

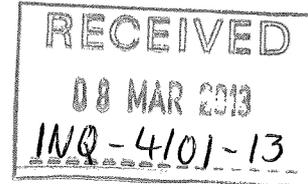
2 Franklin Street, Belfast, BT2 8DQ  
DX 2842 NR Belfast 3

Your Ref:  
AD-0541-13

Our Ref:  
HYP W50/1

Date:  
8<sup>th</sup> March 2013

Mrs Anne Dillon  
Solicitor to the Inquiry  
Arthur House  
41 Arthur Street  
Belfast  
BT1 4GB



Dear Madam,

**RE: INQUIRY INTO HYPONATRAEMIA RELATED DEATHS**

I refer to the above and your letter of 8<sup>th</sup> March 2013.

Please find enclosed copy revised schedule as requested. The documentation in respect of which a claim for privilege is being considered has been reduced to the following: -

3, 6 - 9, 17, 19, 20, 25, 26, 34, 37, 39, 40, 42 - 46, 51, 52, 53, 56, 57, 59, 63, 65, 66, 70 - 74, 78, 79, 83, 88, 89, 90, 94, 97, 99, 101b, 102, 103, 104, 108, 111, 112, 113, 114, 116 - 123, 125 - 129, 132, 133, 134, 138, 139, 142, 144, 145, 146, 147, 151, 153, 154, 155, 157, 159, 167, 170, 171, 173, 175, 176, 177, 179, 182, 184, 186 - 193, 203, 206, 211, 213, 214, 216 - 220, 223, 232, 237 and 242.

We will revert to you by 1pm on Monday confirming those documents over which a claim for privilege is to be made.

We appreciate your forbearance in this matter.

Yours faithfully

Joanna Bolton  
Solicitor Consultant

*Providing Support to Health and Social Care*



INVESTOR IN PEOPLE

## REVISED SCHEDULE DLS INQUEST FILE

1. Old file cover INQ/T50/9/15
2. New file cover
3. Email G McAlinden to A Duffy 23<sup>rd</sup> December 2002
4. Email T Brown to D Scott 18<sup>th</sup> December 2002
5. Email D Scott to T Brown 18<sup>th</sup> December 2002
6. Email G McAlinden to D Scott 18<sup>th</sup> December 2002 – 2 pages
7. Letter of advices G McAlinden to D Scott 7<sup>th</sup> October 2002 – 2 pages
8. Email D Scott to Admin 12<sup>th</sup> January 2004 enclosing email at 6 above.
9. **Consultation notes Counsel, Solicitor, Doctors 5<sup>th</sup> February 2003 – 3 pages**
10. Inquest Hearing notes 5<sup>th</sup> & 6<sup>th</sup> February 2003 – 62 pages
11. Folder of Altnagelvin Payments (letters & receipts) - 21 pages
12. File note – DLS dated 18<sup>th</sup> March 2003
13. Fax cover to Mr Leckey from DLS dated 28<sup>th</sup> February 2003 enclosing Letter to Mr Leckey from DLS dated 28<sup>th</sup> February 2003 – 2 pages
14. Telephone attendance with Coroner's office dated 28<sup>th</sup> February 2003
15. Telephone attendance with Coroner's office 17<sup>th</sup> February 2003
16. Fax cover to D. Scott from Mrs Burnside dated 12<sup>th</sup> February 2003 enclosing 1 page press statement by Altnagelvin Trust
17. Telephone attendances DLS - Trust, Counsel dated 4<sup>th</sup> February 2003  
Telephone attendance DLS - Coroner's office dated 4<sup>th</sup> February 2003 – 2 pages
18. Email to T. Brown from DLS dated 4<sup>th</sup> February 2003
19. Email from G McAlinden to D Scott 4<sup>th</sup> February 2003
20. Email to D. Scott from G. McAlinden enclosed sequence of events dated 4<sup>th</sup> February 2003 12 pages
21. Recorded delivery receipt to T Brown 3<sup>rd</sup> February 2003
22. Letter to Mrs Brown from DLS dated 3<sup>th</sup> February 2003
23. File note – DLS dated 31<sup>st</sup> January 2003
24. File note – DLS dated 31<sup>st</sup> January 2003
25. Consultation notes Counsel Solicitor Trust and nurses 6 pages
26. File note – DLS undated
27. Letter to D. Scott from Mr Leckey dated 31<sup>st</sup> January 2003
28. Fax to G. McAlinden from D. Scott dated 30<sup>th</sup> January 2003

- enclosing copy Jenkins report – 3 pages
29. Fax to D. Scott from Dr J Jenkins dated 30<sup>th</sup> January 2003 – 3 pages
  30. Letter to Mr Leckey from D. Scott dated 30<sup>th</sup> January 2003
  31. Fax to T. Brown from D. Scott dated 30<sup>th</sup> January 2003
  32. Fax to G. McAlinden from D. Scott dated 30<sup>th</sup> January 2003 – 3 pages
  33. Fax to DLS from Dr Jenkins' secretary dated 29<sup>th</sup> January 2003 – 3 pages
  34. Email to G. McAlinden from DLS dated 29<sup>th</sup> January 2003
  35. Fax to T. Brown from DLS dated 29<sup>th</sup> January 2003 – 3 page
  36. Fax transmission receipt – 29<sup>th</sup> January 2003 as per 34 above
  37. File note – DLS dated 29<sup>th</sup> January 2003
  38. Fax to DLS from Dr Jenkins' secretary dated 29<sup>th</sup> January 2003 enclosing copy report 3 pages
  39. Email to DLS from D. Warde dated 29<sup>th</sup> January 2003
  40. Email from DLS to D Warde dated 28<sup>th</sup> January 2003
  41. File note – DLS dated 29<sup>th</sup> January 2003
  42. Letter to Dr Warde from D. Scott dated 28<sup>th</sup> January 2003
  43. Email to D. Warde from DLS dated 28<sup>th</sup> January 2003
  44. DLS File note 28<sup>th</sup> January 2003
  45. Letter to Dr Jenkins from D. Scott dated 23<sup>rd</sup> January 2003
  46. Email to D. Scott from D. Warde dated 19<sup>th</sup> January 2003
  47. Telephone attendance with Coroner's office– DLS dated 23<sup>rd</sup> January 2003
  48. Letter to Mr Leckey from DLS dated 23<sup>rd</sup> January 2003 – enclosing statement
  49. Fax to Coroner's office from DLS dated 23<sup>rd</sup> January 2003 – 4 pages
  50. Telephone attendance with Coroner's office– DLS dated 23<sup>rd</sup> January 2003
  51. Telephone attendance with T Brown – DLS dated 22<sup>nd</sup> January 2003
  52. Telephone attendance with G McAlinden – DLS dated 21<sup>st</sup> January 2003
  53. Telephone attendance with G McAlinden – DLS dated 21<sup>st</sup> January 2003
  54. Fax to T. Brown from D. Scott dated 21<sup>st</sup> January 2003 enclosing Dr Warde's report – 9 pages
  55. Letter to T. Brown from D. Scott dated 20<sup>th</sup> January 2003
  56. Letter to G. McAlinden from D. Scott dated 20<sup>th</sup> January 2003
  57. Telephone attendance with T Brown – DLS dated 17<sup>th</sup> January 2003 - 2 pages
  58. Telephone attendance with Coroner 17<sup>th</sup> January 2003

59. Telephone attendance with G McAlinden 17<sup>th</sup> January 2003
60. Fax to T. Brown from DLS dated 16<sup>th</sup> January 2003 2 pages
61. Fax transmission receipt as per 59 above
62. Letter to Ms M C Carey from Mr Leckey dated 15<sup>th</sup> January 2003
63. Telephone attendance with Dr Warde – DLS dated 16<sup>th</sup> January 2003
64. Letter to Mr Leckey from M C Carey dated 13<sup>th</sup> January 2003
65. Telephone attendance Dr Warde & Trust – DLS dated 13<sup>th</sup> January 2003
66. Telephone attendance with T Brown – DLS dated 7<sup>th</sup> January 2003
67. Letter to D. Scott from Mr Leckey dated 2<sup>nd</sup> January 2003
68. Letter to Mr Leckey from D. Scott dated 23<sup>rd</sup> December 2002
69. Fax to D. Scott from T. Brown dated 19<sup>th</sup> December 2002
70. Email to DLS from G. McAlinden dated 23<sup>rd</sup> December 2002
71. Email to G. McAlinden from DLS dated 23<sup>rd</sup> December 2002
72. Email T Brown to DLS 18<sup>th</sup> December 2002
73. Email G McAlinden to DLS 18<sup>th</sup> November 2002 – 2 pages
74. Email G McAlinden from DLS dated 18<sup>th</sup> December 2002
75. Email to Donna Scott – from T Brown enclosing G McAlinden earlier email 18<sup>th</sup> December 2002
76. Letter to Mr Leckey from D. Scott dated 19<sup>th</sup> December 2002
77. Letter to T. Brown from DLS dated 26<sup>th</sup> November 2002
78. Telephone attendance with G McAlinden dated 18<sup>th</sup> December 2002
79. Letter to G. McAlinden from DLS dated 17<sup>th</sup> December 2002
80. Letter to D. Scott from T. Brown dated 28<sup>th</sup> November 2002
81. Telephone attendance DLS – Dr Jenkins' secretary dated 4<sup>th</sup> December 2002
82. Letter to M C Carey from Dr Jenkins dated 29<sup>th</sup> November 2002
83. Letter to Dr Warde from D. Scott dated 3<sup>rd</sup> December 2002 2 pages
84. Letter to T. Brown from D. Scott dated 3<sup>rd</sup> December 2002
85. Letter to Dr Jenkins from D. Scott dated 3<sup>rd</sup> December 2002
86. Letter to D. Scott from Mr Leckey dated 28<sup>th</sup> November 2002
87. Telephone attendance with Coroner's office dated 29<sup>th</sup> November 2002
88. Telephone attendance with T Brown dated 28<sup>th</sup> November 2002
89. Telephone attendance DLS – Dr Jenkins's Secretary and DLS – Dr Warde dated 27<sup>th</sup> November 2002
90. Telephone attendance DLS- T Brown dated 21<sup>st</sup> November 2002
91. **Telephone attendance DLS – Coroner's office dated 21<sup>st</sup> November 2002**

92. Telephone attendance DLS- Coroner's office dated 20<sup>th</sup> November 2002
- 93. Telephone Attendance DLS - Dr Jenkins' secretary dated 20<sup>th</sup> November 2002**
- 94. Telephone Attendance DLS - Dr Warde dated 20<sup>th</sup> November 2002**
95. Compliments slip Dr Jenkins 18<sup>th</sup> January 2002
96. Telephone attendance with Altnagelvin x 2 – DLS dated 19<sup>th</sup> November 2002
97. Telephone attendance Dr Warde – DLS dated 18<sup>th</sup> November 2002
98. Letter to D. Scott from Mr Leckey dated 14<sup>th</sup> November 2002
99. Telephone attendances with Counsel, Dr Jenkins, Dr Warde, Dr Jenkin's secretary DLS dated 15<sup>th</sup> November 2002 – 2 pages
100. Fax to M C Carey from Dr Jenkins dated 14<sup>th</sup> November 2002 – 1 page
101. Telephone attendances with Coroner-DLS dated 12<sup>th</sup> November 2002
- 101b. LA Telephone attendances with G McAlinden and Altnagelvin – DLS dated 12<sup>th</sup> November 2002 – 2 pages**
102. File note 12<sup>th</sup> November 2002 – 2 pages
103. Fax to D. Scott from T. Brown dated 11<sup>th</sup> November 2002 – 2 pages
104. Fax to G. McAlinden from D. Scott dated 12<sup>th</sup> November 2002 – 1 page
105. Telephone attendance with Coroner's office – DLS dated 12<sup>th</sup> November 2002
106. Letter to D. Scott from Mr Leckey dated 7<sup>th</sup> November 2002 – 2 pages
107. File note – DLS dated 8<sup>th</sup> November 2002
108. Telephone attendances DLS - T Brown, G McAlinden, Dr Warde dated 7<sup>th</sup> November 2002
- 109. Telephone attendances with John Leckey – DLS dated 7<sup>th</sup> November 2002**
110. Letter to Mr Leckey from D. Scott dated 6<sup>th</sup> November 2002 – 2 pages
111. Telephone attendance with Dr Warde – DLS undated
112. Email to DLS from Temple Street Children's Hospital dated 29<sup>th</sup> October 2002
113. File notes – DLS undated – 3 pages
114. Telephone attendance T Brown – DLS dated 4<sup>th</sup> November 2002
115. Letter to Dr Jenkins from M C Carey enclosed schedule of Documents dated 1<sup>st</sup> November 2002 – 2 pages

116. Consultation notes – Doctors undated – 3 pages
117. File note 30<sup>th</sup> October 2002
118. Telephone notes –Dr Jenkins, G McAlinden - DLS dated 30<sup>th</sup> October 2002
119. File notes – DLS undated – 2 pages
120. Telephone attendances T Brown, potential experts - dated 29<sup>th</sup> October 2002 – 3 pages
- 121. Telephone Attendance DLS- Dr Carson's secretary, T Brown dated 28<sup>th</sup> October 2002**
- 122. Telephone Attendance DLS - G McAlinden dated 28<sup>th</sup> October 2012**
- 123. Telephone Attendance DLS – Dr Carson's secretary dated 24<sup>th</sup> October 2002**
124. Letter to DLS from Coroner's Office dated 22<sup>nd</sup> October 2002
125. Telephone attendances with expert – DLS 18<sup>th</sup> October 2002
126. Telephone Attendance - Coroner's office dated 17<sup>th</sup> October 2002
- 127. Telephone attendance DLS - T Brown dated 17<sup>th</sup> October 2002**
- 128. Telephone attendance DLS - Coroner's office, G McAlinden Undated**
- 129. Telephone attendance DLS - T Brown, G McAlinden dated 15<sup>th</sup> October 2002**
130. Email to Dr Lynch from DLS dated 10<sup>th</sup> October 2002
131. Letter to T. Brown from D. Scott dated 8<sup>th</sup> October 2002
132. File note 7<sup>th</sup> October 2002
133. Telephone attendance with T Brown – 2<sup>nd</sup> October 2002
- 134. Telephone attendance DLS - T Brown dated 11 September 2002**
135. Telephone attendance with Coroner's office 6<sup>th</sup> September 2002.
136. Email to D. Scott from T. Brown dated 24<sup>th</sup> May 2002
137. Letter to DLS from T. Brown dated 24<sup>th</sup> May 2002
138. Telephone attendance G McAlinden 23<sup>rd</sup> May 2002
139. Telephone attendance T Brown 24<sup>th</sup> May
140. Email to T. Brown from D. Scott dated 24<sup>th</sup> May 2002
141. Letter to T. Brown from D. Scott dated 22<sup>nd</sup> May 2002
142. File note 21<sup>st</sup> May 2002
143. Letter to D. Scott from T. Brown enclosed statement from Dr Fulton dated 3<sup>rd</sup> May 2002 – 10 pages
144. Telephone with T Brown 11<sup>th</sup> April 2002
145. Consultation notes – Doctors undated – 2 pages
146. File note 8<sup>th</sup> April 2002
147. Telephone attendance G McAlinden 8<sup>th</sup> April 2002

148. Fax to G. McAlinden from DLS dated 8<sup>th</sup> April 2002 – enclosing letter from H Campbell 25<sup>th</sup> March 2002 & Mr Zafar statement 3<sup>rd</sup> April 2002– 4 pages
149. Letter to M C Carey from Mr Leckey dated 4<sup>th</sup> April 2002 – 2 pages
150. Fax to A. Cassidy from Mr Leckey dated 3<sup>rd</sup> April 2002 – 4 pages – enclosing case decision
151. **Telephone attendance DLS - G McAlinden dated 8<sup>th</sup> April 2002**
152. **Telephone attendance DLS - Coroner's office dated 8<sup>th</sup> April 2002**
153. **Telephone attendance DLS - G McAlinden dated 8<sup>th</sup> April 2002**
154. Letter to G. McAlinden from A. Cassidy dated 4<sup>th</sup> April 2002
155. Telephone attendance with T Brown 4<sup>th</sup> April 2002
156. Telephone attendance with Coroner 4<sup>th</sup> April 2002
157. Letter to G. McAlinden from A. Cassidy dated 3<sup>rd</sup> April 2002 – 2 pages
158. Telephone attendance with Mr Leckey dated 3<sup>rd</sup> April 2002 – 2 pages
159. Telephone attendance with T Brown dated 3<sup>rd</sup> April 2002 – 2 pages
160. Telephone attendance with Mr Leckey dates 3<sup>rd</sup> April 2002 – 2 pages
161. Telephone attendance with Mr Leckey date 3<sup>rd</sup> April 2002
162. File note 3<sup>rd</sup> April 2002
163. Letter to Mr Leckey from D. Scott dated 29<sup>th</sup> March 2002 – 4 pages
164. Letter to Mr Leckey from M C Carey dated 29<sup>th</sup> March 2002
165. Fax cover sheet to Mr Leckey from D. Scott dated 29<sup>th</sup> March 2002
166. Fax transmission receipt for 151 above
167. Telephone attendance G McAlinden 29<sup>th</sup> March 2002
168. Draft letter to Coroner undated – 6 pages
169. Email to T. Brown from DLS attached draft letter x 2 dated 28<sup>th</sup> March 2002 – 13 pages
170. Undated file note
171. Consultation notes Doctors dated 27<sup>th</sup> March 2002 – 4 pages
172. Undated file note
173. Telephone attendance T Brown, Dr Johnston 27<sup>th</sup> March 2002
174. Fax cover sheet to D. Scott from T. Brown dated 26<sup>th</sup> March 2002
175. Telephone attendance T Brown 21<sup>st</sup> March 2002
176. File note undated

177. Telephone attendance with T Brown 21<sup>st</sup> March
178. Letter to T. Brown from Mr Leckey dated 14<sup>th</sup> March 2002
179. Consultation notes Doctors dated 20<sup>th</sup> March 2002 – 7 pages
180. Email to T. Brown from DLS dated 19<sup>th</sup> March 2002
181. Letter to M C Carey from T. Brown dated 6<sup>th</sup> March 2002
182. Letter to G. McAlinden from M C Carey dated 14<sup>th</sup> March 2002
183. Letter to M C Carey from T. Brown dated 11<sup>th</sup> March 2002 - 2 pages
184. Telephone note 13<sup>th</sup> March 2002 – T Brown
185. Letter to T. Brown from Mr Leckey enclosed list of witnesses dated 12<sup>th</sup> March 2002
186. Telephone note G McAlinden 8<sup>th</sup> March 2002
187. Telephone note T Brown 8<sup>th</sup> March 2002
188. Telephone note 7<sup>th</sup> March 2002
189. Telephone note T Brown 6<sup>th</sup> March 2002
190. Letter to G. McAlinden from M C Carey dated 8<sup>th</sup> March 2002 –2 pages
191. Fax to G. McAlinden from M Carey dated 1<sup>st</sup> March 2002
192. File note undated
193. Telephone attendance with G McAlinden 1<sup>st</sup> March 2002
194. Telephone attendance with Coroner's office 28th February 2002
195. Letter to M C Carey from T. Brown dated 25<sup>th</sup> February 2002
196. Letter to T. Brown from Mr Leckey dated 20<sup>th</sup> February 2002
197. Letter to T. Brown from Mr Leckey dated 18<sup>th</sup> February 2002
198. Letter to Mr Leckey from T. Brown dated 25<sup>th</sup> February 2002
199. Letter to Mr Leckey from M C Carey dated 25<sup>th</sup> February 2002
200. Telephone notes – Coroner's office 19 Feb 2002
201. File note
202. Letter to M C Carey from T. Brown dated 18<sup>th</sup> February 2002
203. Letter to M C Carey from T. Brown dated 6<sup>th</sup> February 2002
204. Letter from C Jamison to T Brown enclosing amended statement 3<sup>rd</sup> February 2002
205. Letter to M C Carey from T. Brown dated 25<sup>th</sup> January 2002
206. Telephone notes to T. Brown undated – 3 pages
207. Letter to D. Scott from T. Brown dated 31<sup>st</sup> December 2001
208. Letter to D. Scott from T. Brown dated 21<sup>st</sup> December 2001
209. Letter to D. Scott from T. Brown dated 19<sup>th</sup> December 2001
210. Letter to D. Scott from T. Brown dated 7<sup>th</sup> December 2001
211. Telephone notes T Brown 22<sup>nd</sup> January 2002
212. Letter to D. Scott from T. Brown dated 8<sup>th</sup> November 2001
213. Consultation notes Dr Butler dated 11<sup>th</sup> June 2005
214. Cover sheet reports envelope
215. Brown envelope containing report from Dr Jenkins dated 27<sup>th</sup> January 2003 2 pages, Dr Jenkins 12 November 2002 2 pages,

- Dr Warde January 2003 - 7 pages
216. Letter to Dr Warde from D. Scott dated 3<sup>rd</sup> December 2002
  217. **Statement to T. Brown from Staff Nurse Ann Noble dated 14<sup>th</sup> June 2001**
  218. **Statement from SM Gilchrist dated 10<sup>th</sup> June 2001**
  219. Letter from Dr McCord dated 12<sup>th</sup> June 2001
  220. Statement to T. Brown from Dr Jamison dated 10<sup>th</sup> December 2001
  221. Amended statement to T. Brown from Dr Jamison dated 3<sup>rd</sup> February 2002
  222. Statement from Sr E Millar dated 15<sup>th</sup> June 2001
  223. Statement from Staff Nurse Michaela Rice dated 26<sup>th</sup> June 2001
  224. Letter to T. Brown from G. Nesbitt dated 14<sup>th</sup> November 2001
  225. Letter to T. Brown from Dr Morrison dated 6<sup>th</sup> December 2001
  226. Letter to T. Brown from Dr Date dated 12<sup>th</sup> December 2001
  227. Statement from Dr Trainor dated 15<sup>th</sup> December 2001
  228. Statement from Dr Johnston undated
  229. Statement from Mr Makar dated 16<sup>th</sup> January 2002
  230. Statement from Mr Gilliland dated 30<sup>th</sup> January 2002
  231. Statement from Dr Zafar dated 3<sup>rd</sup> April 2002
  232. Statement from Dr Gund undated
  233. Letter to Dr Campbell from G. Nesbitt dated 1<sup>st</sup> May 2002
  234. Letter to G. Nesbitt from Dr Campbell dated 10<sup>th</sup> May 2002
  235. RVH Department Neuropathology autopsy report Dr Herron 12 pages
  236. Deposition of Dr Johnston dated 5<sup>th</sup> February 2003
  237. Statement from Dr A Date undated
  238. Fax to M C Carey from T. Brown dated 8<sup>th</sup> April 2002 enc Zafar amended statement 3<sup>rd</sup> April 2002 – 2 pages
  239. Letter/statement to T. Brown from Dr Zafar dated 22<sup>nd</sup> March 2002
  240. CT Scan 9<sup>th</sup> June 2001 Dr CCM Morrison
  241. Statement from Mr Gilliland dated 30<sup>th</sup> January 2002
  242. Statement from Dr Jenkins dated 30<sup>th</sup> January 2003 – 2 pages
  243. Medicolegal Report by Edward Sumner dated February 2002 – 15 pages
  244. Statement from Dr Fulton dated 12<sup>th</sup> November 2002 – 18 pages

