

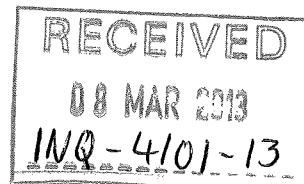
2 Franklin Street, Belfast, BT2 8DQ
DX 2842 NR Belfast 3

Your Ref:
AD-0541-13

Our Ref:
HYP W50/1

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

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

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

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

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

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

177. Telephone attendance with T Brown 21st March
178. Letter to T. Brown from Mr Leckey dated 14th March 2002
179. Consultation notes Doctors dated 20th March 2002 – 7 pages
180. Email to T. Brown from DLS dated 19th March 2002
181. Letter to M C Carey from T. Brown dated 6th March 2002
182. Letter to G. McAlinden from M C Carey dated 14th March 2002
183. Letter to M C Carey from T. Brown dated 11th March 2002 - 2 pages
184. Telephone note 13th March 2002 – T Brown
185. Letter to T. Brown from Mr Leckey enclosed list of witnesses dated 12th March 2002
186. Telephone note G McAlinden 8th March 2002
187. Telephone note T Brown 8th March 2002
188. Telephone note 7th March 2002
189. Telephone note T Brown 6th March 2002
190. Letter to G. McAlinden from M C Carey dated 8th March 2002 –2 pages
191. Fax to G. McAlinden from M Carey dated 1st March 2002
192. File note undated
193. Telephone attendance with G McAlinden 1st March 2002
194. Telephone attendance with Coroner's office 28th February 2002
195. Letter to M C Carey from T. Brown dated 25th February 2002
196. Letter to T. Brown from Mr Leckey dated 20th February 2002
197. Letter to T. Brown from Mr Leckey dated 18th February 2002
198. Letter to Mr Leckey from T. Brown dated 25th February 2002
199. Letter to Mr Leckey from M C Carey dated 25th February 2002
200. Telephone notes – Coroner's office 19 Feb 2002
201. File note
202. Letter to M C Carey from T. Brown dated 18th February 2002
203. Letter to M C Carey from T. Brown dated 6th February 2002
204. Letter from C Jamison to T Brown enclosing amended statement 3rd February 2002
205. Letter to M C Carey from T. Brown dated 25th January 2002
206. Telephone notes to T. Brown undated – 3 pages
207. Letter to D. Scott from T. Brown dated 31st December 2001
208. Letter to D. Scott from T. Brown dated 21st December 2001
209. Letter to D. Scott from T. Brown dated 19th December 2001
210. Letter to D. Scott from T. Brown dated 7th December 2001
211. Telephone notes T Brown 22nd January 2002
212. Letter to D. Scott from T. Brown dated 8th November 2001
213. Consultation notes Dr Butler dated 11th June 2005
214. Cover sheet reports envelope
215. Brown envelope containing report from Dr Jenkins dated 27th 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 3rd December 2002
217. **Statement to T. Brown from Staff Nurse Ann Noble dated 14th June 2001**
218. **Statement from SM Gilchrist dated 10th June 2001**
219. Letter from Dr McCord dated 12th June 2001
220. Statement to T. Brown from Dr Jamison dated 10th December 2001
221. Amended statement to T. Brown from Dr Jamison dated 3rd February 2002
222. Statement from Sr E Millar dated 15th June 2001
223. Statement from Staff Nurse Michaela Rice dated 26th June 2001
224. Letter to T. Brown from G. Nesbitt dated 14th November 2001
225. Letter to T. Brown from Dr Morrison dated 6th December 200
226. Letter to T. Brown from Dr Date dated 12th December 2001
227. Statement from Dr Trainor dated 15th December 2001
228. Statement from Dr Johnston undated
229. Statement from Mr Makar dated 16th January 2002
230. Statement from Mr Gilliland dated 30th January 2002
231. Statement from Dr Zafar dated 3rd April 2002
232. Statement from Dr Gund undated
233. Letter to Dr Campbell from G. Nesbitt dated 1st May 2002
234. Letter to G. Nesbitt from Dr Campbell dated 10th May 2002
235. RVH Department Neuropathology autopsy report Dr Herron 12 pages
236. Deposition of Dr Johnston dated 5th February 2003
237. Statement from Dr A Date undated
238. Fax to M C Carey from T. Brown dated 8th April 2002 enc Zafar amended statement 3rd April 2002 – 2 pages
239. Letter/statement to T. Brown from Dr Zafar dated 22nd March 2002
240. CT Scan 9th June 2001 Dr CCM Morrison
241. Statement from Mr Gilliland dated 30th January 2002
242. Statement from Dr Jenkins dated 30th January 2003 – 2 pages
243. Medicolegal Report by Edward Sumner dated February 2002 – 15 pages
244. Statement from Dr Fulton dated 12th November 2002 – 18 pages

