

## Outline Structure of Report by McGrigors LLP

### Introduction

- 1 Aim of report
- 2 Brief scene setting
- 3 Current position: time and money

### Time Issues

- 4 Current position: actual v planned progress
- 5 Extensions of time granted
- 6 Notices/compensation events/entitlement programmes
- 7 SDS [misalignment]
- 8 MUDFA
- 9 Mitigation/acceleration
- 10 Analysis

### Financial Claims




- 11 Notified Departures
- 12 Schedule Part 4
- 13 Infraco's position at adjudications and decisions (Hunter, Wilson)
- 14 Factual matrix: key witnesses and documents
- 15 "Chartbrook" argument: objectives of the Contract
- 16 Richard Keen QC Opinion
- 17 Analysis

### Breach/Default/Behaviour

- 18 Other breaches and their consequences (including SDS)
- 19 Analysis

### Conclusions

- 20 Summary
- 21 Action points

Key	
	- Not required, in Pitchfork report
	- In draft form
	- Draft – evening of 3 March 2010
	- Will be examined under time and financial claims.