



Business Services
Organisation

Directorate of Legal Services

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

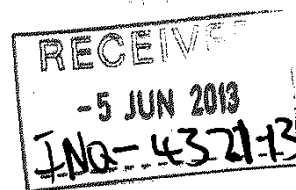
2 Franklin Street, Belfast, BT2 8DQ
DX 2842 NR Belfast 3

Your Ref:
BMCL-0053-13

Our Ref:
HYP W50/02

Date:
4th June 2013

Mr B McLoughlin
Assistant Solicitor to the Inquiry
Arthur House
41 Arthur Street
Belfast
BT1 4GB



Dear Mr McLoughlin,

**RE: INQUIRY INTO HYPONATRAEMIA RELATED DEATHS - RAYCHEL FERGUSON
PRELIMINARY**

I refer to your letter dated 30th January 2013 and our subsequent replies of 25th April 2013 and 4th June 2013. Further to your request at 4 thereof I now enclose an index of the file held by the DLS (INQ T59/9/2) in respect of Lucy Crawford Inquest.

I now enclose an Index in respect of this file which identifies the documentation over which the Trust asserts a claim of legal advice privilege. We will arrange to copy and redact the remainder of the documentation listed on that Index and provide same to you as soon as possible.

Please accept my apologies for the delay in providing this documentation to you.

Yours faithfully

Joanna Bolton
Solicitor Consultant

Providing Support to Health and Social Care



INVESTOR IN PEOPLE

LUCY CRAWFORD – DLS INQUEST FILE

NUMBER	DATE	DOCUMENT	LP CLAIMED
1.		New File Cover – INQ T59/9/2	
2.	01.10.04	Fax to Donna Scott enclosing draft press statement 3pages	(LA)
3.	06.09.04	Email Donna Scott to DLS Internal - Enclosing – email SLT to DS enclosing News Article 4pages	
4.	17.02.04	Handwritten Notes – Inquest Hearing 40pages	
5.	16.02.04	Email DLS to Mr Leckey	
6.	16.02.04	Email – Murnaghan Fee to Coroner, Coroner to DS, Internal DLS, DLS to SLT 2pages	
7.	16.02.04	Email – MF to Coroner, Coroner to DLS, DLS Internal	
8.	16.02.04	Email – MF to Coroner, Coroner to DLS, DLS Internal, DLS to K Doherty 2pages	
9.	16.02.04	Fax DLS to Patrick Good (counsel) 1page	(LA)
10.	16.02.04	Fax Transmission DLS to P. Good (Counsel)	(LA)
11.	16.02.04	Email DLS Internal, John Leckey to DS, Kevin Murnaghan to John Leckey	
12.	Feb 04	Press Statement	
13.	16.02.04	Telephone Attendance DLS Internal	
14.	16.02.04	Compliments from Westcare Business Services	
15.	11.02.04	Letter Kevin Doherty to Mr Maxwell x2	
16.	13.02.04	File Note	
17.	13.02.04	Fax Donna Scott to Kevin Doherty + Fax Transmission 2pages	
18.	13.02.04	Telephone Attendance Note – DLS/K Murnaghan, File Note, Telephone attendance DS to MF x2	

LUCY CRAWFORD – DLS INQUEST FILE

19.	12.02.04	Telephone Attendance Note DS & Coroner	
20.	11.02.04	Telephone Attendance Note – DLS/Counsel	(LA)
21.	13.02.04	Letter DLS to Mr Leckey	
22.	13.02.04	Fax Confirmation of letter at no.21 above	
23.	13.02.04	Telephone Attendance Note – DLS/Coroner's Office	
24.	12.02.02	Fax Kevin Doherty to Donna Scott	
25.	12.02.04	Compliments Slip – Coroner's Office	
26.	12.02.04	Fax DLS to Patrick Good BL 2pages	(LA)
27.	12.02.04	Fax DLS to Kevin Doherty 2pages	
28.	12.02.04	Telephone Message DLS/Coroner	
29.	11.02.04	Fax DLS to Patrick Good BL 2pages	(LA)
30.	11.02.04	Telephone Message DLS/Coroner	
31.	11.02.04	Letter Donna Scott to Mr Leckey	
32.	10.02.04	Fax Court Service to Donna Scott enclosing document "Steps taken to try and trace Dr Malik" 3pages	
33.	09.02.04	Telephone Attendance Note DLS/K Doherty	
34.	05.02.04	Consultation Notes 7pages	(LA)
35.	04.02.04	Letter DLS to Patrick Good BL	(LA)
36.	22.01.04	Letter DLS to Patrick Good BL – with note Counsel/DLS	(LA)
37.	03.02.04	Telephone Attendance Note DLS/K Doherty	
38.	03.02.04	Telephone Message DLS/K Doherty	
39.	27.01.04	Compliments Slip from Appeals & Lists Office (enclosing Letter from Murnaghan & Fee Solicitors 23.01.04) enclosing Jenkins Report 3pages	
40.	28.01.04	Letter DLS to Kevin Doherty	
41.	27.01.04	File Note – Internal DLS	

LUCY CRAWFORD – DLS INQUEST FILE

42.	06.01.04	Telephone Attendance Note with DLS/Dr Jenkin's Office	
43.	20.01.04	Letter Mr Leckey to Donna Scott	
44.	17.02.04	List of Witnesses	
45.	22.01.04	Letter DLS to Patrick Good BL	(LA)
46.	22.01.04	Telephone Attendance Note KD/DLS	(LA)
47.	21.01.04	Telephone Message DLS/KD	(LA)
48.	21.01.04	Letter Donna Scott to Kevin Doherty	
49.	21.01.04	Index for Reports x2	
50.	20.01.04	Telephone Message DLS/K Doherty	(LA)
51.	19.01.04	Letter DLS to Kevin Doherty	
52.	16.01.04	Letter Mr Leckey to Donna Scott	
53.	19.01.04	Telephone Attendance Note DLS/K Doherty	
54.	16.01.04	Telephone Message DLS/Coroner	
55.	16.01.04	Telephone Message DLS Internal, DLS to MF, DLS to KD	(LA)
56.	16.01.04	Email Bridget O'Rawe to Jim Kelly, Jim Kelly to B O'Rawe, B O'R to KD, KD to DS 2pages	
57.	15.01.04	Email Kevin Doherty to Donna Scott	
58.	15.01.04	Letter Donna Scott to Mr Leckey	
59.	15.01.04	Letter Donna Scott to Kevin Doherty	(LA)
60.	17.02.04	Compliments Slip - Witness List 2pages	
61.	14.01.04	Letter Mr Leckey to Donna Scott	
62.	15.01.04	Attendance Note	
63.	15.01.04	Letter DLS to Kevin Doherty	
64.	14.01.04	Fax DLS to Patrick Good BL 2pages	(LA)
65.	14.01.04	File Note, Telephone Attendance DS/Counsel, DS, Bridget O'Rawe, DS K. Doherty	(LA)

LUCY CRAWFORD – DLS INQUEST FILE

66.	13.01.04	Letter Coroner's Office to Donna Scott	
67.	09.01.04	Letter Mr Leckey to Donna Scott	
68.	13.01.04	Fax Confirmation DLS to Patrick Good BL	(LA)
69.	13.01.04	Fax DLS to Patrick Good BL	(LA)
70.	13.01.04	Telephone Message DLS/Coroner's Office	
71.	09.01.04	Letter Litigation Services to DLS	
72.	07.01.04	Attendance Note	
73.	15.12.03	Compliments Slip	
74.	15.12.03	Telephone Message	
75.	12.12.03	Fax Litigation Services to Donna Scott enclosing draft statement Dr O'Donohoe 2pages	(LA) – only handwritten advice on statement
76.	26.11.03	Telephone Message	
77.	25.11.03	Fax Kevin Doherty to DLS enclosing letter Coroner to Jim Kelly 2pages	
78.	25.11.03	Letter DLS to Kevin Doherty	
79.	25.11.03	Fax DLS to Kevin Doherty 2pages	
80.	24.11.03	File Note	
81.	18.11.03	Letter Mr Leckey to Donna Scott	
82.	05.11.03	Letter Donna Scott to Kevin Doherty	
83.	05.11.03	Letter Donna Scott to Mr Leckey	
84.	05.11.03	File Note	(LA)
85.	05.11.03	Telephone Message DLS/KD 2pages	(LA)
86.	23.10.03	Letter Litigation Services to DLS with Internal DLS Note	(LA)
87.	03.11.03	Letter Mr Leckey to Donna Scott	
88.	Undated	File Note	(LA)
89.	29.10.03	Telephone Message DLS/KD	(LA)
90.	14.10.03	Letter Kevin Doherty to Donna Scott	(LA)
91.	15.10.03	Telephone Attendance Note DLS/KD	(LA)

LUCY CRAWFORD – DLS INQUEST FILE

92.	07.10.03	Telephone Message DLS/KD	(LA)
93.	07.10.03	Telephone Message DLS/KD	
94.	06.10.03	File Note, Telephone Call DS/KD 4pages	(LA)
95.	02.09.03	Telephone Message DLS/Westcare	
96.	24.07.03	Telephone Message	
97.	07.07.03	Telephone Attendance DLS/Westcare	
98.	02.07.03	Email Kevin Doherty to DLS, Jim Kelly to KD, KD to JK 2pages	
99.	07.01.04	Fax Dr O'Donohoe to Kevin Doherty	
100.	02.02.03	Pediatrics Article 4pages	
101.	07.03.03	Letter Dr Holmes to Dr Kelly 2pages	
102.	12.04.00	Handwritten Notes 3pages	
103.	12.04.00	Handwritten Notes 3pages	
104.	Undated	Coroner's Preliminary Statement x3 6pages	
105.	17.02.04	Coroners Certificate x2 4pages	
106.	Undated	Deposition Dr Aisling Kirby 2pages	
107.	Nov 03	Ulster Medical Journal Article 4pages	
108.	21.04.00	Letter Eugene Fee to Nurse McCaffrey 2pages	
109.	10.09.03	Witness Statement S/N Siobhan MacNeill x2 4pages	
110.	08.10.03	2 nd Witness Statement S/N Swift x2 4pages	
111.	16.09.03	1 st draft Witness Statement S/N Swift x2 4pages	
112.	11.09.03	Witness Statement S/N Teresa McCaffrey 2pages	
	24.04.00	T McCaffrey Handwritten Statement 2pages	
	21.04.00	Letter to Nurse McCaffrey from Eugene Fee 2pages	

LUCY CRAWFORD – DLS INQUEST FILE

	11.09.03	Witness Statement S/N Teresa McCaffrey 2pages	
	27.04.00	T McCaffrey Handwritten Statement 2pages	
	10.10.03	2 nd Witness Statement S/N Teresa McCaffrey x2 4pages	
113.	11.09.03	Letter to Eugence Fee from S/N Jones enclosing Witness Statement S/N Jones x2 6pages	
	17.10.03	2 nd Witness Statement S/N Jones x2 4pages	
114.	20.09.03	Witness Statement S/N McManus x2 4pages	
	10.10.03	2 nd Witness Statement S/N McManus x2 4pages	
115.	14.04.00	Post Mortem Report 12pages	
116.	07.03.02	Medical Report Dr Jenkins 3pages	
117.	06.02.04	Medical Report Dr Jenkins 3pages	
118.	18.02.01	Report Dr Evans 12pages	
119.	22.04.03	Report Edward Sumner 7pages	
120.	17.02.04	Deposition Mae Crawford 5pages	
121.	17.02.04	Deposition Dr Edward Sumner	
122.	17.02.04	Deposition Dr Peter Crean 2pages	
123.	17.02.04	Deposition Dr Hanrahan 4pages	
124.	17.02.04	Deposition S/N Jones 2pages	
125.	17.02.04	Deposition S/N McManus 2pages	
126.	17.02.04	Deposition S/N McCaffrey 2pages	
127.	17.02.04	Deposition S/N Swift 2pages	
128.	17.02.04	Deposition Dr Auterson 3pages	

LUCY CRAWFORD – DLS INQUEST FILE

129.	17.02.04	Deposition Dr O'Donohoe 2pages	
130.	17.02.04	Deposition Dr Caroline Gannon	
131.	17.02.04	Deposition Dr Evans	
132.	17.02.04	Deposition Dr Jenkins	
133.	12.02.04	Fax Letter Dr Malik to Mrs Miller 2pages	
134.		Brown Envelope with Index of Statements & Reports	
135.	10.12.03	Fax to Donna Scott enclosing copy extract from Medical Journal 3pages	
136.	24.08.03	1 st draft Letter Dr O'Donohoe to Dr Kelly x2 4pages	
137.	20.04.00	Witness Statement – Dr Auterson x3 (2 draft + 1 amended) 8pages	
138.	11.06.04	Fax cover sheet to DS enclosing Letter to Mr Leckey from Dr Geoff Nesbitt, Dr Nesbitt from Mr Leckey, Mr Leckey from G.N, G.N from Mr Leckey 7pages	
139.	27.01.04	File Note	
140.	19.02.04	Consultation Note	(LA)
141.		Old File Cover – INQT59/9/02	
142.	Undated	Draft Deposition Dr Kirby x2 4pages	
143.	17.02.04	Draft Deposition Mae Crawford 5pages	
144.	Undated	Copy of RBHSC Notes 27pages	
145.	Undated	Copy of Erne Hospital Notes 81pages	
146.	13.02.04	Fax Copy of RBHSC Notes 14pages	
147.	13.02.04	Fax Copy of RBHSC Notes 38pages	
148.	13.02.04	Fax Copy of RBHSC Notes 27pages	
149.	Undated	DLS List of Files for Destruction	