

Tranche was represented by Jackson & Canter and another was represented by Stephen Rimmer & Co).

Q8(c) – The number of claims and how they fitted within the tranche of claims

71. I refer to paragraph 60 above regarding the division of the tranches. I understand that:

- (A) the **Clwyd Tranche** involved 139 claims, including around 28 claims that were brought after the "cut-off" date;
- (B) the **Gwynedd Tranche** involved 14 claims and that there were a few additional claims which were either not pursued, discontinued or struck out; and
- (C) the **Third Tranche** involved 52 claims against Bryn Alyn.

Q8(d) – The period of time to which the claims related

72. My understanding is:

- (A) **Clwyd Tranche:** the Practice Direction (**Exhibit DN1/2**) suggests that these claims arose in whole or in part between 1974 and 1996.
- (B) **Gwynedd Tranche:** I understand that these claims related to abuse which occurred in the 1970s, 1980s and 1990s.
- (C) **Third Tranche:** these claims arose out of physical and sexual abuse at five different private homes, which according to the High Court's judgment in *Various Claimants v B AL CHL and The Royal and Sun Alliance plc* (High Court (QB) Connell J, 26 June 2001) (**Exhibit DN1/5**) occurred between 1973 and 1991. These homes were run by Bryn Alyn from 1972.

Q8(e) – Chronology of the litigation

Clwyd Tranche

73. I refer to the judgment of Mr Justice Scott Baker in *Various Claimants v Flintshire CC* (High Court (QB), 26 July 2000) (**Exhibit DN1/6**) and the Court of Appeal in *[redacted] v Flintshire CC* [2001] EWCA Civ 302. These judgments related to the 11 claims in the Clwyd Tranche that ultimately went to trial before Mr Justice Scott Baker (out of the total of 139 claims within the Clwyd Tranche). In the High Court, evidence was heard for the 11 claims in March and April 2000 and, following written submissions, oral submissions were made on 6 June 2000 and judgment was