

## The Inquiry into Hyponatraemia-related Deaths

Chairman: Mr John O'Hara QC

Ms Wendy Beggs  
Director of Legal Services  
2 Franklin Street  
BELFAST  
BT2 8DQ

Your Ref: NSCB04/1  
NCSW50/1

Our Ref: AD-0573-13

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

Dear Ms Beggs,

**Re Raychel Ferguson**

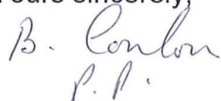
I refer to the above. The Chairman has granted Interested Party status to Mrs. Therese Brown. This relates in particular to her role or possible role in events after Raychel's death including the meeting with the Ferguson family in September 2001 and the inquest.

The Inquiry is now in a position to release witness statement requests in relation to the Raychel Ferguson governance segment of the Inquiry. However, before doing so I will require an undertaking from DLS that Mrs. Browne will only have access to her own statement and will not in any way be involved in the distribution of other statements or assist with the preparation and return of any witness statement other than her own. In the circumstances and in the interests of propriety and fairness, I will also require an undertaking from DLS that Ms. Brown will not have access to anyone else's witness statement, save as and when they are released by the Inquiry to the Interested Parties.

These undertakings are sought because the Chairman believes that it is entirely inappropriate for a person who is herself an interested party to be involved in or responsible for the arrangements made within the Trust for these various matters. It does not follow that any criticism will be made of Mrs. Brown and the Chairman will not form a view on that before hearing and considering all the evidence. However for so long as there is a possibility of such criticism it is appropriate for another individual to take over the role which Mrs. Brown filled during the clinical hearing.

I should be grateful if you would let me have those undertakings as soon as possible so that no delay is caused to the preparation of the Raychel Ferguson governance evidence in advance of oral hearings.

Yours sincerely,



Anne Dillon  
Solicitor to the Inquiry

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