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This document is designed to assist both the client and counsel in identifying key factual events that have occurred and which are relevant to the brief to counsel. Consideration should be given to updating the document as additional key events come to light.

Factual Chronology of Events

Date:

Date ¹	Event ²	Document Reference ³	Comment ⁴	Page in Brief ⁵
12 September 2018	At 11:30am Kelly Smith (DOB 2 August 1980) slips and falls in Hyde Park.	Nil	3 witnesses have provided statements.	2
12 September 2018	At 11:41am, paramedics attend and she is taken to Sydney Hospital, Macquarie Street, Sydney.	NSW Ambulance records		3
20 September 2018	ABC lawyers send letter of demand to Sydney City Council alleging negligence.	Letter of demand from ABC lawyers to Sydney City Council		5.

¹ Date that an event took place.

² Describe the event: What took place, where it took place, who was involved. If referring to a corporate entity - use the full legal entity name, ABN, ACN if available. If referring to people - include full name and date of birth. If referring to a place – include the full address, state and country (if relevant).

³ If possible identify the document from the brief that supports or proves the factual assertion in the chronology. If the factual allegation is taken from a pleading (statement of claim or defence etc), include the paragraph number from the pleading eg. Statement of Claim paragraph 10 can be summarised as SOC [10]. If the allegation is made in a statement or affidavit, refer to the paragraph number of the affidavit. Eg Affidavit of Jessie Smith dated 12 October 2018 at paragraph 20, can be summarised as Aff Smith 12.10.18 [20].

⁴ This column is optional, but can be useful for including a comment on the factual contention or drawing counsel's attention to an alternative theory or evidence.

⁵ This is optional, but it can be efficient to refer to the page in the brief where the document appears.



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