

The Inquiry into Hyponatraemia-related Deaths

Chairman: Mr John O'Hara QC

Ms Wendy Beggs
Assistant Chief Legal Adviser
Directorate of Legal Services
2 Franklin Street
BELFAST
BT2 8DQ

Your Ref:

Our Ref: BMcL-0124-13

Date: 18th July 2013

Dear Ms Beggs,

Re: RAYCHEL FERGUSON (LUCY CRAWFORD AFTERMATH)

Thank you for your letter of 4 July attaching index and documents relating to the DLS litigation file.

We note from the index that 3 designations have been used in the column "LP CLAIMED". These are , respectively, LLP, LA, and LP. For the avoidance of doubt can you please confirm what each of these designations means. We assume that LA signifies "legal advice" and that LP may signify "litigation privilege". But for the avoidance of doubt please confirm what each of the three designations means.

Copies of the statement of claim, notice of further and better particulars, defence, and replies to particulars, have not been provided. Why not? Please provide copies of these documents.

Document number 39 is described in the index as "undated WHSSB statement and SPLT statement dated 25/03/2004". While the Sperrin Lakeland Trust has previously disclosed to the Inquiry its press statement dated 25/03/2004, I can find no record of the Inquiry having previously received the "undated WHSSB statement" from the WHSSB. Can you please take instructions on the following questions from the WHSSB's successor, the HSCB. Does the HSCB or its predecessor have records relating to this statement? Who was the author of this statement? Was it issued? If this document has previously been disclosed to the Inquiry please identify when this was done. If it has not, please explain why not, and provide full disclosure of the WHSSB records relating to this document, its preparation and its issue.

Secretary: Bernie Conlon

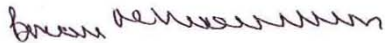
Arthur House, 41 Arthur Street, Belfast, BT1 4GB

Email: inquiry@ihrdni.org **Website:** www.ihrdni.org **Tel:** 028 9044 6340 **Fax:** 028 9044 6341

Document number 206 is described in the index as "24/08/2001 telephone attendance - DLS to Coroners Office". However no copy of this document is contained in the bundle. Please provide a copy of this document.

May I have a response please by 1st August 2013.

Yours sincerely,

A handwritten signature in dark ink, appearing to read "Brian McLoughlin", with a stylized, wavy line extending from the end.

Brian McLoughlin
Assistant Solicitor to the Inquiry