

SCHEDULE of COPY PAPERS

BRANGAM BAGNALL FILE (B & B) RELATING TO CLAIRE ROBERTS' INQUEST

1. B & B File Cover and File Note (2 pages)
2. Letter from MSC Daly to Mr Walby, RVH Litigation Office dated 03.10.06
3. Letter from MSC Daly to Coroners Service dated 03.10.06
4. Letter from Mr Walby to G Daly dated 07.09.06
5. Letter from Mr Walby to B & B dated 23.08.06 (2 pages)
6. Letter from Mr Walby to G Daly dated 04.08.06
7. Memorandum from Mr Walby to Dr H Steen dated 04.08.06
8. Letter from G Daly to Mr Walby dated 31.07.06 (2 pages)
9. Letter from Mr Walby to G Daly dated 21.07.06 together with enclosures (3 pages)
10. Letter from G Daly to Mr Walby dated 04.07.06
11. Letter from G Daly to HM Coroner dated 04.07.06 (2 pages)
12. LEGAL PROFESSIONAL PRIVILEGE CLAIMED- Letter from Mr Walby to G Daly dated 16.06.2006
13. Letter from B & B to M Lavery BL dated 14.06.06
14. Internal Memorandum B & B dated 07.06.06
15. Internal Memorandum B & B dated 06.06.06
16. Letter from G Daly to Mr Walby dated 06.06.06
17. Letter from G Daly to HM Coroner dated 06.06.06
18. Fully Redacted Remittance Advice from RVH dated 01.06.06
19. Letter from H M Coroner to B & B dated 31.05.06
20. Letter from G Daly to H M Coroner dated 25.05.06
21. Letter from B & B to Mr Walby dated 25.05.06
22. Fax cover note from RVH Litigation Office to G Daly dated 23.05.06
23. Faxed letter from Mr Walby to G Daly dated 12.05.06 enclosing Coroner's Verdict (2 pages)
24. Letter from G Daly to Mr Walby dated 18.05.06 (2 pages)

25. Fully Redacted Invoice from B & B to RVH dated 18.05.06
26. Letter from G Daly to Mr Walby dated 18.05.06 enclosing verdict
27. Cover note from HM Coroner (undated)
28. Fully Redacted letter from M Lavery BL to B & B in relation to his fee note dated 15.05.06
29. Letter from Mr Walby to Mr G Daly dated 12.05.06
30. B & B Internal Memorandum dated 08.05.06
31. Letter from G Daly to H M Coroner dated 08.05.2006
32. Email from B & B to M Lavery BL dated 10.05.06
33. Internal Memorandum from G Daly to his PA dated 08.05.06
34. Fully Redacted Letter from M Lavery BL to B & B in relation to his fee dated 15.05.06
35. LEGAL PROFESSIONAL PRIVILEGE CLAIMED - Consultation notes between B & B, Dr Webb and Prof Young dated 25.04.06 (8 pages)
36. Notes from Inquest prepared by B & B 25.04.06 (12 pages)
37. Prof. Young's Formulae
38. Dr Steen's Formulae
39. Dr Sands' Formulae
40. Notes from Inquest continued 04.05.06 (2 pages- 2 sided)
41. Copy Death Certificate of C Roberts
42. Notes from Inquest dated 04.05.06 (5 pages 2 sided)
43. LEGAL PROFESSIONAL PRIVILEGE CLAIMED – Letter from G Daly to Mr Walby dated 03.05.2006 (2 pages)
44. Notes from Inquest 28.04.06 (8 pages 2 sided)
45. LEGAL PROFESSIONAL PRIVILEGE CLAIMED - Telephone attendance note from G Daly to Dr Webb dated 24.04.2006
46. Telephone attendance note- G Daly- dated 24.04.06
47. Letter Mr Walby to G Daly dated 13.04.06
48. LEGAL PROFESSIONAL PRIVILEGE CLAIMED – Letter from G Daly to Mr Walby dated 24.04.06 (2 pages)
49. Fully redacted File note by Gary Daly with Dr Webb's telephone numbers

50. Letter from Ferguson & Co to B & B dated 13.04.06
51. Letter from B & B to Ferguson & Co dated 19.04.06
52. Letter from B & B to H M Coroner's Office 19.04.06
53. Faxed letter from N Barr, Ferguson & Co to B & B dated 13.04.06
54. Letter from B & B to M Lavery dated 13.04.06
55. Telephone attendance note dated 07.04.06
56. Letter from G Daly to Mr Walby dated 10.04.06 (2 pages)
57. Letter from G Daly to M Lavery dated 10.04.06
58. Letter from G Daly to Mr Walby dated 10.04.06
59. Letter from G Daly to H M Coroner dated 10.04.06
60. LEGAL PROFESSIONAL PRIVILEGE CLAIMED - Consultation notes B & B, Prof Young dated 07.04.06 (6 pages)
61. Letter from Mr Walby to G Daly dated 02.03.06
62. Letter from G Daly to Mr Walby dated 03.11.05
63. LEGAL PROFESSIONAL PRIVILEGE CLAIMED - Letter from Mr Walby to G Daly dated 27.10.05
64. Letter from G Daly to HM Coroner dated 11.10.05
65. Letter from G Daly to Mr Walby dated 11.10.05
66. Letter from Mr Walby to G Daly dated 06.10.05
67. Letter from Mr Walby to G Daly dated 06.10.05
68. LEGAL PROFESSIONAL PRIVILEGE CLAIMED - Letter from Mr Walby to G Daly dated 03.10.05 (2 pages)
69. 'New file requisition' dated 10.10.05
70. NOT DISCLOSED – INQUIRY RELATED letter to Mr O'Hara QC from Gary Daly dated 28.09.05
71. NOT DISCLOSED – INQUIRY RELATED letter to Gary Daly from Mr O'Hara QC dated 26.09.05
72. NOT DISCLOSED – INQUIRY RELATED letter to Mr McKee from Mr O'Hara QC dated 26.09.05 (2 pages)
73. Letter from Mr Walby to H M Coroner dated 16.12.04 (2 pages)
74. Letter from Mr Walby to H M Coroner dated 25.01.05

75. Letter from Mr Walby to Dr Bingham dated 11.01.05
76. Letter from Dr N Rooney to Mr. & Mrs Roberts dated 12.01.05 (4 pages)
77. LEGAL PROFESSIONAL PRIVILEGE CLAIMED- letter from G Daly to Mr Walby dated 10.10.05 (2 pages)
78. NOT DISCLOSED – INQUIRY RELATED draft letter from W McKee to Mr O'Hara QC dated October 2005 (3 pages)
79. LEGAL PROFESSIONAL PRIVILEGE CLAIMED - Letter from Mr Walby to G Daly dated 03.10.05
80. NOT DISCLOSED – INQUIRY RELATED fax cover sheet from IHRD to G Daly dated 26.09.05 with enclosures (5 pages)
81. Verdict on Inquest dated 04.05.06 (4 pages)
82. Undated Letter from Dr Webb to Mr Walby (date-stamped 25.10.05)
83. Short CV of Dr Bingham (5 pages)
84. Statement of Witness – Andrew Sands dated 06.07.05 (2 pages)
85. Statement of Witness – Heather Steen dated 16.03.05 (3 pages)
86. Statement of Witness – Ian Young (4 pages)
87. Medico-legal report of Dr R M Bingham (5 pages)
88. Statement of Dr D Webb (undated) (16 pages)
89. Report of Dr Maconachie- faxed copy dated 14.09.05 (4 pages)
90. Statement of Ian Young (undated) (2 pages)
91. Letter from Mr Leckey dated 03.10.05 to Mr Walby enclosing Mr Roberts' statement dated 29.09.05 (10 pages)
92. 'Pediatrics': 'Acute Hyponatraemia Related to Intravenous Fluid Administration in Hospitalized Children: An Observational Study'- Authors: EJ Hoorn, D Geary et al. (8 pages)
93. RGH Trust- Casenotes Index (3 pages)
94. Statement of Dr H Steen dated 16.03.05 (3 pages)
95. Statement of Dr A Sands dated 06.07.05 (2 pages)
96. Further Statement of Dr A Sands dated 10.11.? (one page)
97. Statement of Ian Young- undated (2 pages)
98. Inquest Verdict dated 04.05.06 (2 pages)

99. Mr Roberts' Notes of Meeting dated 08.12.04 (2 pages)

100 Letter from Mr Walby to Dr Bingham dated 11.01.05