



Business Services  
Organisation

## Directorate of Legal Services

— PRACTITIONERS IN LAW TO THE  
HEALTH & SOCIAL CARE SECTOR —

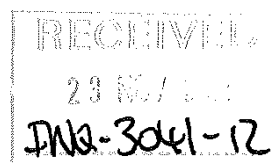
2 Franklin Street, Belfast, BT2 8DQ  
DX 2842 NR Belfast 3

Your Ref:

Our Ref:  
HYP B04/2

Date:  
23rd November 2012

Ms Anne Dillon  
Solicitor to the Inquiry  
Inquiry into Hyponatraemia-related Deaths  
Arthur House  
41 Arthur Street  
Belfast  
BT1 4GB



Dear Madam

### RE: INQUIRY INTO HYPONATRAEMIA RELATED DEATHS- CLAIRE ROBERTS

We refer to the above matter and to the disclosure documentation which we had submitted to the Inquiry in late September 2012, in respect of this case, namely the Trust's Litigation Office file relating to the Coroner's Investigation (issued as File 139) and the Brangam and Bagnall File relating to the Coroner's investigation (which would not appear to have been issued by the Inquiry, as of yet).

It has recently come to our attention that there are some documents over which our client is claiming Legal Professional Privilege which have been erroneously omitted from the Indexes attached to both files, due to an error on our part.

We now enclose corrected indexes describing the documents over which our client claims privilege. We have also included fully redacted copies of these documents at the relevant sections of the enclosed copies of both files.

Upon re-checking the papers, we have also noticed that the following documents were omitted from the original Index of the Trust's Litigation file due to our mistake:-

- Page 39/ 46- email correspondence between P Walby and Pauline Webb
- Pages 43, 44 & 45- copy internet news articles relating to Inquiry
- Page 60- page 9 of Dr Webb's statement
- Pages 66 & 67- Inquiry's Terms of Reference

*Providing Support to Health and Social Care*



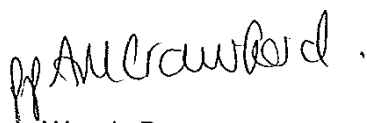
- Page 83- e-mail correspondence to and from Prof.Young and the RVH Litigation Office
- Page 228- email correspondence to and from Dr A Sands
- Page 237- 238 - Annotated statement of Prof. Young
- Page 298-314- Draft letters to Mr & Mrs Roberts

We have now included copies of the above documents in the attached file.

We apologise for the errors on our part, and we trust that you will accept our assurance that there was no intention to either mislead the Inquiry, or deliberately conceal the fact that there was additional documentation in respect of which privilege has been claimed by our client.

We confirm that you may forward a copy of this letter to the Interested Parties when you are re-issuing the Trust's Litigation file. We should also be obliged if you could confirm when you shall be issuing the Brangam and Bagnall copy papers?

Yours faithfully



Wendy Beggs  
Assistant Chief Legal Adviser