



Business Services  
Organisation

## Directorate of Legal Services

PRAGNITIONERS IN LAW TO THE  
HEALTH & SOCIAL CARE SECTOR

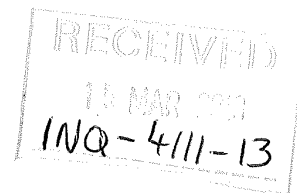
2 Franklin Street, Belfast, BT2 8DQ  
DX 2842 NR Belfast 3

Your Ref:

Our Ref:  
HYP W50/1

Date:  
14 March 2013

Mrs Bernie Conlon  
Secretary to the Inquiry  
Arthur House  
41 Arthur Street  
Belfast  
BT1 4GB



Dear Madam,

### RE: INQUIRY INTO HYPONATRAEMIA RELATED DEATHS-RAYCHEL FERGUSON

I refer to the above matter and now enclose copy Index relating to the file held by Brangam Bagnall & Co in respect of the Raychel Ferguson Inquest. As you are aware Brangam Bagnall & Co were instructed by the then Royal Group of Hospitals & Dental Hospital Health and Social Services Trust.

I confirm that a claim based on Legal Advice Privilege is made in respect of the following documents: -

4, 5, 6, 9, 10, 11, 12, 13, 14, 15, 29, 30, 35, 36, 38, 40, 52, 53, 58, 59, 61 and 63.

I shall forward a copy of the file, excluding the abovementioned documentation, to you in due course.

Yours faithfully

Joanna Bolton  
Solicitor Consultant

*Providing Support to Health and Social Care*



INVESTOR IN PEOPLE

Raychel Ferguson

Inquest File DLS/Brangam Bagnall & Co – [client Belfast Health and Social Care Trust]

1. New file cover INQ B004/003
2. Medical Records index - blank
3. Brown envelope with index of statements and containing deposition of Mr Makar
4. Letter to Mr Brangam from Counsel Mark Robinson dated 25<sup>th</sup> September 2002 – 4 pages
5. Counsel Fee note Mark Robinson 25<sup>th</sup> September 2002
6. Letter to Mr Brangam from Counsel Gareth McCullagh dated 14<sup>th</sup> February 2003 – 2 pages
7. Letter to Mr Brangam from Belfast Trust dated 21<sup>st</sup> July 2004
8. Letter to Belfast Trust from Brangam Bagnall & Co dated 20<sup>th</sup> July 2004
9. Letter to Mr McCullagh from Brangam Bagnall & Co enclosing cheque dated 2<sup>nd</sup> May 2003
10. Remittance advice 1<sup>st</sup> May 2003
11. Letter to Belfast Trust from Brangam Bagnall & Co dated 17<sup>th</sup> April 2003
12. Letter to Belfast Trust from Brangam Bagnall & Co dated 10<sup>th</sup> April 2003
13. Internal Memo dated 9<sup>th</sup> April 2003
14. Letter to Mr McCullagh from Mr Brangam dated 20<sup>th</sup> February 2003
15. Letter to Mr Walby from Mr Brangam dated 20<sup>th</sup> February 2003
16. Letter to Mr Brangam from Mr Walby dated 17<sup>th</sup> February 2003
17. Letter to Mr Walby from Mr Brangam dated 31<sup>st</sup> January 2003 – 2 pages
18. Letter to Mr Brangam from Mr Walby dated 26<sup>th</sup> January 2003
19. Letter to Belfast Trust from Brangam Bagnall & Co dated 3<sup>rd</sup> February 2003
20. Letter to Mr Brangam from Litigation Management Office (Royal Hospitals) dated 31<sup>st</sup> January 2003
21. Letter to Mr Walby from Mr Brangam dated 31<sup>st</sup> January 2003
22. Courts Service compliments slip 22<sup>nd</sup> January 2003
23. Letter to Mr Leckey from Mr Brangam dated 16<sup>th</sup> January 2003
24. Letter to Mr Walby from Mr Brangam dated 16<sup>th</sup> January 2003
25. Internal memo dated 2<sup>nd</sup> January 2003
26. Letter to Mr Brangam from Mr Walby dated 16<sup>th</sup> December 2002
27. Fax cover sheet to Mr Brangam from Litigation Management Office (Royal Hospitals) dated 12<sup>th</sup> December 2002
28. Telephone attendance with Belfast Trust dated 12<sup>th</sup> December 2002
29. Letter to Mr Robinson from Brangam Bagnall & Co enclosing cheque dated 19<sup>th</sup> November 2002
30. Remittance advice 14<sup>th</sup> November 2002
31. Email to Brangam Bagnall & Co from Royal Hospitals dated 13<sup>th</sup> November 2002 and internal office email dated 13<sup>th</sup> November 2002.
32. Email to Brangam Bagnall & Co from Royal Hospitals dated 13<sup>th</sup> November 2002 as per 31 above.
33. Internal memo dated 15<sup>th</sup> November 2002
34. Telephone attendance with Coroner's office & file note dated 8<sup>th</sup> November 2002
35. Letter to Mr Walby from Brangam Bagnall & Co dated 24<sup>th</sup> October 2002
36. File note dated 17<sup>th</sup> October 2002
37. Letter to Mr Walby from Mr Brangam dated 23<sup>rd</sup> September 2002
38. Letter to Mr Robinson from Mr Brangam dated 23<sup>rd</sup> September 2002

39. Email to Mr Brangam from Mr Bowles dated 11<sup>th</sup> September 2002
40. Fax cover sheet to Mr Robinson from Brangam Bagnall & Co dated 10<sup>th</sup> September 2002
41. Letter to Mr Brangam from Mr Walby dated 9<sup>th</sup> September 2002
42. Letter to Belfast Trust from Mr Leckey dated 4<sup>th</sup> April 2002
43. Letter to Belfast Trust from Mr Leckey dated 11<sup>th</sup> December 2001
44. New file requisition sheet 10<sup>th</sup> September 2002
45. Brangam Bagnall & Co folder RCH/1/65/GB (enclosing medical records index, file details index, empty brown envelope with statement index)
46. Brown envelope with index of staff/Medical experts - empty
47. Medicolegal Report by Edward Sumner dated February 2002 19 pages x 3
48. PSNI Statement of Witness – Peter Crean
49. Report of Clodagh Loughrey 24<sup>th</sup> October 2001 4 pages
50. Department of Neuropathology Autopsy Report 8 pages
51. Department of Neuropathology Autopsy Report 8 pages (plus one additional copy of the last two pages of the Autopsy Report)
52. File notes from Brangam Bagnall & Co – 2 pages
53. Fax to Mr McCullagh from Brangam Bagnall & Co dated 6<sup>th</sup> February 2003 enclosing Depositions of Mrs Ferguson, Dr Jenkins, Dr McCord, Dr Gund, Dr Trainor, Dr Nesbitt, Dr Johnston, Mr Gilliland, Dr Jamison, S/N Rice, Sister Millar, S/N Noble, 35 pages
54. Deposition of Staff Nurse Sandra Gilchrist dated 5<sup>th</sup> February 2003 – 3 pages
55. Deposition of Dr R Fulton dated 6<sup>th</sup> February 2003- 17 pages
56. List of witnesses for Inquest hearing dated 5<sup>th</sup> February 2003
57. Letter from Henrietta Campbell (Dr) dated 25<sup>th</sup> March 2002
58. Fax to Mr Robinson from Brangam Bagnall & Co dated 10<sup>th</sup> September 2002 – 17 pages enclosing Letter dated 9<sup>th</sup> September 2002 P Walby to BB&Co, Letter Coroner to Belfast Trust dated 4<sup>th</sup> April 2002 & 11<sup>th</sup> December 2001, PSNI Statement Peter Crean, Clodagh Loughrey Report 24<sup>th</sup> October 2001, Autopsy Report
59. Draft Statement for PSNI from Dr Caroline Stewart dated January 2005
60. Medical Report by Edward Sumner dated 22<sup>nd</sup> January 1996 064-027-071
61. Brief of Mr McCullagh from Brangam Bagnall & Co including fax and documents at 53 above dated 6<sup>th</sup> February 2003 – 35 pages , Deposition of Mr Zafar, Deposition of Dr Herron, Deposition of Dr Sumner.
62. BMJ article 2 pages, BMJ medical article – 5 pages.
63. Undated file note
64. PSNI Statement of Witness – Dr Anthony Chisakuta dated 2<sup>nd</sup> February 2005
65. Typed Attendance note 6<sup>th</sup> February 2003 – 7<sup>th</sup> February 2003 – 22 pages.