

WITNESS QUESTIONNAIRE – DRIVER – CVD. T10771518

1. What is your date of birth?
25/07/1994
2. What is your occupation?
Front End Developer
3. At the time of the accident, was your driving licence endorsed with any convictions or penalty points?
No
4. Were you the owner of the vehicle? (If not, please state who the owner was and whether you were authorised to drive it.)
The car is a lease, so I think the owner is technically the finance company Alphabet.
5. Did you have any medical conditions which may impair your driving capability at the time of the accident?
No
6. Had you taken any alcohol or drugs, including prescription drugs, within the 24 hours before the accident?
No
7. Do you wear glasses or contact lenses? If so, were you wearing these when you witnessed the accident?
No
8. At what time of day did the accident occur?
Morning, around 8:45am.
9. Was it dark? If so, what lights were the vehicles displaying?
No
10. Where were you travelling to and from before the accident occurred?
From home to work. Basingstoke to Kingston.
11. Were you in a rush?
No
12. What were the weather and/or driving conditions?
Normal morning weather, perhaps slightly damp.
13. What were the road conditions like at the time of the accident?
Heavy traffic but nothing more.
14. How familiar were you with the road layout of the accident location?
Very.
15. How often have you driven down the road in question?

Every Monday-friday since last January.

16. Please provide a full description of what happened, including the run up to the accident and exactly how it occurred. Please give as much detail as possible.

I was in the far left lane of the M25, ready to turn off for the A3. Traffic starts to build up 2 miles or so away from the junction. I have a lorry behind me the whole way up to the junction, and when we were probably half a mile away from the exit, traffic is going less than 5mph as everyone is queueing. Whilst stationary I was suddenly sent forward, I check the rear view mirror and that lorry has obviously just drove into me.

17. What happened immediately after the collision?

There was no hard shoulder where we were. I looked back at the driver of the lorry from my window, he points forward to the hard shoulder just a few meters ahead. We both drove into there and proceeded to get out the vehicles. We both checked the damage and took photos. I asked him for his details and he told me I didn't need them. He told me his name was Kevin. I was definitely slightly suspicious but also unaware of what else to do so I made sure I had his licence plate, phone number and photo.

18. What did the other driver say to you after the collision? Was there any admission of liability at the scene?

I don't think there was any direct admission except he apologised. I didn't push for any admissions or anything because I didn't want him to feel worse than he probably already did.

19. Were there any witnesses to the accident? If so, please give details.

Not that I can name. I'm sure other drivers on the day saw as they past round us.

20. Please describe the damage on your vehicle, including the location of the damage.

I had one major dent in my boot with minor dents leading towards it.

21. Please describe the damage on the other driver's vehicle, including the location of the damage.

Nothing, he hit me with his front metal bar, it was untouched really.

22. If you have suffered any financial loss as a result of the accident (for example, repairs to your vehicle or incurring a policy excess) please detail these losses below and provide documentation in support of the same.

No financial loss, repair covered by insurance.

23. Were you injured as a result of the collision?

No.

24. Did the other driver complain of any injuries?

No.

25. Did an ambulance attend the scene?

No.

26. Did the police attend the scene? If so, please provide details of the attending police officer, and the police reference number.

No.

27. Are any of the parties involved known to you? If so, please give details

No.

28. Are you willing to attend Court to defend this matter?

If needs be, yes.

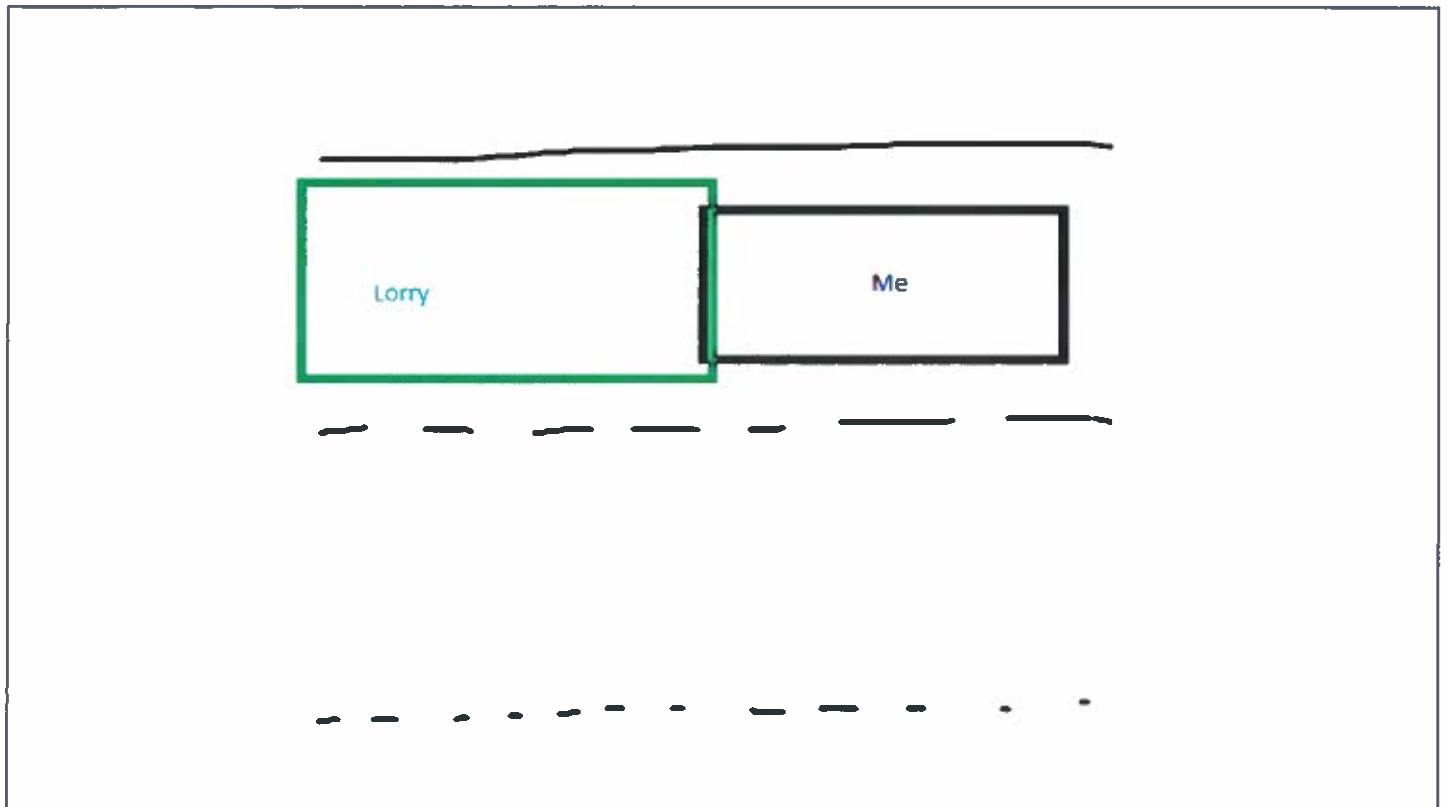
I believe the facts stated above to be true and understand that the information provided will be disclosed to the court in evidence.

Signed: 

Date: 13/12/2021

ACCIDENT DIAGRAM

Please provide a diagram of the accident at the point of collision:



Statement of Truth

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

Signed: *[Handwritten Signature]*

Dated:13/12/2021.....

Please delete as appropriate and scan and email to the file handler or return in the self-addressed envelope provided.

I confirm that I do not have an outstanding claim for personal injury and/or uninsured losses.

The solicitors acting for me are.....N/A..... and
the reference is N/A

I confirm that I am willing to attend Court. Dates to be avoided are
Beginning of April.

I confirm I do not intend to pursue a claim for uninsured losses. My losses are:

<i>Loss</i>	<i>Amount Claimed</i>	<i>Invoice Attached</i>
<i>Hire Car</i>	-----	<i>Yes / No</i>
<i>Damaged Items</i>	-----	<i>Yes / No</i>
	-----	<i>Yes / No</i>
	-----	<i>Yes / No</i>
<i>Other</i>	-----	<i>Yes / No</i>

Signed

Print NameSam Awan.....

Dated.....13/12/2021.....

TERMS OF BUSINESS

1. PLACES AND HOURS OF BUSINESS

Bolton Office: 2 the Parklands, Bolton, BL6 4SE

Coventry Office: Compton Court, Harry Weston Road, Binley Business Park, Binley Coventry, CV3 2SU

The normal hours of opening are between 9.00am and 5.00pm weekdays.

Appointments can be arranged outside those hours where necessary

2. FEES

The information regarding fees in the attached letter comes from parts of our Terms of Business. We accept payment of our services by Access and Visa credit cards. If you wish to make use of this facility you should discuss it with the Fee Earner having conduct of your file.

3. PROFESSIONAL INDEMNITY

In accordance with Law Society requirements we maintain a policy of professional indemnity insurance for the protection of our clients.

4. MONEY LAUNDERING REGULATIONS

The Money Laundering Regulations place certain obligations upon Solicitors. As part of these obligations we are required to verify a client's identity and the source and destination of any funds before any instructions can be carried out. We will disclose to the appropriate authorities any suspicion of money laundering by a client.

We cannot accept liability for any consequential loss arising as a result of our compliance with our statutory obligations and our costs may include a charge for complying with those obligations.

As part of this Firm's strategy to comply with the Money Laundering Regulations we will not accept payments in cash in excess of £500.

5. INTEREST PAYMENTS

If we hold money on your behalf interest will be calculated and paid to you in accordance with the Solicitors Accounts Rules 1991. The period for which interest will be paid will normally run from the date on which cleared funds are received by us until the date of issue of any cheque in payment.

6. FINANCIAL SERVICES

We are not authorised by the Financial Conduct Authority. However, we are included on the register maintained by the Financial Conduct Authority so that we can carry on insurance mediation activity, which is broadly the advising on, selling and administration of insurance contracts. This part of our business, including arrangements for complaints or redress if something goes wrong, is regulated by The Law Society. The register can be accessed via the Financial Conduct Authority website at www.fsa.gov.uk/register.

GENERAL

The above leaflet outlines some general guidance and the firm's terms of acting in relation to civil litigation matters for which we are already instructed by a motor insurer. This information and these terms will not necessarily apply to other types of legal services which the firm offers. We are happy to provide a copy of the firm's brochure upon request.

Keoghs LLP

