

Jeremy Warner

Year of Call: 2022
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Personal Injury

Jeremy has appeared in both the County Court and High Court and has been instructed in a variety of hearings such as trials, CCMCs, pre-action disclosure applications, strike outs, relief from sanctions applications, and applications to resile across a variety of cases. He also has experience in enforcing third party costs orders further to *Tescher v Direct Accident Management Limited* [2025] EWCA Civ 733.

He has also made submissions on directions and budgeting in high value claims and has advocated before the Masters at the Royal Courts of Justice.

His experience includes:

- Acting in a variety of personal injury related trials, including those involving allegations of fundamental dishonesty and s57 Criminal Justice Act 2015.
- Advising on liability and quantum in personal injury claims relating to spinal fractures, chronic regional pain syndrome, hip fractures, facial disfigurement, supraspinatus tears, ophthalmic trauma, PTSD and stinger injuries.
- Represented claimants with traumatic brain injuries, risk of epilepsy, acoustic shock and tinnitus.
- Drafting schedules of loss for claimants who are employed and self-employed including those who are directors of companies with consideration of issues regarding separate legal personality.
- Interim payment applications, including a recent multi-track application for a claimant suffering from functional neurological disorder and chronic regional pain syndrome where multidisciplinary treatment is sought.
- Advising on strategy regarding provisional damages.
- Multi-track applications and CCMCs, including a successful opposition to an application seeking to withdraw a pre-action admission in a multi-track acoustic shock case.
- Advising on privity of contract and/or whether a duty of care was owed between an insurance company and its policyholder(s) in respect of the delay in investigating a subsidence claim causing psychiatric injury.
- Drafting Advice and skeleton arguments for multi-track personal injury claims, including complex injury cases relating to the spectrum of Ogden disability, Smith v Manchester awards, and the nuances of claims involving future losses.
- Advising on liability and quantum, drafting skeleton arguments and injunctions in the cross-cut between education, personal injury law, and abuse.
- Fatal accident claims including dependency claims.
- Advised on the scope of duty of care in tort with reference to the SAAMCO principles and *Khan v Meadows* [2021] UKSC 21.
- Drafting pleadings in negligence, product liability, and cases under the Highways Act, Animals Act, employers' liability, occupiers' liability and road traffic accidents.
- Acting in credit hire litigation, where he has been often praised by the judiciary for his pragmatic approach.

- Striking out deficient pleadings.

Articles

Winding back the clock and withdrawing a pre-action admission is difficult. There is inevitably a tension between the finality of litigation and the interests of fairness. When a pre-action admission is made, the trajectory of a claim is set in motion. As the White Book commentary provides scant guidance on CPR 14.5, in this article I examine what happens when a defendant seeks to withdraw that admission, with particular focus on Somoye v North West Anglia NHS Foundation Trust [2023] EWHC 191 (KB) and the Court of Appeal's guidance in Wood v Days Healthcare UK Limited [2017] EWCA Civ 2097.

View Article

Michelle Marnham and future 3PB Pupil Jeremy Warner analyse MXX v A Secondary School [2023] EWCA Civ 996, a case concerned with the grooming of a minor, in which the Court of Appeal clarified that work experience can be a relationship akin to employment for the purpose of vicarious liability. The Court confirmed the difficulty to satisfy the "close connection" test, which requires for the tort and the employment of the tortfeasor to be "inextricably woven".

View Article

Recommendations

"I was hugely impressed by Jeremy at the recent inquest. He was proactive, engaged and focussed, cutting to the heart of the key issues. His calm and thoughtful manner was a huge source of reassurance for the family during an incredibly difficult and emotional process. I look forward to instructing Jeremy again in the future".

"I did consider Jeremy's assessment of the relevant issues to be spot on and it was clear that he had gone through the papers with a fine tooth comb and noted pertinent issues. I would be more than happy to instruct you again on matters and will confirm the same to members of my team for their own files."

"Jeremy clearly understood his brief well and had a good knowledge of the vagaries of credit hire and the specifics of this matter. Overall, this was a positive experience and a good outcome for the client, I would happily book him again for such work."

"Jeremy has been very attentive to the details of the case and notified us in good time of any queries he thought the court would raise. He won our case in Court and we would definitely book him in again."

"His communication prior to an up to the hearing was greatly appreciated and which resulted in a settlement moments before the hearing. I will not hesitate to instruct him again."

Academic qualifications

- Hatfield College, Durham University, Law, 2:1, 2016-2019
- City University, Bar Vocational Studies with a Specialism in Advanced Advocacy, Distinction, 2021-2022
- City University, Masters of Laws LLM, Distinction (88%)

Scholarships

- Sir Joseph Priestley Scholarship, The Inner Temple, June 2023
- Semi-Finalist of the National Cecilia Moot, March 2022
- Commitment to Career Scholarship, BPP Law School, June 2021

- Major Scholarship for the Bar Practice Course, The Inner Temple, April 2021
- Duke of Edinburgh Scholarship, The Inner Temple, April 2021
- Brian Johnston Memorial Trust Scholarship, September 2015

Professional bodies

- Association of Personal Injury Lawyers (APIL)
- Honourable Society of The Inner Temple
- Pro Bono Recognition List
- Bridging the Bar
- Attorney General's Junior Junior Panel.