

**FURTHER SUPPLEMENTAL BRIEF FOR
EXPERT ON PAEDIATRIC NEPHROLOGY**

ADAM STRAIN

Introduction

1. Thank you for your previous reports in respect of Adam Strain. The Inquiry Team would be grateful for your comment or opinion on the following issues:

Dr. Robert Taylor's sixth Witness Statement to the Inquiry

2. Please find attached Dr. Robert Taylor's latest witness statement to the Inquiry. The Inquiry team would ask that you reflect on this statement and address the following:
 - (1) The extent to which you agree or disagree with the points made by Dr. Taylor
 - (2) The significance of Dr. Taylor's statement for the issues to be considered by the Inquiry
 - (3) The consistency of Dr Taylor's comments with his previous statements, his deposition to the Coroner and his PSNI interview under caution
 - (4) Your assessment of Dr. Taylor's conduct at the time and subsequently from 1995 to 2012 in light of this statement
 - (5) Whether there is anything arising that requires further query or investigation
 - (6) Whether the statement causes any amendment of your previous expert reports to the Inquiry, and if so, what amendment is required and the reason(s) for the amendment(s).

The significance of the renal transplant surgery

3. Please comment on the significance of the fact that Adam was undergoing a renal transplant surgery in terms of:
 - (1) The difficulty (or otherwise) in making accurate fluid calculations

- (2) The need (or otherwise) for prompt responses to requests for laboratory testing of electrolytes

Living donors

4. In her second witness statement to the Inquiry, Debra Slavin, Adam's mother, stated (WS-001-2, Answer to Q25(b), p.5):

"I asked if I could donate [as a living donor] but as a single parent this was not allowed, apart from that there was no other discussion as a living donor."

5. Please comment on the following:

- (1) What consideration you think should have been given by Dr. Savage (or anyone else involved in Adam's case) to the possibility of living donation for Adam.
- (2) If you consider that consideration should have been given to a living donation for Adam, please state
 - (a) When that should have happened
 - (b) Who should have been involved in considering that option
 - (c) What would have been involved in any such consideration
 - (d) When it should have been raised with Adam's mother and what should have been discussed with her about it
 - (e) What notes and records should have been made of any clinical consideration of a living donation and any information provided to Adam's mother about the process
- (3) Whether the fact that Adam's mother was a single parent was a legitimate factor when considering the viability of living donation in Adam's case
- (4) The advantages and disadvantages of living donors.

Comparison of fluid balance assessments

6. As you are aware, you recently completed a fluid balance chart showing what you believed to be the fluids received and the fluid lost by Adam both before and during his surgery. The Inquiry also asked other Inquiry expert witnesses and Dr. Robert Taylor to complete a similar chart, and this data has now been included in a comparison table, which is attached.

7. The Inquiry team would ask you to:
- (1) Check that your calculations and assumptions have been transcribed correctly onto this comparison table.
 - (2) Comment on any differences (if any) that are apparent between your calculations and the other Inquiry expert witnesses.
 - (3) Comment on the assumptions and calculations used by Dr. Robert Taylor, particularly in the light of:
 - (a) His previous arguments and
 - (b) His most recent statement

Further issues

8. Please comment on whether there are any further issues in Adam's case you would like to see the Inquiry consider investigating further, or in greater detail.

Procedures at oral hearings

9. The Inquiry's procedural documents listed at No 10 are available on the Inquiry website under Guidance however they may be subject to some minor change.
10. General Procedures of the Inquiry
- Oral Hearing Procedures
 - Protocol No 1 - Interested Parties
 - Protocol No 2 - Documents
 - Protocol No 3 - Witnesses
 - Protocol No 4 - Experts
 - Protocol No 5 - Costs
 - Protocol No 6 - Disclosure
11. Should you have any issues or queries arising from your participation in the oral hearings, please do not hesitate to contact the Inquiry.

Attached documents

12. The following documents are attached for your assistance:
- (1) Dr. Robert Taylor's sixth Witness Statement to the Inquiry
 - (2) Comparison chart of fluid balance calculations

(3) Inquiry procedural documents (protocols)

13. Please advise us if there are any other documents that you require.

Conclusion

14. It is of fundamental importance that the Inquiry receives a clear and reasoned opinion on these issues.
15. Your assistance on the Inquiry's requirements should be provided in the form of an Expert's Report (please reference if necessary).