

## Zoe Earnshaw

2001 Lincoln's Inn, earnshaw@deanscourt.co.uk



### Education

Kings College London- BA (Hons)  
Manchester High School for Girls

### Professional Associations

Northern Circuit  
Personal Injuries Bar Association

### Areas of Specialism

Catastrophic Injury

Employers Liability

Public Liability

Occupiers Liability

Personal Injury

Civil and Insurance Fraud

Road Traffic

Costs

Fatal Accidents

Motor Claims

Employer's Liability and Public Liability

Contempt & Private Prosecutions

Zoe is a Personal Injury specialist.

She is described in the Legal 500 as a leading junior, particularly recognised for her expertise in catastrophic injury work. Her practice focuses on complex and high value litigation. She represents both Claimants and Defendants.

Zoe is able to combine a robust approach in Court and in negotiations with a sensitive manner towards her own clients. Known for her meticulous preparation and detailed analysis of cases, Zoe is tactically astute and well suited to complex cases, particularly where confident handling of experts is required.

She is a member of the Civil and Insurance Fraud team. She has significant expertise in defending fraudulent and exaggerated claims across the spectrum of personal injury work. She has secured findings of fundamental dishonesty and has provided training to solicitors on the topic.

Zoe is proficient in handling cases involving chronic pain. She is practiced in analysing issues of medical causation, competing expert evidence and credibility in this context.

Zoe has previously been led by Tim Horlock KC in a High Court tetraplegic claim arising from a road traffic accident between a car and a cyclist. Liability was settled on the morning of trial. Quantum proceedings are ongoing.

Zoe is happy to provide seminars. Previous topics have included fundamental dishonesty, employer's liability post the Enterprise and Regulatory Reform Act 2013, tactics on quantum and resiling from admissions of liability.

## Notable Cases

### Practice Area:

Instructed in successful appeal against the refusal to allow the withdrawal of a pre-action admission. The modest claim value initially pleaded was "fundamentally wrong" and new evidence changed the character of the claim  
Clyde & Co success offers further guidance on withdrawal of pre-action admissions : Clyde & Co (clydeco.com)

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### W v A

#### Practice Area:

Instructed by the Defendant in a severe traumatic head injury claim with permanent memory deficit, cognitive impairment, and risk of epilepsy. Claim pleaded at £1.3 million. Settlement secured at JSM at 20% of the pleaded value.

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### R v M

#### Practice Area:

Acted for a Defendant in a liability and quantum dispute where a young motorcyclist suffered multiple injuries including a severe knee fracture. He was likely to deteriorate in the future, require surgery and suffer disadvantage in his manual job. The case was pleaded at £875,000 and was successfully settled at JSM at £194,500.

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### T v A

#### Practice Area:

Instructed on behalf of a Claimant who suffered a severe knee injury when he was knocked off his bicycle and reversed over by the Defendant driver. Ongoing chronic pain, limitation and restricted mobility. Case settled shortly after CCMC.

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### R v H

#### Practice Area:

Acted for the Defendant in a chronic pain claim where the Claimant alleged she failed to recover from minor orthopaedic injuries. Orthopaedic, pain and psychological experts instructed on both sides. Credibility was in issue.

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### G (on behalf of RD, deceased) v D

#### Practice Area:

Acted for a young Claimant in a fatal accident claim after her fiancée was killed in a motorcycle accident. Settlement secured for c£400,000 prior to commencement of proceedings.

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### A v K

#### Practice Area:

Acted for a cyclist struck by a car who suffered multiple injuries including a head injury. Significant dispute within the expert evidence as to whether a mild traumatic brain injury had been sustained.

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### S v NMS

#### Practice Area:

Acted for a Claimant who suffered chronic pain following a crush injury to his leg after a JCB was driven into him at work. Key issues were injury diagnosis / prognosis and future loss of earnings / earnings capacity. Case settled at JSM.

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### Farnworth v Davis

#### Practice Area:

Successful appeal overturning a Part 36 costs decision on a point of law. Issue was the correct interpretation of "proceedings" in CPR 36.13(1). Case reported on Lawtel (LTL 21/06/2016)

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## SC v Blackpool Pleasure Beach

### Practice Area:

Acted for a teenage girl who suffered serious gynaecological injuries while playing in water fountains at the Pleasure Beach. Liability and quantum were disputed. Case reported in the media.

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## K v P

### Practice Area:

Case arising from a fall down steps at a pub which caused a fracture dislocation of the ankle. Orthopaedic expert dispute re future deterioration. Acted for the Defendant and settled at JSM.

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## What the Directories say

"Zoe has a great ability to turn around voluminous papers and has a swift analytical brain. She's also commercial minded and not afraid of fighting."

*Chambers & Partners, 2024*

"Zoe is friendly and approachable, but a fierce advocate. Her attention to detail is second to none. You can rely on her to be thoroughly prepared."

*Chambers & Partners, 2024*

"Zoe is technically excellent; she is forensic in her analysis of complex and detailed documents and evidence."

*Chambers & Partners, 2024*

Zoe has a fantastic eye for detail, she cuts through the nonsense, and she is very robust in court. She does not falter when challenged, she is a first-choice junior counsel for particularly difficult cases, and she handles experts very well at conferences.

*Legal 500, 2024*

She is extremely forensic in her approach to claims and her attention to detail is second to none.

*Chambers & Partners, 2023*

Zoe is approachable and reliable, always on hand to offer advice and assistance.

*Chambers & Partners, 2023*

Zoe is approachable and accessible, well prepared and efficient, which makes it a pleasure to work with her. She is very good on her feet in Court with a strong but measured approach.

*Legal 500, 2023*

She is extremely personable, has great attention to detail and is a firm hand on the tiller.

*Chambers and Partners, 2022*

Zoe was well prepared and very thorough in her approach. She provided high quality and pragmatic advice in this high value claim under pressure of time. She was extremely collaborative in her approach and very pleasant to work with.

*Legal 500, 2021*

Particularly experienced in road traffic accident matters.

*Legal 500*

Very conscientious and focused.

Her advice is realistic and pragmatic, and she is a pleasure to deal with.

She is very thorough in her work and is a polished advocate.

*Chambers and Partners*

She has expertise in catastrophic injury cases.

*Legal 500*

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