

Andrew Ward

Call: 2000
ward@12kbw.co.uk

AREAS OF EXPERTISE

Personal Injury, Fraud, Insurance, Inquests, Military Claims

Andrew represents Claimants and Defendants in serious and catastrophic personal injury claims. He is endorsed by the legal directories and is ranked as a Band 1 personal injury junior in the Legal 500 (2025 Edition). He has extensive experience of cases involving traumatic brain injury, amputation, chronic pain conditions, functional neurological disorder, paralysis caused by spinal injury, fatal accidents, issues of motor insurance policy coverage and fundamental dishonesty.

Andrew was shortlisted for the 'Barrister / KC of the Year' award at the Manchester Legal Awards in 2023 and 2024. He is a member of the Attorney General's Regional 'A' Panel of Junior Counsel to the Crown and is also a tenant at Exchange Chambers in Manchester.

The Legal 500, 2025, says: "Great written advice, and he is quick on his feet, friendly and approachable."

He is also experienced in representing properly interested persons at Inquests.

Personal Injury

Andrew's principal areas of expertise comprise:

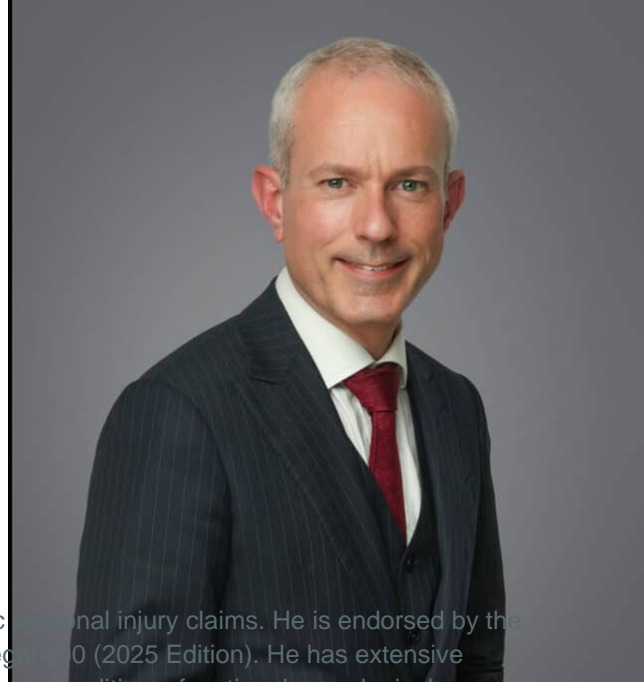
- Serious traumatic brain injury
- Subtle brain injury
- Amputation
- Multiple orthopaedic and serious spinal injuries
- Brachial plexus injuries
- Fatal accidents
- Chronic pain, CRPS, fibromyalgia and somatoform disorder
- Serious psychiatric injury
- Accidents abroad, including disputes as to jurisdiction and applicable law
- Industrial disease (including mesothelioma claims concerning the cost of immunotherapy treatment)
- NIHL (Noise-Induced Hearing Loss) claims
- NFCI (Non-Freezing Cold Injury) claims
- PTSD / abuse claims

Fraud

Andrew regularly represents Defendants in cases involving allegations of Fundamental Dishonesty pursuant to Section 57 of the Criminal Justice and Courts Act 2015 and in relation to committal proceedings for Contempt of Court pursuant to CPR Part 81.

He represented the successful Defendant in **Brian Muyepa -v- Ministry of Defence [2022] EWHC 2648 (KB)** and secured the dismissal of a £3.7 million personal injury claim on the ground of fundamental dishonesty at a 12-day trial involving oral evidence from 29 lay and 10 expert witnesses.

Muyepa is also a seminal case regarding the CPR Part 35 duties of experts. All five of the Claimant's experts were



cross-examined by Andrew and each was found to have been, at least in part, pro-Claimant and partisan.

Insurance

Andrew regularly advises upon insurance policy coverage issues related to personal injury litigation (e.g.: claims involving the MIB; Section 151 of the Road Traffic Act 1988; Article 75 of the MIB's Articles of Association; and actions involving the Third Parties (Rights Against Insurers) Acts 1930 and 2010).

Inquests

Andrew is experienced in representing the Deceased's Family or other Properly Interested Persons at Inquests. He adopts a sensitive and empathetic approach to Inquest work but is robust when necessary.

Andrew's recent inquest work includes the following:

- October 2024: Andrew represented the MOJ at an 8-day Article 2 Jury Inquest at Nottingham Coroner's Court touching upon the death of a prisoner at HMP Ranby.
- September 2024: Andrew represented the MOJ at a 4-day Article 2 Jury Inquest touching upon the death of a prisoner at HMP The Mount.
- March 2024: Andrew represented the MOJ at a 2-day Article 2 Jury Inquest at Peterborough Coroner's Court touching upon the death of a prisoner.
- February 2024: Andrew represented the MOJ at two linked Article 2 Jury Inquests heard over 6 days at Hastings Coroner's Court touching upon the deaths of two prisoners at HMP Lewes.
- November 2023: Andrew represented the MOJ at a 6-day Article 2 Jury Inquest at Nottingham Coroner's Court touching upon the death of a prisoner at HMP Ranby.
- October 2023: Andrew represented the MOJ at a 5-day Article 2 Jury Inquest at Nottingham Coroner's Court touching upon the death of a prisoner at HMP Ranby.
- February 2023: Andrew represented the MOJ at a 3-day Article 2 Jury Inquest at Nottingham Coroner's Court touching upon the death of a prisoner at HMP Ranby.

Military Claims

Andrew regularly defends the Ministry of Defence against claims brought by injured Armed Forces Service Personnel.

The Legal 500, 2025, says that:

"Andrew is extremely knowledgeable in respect of military claims with a keen interest and understanding in non-freezing cold injuries. He is an expert in fundamental dishonesty with great written advice, and he is quick on his feet, friendly and approachable."

Andrew frequently represents the Ministry of Defence in NFCI (Non-Freezing Cold Injury), NIHL (Noise-Induced Hearing Loss) and PTSD claims.

Cases

Andrew's recent cases include:

- **Christopher Fraser -v- Ministry of Defence [2024] EWHC 2977 (KB)**: successful defence of a claim for Non-Freezing Cold Injuries (NFCI). The Claimant failed to beat the Defendant's CPR Part 36 offer at trial).
- **Richard Adams and Ors -v- Ministry of Defence [2024] EWHC 1966 (KB)** (concerning CPR Rule 7.3 and the use of 'omnibus' Claim Forms in a cohort of >600 NFCI claims).
- **Michael Mantey -v- Ministry of Defence [2023] EWHC 761 (KB)** (successful finding of fundamental dishonesty at trial in a £1.6 million claim).
- **Brian Muyepa -v- Ministry of Defence [2022] EWHC 2648 (KB)** (successful finding of fundamental dishonesty

in a £3.7 million claim following a 12-day trial).

- **Brian Muyepa -v- Ministry of Defence [2021] EWHC 2236 (QB)** (successful application by the Defendant to rely upon surveillance evidence)
- **R -v- BBC Studios Productions Limited:** Andrew is instructed to defend the BBC in relation to a claim by a cameraman for injuries sustained whilst filming a nature programme on the island of Zanzibar (ongoing in 2025).
- **G -v- MOD:** Andrew is instructed to represent the Ministry of Defence in its defence of a claim by a soldier who suffered a catastrophic brain stem injury during a grenade throwing practice session. The claim is provisionally pleaded in excess of £10 million (ongoing in 2025).
- **S -v- MOD:** Andrew represented the Ministry of Defence in a claim by a former soldier for damages for historic abuse and PTSD. The Claimant was represented by leading counsel. A confidential settlement was negotiated at a JSM in December 2024.
- **WP -v- QBE:** Andrew acted as junior counsel, led by Will Waldron K.C., for a Claimant who sustained a severe traumatic brain injury and left-sided hemiplegia when a cast iron soil pipe struck his head as he footed a ladder at work in the construction industry. The impact penetrated the Claimant's skull. The tortfeasor employer became insolvent and the Claimant proceeded against the employer's insurer under the Third Parties (Rights Against Insurers) Act 2010. Damages of £2.3 million were recovered on a full liability basis at a JSM in October 2024.
- **CH -v- LS:** Andrew represented the Claimant who sustained a severe traumatic brain injury, maxilla-facial injuries and a spinal fracture when a lorry collided at speed with his car that was queuing in motorway traffic. The Claimant suffered a profound personality change. The case underscored the need for empathy and soft skills when representing the Claimant and family in a serious TBI case. The Claimant benefits from an income protection insurance policy that will pay 75% of his basic salary until the age of 65 years. In addition to that, damages of £1.8 million were recovered at a JSM in September 2024.
- **CS -v- AS:** Andrew represented the Claimant who sustained an amputation of his left ring and middle fingers when a car, in which he was travelling as a passenger, overturned. The Claimant suffered from severe neuropathic and nociceptive pain. Damages in excess of £1 million were recovered at a JSM in July 2024.
- **D -v- MOD:** Andrew represented the Ministry of Defence in a claim by an RAF service person who suffered an elective below-knee amputation following an accident at RAF Akrotiri in Cyprus. The Claimant went on to participate in the Invictus Games. The case involved complicated issues of medical diagnosis and causation; difficult issues concerning the offsetting of various Armed Forces Compensation Scheme payments; and complicated quantum issues relating to earnings, pension and care. The case settled for a confidential sum at a JSM in January 2024.
- **BO -v- RT:** Andrew acted as junior counsel, led by Will Waldron K.C., for a motorist who suffered a severe traumatic brain injury and a serious acetabular fracture following a road traffic accident. Damages of £3 million were agreed at a JSM in February 2023 and Court approval was forthcoming in March 2023.
- **James Barry -v- MOD [2023] EWHC 459 (KB):** Andrew represented the Defendant at an 8-day trial before Johnson J. in relation to this claim by a former Royal Marine for damages for Noise-Induced Hearing Loss (NIHL) sustained during his military service. The case concerned issues of contributory negligence, medical diagnosis and an Ogden 8 "disabled" future loss of earnings claim.
- **SL -v- MOD:** Andrew represented the Ministry of Defence in a claim by an Army WO2 injured in a Challenger Tank accident at Castlemartin Ranges, South Wales, in June 2017. The gun's obturator pad had been removed for cleaning and it was fired with the pad missing. Ignition gases backfired into the tank's compartment. Further propelling charges that were lying on the compartment floor exploded. They should have been kept in the secure charge bin. Two Corporals were killed and two others, including SL, were very seriously injured. SL's injuries included burns to 35% of his body requiring skin grafts; the loss of all digits on his left hand; and PTSD. There was disputed expert evidence as to whether he had suffered a hypoxic or traumatic brain injury. A confidential settlement was negotiated at a JSM in November 2022.
- **SC -v- AL:** Andrew acted as junior counsel, led by Will Waldron Q.C., for a motorcyclist who suffered a severe traumatic brain injury following an accident in May 2016. The claimant had an initial Glasgow Coma Score of 3/15 and significant retrograde and post-traumatic amnesia. He also suffered a spinal cord contusion at the level of T2/3. Damages of £2.8 million were recovered at a JSM in December 2021.
- **CW -v- DM:** Andrew represented the Claimant who sustained a serious left foot fracture and avulsion of the heel pad when he was knocked off his motorcycle by a car in May 2016. The treating and medical experts in the

disciplines of orthopaedics and rehabilitation medicine agreed that the Claimant would benefit from an elective below-knee transtibial amputation. However, he had received input from a multi-disciplinary rehabilitation team and had opted for conservative treatment for nearly five years. The claim was presented on the basis that it was inevitable that he would come to an elective amputation in due course. Damages of £1.6 million were recovered at a JSM in February 2021.

- **CP -v- NP:** Andrew represented the Claimant, aged 58 years, who was rendered paraplegic in a road traffic accident. A gross settlement was secured in January 2021 of £2,500,000.
- **AP -v- KT:** Andrew acted as junior counsel, led by Will Waldron Q.C., for the Claimant who was knocked over by the Defendant's car as she walked across a country road. She was rendered paraplegic with no bony connection left between her upper and lower body. Liability was hotly contested. William Waldron Q.C. and Andrew established liability at a High Court trial in March 2019 with no finding of contributory negligence. The Defendant obtained permission to appeal to the Court of Appeal. Andrew prepared the Claimant's Skeleton Argument in response to the appeal. The appeal was compromised at a JSM in March 2020 when the Claimant recovered damages in excess of £2 million.
- **C -v- MOD:** Andrew represented the Ministry of Defence in a claim by an Indian soldier who suffered a traumatic below-knee amputation whilst participating in a joint training exercise with the MOD in the UK. The claimant returned to India. The case raised various difficult issues including the correct quantification of loss under English law where the claimant's rehabilitation will take place in India; the cost of care in India; the reasonableness of Indian prosthetic provision; the use of English and Indian experts; and consideration as to whether a different discount rate should be applied under the Damages Act 1996. The claim settled at a JSM in March 2020 for £700,000.
- **ERS -v- BTL:** Andrew defended a haulage company against a substantial claim by its motor insurer for the reimbursement of sums paid out to third parties following a serious road traffic accident when a lorry collided with a Metrolink tram in Manchester. The case raised difficult issues concerning forms of consent and assignment, material non-disclosure, Section 151 of the Road Traffic Act 1988 and unjust enrichment. The case settled at a Mediation in January 2020.
- **Malcolm Carew -v- Ministry of Defence [2019] 6 WLUK 858:** Limitation trial in an NFCI claim.
- **L -v- H and M:** Andrew represented the defendants in a claim arising from a riding accident at a livery yard in which the claimant fell from a horse and was rendered paraplegic. The claimant was represented by leading counsel. The claimant's schedule of loss exceeded £4 million. Andrew successfully negotiated a settlement of £150,000 in January 2018
- **Watson -v- Ministry of Defence [2016] EWHC 3163:** Successful application by the Defendant to rely upon surveillance evidence in a £2 million claim.

Qualifications & Awards

St. Bede's College, Manchester

B.C.L., M.A. (Oxon) (Jesus College, Oxford)

Winner of the Middle Temple Rosamund Smith Mooting Competition (2000)

Astbury Scholar (Middle Temple, 2000)

Appointment & Memberships

Andrew is a member of the Attorney-General's Regional 'A' Panel of Junior Counsel to the Crown.

PIBA (Personal Injuries Bar Association)

Directories

He is an expert in fundamental dishonesty with great written advice, and he is quick on his feet, friendly and approachable – Legal 500, 2025

Andrew has an eye for detail and he is quick to identify the critical issues, the evidence required, and the relevant law and case law – Legal 500, 2024

He is excellent – Chambers & Partners, 2023

Andrew is a very measured and persuasive advocate at court. He is never flustered, he is scrupulously polite and he is devastatingly effective. He knows his specialist area of the law backwards, he rarely pursues bad points and he is a very sensible opponent – Legal 500, 2023

He is technically very good, with an eye for detail. He sees the overall picture but doesn't lose sight of more minute detail that is important to the case. He also has a lovely manner with clients – Chambers & Partners, 2022

Andrew is extremely well-versed and knowledgeable in all aspects of military claims. Andrew has an unrivalled knowledge of non-freezing cold injury claims, and has an excellent rapport and relationship with clients. His Advices are clear and consistent. He is very good on his feet, particularly in tricky JSM scenarios and in Court. Quick thinking, but with a practical aspect to benefit the client. I would not hesitate to instruct Andrew on any complex injury or military claim – Legal 500, 2022

Very strong on military matters and earns the trust of his clients – Chambers & Partners, 2021

A lawyer of real quality. He is intellectually the equal of anybody. He has a wide and extensive knowledge of personal injury cases at the highest level and comes at them with balance, because he represents both Claimant and Defendant firms – Legal 500, 2021

Very good both on paper and on his feet – Chambers & Partners, 2020

Responsive, available and has great attention to detail – Legal 500, 2020

His work on papers is very accessible, and he has a forensic way of looking at medical evidence in a case. He is an accomplished junior who is a pleasure to work with and has a keen eye for detail – Chambers & Partners, 2019

Very experienced in high-value catastrophic injury cases – Legal 500, 2019

Very approachable and able to relate to lay clients on their level and explain difficult concepts in easily accessible terms. Good on paper and a very good advocate at application hearings – Chambers & Partners, 2018

He has excellent client-care skills – Legal 500, 2017

He is very accessible and good with the clients, and he takes a good common-sense approach. He is very smooth, very knowledgeable, and always in control – Chambers & Partners, 2017

He has a great ability to deal with problems in a no-nonsense way – Legal 500, 2016

He focuses on high-value multi-track litigation, including amputee claims, fatal accidents and brain injuries – Legal 500, 2015

A strong team player who represents claimants and defendants – Legal 500, 2014

Stand out – Legal 500, 2013

