



Neutral Citation Number: [2026] EWHC 86 KB

Case No: QB-2019-000365

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION

Royal Courts of Justice
Strand, London, WC2A 2LL

Date: 22 January 2026

Before :

MR JUSTICE LAVENDER

Between :

COL

Claimant

- and -

THE UNITED ARAB EMIRATES

Defendant

James Robottom (instructed by Deighton Pierce Glynn) for the Claimant
No attendance by the Defendant

Hearing date: 20 October 2025

Approved Judgment

This judgment was handed down remotely at 10.30am on Thursday 22 January 2026 by circulation to the parties or their representatives by e-mail and by release to the National Archives.

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Mr Justice Lavender:

(1) Introduction

1. This is the assessment of damages in a case of modern slavery. The claimant was born in the Philippines in 1990. In 2012 she went to work in the United Arab Emirates (“the UAE”) for Salem Mohammed Sultran Aljaberi and his family. Mr Aljaberi was a diplomat in the service of the UAE. In 2013 the claimant was taken to London to work for Mr Aljaberi and his family. The claimant had no family, friends or support in the United Kingdom.
2. The claimant worked for the Aljaberis in their London home from 1 February to 1 May 2013. She provided care for the Aljaberis’ children and performed other domestic services. She worked long days. She was not given rest breaks or lunch breaks or any days off. She was paid £340 in February 2013 (£140 of which related to January 2023), £200 in April 2023 and no more. She was subject to verbal abuse and threats. She was fed, but inadequately. The Aljaberis retained custody of her passport. She was not permitted to leave the flat alone and she was locked in the flat when the Aljaberis were away from home. She was also isolated from the outside world by being denied use of the Wi-Fi in the flat and denied a UK SIM card until mid-April 2023.
3. On 19 November 2014 the competent authority concluded that the claimant had been a victim of human trafficking. In December 2015 the claimant was given leave to remain in the United Kingdom.
4. Following lengthy, but ultimately unsuccessful, attempts to persuade the police and the crown prosecution service to prosecute the Aljaberis, the claimant’s claim form was issued on 26 September 2019. She asserted the following causes of action:
 - (1) false imprisonment;
 - (2) servitude, forced or compulsory labour;
 - (3) infringement of the right to personal safety;
 - (4) harassment;
 - (5) conspiracy by unlawful means;
 - (6) trespass to goods (i.e. the claimant’s passport);
 - (7) intimidation; and
 - (8) negligence.
5. On 13 November 2019 Master Eastman granted permission for the service of the claim form out of the jurisdiction. The claim form was served on 15 December 2020. However, the defendant has played no part in these proceedings. On 19 December 2022 the court gave judgment for the claimant for damages to be assessed.
6. The defendant did not appear and was not represented at the hearing for the assessment of damages. I accept the claimant’s evidence, which was contained in two witness

statements and supplemented briefly at the hearing. I also accept the medical evidence adduced by the claimant.

(2) Heads of Loss

(2)(a) The Heads of Loss Claimed

7. In an updated schedule of loss dated 14 May 2025, the claimant claimed damages under the following heads:

- (1) pain, suffering and loss of amenity;
- (2) false imprisonment/trespass to the person/distress and anxiety;
- (3) exemplary damages;
- (4) unpaid wages;
- (5) loss of earnings; and
- (6) treatment costs.

(2)(b) Relevant Authorities as to the Approach to the Heads of Loss

8. I was referred to the following cases in which damages were awarded for modern slavery and/or human trafficking:

- (1) *AT v Dulghieru* [2009] EWHC 225 (QB);
- (2) *A v Abu* [2017] EWHC 3098 (QB), [2018] I.R.L.R. 1028; and
- (3) *LB v Hick Lane Bedding Ltd* [2021] EWHC 1140 (QB).

(2)(b)(i) LB v Hick Lane Bedding Ltd

9. *LB v Hick Lane Bedding Ltd* was a case of modern slavery. In sub-paragraphs 17(i) to 17(iii) of his judgment, Master Davison held that the claimants were entitled to general damages under 3 heads, namely:

- (1) for the torts of intimidation and harassment “in circumstances closely akin to false imprisonment”;
- (2) for pain, suffering and loss of amenity, consequent on their psychiatric injuries; and
- (3) “for what I might call “sub-clinical” distress, anxiety and injury to feelings. That falls to be assessed by reference to the well-known *Vento* guidelines.”

10. However, Master Davison added as follows in paragraph 19 of his judgment:

“A separate question is whether general damages should consist of distinct awards for each of the heads I have identified, or a single rolled-up (or “global”) award. Treacy J, in the case of *AT v Dulghieru* [2009] EWHC 225 (QB), rolled

up awards (i) and (ii), but, following some observations made by Janet Smith LJ in *Choudhary v Martins* [2008] 1 WLR 617, he made a separate award for injury to feelings. In the circumstances of these cases, I have concluded that to make separate awards would involve very substantial overlap and, therefore, double recovery. For each claimant, this was a single, lived experience, albeit that it has impacted upon them in a variety of ways. I propose to identify, for each claimant, the relevant bracket for each head of loss and then make a single award, leaving out only exemplary damages, which I will assess separately.”

(2)(b)(ii) Vento

11. *Vento v Chief Constable of West Yorkshire Police* [2003] I.C.R. 318 (“*Vento*”) was a discrimination case. Section 66(4) of the Sex Discrimination Act 1975 provided as follows:

“For the avoidance of doubt it is hereby declared that damages in respect of an unlawful act of discrimination may include compensation for injury to feelings whether or not they include compensation under any other head.”

12. Section 119(4) of the Equality Act 2010 now provides as follows:

“An award of damages may include compensation for injured feelings (whether or not it includes compensation on any other basis).”

13. In paragraph 61 of its judgment in *Vento*, the Court of Appeal said:

“At the end of the day this Court must first ask itself whether the award by the Employment Tribunal in this case was so excessive as to constitute an error of law. That was the conclusion of the Appeal Tribunal and it is clearly right. The totality of the award for non-pecuniary loss is seriously out of line with the majority of those made and approved on appeal in reported Employment Appeal Tribunal cases. It is also seriously out of line with the guidelines compiled for the Judicial Studies Board and with the cases reported in the personal injury field where general damages have been awarded for pain, suffering, disability and loss of amenity. The total award of £74,000 for non-pecuniary loss is, for example, in excess of the JSB Guidelines for the award of general damages for moderate brain damage, involving epilepsy, for severe post-traumatic stress disorder having permanent effects and badly affecting all aspects of the life of the injured person, for loss of sight in one eye, with reduced vision in the remaining eye, and for total deafness and loss of speech. No reasonable person would think that that excess was a sensible result. The patent extravagance of the global sum is unjustifiable as an award of compensation. It is probably explicable by the understandable strength of feeling in the tribunal and as an expression of its condemnation of, and punishment for, the discriminatory treatment of Ms Vento.”

14. In paragraph 63 of its judgment in *Vento*, the Court of Appeal held as follows:

“In our judgment, taking account of the level of awards undisturbed on recent appeals to the Appeal Tribunal and of the JSB Guidelines, the fair, reasonable and just award in this case for non-pecuniary loss is a total of £32,000, made

up as to £18,000 for injury to feelings, £5,000 aggravated damages and £9,000 for psychiatric damage, which took the form of clinical depression and adjustment disorder lasting for 3 years (and against which there was no appeal). We also bear in mind that there was no finding by the Employment Tribunal that the injury to Ms Vento's feelings would continue after the psychiatric disorder had passed. During the period of psychiatric disorder there must have been a significant degree of overlap with the injury to her feelings.”

15. The Court of Appeal then set out in paragraph 65 of its judgment guidance as to the level of awards of damages for injury to feelings in each of three bands of discrimination case. The *Vento* bands have been the subject since 2017 of Presidential Guidance issued from time to time by the Presidents of the Employment Tribunals of Scotland and of England and Wales.
16. The three bands were described as follows:
 - (1) The top band: “Sums in this range should be awarded in the most serious cases, such as where there has been a lengthy campaign of discriminatory harassment on the ground of sex or race.”
 - (2) The middle band: “should be used for serious cases, which do not merit an award in the highest band.”
 - (3) The lower band: “appropriate for less serious cases, such as where the act of discrimination is an isolated or one off occurrence.”
17. According to the Presidential Guidance issued on 25 March 2019, the level of these bands for claims presented on or after 6 April 2019 is:
 - (1) The top band: £26,300 to £44,000.
 - (2) The middle band: £8,800 to £26,300.
 - (3) The lower band: £900 to £8,000.
18. The Court of Appeal added, in paragraph 68 of its judgment in *Vento*, the following:

“Common sense requires that regard should also be had to the overall magnitude of the sum total of the awards of compensation for non-pecuniary loss made under the various headings of injury to feelings, psychiatric damage and aggravated damage. In particular, double recovery should be avoided by taking appropriate account of the overlap between the individual heads of damage. The extent of overlap will depend on the facts of each particular case.”

(2)(b)(iii) Choudhary v Martins
19. *Choudhary v Martins* was a case of harassment, which culminated in the defendant deliberately driving into the car which the claimant was driving and in which the claimant's wife was a passenger. The case did not involve false imprisonment, modern slavery or human trafficking. The judge awarded the claimants £12,500 damages for psychiatric injury and a separate sum of £10,000 for injury to feelings. On appeal, the

defendant contended that the judge had been wrong to make two awards, rather than a single, global award of damages.

20. Smith LJ, with whom Sir Anthony Clarke MR and Toulson LJ agreed, said as follows about this ground of appeal:

“17. First, it was said that the judge should not have made two separate awards; in assessing the psychiatric injury separately from injury to feelings, there was bound to be some overlap. In any event, in *Richardson v Howie* [2005] PIQR Q48, the Court of Appeal had recommended a single global award to compensate the claimant for all the harm she had suffered.

18. It is true that one division of this court did so recommend in the context of a case of modest damages for assault. In the *Vento* case [2003] ICR 318, however, another division of this court approved the making of separate awards for psychiatric harm, injury to feelings and aggravated damages in the context of sex discrimination. I would venture to suggest that there should be no hard and fast rule about whether separate awards should be made. It will all depend on the facts of the individual case. If, for example, as is sometimes the case, the psychiatric harm is very modest and to all intents and purposes merges with the injury to feelings, it will plainly be more convenient to make one award covering both aspects. If, as here, where the psychiatric injury is not insubstantial, it is positively helpful to the parties (and to this court) if the judge separates the award for psychiatric injury from that for injury to feelings. This leads to a better understanding of the judge’s thought processes. However, I do accept that there is a risk of double recovery by overlap if two awards are made and the judge must take care to avoid that.

19. In the present case, I think the judge was justified in making separate awards as she did. Moreover, she warned herself to avoid double recovery by overlap and, save that it might be said that there must have been double recovery because the awards are both too high, I cannot see any specific basis on which to conclude that there was.”

(2)(b)(iv) AT v Dalghieru

21. The claimants in *AT v Dalghieru* had been trafficked into the United Kingdom for the purposes of sexual exploitation and prostitution and then forced to work as prostitutes. Treacy J said as follows in paragraph 41 of his judgment about his approach to general damages:

“My approach under this heading is to look at the matter globally for the various elements which are reflected, namely post traumatic stress disorder, coerced sexual activity and false imprisonment.”

(2)(b)(v) *A v Abu*

22. The claimant in *A v Abu* worked for the defendants' family. She was found to be a victim of trafficking and of harassment. HHJ Hampton said as follows in paragraph 120 of her judgment:

"I find that the Claimant is entitled to damages for injury to feelings and psychiatric injury at a level in the lower half of the top band of the *Vento* Guidance. Accordingly, for the injury to feelings arising from the trafficking, and the breach of contract, I make an award of £30,000. I make an additional award of £9,000 for the psychiatric injury amounting to £39,000 in all."

(2)(c) *Submissions and Decision as to the Approach to the Heads of Loss*

23. In the light of these authorities, Mr Robottom contended on behalf of the claimant that, while I should take care to avoid double-counting, I should make separate awards for:

- (1) psychiatric injury;
- (2) false imprisonment; and
- (3) injury to feelings.

24. Having carefully considered the claimant's submissions and the authorities to which I have been referred, I have concluded as follows:

- (1) It would not be appropriate in this case for me to make separate awards for false imprisonment and for injury to feelings, given the following:
 - (a) Injury to feelings is an integral part of the loss suffered by a claimant who has been falsely imprisoned.
 - (b) I do not consider that the awards of damages which have been made in the past for false imprisonment have been limited to damages for loss of liberty and have excluded damages for injury to feelings. This is illustrated, for instance, by the reference to "the initial shock of being arrested" in the passage cited below from Lord Woolf M.R.'s judgment in *Thompson v Commissioner of Police of the Metropolis* [1998] Q.B. 498 ("Thompson").
 - (c) In none of the cases to which I was referred were separate awards made for false imprisonment and for injury to feelings. Although Mr Robottom placed particular reliance on the decision in *Choudhary v Martins*, that was not a case in which false imprisonment and injury to feelings were treated as separate heads of loss.
 - (d) In all the circumstances, it would be artificial to attempt to separate out the damages attributable to loss of liberty and to injury to feelings in a case of false imprisonment.
- (2) On the other hand, I consider that I can properly make a separate award for psychiatric injury, as was done in *A v Abu*, insofar as the psychiatric injury

sustained by the claimant went beyond the injury to feelings inherent in an award of damages for false imprisonment.

(3) In any event, as the claimant accepts, I must be astute to avoid double recovery. However I arrive at the overall award for general damages, it is the overall award which matters.

(3) General Damages

(3)(a) General Damages for False Imprisonment and Injury to Feelings

25. In the light of my decision not to make separate awards of damages for false imprisonment and for injury to feelings, I have considered the authorities concerning both types of award in order to inform my decision as to the appropriate composite award.

26. As for false imprisonment, a natural starting point is the well-known decision in *Thompson* and, in particular, what Lord Woolf MR said at 515D-G:

“In a straightforward case of wrongful arrest and imprisonment the starting point is likely to be about £500 for the first hour during which the plaintiff has been deprived of his or her liberty. After the first hour an additional sum is to be awarded, but that sum should be on a reducing scale so as to keep the damages proportionate with those payable in personal injury cases and because the plaintiff is entitled to have a higher rate of compensation for the initial shock of being arrested. As a guideline we consider, for example, that a plaintiff who has been wrongly kept in custody for 24 hours should for this alone normally be regarded as entitled to an award of about £3,000. For subsequent days the daily rate will be on a progressively reducing scale.”

27. That was the approach prescribed by the Court of Appeal in 1998. However, I note that:

(1) the value of money has changed since 1998; and

(2) a case of modern slavery is not “a straightforward case of wrongful arrest and imprisonment”: the forced servitude involved in modern slavery is additional to the mere fact of detention and needs to be reflected in any award of damages.

28. Mr Robottom submitted that I should not apply the “taper” referred to in *Thompson* and also in *R v Governor of Brockhill Prison ex parte Evans (No. 2)* [1999] Q.B. 1043, *MK (Algeria) v Secretary of State for the Home Department* [2010] EWCA Civ 980, at paragraph 8, and *LB v Hick Lane Bedding Ltd*, at paragraph 37. I do not accept this submission, as it would be contrary to Court of Appeal authority for me not to apply the taper at all. However, I do accept that the consequences of the application of the taper will necessarily be specific to the facts of the individual case.

29. I have had regard to the level of the awards in all of the cases to which I was referred. Obviously, however, each case falls to be decided on its own particular facts. For example, as Mr Robottom quite properly accepted, *AT v Dulghieru* was a case of sexual exploitation, which represents a particularly extreme form of false imprisonment. By

contrast, the facts of the present case are closer to the facts of *LB v Hick Lane Bedding Ltd*. One of the claimants in that case, TB, was made to work for 67 days in what Master Davison described as circumstances closely akin to false imprisonment. TB's general damages, which included the three elements listed by Master Davison in sub-paragraphs 17(i) to (iii) of his judgment, were assessed at £65,000, plus £5,000 in exemplary damages.

30. I have also considered the *Vento* bands. I accept that the claimant fell within the top band. I have set out above the bands as they apply to claims presented on or after 6 April 2019, but I have also taken account of the passage of time since the claim was issued, which is not the fault of the claimant, and that the bands have been increased since 2019, with the top band now being from £36,400 to £60,700.
31. Taking all relevant matters into consideration, I assess the damages for false imprisonment and injury to feelings at £85,000.

(3)(b) General Damages for Personal Injury

32. As appears from the report of a consultant psychiatrist, Dr O'Neill, dated 27 May 2017, the claimant sustained moderately severe post-traumatic stress disorder ("PTSD") as a result of her treatment by the Aljaberis. This improved to the moderate level by the time of Professor Dalgleish's report dated 18 April 2024. Professor Dalgleish also expressed the opinion that from 2013 to 2015 the claimant's PTSD was at the upper end of the moderately severe range.
33. Accordingly to paragraph 4(B) of The Judicial College Guidelines for the Assessment of General Damages in Personal Injury Cases (17th Edn), the bracket for awards for moderately severe PTSD is from £28,250 to £73,050, but the majority of awards are between £35,100 and £45,300 and the bracket for awards in the moderate category is from £9,980 to £28,250. Having regard to these figures and to the length of time for which she has suffered from PTSD, the claimant submits that an award in the range from £28,250 to £45,000 would be appropriate.
34. Given the need to avoid double counting, I assess damages under this head in the amount of £35,000.

(4) Exemplary Damages

35. I was not invited to make an award of aggravated damages (no doubt to avoid double counting, having regard in particular to what Master Davison said in paragraph 18 of his judgment in *LB v Hick Lane Bedding Ltd*), but I was invited to make an award of exemplary damages. I accept that such an award is appropriate in a case in which Mr Aljaberi acted with a cynical disregard for the claimant's rights and exploited the claimant for his own financial advantage, namely as a means of obtaining the claimant's services whilst avoiding his obligation to pay at least the national minimum wage for those services, in circumstances where he intended that, if he succeeded in his oppression of her, the claimant would not be compensated for the wrong done to her.
36. I was invited to award exemplary damages in the amount of £15,000 and I consider that that is an appropriate amount to mark the wrongfulness of Mr Aljaberi's conduct.

(5) Special Damages

(5)(a) Special Damages: Unpaid Wages

37. The claimant was entitled to be paid the national minimum wage, then £6.31 per hour, during the 89 days for which she worked for the Aljaberis in the United Kingdom. She has a claim for this amount (and more, as I will explain) against her employer, Mr Aljaberi, under the National Minimum Wage Act 1998. However, I consider that she also has a claim in tort for the amount of her unpaid wages, since the withholding of her wages was part of the servitude which was inflicted on her and the amount of those wages reflects the value of the services which she was compelled to perform.

38. The amount claimed is based on the claimant working 18 hours per day for 89 days, which, at £6.19 per hour, amounts to £9,916.38. However:

- (1) I note that the claimant said in paragraph 32 of her statement dated January 2014 that she worked from 5 am to around 10.30 to 11 pm. She said the same in paragraph 23 of her particulars of claim. However, in paragraph 6 of her statement dated 28 March 2025 she said that she worked for 16 hours a day, although in paragraph 8 of the same statement she said that she worked from 5 am to 11 pm. I find that she worked an average of 17 $\frac{3}{4}$ hours per day. At £6.19 per hour, 17 $\frac{3}{4}$ hours per day for 89 days amounts to £9,778.65.
- (2) Since the claimant was provided with accommodation, there falls to be deducted from this amount the accommodation offset provided for in regulations 30(4), 31(1)(i) and 36 of the National Minimum Wage Regulations 1999 then in force. At £4.73 per day for 87 days, the accommodation offset amounted to £411.51.
- (3) The £400 paid to the claimant also falls to be deducted.
- (4) On that basis, the claimant should have been paid £8,967.14.

39. However, in reliance on subsection 17(4) of the National Minimum Wage Act 1998 (“the 1998 Act”), the claimant claims an uplift on this amount of 97.3% (i.e. 12.21/6.19 - 1).

40. Section 1(1) of the 1998 Act provides as follows:

“A person who qualifies for the national minimum wage shall be remunerated by his employer in respect of his work in any pay reference period at a rate which is not less than the national minimum wage.”

41. Section 17 of the 1998 Act provides, *inter alia*, as follows:

- “(1) If a worker who qualifies for the national minimum wage is remunerated for any pay reference period by his employer at a rate which is less than the national minimum wage, the worker shall at any time (“the time of determination”) be taken to be entitled under this contract to be paid, as additional remuneration in respect of that period, whichever is the higher of—
 - (a) the amount described in subsection (2) below, and

(b) the amount described in subsection (4) below.

(2) The amount referred to in subsection (1)(a) above is the difference between—

(a) the relevant remuneration received by the worker for the pay reference period; and

(b) the relevant remuneration which the worker would have received for that period had he been remunerated by the employer at a rate equal to the national minimum wage.

(3) In subsection (2) above, “relevant remuneration” means remuneration which falls to be brought into account for the purposes of regulations under section 2 above.

(4) The amount referred to in subsection (1)(b) above is the amount determined by the formula—

$$\frac{A}{R_1 \times R_2}$$

where—

A is the amount described in subsection (2) above,

R1 is the rate of national minimum wage which was payable in respect of the worker during the pay reference period, and

R2 is the rate of national minimum wage which would have been payable in respect of the worker during that period had the rate payable in respect of him during that period been determined by reference to regulations under section 1 and 3 above in force at the time of determination.”

42. It will be noted that subsection 17(1) creates a contractual right to additional remuneration for a worker who is underpaid and that the formula in subsection 17(4) has the effect that the additional remuneration is to be paid at the rate of the national minimum wage in force at the time of determination of the additional remuneration (which was £12.21 at the date of the hearing). The claimant therefore has a contractual claim against Mr Aljaberi for this additional remuneration, but it does not follow that the damages payable to the claimant in tort should be measured using the same formula. The measure of damages in tort is that sum of money which will put the claimant into the position she would have been in if the tort had not been committed. In this case, had the torts against the claimant not been committed, she would have been paid her wages at the rate of the national minimum wage in force in 2013.

(5)(b) Special Damages: Loss of Earnings

43. The claimant contends, and I accept, that she was unable to work by reason of her psychiatric injury during the period from May 2013 to December 2017. In the hearing, I expressed some doubts about aspects of this claim in the light of the claimant’s written evidence, but the claimant’s oral evidence resolved these issues. She clarified that the effect of her PTSD during the relevant period was that she could not trust any employer or even any employment agency, that she was in constant fear, if re-employed, of being

subjected to the same treatment as she had received from the Aljaberis and, consequently, that she could not bring herself to work for any employer.

44. The claimant claims that she has suffered a loss of £23,930.40 per annum, based on the 2024 Annual Survey for Hours and Earnings (“ASHE”) median gross full-time pay for a cleaner or domestic worker of £460.20 per week. The claim can be broken down into three periods:

- (1) From May 2013 to December 2015 the claimant was prohibited from working in the United Kingdom by reason of her immigration status. During this period, she met her husband in August 2013 and had a son in December 2014. She accepted that, if she had been working at that time, she would have taken 5 months off work to look after her son, so her claim was limited to 27 of the 32 months.
- (2) From January to June 2016 the claimant did not work at all.
- (3) From July 2016 to December 2017 the claimant worked part time on a casual basis, but only for an average of £90 (i.e. 9 hours at £10 per hour) per month.

45. Since the claimant was prohibited from working in the United Kingdom during the first of these periods, it would be wrong to compensate her for the loss of income which she was prohibited from earning. However, she was permitted to work for Mr Aljaberi during that period and I accept that, had she not been held in servitude, the claimant would have continued in the Aljaberis’ employment during this period. Subject to any further submissions which I may receive, I consider that it is appropriate to assess her lost income during this period by reference to the national minimum wage at the time and the number of hours which she could properly have been required to work. I invite the claimant to provide a calculation on this basis.

46. I accept that the claimant is entitled to damages in respect of the second and third periods of her claim. She has lost 2 years’ income, less £1,620 (i.e. £90 per month for 18 months). However, subject again to any further submissions which I may receive, I do not consider it appropriate to assess her lost income by reference to 2024 rates. I invite the claimant to provide a calculation based on contemporary rates.

(5)(c) Special Damages: Treatment Costs

47. I accept both the medical evidence as to the need for treatment and the claimant’s estimate as to the cost of that treatment. Accordingly, I award damages under this head in the amount of £2,250.

(6) Conclusion

48. I assess the claimant’s damages as follows:

- (1) £85,000 for false imprisonment and injury to feelings;
- (2) £35,000 for psychiatric injury;
- (3) £15,000 exemplary damages;

(4) £8,967.14 for unpaid wages; and

(5) £2,250 for treatment costs.

49. I will assess damages for loss of earnings on receipt of the further calculations requested above and in the light of any further submissions made in respect of what I have said above. I also invite submissions as to interest on all heads of damages.

50. I am content to receive these calculations and submissions in writing and to deal with them without a hearing, but I will also consider any request for a hearing on these matters.