

<p>1 (10:00am) Thursday, 29 June 2017. 2 PROCEEDINGS 3 THE CORONER: Yes, good morning. 4 COUNSEL TO THE INQUESTS: Sir, this is effectively a resumed 5 PIR because, as you will be aware, KRW had not secured 6 public funding by the time of the last hearing and so 7 were unable to appear through counsel. 8 Now that funding has happily been secured by the 9 families and therefore they are represented through 10 Mr McGowan today, and the sole purpose today, sir, is to 11 hear Mr McGowan's submissions on behalf of the clients 12 who he and KRW represent. 13 THE CORONER: Yes, thank you. 14 Mr McGowan, I have your recent written submissions, 15 thank you very much, for which I am very grateful, of 16 15 June. 17 But I think as I said on the previous occasion, 18 I have also recently read your submissions to the Senior 19 Coroner of 9 September 2015 and 30 March 2016 and, since 20 resumption of the Inquests, submissions in one form or 21 another dated 24 November 2016 and also 15 May 2017. 22 Submissions on behalf of the families instructing KRW Law by 23 MR MCGOWAN 24 MR MCGOWAN: I'm much obliged, sir. 25 In light of that, and in light of the submission</p> <p style="text-align: center;">Page 1</p>	<p>1 addressed. We say the connection between the issue of 2 forewarning and the perpetrators is similarly 3 inextricable. 4 Now, we've highlighted in our submission a named 5 individual who has claimed in public that he was 6 responsible for planting the third bomb at Hagley Road, 7 and he has said he believed there should have been 8 a warning, and he claims that he then went and diffused 9 that third bomb. 10 Now if those claims are true, then we say they 11 should be examined by the Inquest, and additionally that 12 those claims are impossible to examine without examining 13 the perpetrator issue as a whole. 14 Related to that, there have been public claims from 15 various individuals that the bombers were unable to find 16 a functioning phone box and that is the reason that no 17 warning -- or inadequate warning -- was given. 18 Now we say that that would change the whole way you 19 could view these bombings. That this was some sort 20 of -- albeit evil and deliberate as an act, that these 21 claims that it wasn't intentionally an act of mass 22 murder have been circulating. They are bound up with 23 the issue of forewarning and we say they are impossible 24 to examine without addressing the issue of the 25 perpetrators.</p> <p style="text-align: center;">Page 3</p>
<p>1 which was lodged in June and the substantial submissions 2 that were heard on the last occasion, albeit that I was 3 not present, I don't intend to delve into a significant 4 amount more detail than in my previous submission or in 5 our previous submissions. 6 THE CORONER: Yes, I wanted to give you the opportunity to 7 make submissions orally should you wish to do so. 8 MR MCGOWAN: Yes, sir. And the reason we are attending is 9 essentially to emphasise the importance of this issue to 10 the families and to stress that they believe that this, 11 the issue of the perpetrators in particular, is 12 a central issue to these Inquests. 13 We highlighted a number of reasons in our submission 14 at paragraph 14 which essentially summarised our 15 positions, and I intend just to address you orally on 16 those. 17 THE CORONER: Yes. 18 MR MCGOWAN: We say, first of all, in terms of perpetrators 19 the question of whether state informants are in some way 20 implicated in these bombings remains a live issue. 21 I think that is accepted by everyone. That issue is 22 something that is inherently bound up with the 23 perpetrator issue. I think that is also accepted by 24 everyone. 25 Secondly, the issue of forewarning will have to be</p> <p style="text-align: center;">Page 2</p>	<p>1 We also say that the very plain meaning of 2 determining in what circumstances these deceased came by 3 their deaths will simply require consideration of the 4 perpetrators. It requires the Inquest to examine who 5 was responsible for these bombings. We say that is not 6 merely a matter of plain English, but it also supported 7 by the jurisprudence and Article 2. 8 We say Article 2 requires that the full facts be 9 brought to light and that would require the Inquest to 10 consider the perpetrator issue. As a corollary of that, 11 we say that that Article 2 obligation has not yet been 12 satisfied and an Inquest is plainly capable of 13 satisfying it, and in fact is the only way to satisfy it 14 at this stage. 15 Finally, we say that the issue of perpetrators is 16 particularly central in light of the context of these 17 deaths, which were at the time the worst peacetime loss 18 of life in a violent act, followed by what has been 19 labelled as the worst miscarriage of justice in living 20 memory. 21 This has understandably caused -- and it is accepted 22 it has caused -- immense suffering to the families we 23 represent, and that suffering has been compounded by the 24 rumours and suspicion over the years as to who was 25 responsible and why so many people lost their lives.</p> <p style="text-align: center;">Page 4</p>

1 Now the families are seeking -- they are only
 2 seeking a full investigation into these deaths that
 3 considers evidence of who the perpetrators were. The
 4 strength of feeling, I think, was amply summarised by
 5 Ms Hamilton on the last occasion, when she suggested
 6 that they felt so strongly on this issue that without
 7 examining the perpetrator issue, we may as well not have
 8 an Inquest at all.

9 So said, you have our written submissions and not
 10 just from June but on previous occasions on which we
 11 have addressed this issue, so I don't intend to
 12 significantly add to those submissions. As I said, the
 13 purpose of us appearing here is to express the strength
 14 of feeling of the next of kin on this issue. They have
 15 fought for years to have a full investigation of the
 16 circumstances of these deaths and we say this court has
 17 the power to consider the perpetrator issue, we say that
 18 in fact the court is obliged to consider it under
 19 Article 2, and we say that it's in the best interests of
 20 the families and in the public interest that this issue
 21 be examined.

22 Those are my submissions, Mr Coroner.

23 THE CORONER: Can I just ask you about one of the practical
 24 aspects?

25 MR McGOWAN: Yes, sir.

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1 THE CORONER: There will be a jury.

2 MR McGOWAN: Yes, sir.

3 THE CORONER: You are asking for scope to consider -- and
 4 the evidence therefore in due course to consider -- who
 5 were the perpetrators, named persons?

6 MR McGOWAN: Well, they may or may not be named. I think
 7 Ms Williams had her submissions on this on the last
 8 occasion that there are steps that can be taken that may
 9 mean that those individuals --

10 THE CORONER: Yes, apart from anonymity which is
 11 a possibility, and Contempt of Court orders which is
 12 a possibility, it is likely that persons would be named
 13 in the evidence.

14 MR McGOWAN: Yes, sir.

15 THE CORONER: That seems to be really an inevitable
 16 consequence of your submission.

17 MR McGOWAN: Yes, sir.

18 THE CORONER: How would the jury express their findings in
 19 relation to named persons?

20 MR McGOWAN: We would say that provided they keep the
 21 findings within the statutory requirements, they can
 22 express that individuals undertook certain acts but
 23 there is no need to express a view on criminal
 24 liability.

25 So, for example, it would be very difficult to

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1 examine whether or not the named individual I have
 2 referred to had indeed planted and diffused a bomb, it
 3 would be difficult to examine that issue without naming
 4 that individual and it may not make sense to have
 5 obscure findings that avoid mentioning it at all, but it
 6 would certainly be possible to frame those without
 7 coming to a conclusion on his criminal liability.

8 As we have said, this is something that is
 9 confronted --

10 THE CORONER: How will they do that?

11 MR McGOWAN: I suppose it is hard to speculate in the
 12 abstract, but we would say that this is something that
 13 is confronted regularly by inquests frequently, and it
 14 is something that's confronted by legacy inquests in
 15 Ireland frequently in terms of the issues that are
 16 raised.

17 So, for example, you have historic inquests that
 18 address mass killings in the 1970s that do examine the
 19 issue of perpetrators and will have to grapple with
 20 those difficulties when it comes to the findings, but it
 21 doesn't prevent an examination of those issues in the
 22 course of those inquests.

23 So my solicitor, for example, is involved in the
 24 Kingsmill Inquest at the moment and my understanding
 25 is --

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1 THE CORONER: Is that with a jury or without a jury?

2 MR McGOWAN: It is without a jury, sir.

3 THE CORONER: Yes.

4 MR McGOWAN: They get round the issue by using ciphers, but
 5 they are investigating the identity of the perpetrators.
 6 They are using ciphers and PII, but they are
 7 investigating the issue of the perpetrators and
 8 I understand it to be one of the central issues that
 9 they are investigating.

10 I think the families I represent would feel strongly
 11 that it would be unfair that Inquests -- Troubles
 12 Inquests, legacy inquests in Ireland -- would address
 13 these issues but an inquest into the Birmingham Pub
 14 Bombings wouldn't.

15 THE CORONER: Yes, thank you very much.

16 Does anybody else wish to say anything?

17 Submissions on behalf of Michael John "Sean" Reilly by MS
 18 PATRICK

19 MS PATRICK: If it would be helpful, since my learned friend
 20 Mr McGowan has referred back to the submissions of
 21 Ms Williams --

22 THE CORONER: Yes.

23 MS PATRICK: -- I would be very happy to clarify our
 24 position and provide the references to the relevant
 25 parts of the transcript if that is helpful.

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<p>1 THE CORONER: I have the transcript. 2 MS PATRICK: Of course. The only suggestion was to clarify 3 the position of our client in light of the submission 4 prepared by Counsel to the Inquest in response to the 5 written submissions of KRW on this issue. 6 At paragraph 18B of those written submissions, they 7 infer that the Jackson Canter team have been unable to 8 explain how it would be possible and lawful to elicit 9 from a jury the conclusions on precisely this 10 perpetrator issue. 11 THE CORONER: Yes. 18B of? 12 MS PATRICK: The written response of Counsel to the Inquiry 13 to the submissions of KRW. 14 THE CORONER: Yes. 15 MS PATRICK: Very briefly -- I'm very conscious of time -- 16 we say two things to that situation which we think may 17 misrepresent our position. 18 Firstly, in our written and oral submissions we were 19 clear, repeating again Mr McGowan's submission, that 20 there are a multitude of practical ways to manage both 21 the inquiry and the making of the conclusions in an 22 inquest to avoid any inconsistency with the requirements 23 of section 10(2) on "Conclusions". 24 We gave, obviously, the example of the Hillsborough 25 Inquests as one example of how detailed historical</p> <p style="text-align: center;">Page 9</p>	<p>1 be conducted by the inquest. 2 In fact, the case law cited at some length by 3 Ms Williams establishes that where there is any conflict 4 between that limit and the investigative duty of the 5 coroner, the default should be to ensure that there is 6 a full investigation and inquiry. And that is at 7 transcript pages again 52 to 60, where there is citation 8 of R v West London Coroner, ex parte Gray [1988] 1 QB 9 467 and the general conclusions of Lord Bingham in 10 Humberside and Scunthorpe Coroner, ex parte Jamieson 11 [1994] 3 All ER 972 and his general observation 5. 12 Put broadly, we support the submission of Mr McGowan 13 this morning that obviously case management issues such 14 as, of course, anonymity, the use of ciphers and other 15 powers within the case management discretion of the 16 coroner are very different to the question of how scope 17 should be determined at the outset. 18 Unless I can help further, I think that is all the 19 clarification we have. 20 THE CORONER: Yes. Very helpful, thank you. 21 Yes? 22 Submissions by COUNSEL TO THE INQUESTS 23 COUNSEL TO THE INQUESTS: Sir, I won't repeat my 24 submissions. You will have seen that Mr Hill and I put 25 in some follow-up written submissions in response to the</p> <p style="text-align: center;">Page 11</p>
<p>1 evidence might be managed practically with a jury in 2 a way which would not inhibit the possibility of any 3 ongoing and future criminal investigations. And of 4 course, perhaps, recent events have shown that it does 5 not in fact preclude the possibility of future 6 prosecutions being conducted. 7 THE CORONER: Yes. Although of course they don't arise out 8 of the inquests, they arise out of a separate inquiry. 9 MS PATRICK: Of course. But of course it perhaps shows an 10 example that the inquest proceedings have not undermined 11 the prospect of the Crown Prosecution Service concluding 12 that it would be in the public interest to continue with 13 a prosecution. 14 The references for that are our written submissions 15 at 61 to 62 and the transcript of 31 May, page 52 to 16 60 -- 17 THE CORONER: Just a minute. 61 and 62? 18 MS PATRICK: 61 to 62. 19 THE CORONER: Yes. 20 MS PATRICK: And the transcript of 31 May, Ms Williams' 21 submissions, at 52 to 60 and again at 76 to 78. 22 Secondly, in any event our client's submission is 23 that this approach is to put the cart before the horse, 24 in that the statutory limits in section 10(2) are on the 25 conclusion and not the inquiry or the investigation to</p> <p style="text-align: center;">Page 10</p>	<p>1 KRW written submissions dated 22 June. They supplement 2 of course the submissions we originally put in on 23 May 3 and our oral submissions at the hearing a few weeks ago. 4 In summary, sir, it remains the case from our 5 perspective that this Inquest -- or these Inquests -- 6 cannot and should not take on the function of the 7 criminal justice system. It is not legally possible to 8 achieve the objective sought, which is the 9 accountability of individual perpetrators; it would not 10 be fair to those effectively accused of crimes to be put 11 through that process; it would not be legally possible 12 to reach an outcome in which those perpetrators were 13 named, because there is a statutory prohibition under 14 section 10 against that. And, to be clear, sir, it's 15 not just the conclusion, it is the determination of the 16 inquest -- the word is "determination" not 17 "conclusion" -- so factual findings in which those 18 perpetrators were named by the jury or indeed named by 19 you, sir, are also prohibited. 20 It isn't satisfactory to name the perpetrator or 21 perpetrators and then to come to a conclusion of 22 unlawful killing which is said not to offend the 23 prohibition. You have already offended the prohibition 24 by reaching those factual conclusions in which those 25 persons were named.</p> <p style="text-align: center;">Page 12</p>

<p>1 So, sir, in any event it would not be a practical 2 proposition for this, these Inquests, to carry out the 3 function of the criminal justice system in terms of the 4 investigation of crimes. 5 The point, sir, that we made in respect of the jury 6 question which you articulated today is how would the 7 jury go about naming the perpetrators? What questions 8 could the jury be asked which would allow that to 9 happen, and how would they be able to produce an answer 10 without offending the statutory prohibition? 11 In our view, one couldn't frame the questions and 12 one couldn't frame the answers in a way which didn't 13 offend, which means embarking on the process is the 14 wrong thing to do, notwithstanding the manifest 15 injustice which we all recognise. 16 So far as Article 2 of the European Convention is 17 concerned, we stand by our position that that obligation 18 which is on the British State to investigate these 19 heinous crimes has been discharged by the police 20 investigation, and by the assistance of Devon and 21 Cornwall Police in that investigation. 22 In any event, the issues which remain outstanding 23 about potential State involvement, potential State 24 culpability, will be within scope insofar as you rule 25 that those issues are appropriate.</p> <p style="text-align: center;">Page 13</p>	<p>1 2 Submissions on behalf of the1 families instructing KRW Law by MR McGOWAN 3 4 Submissions on behalf of Michael8 John "Sean" Reilly by MS PATRICK 5 6 Submissions by COUNSEL TO THE11 INQUESTS 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 15</p>
<p>1 We note that there is no case law cited back at us, 2 as it were, to refute those propositions. The reason 3 for that is that there is none. 4 So all I can do today, sir, is to reinforce the 5 views which I articulated at the last hearing that the 6 perpetrator issue cannot and should not be within the 7 scope of these Inquests, regrettable as I think we 8 acknowledge that position to be. 9 THE CORONER: Yes. 10 Thank you for your submissions everybody, and for 11 previous submissions in writing and orally at the last 12 hearing for which I am extremely grateful. 13 I will give a ruling on scope but not today. I will 14 take time to consider the further submissions made today 15 and I hope to be able to provide a ruling within seven 16 days. 17 As I said before, it will go first to the families 18 and interested persons before being made public, but it 19 will be made public two working days later by 20 publication on the website. 21 Thank you all very much for coming. 22 (10.31 am) 23 (Inquest adjourned until Thursday, 27 July 2017 at 24 Birmingham Crown Court) 25</p> <p style="text-align: center;">Page 14</p>	

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