SCHEDULE A TO PART 23

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Skeleton arguments

1. A skeleton argument is intended to identify both for the parties and the Court those points which are, and are not, in issue and the nature of the argument in relation to those points that are in issue. It is not a substitute for oral argument.

2. Skeleton arguments must therefore:

(a) identify concisely:

(i) the nature of the case generally and the background facts insofar as they are relevant to the matter before the Court ;

(ii) the propositions of law relied on with references to the relevant authorities;

(iii) the submissions of fact to be made with references to the evidence;

(b) be in numbered paragraphs and state the name of the legal representative(s) who prepared them; and

(c) should avoid arguing the case at length.

Chronologies and indices

3. As far as possible chronologies and indices should be uncontroversial. The ideal is that the Court and the parties should have a single point of reference that all find useful and are happy to work with.

4. Where there is disagreement about a particular event or description, it is useful if that fact is indicated in neutral terms and the competing versions shortly stated.

5. If time and circumstances allow its preparation, a chronology or index to which all parties have contributed and agreed can be invaluable.

6. Chronologies and indices once prepared can be easily updated and are of continuing usefulness throughout the life of the case.