

DWF

**DPA**

JESMOND

Our ref:

**DPA**

Your ref:

9th November 2015

Direct telephone number:

**DPA**

Email:

**DPA**

Dear Sirs

Re: **OUR CLIENT -** **AR-A34**  
**CLAIM AGAINST STANHOPE CASTLE**

We have instructions by our above named client to make a formal offer to settle in the sum of £5000.00 provided that our reasonable costs are met and subject to detailed assessment if not agreed.

Yours sincerely

**DPA**

Alistair Smith  
Watson Woodhouse Solicitors

**HEAD OFFICE**

York House  
102 Borough Road  
Middlesbrough  
TS1 2BJ  
DX No. 60502 Mibro 1

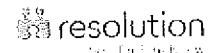
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Mental Health  
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FAO: Alistair Smith  
Watson Woodhouse  
DPA  
Middlesbrough 1

Your Ref:

DPA

Our Ref:

DPA

Date:

17 August 2015

Please ask for:

Andrea Ward

Direct Dial:

DPA

E-mail:

DPA

Dear Sirs

**Our Client: The Former Cleveland County Council**  
**Your Client:** AR-A34

We are instructed on behalf of the Former Cleveland County Council in respect of your Letter of Claim of 18 February 2015. We must apologise for the delay in acknowledging receipt of that Letter of Claim. We were instructed on Friday 14 August 2015.

This Letter of Acknowledgment is written without prejudice to our contention that this claim is statute barred. Your client was born on DPA 1961 and therefore the primary limitation period expired on DPA 1982. More than 30 years has elapsed since the expiration of the primary limitation period and more than 40 years has elapsed since the events complained of. You give no reason for your client's delay and we shall be grateful for an explanation on the basis of the RE v GE Court of Appeal decision.

We note that you have been acting for your client since 24 September 2014 and we would ask the reason for the delay in setting out the Letter of Claim. Your client makes allegations against [Name Redacted] (whom our client has been unable to trace) and AR-F6 who died in 2002. This is clear evidence of prejudice under Section 33 of The Limitation Act 1980.

We note that your client was in the care of Hartlepool Borough Council and that you are seeking records from Hartlepool Social Services.

Please confirm that our Letter of Response is due on or before 14 November 2015 but that if you have not recovered the records from Hartlepool Social Services and disclosed them to us you will grant us further time.

Yours faithfully

DWF LLP

**F.A.O. Mr Nick Williams**

Insurance Officer  
Middlesbrough Borough Council  
Transporter Room  
Town Hall  
Middlesbrough TS1 2QQ

Our ref: DPA  
Your ref:

18th February 2015

Direct telephone number: DPA

Dear Sirs,

**Claimant:** AR-A34  
**Address:** DPA  
**Date of Birth:** DPA 1961  
**NI No:** DPA

**Claim against Castle School, Stanhope, Bishop Auckland**

We are instructed on behalf of AR-A34 in relation to a claim for damages arising out of his residency at the above School.

Please confirm the identity of your insurers. Please note that the insurers will need to see this letter as soon as possible and 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 circumstances of this claim are:-**

AR-A34 instructs he was sent to the Castle School at about the age of 13 years in or about 1974. He believes he left the School in DPA 1977.

AR-A34 says that he was taken to Stanhope from DPA by, he believes, Name Redacted. He recalls walking through a large gate which was slammed closed behind him and he saw another boy being dragged along the corridor by his hair. AR-A34 says he ran back to the gate to find he could not open it and as he did so, he felt a blow to the back of his legs which put him to his knees. Name Redacted had hit him with a stick.

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Partnership No: OC 385783



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AR-A34 says he was allocated to DPA and given the number DPA.

He says that first day he could not stop crying and a man who he believes was called Name Redacted told him to "shut your f..... mouth" and clenched his knuckles and brought them down on the top of his head so that he was knocked to the ground.

AR-A34 says that it was a regular occurrence for him that he would be slapped and punched for no reason and that he lived on the edge all the time fearing an assault. He believes that the people who most regularly assaulted him were called AR-F6 Name Redacted and Name Redacted.

AR-A34 tells of one time where he and some others ran away from the School and were picked up by the Police at DPA. He recalls being returned to the Castle School, having to take off his trousers and shirt and then his wrists were tied together and he was told to stand on the string between his wrists.

AR-A34 then says that Name Redacted beat him with a cane, with such force that every time he jerked up, the string cut into his wrists. He states he was beaten with this cane twenty or thirty times and suffered injuries to his bare legs, shoulders, back and arms. He believes he passed out because the next thing he recalls is the string being cut from between his wrists and being dragged upstairs, being unable to walk. He recalls being showered and watching the blood running down the sink hole of the shower.

AR-A34 says that he believes he was taken to the sick wing where he remained for about a week. After that week, AR-A34 says that he went to see the Headmaster at the time to complain about the brutality and was told that if he could not take the punishment, then he, the Headmaster, could tell him, AR-A34 how many ways to end his life with a piece of rope and a plastic bag.

AR-A34 will tell how he was polishing the dining room floor, on his hands and knees and that there were two lines of children. He believes he was out of line because Name Redacted came up and stamped on his right hand hard and to such an extent, that he could not use it as it was so painful and his hand then swelled up like a balloon. He states that today, the knuckle at the base of his thumb stands out more than on his left hand.

AR-A34 will give examples of how Name Redacted used to beat him with a bar of carbolic soap, wound into a towel and the towel would be swung and hit his body. He recalls this assault happened for some time and he believes he passed out, as he recalls waking up in bed with his arms and body all covered in bandages. He states he was in the sick bay for several weeks.

AR-A34 will say that he has had a weak back, with pain at the base of his spine since that time and he credits that to this assault.

AR-A34 recalls an occasion, when he was about 15 years old and he was running away and AR-F6 caught him and grabbed him by the throat and with his other hand, he tried to unzip his trousers. AR-A34 says he fought back and believes that had he not defended himself, he would have been raped.