

**IN THE HIGH COURT OF JUSTICE  
QUEEN'S BENCH DIVISION**

**Claim Number**

**BETWEEN**

**MASTER ADAM JAMES GLOVER  
(a child by Mrs Shirley Maureen Glover, his Litigation Friend)**

**Claimant**

**and**

**MR VINCENT CRAWFORD**

**Defendant**

**PARTICULARS OF CLAIM** - Breakdown of events.

1. On the 9th March 2019 at about 8.00 p.m. the Claimant was a passenger travelling in the rear offside of a Ford Focus motorcar, registration number BX10 JVB, being driven by his father, John Glover ('Mr Glover'). At all material times, the Defendant was driving a Nissan Qashqui, registration number BX13 PTA.
2. At the time of the accident the Claimant was restrained in a specialist child safety seat.
3. As Mr Glover was driving in a northerly direction along Banchurch Road, Exbridge towards Sanders Lane, he encountered a large tree, which had fallen across both lanes of the road, at a bend some 0.75 miles from the junction. Mr Glover stopped his vehicle and switched on the hazard lights, in addition to his rear and main headlights, which were already lit.
4. Approximately 1 minute later the vehicle being driven by the Defendant suddenly and without warning drove into the rear of Mr Glover's stationary vehicle.
5. The prevailing speed limit on Banchurch Road is 40 mph. It is an unlit carriageway. The road was wet following an earlier rainstorm.

9. The said convictions are relevant to the issue of negligence and the Claimant intends to rely on them as evidence in this action.

\* 10. By reason of the matters aforesaid the Claimant who is now aged 3 years, having been born on 12 February 2016 suffered pain, injury, loss and damage.

CPR PD 16 Para 4.1(a) - have to include age + date of birth for PI cases.

#### **PARTICULARS OF INJURY**

11. The Claimant took the force of the rear impact and suffered multiple fractures to the skull and spine.

12. The Claimant was detained in Exbridge Children's Hospital for 10 days, during which time he underwent three operations to his back. He continues to attend hospital as an outpatient and wears a body caste.

13. Future treatment is under review, given the young age of the Claimant and the continuing pain and distress being suffered.

14. Full details of the injuries and prognosis are disclosed in the medical report of Mr John Bond FRCS dated 19 August 2019, which is attached.

#### **PARTICULARS OF SPECIAL DAMAGES AND GENERAL LOSSES**

15. A schedule of special and general damages is attached.

16. The Claimant will claim interest pursuant to section 35A Senior Courts Act 1981 at such rate and for such a period as the court thinks fit.

Prayer. | AND the Claimant suing by his Litigation Friend, Shirley Maureen Glover claims:—

- (1) Damages exceeding £50000;
- (2) Interest pursuant to section 35A Senior Courts Act 1981;
- (3) Costs

only 3 matters.