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Witness	Statement	Ker.	INO.

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NAME OF CHILD: A	aam	Strain
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Name: Stephen Brown

Title: Consultant Paediatric Surgeon (retired)

Present position and institution:

Previous position and institution:

[Since your Witness Statement of 23rd September 2011]

Membership of Advisory Panels and Committees:

[Identify by date and title all of those since your Witness Statement of 23rd September 2011]

Previous Statements, Depositions and Reports:

[Identify by date and title all those since your Witness Statement of 23rd September 2011]

OFFICIAL USE:

List of previous statements, depositions and reports:

Ref:	Date:	
059-060	20.12.1995	Statement
007/1	15.07.2005	Inquiry Witness Statement
093-011	04.09.2006	PSNI Statement
007/2	25.03.2011	Second Inquiry Witness Statement
007/3	23.09.2011	Third Inquiry Witness Statement

IMPORTANT INSTRUCTIONS FOR ANSWERING:

Please attach additional sheets if more space is required. Please identify clearly any document to which you refer or rely upon for your answer. If the document has an Inquiry reference number, e.g. Ref. 049-001-001 which is 'Chart No.1 Old Notes', then please provide that number.

If the document does not have an Inquiry reference number, then please provide a copy of the document attached to your statement.

I. QUERIES ARISING OUT OF AN OPERATION ON ADAM STRAIN DATED 29TH MAY 1992

With reference to the operation notes dated 29th May 1992 (Ref: 053-015-052), please provide clarification and/or further information in respect of the following:

- (1) "Surgeon: Mr W A McCallion/Mr R J Stewart/Mr S Brown" (Ref: 053-015-052)
 - (a) Describe your role and responsibilities in Adam's surgical procedure of 29th May 1992 and that of "Mr. WA McCallion" and "Mr. RJ Stewart".

To the best of my recollection the insertion of the broviac line was carried out by Mr McCallion assisted by Mr Stewart. My role was to carry out a cystoscopy (I apologise that this procedure was not listed in the operations I carried out on Adam previously reported). I had no role in inserting the broviac line

- (2) "1) Insertion Broviac Line into left common facial vein. Transverse cervical incision. Left common facial vein identified, entering left internal jugular. Left common facial ligated with 5 X 0 PDS. Broviac line tunnelled from anterior chest wall using Westminster and inserted into common facial vein and then internal jugular. Check X-ray confirmed tip of broviac line in proximal SBC. Neck wound closed in layers of 5 X 0 PDs and wound anterior chest wall closed 5 X 0 PDs." (Ref: 053-015-052)
 - (a) State exactly where incisions were made on Adam's neck to insert the Broviac line, illustrating with a diagram if helpful, and explain the purpose of each incision.

As I was not involved in the procedure I cannot comment

(b) Explain what, if anything was done with the left internal jugular vein during this procedure and explain the reasons.

I cannot comment on this as I did not do the operation, but on the basis of the notes made, the Internal Jugular vein would not have been interfered with

(c) Describe the qualities of the " 5×0 PDS" sutures which were used to ligate the left common facial vein.

I do not understand the question. If technical specifications of PDS are required I suggest you apply to the manufacturers. If you asking if the PDS ligatures would still be present a year or two later, my opinion would be that it would not

- (d) State for how long the Broviac line remained in place, and in particular, state whether or not it was:
 - (i) Removed on 9th February 1995 (Ref: 057-102-189)

The chart contains a note to that effect. I cannot comment further

(ii) Still in place at the time of Adam's renal transplant operation on 27th November 1995

Not relevant

(e) Describe what you knew of the state of Adam's left internal jugular vein as at 27th November 1995 and explain the reasons why.

I have no knowledge of this

(f) In Dr. Alison Armour's report of her autopsy on 29th November 1995 (Ref: 011-010-034), she states that there was "a suture in situ on the left side of the neck at the junction of the internal jugular vein and the sub-clavian vein" (Ref: 011-010-039). Please comment generally on this statement, and explain the reasons for your answer.

I know nothing of this

(i) In particular, state if you are aware of any procedure carried out on Adam in which his left internal jugular vein would have been sutured. If so, identify the procedure, where it is noted in Adam's medical notes, and explain the reasons for your answer.

I have no knowledge of this

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THIS STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF					
Signed:	Dated: 20th December 2011				