

The Inquiry into Hyponatraemia-related Deaths

Chairman: Mr John O'Hara QC

Ms Catherine Rodgers
Departmental Solicitors Office
2nd Floor
Centre House
Chichester Street
BELFAST
BT1 4JE

Your Ref: LIT 477/08/B5/CR

Our Ref: JOH-0357-13

Date: 29th January 2013

Dear Ms Rodgers,

Re: Inquiry into Hyponatraemia Related Deaths

I refer to recent correspondence from the Inquiry (copies attached) requesting documents relevant to this Inquiry's investigations. I am aware that an internal e-mail was sent by the Permanent Secretary on the foot of one of the requests.

I understand from an email which you sent to the Inquiry Secretary today, that relevant documents have been identified and that they are being collated. I am afraid that the pressure on the Inquiry is such that we simply cannot wait until 8 February, your suggested date for their delivery. Please arrange to have steps taken for them to be delivered to the Inquiry by Friday 1 February.

Can I also suggest that, if you have not already done so, it might assist you and us if there was a person in the Department who was designated to handle and respond to requests for documentation. Such a person might be able to shorten response times in the event of further requests

Yours sincerely



John O'Hara

Secretary: Bernie Conlon

Arthur House, 41 Arthur Street, Belfast, BT1 4GB

Email: inquiry@ihrdni.org **Website:** www.ihrdni.org **Tel:** 028 9044 6340 **Fax:** 028 9044 6341

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Your Ref: LIT 477/08/B5/CR

Our Ref: AD-0460-12

Date: 5th November 2012

Dear Ms Rodgers,

Re: Request for Documents

I refer to the above matter.

The Inquiry received documents from the Department at the time of establishment. Enclosed for your ease of reference is a copy of a letter dated 18 March 2005 from the Office of the Permanent Secretary to the Chairman. You will note the assurance to forward all updated or new information relevant to the Inquiry on an ongoing basis.

To assist, I enclose for your attention copy indices which list the Departmental documents currently in the Inquiry's possession. That documentation is limited to the period from late 2001 to 2004. I would be grateful if you would review all Departmental papers relating to the issues the Inquiry is investigating, as detailed in the List of Issues (available on the Inquiry's website). Thereafter please forward all additional documents to ensure that the Inquiry has all relevant documents to cover the period 2001 to the present day.

I would also be grateful if you would provide a list of personnel, identifying the job description and grade of all of those who are named in the papers. This will assist the Inquiry team with redacting the papers. Equally should you have any representations regarding redactions which should be made before the documents are circulated, please advise me.

I would be grateful if the papers were indexed and sent to the Inquiry Secretariat before Friday 24th November 2012. Thank you for your assistance in this matter.

Yours sincerely,



Anne Dillon
Solicitor to the Inquiry

Enc

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Your Ref: LIT 477/08/B5/CR

Our Ref: BMcL-0031-12

Date: 28th November 2012

Dear Ms Rodgers,

Re: Raychel Ferguson Preliminary

I write further to Anne Dillon's correspondence with you concerning disclosure of documents in the possession of the Department to the Inquiry, and with particular reference to the aftermath of the death of Lucy Crawford.

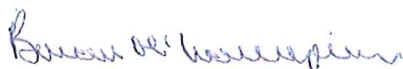
As you know the Inquiry is investigating inter alia what the Department knew about Lucy's death, when they knew it, and what steps they took when they received information about her death. Can you please provide any and all documents of the Department, not already disclosed, as from the date of Lucy's death in April 2000 relating to those issues?

Without prejudice to the generality of this request, there are two specific matters.

The Inquiry notes that among the papers disclosed by the Sperrin Lakeland Trust, at Ref: 030-009-016, is a programme for a meeting between the Chair and Chief Executive of the Trust and Mr Gowdy of the Department on 14 June 2000. Can you please provide all notes and records of that meeting in the possession of the Department?

More generally, can you please provide all records held by the Department relating to contact between Mr Mills or Dr Kelly and the Department, concerning the death of Lucy Crawford, from in and around April 2000?

Yours sincerely,



Brian McLoughlin
Assistant Solicitor to the Inquiry

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Your Ref: LIT 477/08/B5/CR

Our Ref: AD-0478-12

Date: 13th December 2012

Dear Ms Rodgers,

Re: Medical Advisory Structures (1994 – 2006)

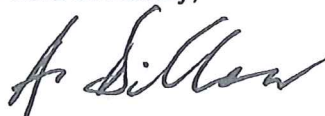
I would be grateful if the Department would forward to the Inquiry the following documents from this period:

1. A list of all members of the Central Medical Advisory Committee.
2. A list of all members of the Paediatric Specialty Advisory Committee (if one existed during this period).
3. A list of all members attending any Chief Medical Officer and Director of Public Health meetings.
4. The Agenda and minutes for all meetings held by the above committees and any relevant sub committees.

Further, the Inquiry also requires confirmation of the structures that were in place in the Department to receive medical advice and their remits for the relevant period. In particular, any diagrams or charts outlining these structures would be of great assistance.

I would be grateful if these documents are indexed and sent to the Inquiry secretariat before 10th January 2013.

Yours sincerely,



Anne Dillon
Solicitor to the Inquiry

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Your Ref: LIT 477/08/B5/CR

Our Ref: BMcL-0042-12

Date: 21st December 2012

Dear Ms Rodgers,

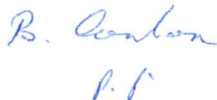
Re: Raychel Ferguson Preliminary

In my letter of 28 November I asked for **all documents of the Department not already disclosed as from the date of Lucy Crawford's death in April 2000** which relate to Lucy's death, and specifically for documents relating to a meeting with Mr Gowdy and representatives of the Sperrin Lakeland Trust on 14 June 2000, and records of contact between Mr Mills and Dr Kelly and the Department from in and about April 2000.

I note that Dr McCormick has yesterday issued a call for documents within the Department (copied to the Inquiry Chairman). However Dr McCormick's memo refers to documents from 2001 onwards. I appreciate that this was the date mentioned in Anne Dillon's letter of 5 November. However as appears from my later correspondence, in the case of Lucy Crawford the Inquiry is interested in documents from the date of Lucy's death in April 2000.

A small addendum to Dr McCormick's memo, making clear that in the case of Lucy Crawford's death, the search for documents should be from 14 April 2000, the date of Lucy's death, would deal with the issue.

Yours sincerely,



Brian McLoughlin
Assistant Solicitor to the Inquiry

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