 7211 | F: 01223 316 511 | F: 02922 749 201 | F: 01242 518 428 | F: 01432 349 660 | F: 0207 6811261 |

lawyers@hcrlaw.com www.hcrlaw.com

| | | | | |
|------------------|------------------|------------------|------------------|------------------|
| Milton Keynes | Northampton | Thomas Valley | Worcester | Wye Valley |
| T: 01908 247 010 | T: 01604 233 233 | T: 0118 911 1206 | T: 01905 612 001 | T: 01989 562 377 |
| F: 01908 247 020 | F: 01604 627 941 | F: 0118 900 7874 | F: 01905 744 899 | F: 01989 565 961 |



Harrison Clark Rickerby is a trading name of Harrison Clark Rickerby Limited.
Harrison Clark Rickerby Limited is authorised and regulated by the Solicitors Regulation Authority (SRA number 520892). Service of documents by email is not accepted. Registered in England number 2035248. Registered office 5 Deansway Worcester WR1 2JG. A list of directors of Harrison Clark Rickerby Limited is available for inspection at 5 Deansway Worcester WR1 2JG. The term "Partner" is used for directors and also senior members of staff who may be either lawyers of England and Wales or professionals other than lawyers.

advise on aspects of civil procedure.

Our Response

Dealing with each of the points you raise in turn:

With regard to your first point on whether there was a written retainer, I refer you to the email sent by Andrea Thomas of the 14th of July 2022. As you will be aware, you initially instructed Liz McGlone to deal with this matter and Liz dealt with the initial compliance matters, including the opening of a file and sorting out the funding arrangements. This would normally include the preparation of a client care letter and a draft letter was indeed prepared by Liz. It is a requirement of our case management system that a signed copy of the client care letter is uploaded to the system when it is sent out to the client and once this has been done the system will indicate that the file is compliant. A copy of the client care letter was indeed uploaded to our case management system by Liz and the system therefore indicated that this step had been undertaken and that the file was compliant. However, when a detailed review was carried out by Andrea Thomas and myself following receipt of your previous correspondence, including a review of Liz's emails, we were unable to ascertain whether the letter had been sent out to you by Liz. In her email of 14 July 2022, Andrea explained the position and asked you to let her know if you had received a client care letter from Liz. I note that you have not responded to this point and I would therefore be grateful if you could please confirm that you did not receive a client care letter from Liz. I will then respond to that specific aspect of your complaint.

With regard to the related point, being that the absence of a written retainer would have prevented you from recovering your costs, I do not agree that this is the case. Whether or not a party is able to recover their costs from the unsuccessful party in litigation will depend on what is known as the "indemnity principle". The indemnity principle essentially provides that no party should be able to recover costs from their opponent if they are not themselves liable to their lawyers for the payment of those costs. On that point, I would reiterate the points made by Andrea in her email of 14 July 2022. Even in the absence of a written retainer, a retainer will usually be implied where it is clear that a party intended to instruct a solicitor to act on their behalf. That was clearly the case here as can be seen not only in correspondence between you and lawyers from this firm, but also from your Crowdjustice page, where you stated that you were raising funds for this very purpose. I am therefore of the view that there was clearly a retainer in place and, that being the case, there is no breach of the indemnity principle which would prevent you from recovering your costs if your claim is successful. However, it is my understanding that under the rules of the Crowdjustice platform, any costs recovered in excess of £1,000 must be returned to donors on a pro rata basis.

On the second issue raised, being whether you were provided with costs estimates, it is not the case that a costs estimate must always be provided before any work is incurred. A costs estimate must be provided where possible, but in some cases it is not possible to estimate at the outset of a case how much work may be incurred. In a case such as yours, involving a novel point of law, it is very difficult to give an accurate estimate at the outset of the matter, although I see that a broad indication was given for the purpose of estimating how much you would need to raise through crowd funding. There were unexpected developments during the case, such as the Defendants making an Application to strike out part of your claim and their Request for Further and Better Particulars of the claim, which would inevitably have increased costs. However, I note that you were regularly updated as to such developments and provided with interim bills on a regular basis, which was generally monthly. Each bill was also accompanied by a time breakdown. You would therefore have been regularly updated as to the costs incurred on the file. In particular, I note the email sent to you by Andrea Thomas of 6 December 2021 updating you on the costs incurred and explaining why these were higher than anticipated, which

because of inadequacies in the documents prepared by Counsel, the work done in trying to remedy this was clearly necessary and I do not consider that this can be blamed on the solicitors working on your case.

Whilst I note your contention that any failure in regulatory requirements would render the bills unenforceable, that is not the case. As I have set out above, I will respond to the first point in your complaint when I have received your confirmation as to whether you received a client care letter from Liz McGlone. If you did not do so, or if there was any other regulatory failure, then this is something that we would very much regret. However, it does not necessarily mean that any bills rendered are unenforceable and, for the reasons set out above, I consider that a retainer would readily be implied from the conduct of the parties in this matter. For this reason I do not agree that we have any obligation to refund invoices that have already been paid from the money on account. Nor do I consider that any outstanding bills should be waived.

This is our final response to your complaint. If you choose to accept our response then please let us know by 9 September 2022.

I hope that we have been able to resolve your complaint to your satisfaction. However, if you remain unhappy with our response you can refer your complaint to the Legal Ombudsman who investigates complaints about poor service provided by lawyers.

The Legal Ombudsman can investigate complaints up to six years from the date of the problem happening or within three years of when you should reasonably have been aware of it. If you wish to refer your complaint to the Legal Ombudsman this should be done within six months of the date of this final response letter.

The Legal Ombudsman contact details are:-

Visit – www.legalombudsman.org.uk

Call – 0300 555 0333 between 8:30am to 5:30pm.

Calls to 03 numbers will cost no more than calls to national geographic numbers (starting 01 or 02) from both mobiles and landlines, and will be included as part of any inclusive call minutes or discount schemes in the same way as geographic calls.

Calls are recorded and may be used for training and monitoring purposes.

Minicom call - 0300 555 1777

Email – enquiries@legalombudsman.org.uk

Legal Ombudsman
PO Box 6806
Wolverhampton
WV1 9WJ

Do not send original documents to the Legal Ombudsman. They will scan any documents you send them to make computer copies and then destroy the originals.

If you intend referring the matter to the Legal Ombudsman please would you let me know so that I can arrange for your file to be retained.

Alternative complaints bodies (such a ProMediate (www.promediate.co.uk) exist which are competent to deal with complaints about legal services should both you and our firm wish to use such a scheme.

We do not intend to use this scheme.

Yours sincerely



Michael Stokes
For and on behalf of
HARRISON CLARK RICKERBYS LIMITED

From: Raquel Rosario Sánchez - [REDACTED]
Sent: 30 August 2023 11:26
To: Mark Carlisle <mark.carlisle@checkmylegalfees.com>
Subject: Fwd: Your Complaint [HCRLAW-LIVE.FID11081166]

----- Forwarded message -----

De: Raquel Rosario Sánch [REDACTED]
Date: vie, 9 sept 2022 a la(s) 16:50
Subject: Re: Your Complaint [HCRLAW-LIVE.FID11081166]
To: Thanchanok Srisuk <tsrisuk@hcrlaw.com>
Cc: Lesley-Ann Hamlyn <L.A.hamlyn@hcrlaw.com>

Dear Thanchanok,

Please retain our file.

Best,

Raquel

El vie, 12 ago 2022 a la(s) 09:56, Thanchanok Srisuk (tsrisuk@hcrlaw.com) escribió:

Dear Ms Rosario Sánchez,

Please find attached correspondence for your attention.

Kind regards,

Thanchanok Srisuk
Risk Management Paralegal
Risk Management Team

For and on behalf of Harrison Clark Rickerbys Limited

T: 01905 744 879 | E: hrisuk@hcrclaw.com

Harrison Clark Rickerbys Limited, 5 Deansway, Worcester, Worcestershire WR1 2JG, United Kingdom

Service of Documents: Harrison Clark Rickerbys Limited does not accept service of documents or proceedings by email unless consent has been given.

Birmingham | Cambridge | Cardiff | Cheltenham | Hereford | London | Milton Keynes | Northampton | Thames Valley | Worcester | Wye Valley

Our passion for people is at the heart of everything we do, so we work in a way that works for you. We can meet you in person at our offices by appointment, via Zoom, FaceTime or Teams, to ensure that everyone has access to the legal guidance they need for themselves, their family and their business.

Crime and Fraud Alerts: Please be aware that we do not send notification of changes to our bank details by email. Fraudsters have been impersonating law firms and some individuals and organisations have been tricked into forwarding money to them. If you receive an email that appears to come from us providing different bank details to the ones we supplied to you or indicating a change in our bank details, please contact our Finance Director, Adam Collett, immediately on 01905 744879 and alert the lawyer dealing with your matter. Do not reply to the email or act on any information contained in it. We cannot accept responsibility if you transfer money into an incorrect account.

Warning: Copyright Harrison Clark Rickerbys Limited. Where the content of this e-mail and/or attachment includes materials prepared by Harrison Clark Rickerbys Limited the use of those materials is subject exclusively to the conditions of engagement between the practice and its client. Harrison Clark Rickerbys Limited do not accept service of documents or proceedings by email unless consent has been given. This communication is confidential and may contain legally privileged information. By the use of e-mail over the internet Harrison Clark Rickerbys Limited is not waiving either confidentiality of, or legal privilege in, the content of the e-mail and of any attachments. Harrison Clark Rickerbys Limited are committed to protecting and respecting your privacy. Click [here](#) to access our Privacy policy. If you have received this e-mail in error please contact Harrison Clark Rickerbys Limited on telephone number 01905 612001 or e-mail gdp@hcrclaw.com. Harrison Clark Rickerbys Limited will communicate with you by e-mail, however, the practice cannot guarantee the confidentiality, reliability or speed of these communications, or of any attached documents. If you wish to send to the practice any urgent, critical or encrypted e-mail communication please notify the addressee first by telephone on 01905 612001. The preferred format for receiving word-processed documents is Microsoft Word. Regulatory information: Harrison Clark Rickerbys, Harrison Clark Rickerbys Inc Shawcross, Harrison Clark Rickerbys Inc Gordon Lutton, Harrison Clark Rickerbys Inc Sprecher Grier, HCR Hewitsons, HCR Hewitsons inc Houlden Sweeney, Safe from harm, Eagle HR and wills at work are all trading names of Harrison Clark Rickerbys Limited. Harrison Clark Rickerbys Limited is a limited company incorporated in England under 7033248 and practising English Law. A list of directors is open to inspection at the registered office which is at 5 Deansway, Worcester, WR1 2JG. All directors are solicitors or barristers. The term "Partner" is used for directors and also senior members of staff who may be either lawyers of England and Wales or professionals other than lawyers. The firm is authorised and regulated by the Solicitors Regulation Authority (SRA number 520597). A copy of the Authority's rules is available at <https://www.sra.org.uk/solicitors/standards-regulations> Address: 5 Deansway, Worcester, WR1 2JG. Telephone: 01905 612001 Email: lawyers@hcrclaw.com VAT registration number: GB 979 9180 4

Dimitra Tannou

From: CCBC Fees <ccbcfees@Justice.gov.uk>
Sent: 18 September 2023 12:04
To: Dimitra Tannou
Subject: FW: Claim No: J1QZ6Q6V - Harrison Clark Rickerbys Limited v. Ms. Raquel Maria Rosario Sanchez
Attachments: Application to Set Aside Default Judgment - signed.pdf; Draft Order.docx; RMRS Witness Statement and Exhibit - signed.pdf; Notice of Change.pdf

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Please find enclosed your paperwork which is returned for the reason(s) given below:

A Writ of Control has been issued. In order to proceed with an application to set aside a judgment, you will also need to apply to stay. Please ensure that you request **'to Stay the Writ and set Judgment aside'** in Section 3 of the N244 form. Please give reasons for your application in Section 10 and ensure that you sign the form.

Please be advised the writ may remain active unless you first obtain an order from the court that the writ has been stayed.

Please send the completed N244 application directly to your local High Court District Registry. You can find address details on <https://courttribunalfinder.service.gov.uk/search/>.

If you require any further information, please email us, or contact our helpdesk

Kind Regards,

Paresh Joshi

Applications & Orders
Civil National Business Centre (CNBC)

St Katharine's House
21-27 St Katharine's Street
Northampton
NN1 2LH
CCBC Helpdesk: 0300 123 1056
MCOL Helpdesk: 0300 123 1057
TEC Helpdesk: 0300 123 1059

HM Courts & Tribunals Service

For information on how HMCTS uses personal data about you please see:
[Here is how HMCTS uses personal data about you.](#)

"I am not authorised to bind the Ministry of Justice contractually, nor make representations or other statements which may bind the Ministry of Justice in any way via electronic means."

Protect our environment - do you really need to print this email?

Customer Feedback - we would love to hear from you. Click here to submit your customer feedback.

From: Dimitra Tannou <Dimitra.Tannou@richardslade.com>
Sent: 01 September 2023 16:08
To: CCBC <CCBC@Justice.gov.uk>
Cc: Mark Carlisle <Mark.Carlisle@richardslade.com>
Subject: Claim No: J1QZ6Q6V - Harrison Clark Rickerbys Limited v. Ms. Raquel Maria Rosario Sanchez
Importance: High

Dear Sirs

Re: Claim No: J1QZ6Q6V - Harrison Clark Rickerbys Limited v. Ms. Raquel Maria Rosario Sanchez

We are instructed by the Defendant in the above proceedings. You can find attached a copy of the relevant notice of change of legal representative as filed with the court on 27 July 2023.

By way of filing, please find attached the Defendant's application to set aside the default judgment issued against her. You can also find attached the supporting Witness Statement of Ms Sanchez and a draft order in word format.

Please note that the Defendant is fees exempt and her HWF reference number is ABE-5G8.

You are kindly asked to confirm receipt of the documents and issue the attached application as a matter of urgency.

Yours faithfully
Richard Slade and Company

Dimitra Tannou
Solicitor England & Wales
Lawyer Thessaloniki, Greece

Richard Slade & Company
13 Gray's Inn Square | London WC1R 5JD
Tel: 0203 330 0900 | Fax: 0207 806 8267 | Mobile: 07458 016429

Authorised and regulated by the Solicitors Regulation Authority, No. 510176
Richard Slade and Company, Registered in England No. 02624852

This e-mail and any attachments is intended only for the attention of the addressee(s). Its unauthorised use, disclosure, storage or copying is not permitted. If you are not the intended recipient, please destroy all copies and inform the sender by return e-mail. Internet e-mail is not a secure medium. Any reply to this message could be intercepted and read by someone else. Please bear that in mind when deciding whether to send material in response to this message by e-mail. This e-mail (whether you are the sender or the recipient) may be monitored, recorded and retained by the Ministry of Justice. Monitoring / blocking software may be used, and e-mail content may be read at any time. You have a responsibility to ensure laws are not broken when composing or forwarding e-mails and their contents.