



Nugent Care Society  
99 Edge Lane  
Liverpool  
L7 2PE

**BY FIRST CLASS POST**

Date: 13<sup>th</sup> November 2014

Our Ref: **DPA**

Your Ref:

E-mail: **DPA**

Dear Sirs,

RE: **AR-A36** Date of Birth **DPA** 1964

**Abuse at St Aidans and St Thomas Moore**

We have been instructed on behalf of the above named who alleges that he has been damaged by acts of abuse and wishes to claim compensation from you in your capacity as Managers and Owners of the above children's homes.

Please note that your insurers will need to see this letter as soon as possible. It may affect your insurance cover and/or the conduct of any subsequent legal proceedings if you do not send this letter to them.

The following allegations are provided on a without prejudice basis subject to a fuller description in the form of medical evidence and a statement of evidence in the course of legal proceedings, and is based on a summary of initial instructions only. We reserve the right to make additions to the allegations in the event liability is denied and on full and extensive disclosure of all relevant documentation

Our client alleges abuse at St Aidans by Mr Colin Dick. The abuse was by way of oral sex, masturbation and buggery. He also alleges abuse at St Thomas Moore by Mr Sutton whereby the abuse was by way of masturbation, oral sex and buggery.

For the avoidance of doubt it is alleged that if you owed our client a duty of care you are directly and/or vicariously liable for any abuse which took place.

If the abuser has been prosecuted then any details of the case, which we have in our possession, appear below. We rely upon the conviction of the abuser(s) as evidence that the abuse took place.

We can confirm that Mr Sutton was convicted of offences in respect of our client at Liverpool Crown Court in 2001. With regard to Mr Dick, Mr Dick was convicted of offences committed at St Aidans in respect of other individuals and sentenced at Chester Crown Court in 1995.

Without prejudice to any legal proceedings which may be issued the reasons we are alleging fault are likely to be:-

- a) Our client was subjected to abuse.

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The firm is a member of the Multi-Party Action Panel and has members of the Personal Injury and Family Panel, ACAL (Association of Child Abuse Lawyers).

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Legal Aid Agency

