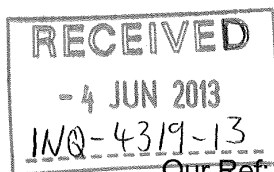


2 Franklin Street, Belfast, BT2 8DQ
DX 2842 NR Belfast 3



Your Ref:
JOH-0329-13

Our Ref:
HYP B04/05

Date:
4th June 2013

The Honourable Mr Justice O'Hara
Chairman of the Inquiry
Inquiry into Hyponatraemia Related Deaths
Arthur House
41 Arthur Street
Belfast
BT1 4GB

Dear Sir,

RE: INQUIRY INTO HYPONATRAEMIA RELATED DEATHS – RAYCHEL FERGUSON

I refer to the above matter and your letter of 3rd June 2013.

As you are aware the Trust has asserted a claim for privilege over documents number 3, 9, 13, 19, 20, 32, 36 and 37 on the index which was provided to you. Dealing with each of the documents over which is claim is made in turn I would advise as follows: -

3) This is a letter from Mr Peter Walby to Mr Gary Daly dated 27th September 2005. Mr Walby is seeking advice from Mr Daly and a record of that advice is contained within the handwritten note telephone which is recorded on the letter.

9) This is a letter from Mr Peter Walby to Mr Gary Daly dated 3rd March 2004. The letter relates to issues regarding the preliminary statement made by the Coroner in respect of the Lucy Crawford Inquest.

19) This document is a typed attendance note of a consultation which took place on 10th December 2013 between Mr Daly and Dr Peter Crean, an employee of the Trust acting as its servant or agent, in preparation for and in advance of the Inquest hearing. The Trust is the client.

20) This document is a handwritten attendance note of the 10th December 2013 consultation referred to at 19 above.

36) This document is an undated note recording the main points of the information discussed at the consultation on 10th December 2013 referred at 19 above.

Providing Support to Health and Social Care



37) This document is another copy of the document referred to at 19 above.

I trust that this is in order.

Yours faithfully

A handwritten signature in black ink, appearing to read 'JRBolton', with a stylized flourish at the end.

Joanna Bolton
Solicitor Consultant