SOLICITORS' STARTER PACK

# Points of dispute working layout

Paying-party drafting aid

Blank template • England and Wales • Prepared 14 October 2026

A preparation aid, not a reproduction of official Precedent G. The final points should follow Precedent G as closely as possible and be short and to the point. CPR 47.9 normally requires service within 21 days of notice of commencement; check any variation.

## Heading and service checks

[Court; claim number; parties; paying party; bill date; date notice served; verified deadline; recipients.]

## Point of principle

[State the issue, relevant order/rule and concise reasons. Identify affected items and any documents needed. Avoid unsupported blanket objections.]

## Specific item or group

[Point number; exact bill item(s)/phase; description; sum claimed; disputed time/rate/amount; reasons; proposed allowance where possible.]

## Evidence and calculation

[Identify supporting records and explain any proposed reduction. Group genuinely common issues without hiding item references.]

## Final review

[Check arithmetic, self-contained reasons, relevance and Precedent G format. Keep settlement offers separate from points of dispute.]

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# Fictional worked example

## Points of dispute working layout

All parties, facts and amounts below are invented. This is not a real case, approved precedent or promised outcome.

### Point 1 — fictional item 42

Document review: 4.0 hours at £250 per hour; £1,000 claimed, excluding VAT.

### Objection

The fictional attendance note records a 2.0-hour review of the same document set. No additional work is identified. Subject to clarification of the records, the paying party proposes 2.0 hours at the claimed rate.

### Proposed allowance

2.0 × £250 = £500, excluding VAT; proposed reduction £500. This is an illustration of an evidence-led objection, not a guideline rate or typical outcome.

### Before service

Verify the actual bill reference, evidence, entitlement and rate. Transfer into the appropriate final format; omit fictional wording and check the service deadline.

### Before adapting

Replace every placeholder, verify the current rules and the actual order, reconcile all figures, and obtain legal review. Never file or serve the fictional example unchanged.

Rules reference: CPR Part 47 and Practice Direction 47 (justice.gov.uk); for settlement offers, CPR 44.2 and Part 36. Check current provisions before use.

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