

SUBMISSION ON LIABILITY

4. The Plaintiff's/ Defendant's submission on liability is as follows:

Plaintiff's / Defendant's submission on liability	
Plaintiff's / Defendant's reference from Motor Accident Guide (MAG)	
Plaintiff's / Defendant's authorities	

SUBMISSION ON QUANTUM

5. Where quantum is also in dispute, the quantum table to be annexed is herewith as an "Annexure" to the opening statement.

6. Item number(s) () and () of the Plaintiff's claim has/have been agreed between the parties.

Dated this day of 20 .

SOLICITORS FOR THE PLAINTIFF/DEFENDANT

Annexure (For NIMA matter)

<u>NO.</u>	<u>HEAD OF DAMAGES CLAIMED</u>	<u>PLAINTIFF'S CLAIM FOR AWARD</u>	<u>PLAINTIFF'S SUPPORTING DOCUMENTS</u> <i>[Please include pg no. in Bundle of Documents]</i>	<u>DEFENDANT'S ESTIMATE OF AWARD</u>	<u>DEFENDANT'S SUPPORTING DOCUMENTS</u> <i>[Please include pg no. in Bundle of Documents]</i>
1.	Costs of Repairs	\$ _____	1) Pg _____ 2) Pg _____	\$ _____	1) Pg _____ 2) Pg _____
2.	Loss of Use	\$ _____ per day for _____ days = \$ _____		\$ _____ per day for _____ days = \$ _____	
3.	Costs/Loss of Rental	\$ _____ per day for _____ days = \$ _____		\$ _____ per day for _____ days = \$ _____	

4.	Loss of Earnings	\$ ___ per day for ___ days = \$ _____		\$ ___ per day for ___ days = \$ _____	
	TOTAL (at ___%)	\$ _____ \$ _____		\$ _____ \$ _____	