

<p>1 Wednesday, 31 May 2017. 2 (10.30 am) 3 Discussion re representation 4 THE CORONER: Good morning, and thank you all very much for 5 coming. 6 The last pre-inquest review hearing was held in this 7 building on 23 February. Today is scheduled for the 8 long-awaited submissions on scope, which have been 9 listed for submission purposes into four issues, and 10 those four issues have been circulated in advance as 11 part of the agenda. 12 First, however, there is a problem with KRW Law, who 13 represent a number of families of the deceased. 14 Yesterday I received -- can I address you, Mr Stanley? 15 MR STANLEY: Yes, you can, sir. 16 THE CORONER: Thank you very much for coming. 17 Yesterday I received a document called "Submissions 18 on the position on public funding", which has been 19 circulated to interested persons, which in summary says 20 that you are not able to proceed for now; that funding 21 for the lawyers has not yet been agreed; there has been 22 an offer, a draft contract, by the Legal Aid Agency 23 dated 3 May, backdated in part to 22 February, which has 24 not been accepted by KRW Law, as I understand that to be 25 the position --</p> <p style="text-align: center;">Page 1</p>	<p>1 suppliers in England and Wales or a Lexcel mark which is 2 administered by the Law Society of England and Wales. 3 You will appreciate that, having pointed it out to 4 the agency, we, as a firm practising in the north of 5 Ireland, are regulated to a different standard. First 6 of all, we don't work on a contract basis, we work on 7 a one-off basis for certificates of funding; we are 8 regulated by the Northern Ireland Legal Services Agency 9 and we are obviously members of the Northern Ireland 10 Law Society. 11 THE CORONER: Yes. 12 MR STANLEY: That problem was then managed by the Agency. 13 On Friday a new contract was issued which we are happy 14 to enter into. 15 THE CORONER: Yes. 16 MR STANLEY: And the case plan for funding is being 17 submitted today to cover the period February 22 to June 18 of the next hearing you are planning on scope. That 19 should be agreed -- if that could be expedited by the 20 Agency, which we have very good working relationships 21 with, that should be expedited in the next two weeks. 22 What we have not asked you to do, sir, is either 23 vacate this hearing or we have not requested an 24 adjournment. We don't feel that would be in the public 25 interest.</p> <p style="text-align: center;">Page 3</p>
<p>1 MR STANLEY: Can I address you on that point, sir? 2 THE CORONER: Yes. If I may summarise, what the document 3 says and then you may speak, of course. 4 It has not been accepted by KRW Law and negotiations 5 are continuing. I hope that summarises reasonably 6 fairly your document? 7 MR STANLEY: That does summarise it, and it is on a changing 8 day-to-day basis as to what is happening. 9 THE CORONER: Yes. 10 MR STANLEY: And hopefully I can be a bearer of better news 11 this morning for you, because we are here not just to 12 represent the 10 people we are instructed by but to 13 assist you in this process and we do understand the 14 public interest in expediting this progress as I made 15 clear in the submissions. 16 Until Friday of last week, the contract that the 17 offer had been made on, and which we were prepared to 18 enter therefore to be able to make a grant of funding 19 via certificates on the back of that contract, could not 20 be workable for KRW or the Lord Chancellor, because the 21 Lord Chancellor can only enter into a Legal Aid 22 arrangement or contract of that nature if the offering 23 party, the supplier of Legal Aid services, is regulated 24 to a particular quality standard, which is the standard 25 quality mark which is applicable to all public legal aid</p> <p style="text-align: center;">Page 2</p>	<p>1 What we do request is again once again asking for 2 your good grace to allow us to make further submissions 3 written on scope, that scope is not closed and that we 4 can revisit it when we are fully prepared. At the 5 moment -- and I apologise for counsel for their 6 non-attendance -- we are not in a position to make 7 substantive written or oral submissions on the important 8 issue of scope beyond the very brief ones we made on 15 9 May which were pro bono. That is where I am today. 10 THE CORONER: Yes. 11 Mr Winters, in response to my email yesterday -- 12 MR STANLEY: Yes. 13 THE CORONER: -- through the Solicitor to the Inquests about 14 timing said that an offer has not yet been made, but 15 "following a lengthy consultation with LAA last week, we 16 are confident an offer is imminent". 17 MR STANLEY: I think the offer has now been technically 18 made, the contract has been amended. We can sign that 19 contract and then we can put in that case plan for 20 funding and we can move forward. If that is expedited, 21 because the Legal Aid has been granted on 3 May subject 22 to that technicality, we were not able to progress it -- 23 THE CORONER: Yes. But the quality standard is simply 24 a question of applying before the contract was signed, 25 and then obtaining the standard within the next six</p> <p style="text-align: center;">Page 4</p>

<p>1 months.</p> <p>2 MR STANLEY: I pointed that out. We pointed it out, saying</p> <p>3 we don't have that standard.</p> <p>4 THE CORONER: Yes.</p> <p>5 MR STANLEY: We are not required to have that standard.</p> <p>6 THE CORONER: Yes. But the contract which you kindly sent</p> <p>7 to me says that in relation to the quality standard, you</p> <p>8 must have applied for the relevant standard by the date</p> <p>9 of this contract and have received the necessary</p> <p>10 accreditation within six months of the contract</p> <p>11 starting.</p> <p>12 MR STANLEY: Which we shall do.</p> <p>13 THE CORONER: Yes. So it is not a great hurdle.</p> <p>14 MR STANLEY: It does allow us to move forward in terms of</p> <p>15 there is an expectation that the contract can be signed,</p> <p>16 the standard can be achieved, the certificates granted,</p> <p>17 which would assure our clients and our counsel that the</p> <p>18 work can be prepared to the highest standard.</p> <p>19 THE CORONER: Yes. Can I just ask you about the sequence of</p> <p>20 events this year?</p> <p>21 I received some information yesterday -- which I had</p> <p>22 not asked for, but received -- that on 26 January, the</p> <p>23 Legal Aid Agency emailed your firm saying the Legal Aid</p> <p>24 Regulations would be amended the following day, 27</p> <p>25 January, so that you could be included, because you were</p> <p style="text-align: center;">Page 5</p>	<p>1 MR STANLEY: Financial information is sensitive, personal.</p> <p>2 There were problems in collating all the financial</p> <p>3 information for the ten clients we now represent. That</p> <p>4 is why there was a time slippage. The information</p> <p>5 required is extensive. Individuals might feel --</p> <p>6 THE CORONER: I understand that.</p> <p>7 MR STANLEY: -- that they don't want to reveal information</p> <p>8 for whatever reason.</p> <p>9 THE CORONER: Yes.</p> <p>10 MR STANLEY: Therefore it took us some time to collate all</p> <p>11 the information so we could make one application as</p> <p>12 opposed to a staged or staggered application.</p> <p>13 THE CORONER: Yes. But is it right that they were chasing</p> <p>14 you for that information on 8 April?</p> <p>15 MR STANLEY: If they say so, yes.</p> <p>16 THE CORONER: On 12 April, your firm provided some but not</p> <p>17 all the individual applications.</p> <p>18 MR STANLEY: We had one application outstanding. We were</p> <p>19 still waiting on financial details of the means test.</p> <p>20 THE CORONER: On 20 April, the Legal Aid Agency emailed your</p> <p>21 firm about missing information required to complete the</p> <p>22 assessment. So the ball was rather in your firm's</p> <p>23 court.</p> <p>24 MR STANLEY: It was.</p> <p>25 THE CORONER: So this application which could have started</p> <p style="text-align: center;">Page 7</p>
<p>1 outside the jurisdiction, and from that date you were</p> <p>2 informed, from 27 January, that you would be able to</p> <p>3 apply for the Legal Aid.</p> <p>4 I think you have been provided with the information</p> <p>5 which I have received. But it was not for a month that</p> <p>6 you made an application without any supporting</p> <p>7 information applying for funding. Is that right?</p> <p>8 MR STANLEY: We already had a number of applications in with</p> <p>9 the Agency which we submitted in January 2016. We had</p> <p>10 made three applications. We made an extensive</p> <p>11 application for exceptional funding, which was held in</p> <p>12 abeyance by the Agency until the Senior Coroner's</p> <p>13 decision on 1 June, and following protracted</p> <p>14 negotiations with the Home Secretary about the</p> <p>15 Hillsborough model which was subsequently rejected --</p> <p>16 THE CORONER: That was separate. I am just talking about</p> <p>17 the Legal Aid Agency application.</p> <p>18 MR STANLEY: The application --</p> <p>19 THE CORONER: You were told you could make an application on</p> <p>20 27 January, but in fact that was not lodged until</p> <p>21 22 February.</p> <p>22 MR STANLEY: If that is the chronology. I have only just</p> <p>23 seen the email.</p> <p>24 THE CORONER: Yes. By 8 April, six weeks later, the Legal</p> <p>25 Aid Agency were still chasing your firm for information.</p> <p style="text-align: center;">Page 6</p>	<p>1 on 27 January was still rumbling on in April --</p> <p>2 MR STANLEY: Yes.</p> <p>3 THE CORONER: -- because of the lack of information to be</p> <p>4 provided by your firm?</p> <p>5 MR STANLEY: Partly, but then leading to the contract which</p> <p>6 then led to its own consequences.</p> <p>7 THE CORONER: Yes.</p> <p>8 MR STANLEY: We were chasing information from individual</p> <p>9 clients.</p> <p>10 THE CORONER: Yes. On 3 May, the draft contract was</p> <p>11 provided to your firm with a letter saying what you need</p> <p>12 to do is sign --</p> <p>13 MR STANLEY: Yes.</p> <p>14 THE CORONER: -- with financial eligibility waived for all</p> <p>15 of your clients.</p> <p>16 MR STANLEY: Yes.</p> <p>17 THE CORONER: And backdated mostly to 22 February.</p> <p>18 MR STANLEY: We asked for a meeting with the LA to discuss</p> <p>19 the details of the contract, which we then had, and now</p> <p>20 we have a contract which we can sign and move forward.</p> <p>21 I apologise to you and our clients for any dropping</p> <p>22 of the ball from the Belfast end.</p> <p>23 THE CORONER: Yes. It does seem to show something of a lack</p> <p>24 of urgency on the part of KRW Law.</p> <p>25 MR STANLEY: I don't think there is any lack of urgency.</p> <p style="text-align: center;">Page 8</p>

<p>1 I think we and the Agency were both in new territory in 2 relation to this contract. 3 This is a very specific form of contract. We 4 obviously, as you know, have been representing since 5 December 2014. We have maintained relationships with 6 the Agency; we have maintained relationships with the 7 Lord Chancellor's Office and the Ministry of Justice and 8 the Home Secretary. It has been complicated and 9 protracted, but we have actually got to this point today 10 after so many years. 11 THE CORONER: Yes. 12 MR STANLEY: And, yes, there may have been systemic problems 13 in the nature of the application, I'm not going to make 14 excuses for that, but we would like as a firm to move 15 forward, on the agreement that as the letter you have 16 from the Director of the Agency says, yes, the law was 17 changed. This is an exceptional inquest, as you 18 recognised because it is Article 2 compliant, and that 19 in the best and most effective administration of justice 20 test KRW are best placed to continue representing our 21 clients and our clients have been fully instructed and 22 advised on all this throughout on a daily basis. So 23 that is where we are, unfortunately. 24 But I'm begging -- I'm asking -- for your permission 25 to make substantive submissions on scope in the future,</p> <p style="text-align: center;">Page 9</p>	<p>1 inadequate emergency attendance, the emergency services 2 issue, and about the perpetrators, the Birmingham Six 3 case and others, and false police evidence at the 4 Birmingham Six trial. So there were quite a number of 5 submissions made on behalf of your clients on that date. 6 There was then a further submission document which 7 was undated but after 26 January which was only about 8 jurisdiction. 9 Since resumption on 1 June of last year, you made 10 brief submissions on the 24 November about the 11 forewarning/preventability issue and the emergency 12 services. You have made submissions about the scope in 13 relation to the Hagley Road bomb. You listed helpfully 14 matters for further investigation. 15 Then in the most recent submissions, which are 16 described as preliminary submissions -- they are not 17 dated but I think the date is 15 May -- 18 MR STANLEY: They are the 15th. 19 THE CORONER: -- which were described as not exhaustive or 20 final, dealing briefly and fairly effectively with the 21 four listed issues of scope including the emergency 22 response in some detail. I won't list all of the 23 points. They all related, as that document stated, to 24 the adequacy of the emergency service response and then 25 fairly detailed submissions about the perpetrators,</p> <p style="text-align: center;">Page 11</p>
<p>1 which we are prepared to do so. 2 THE CORONER: Yes. 3 MR STANLEY: We want to do it in the best interests of our 4 clients and the best interests of the administration of 5 justice. 6 THE CORONER: Yes. I mean, I originally said that you 7 should have six weeks from the time of funding. But 8 that position has changed somewhat now, because we are 9 down to four points, one of which is agreed. 10 MR STANLEY: Yes. 11 THE CORONER: The other of which is to be put off for 12 a while, and that's therefore just two points, one of 13 which is essentially a matter of law. 14 Looking back at the submissions which you have made 15 since 2015: on the 9 September 2015, you made 16 submissions to the Senior Coroner over resumption -- 17 45 pages, I think -- and there were a number of 18 submissions that the fresh inquests would provide the 19 opportunity to clarify a number of issues. So in effect 20 you were setting out your scope submissions and they did 21 include both the emergency services and the 22 perpetrators, the two issues outstanding. 23 Then, on 30 March 2016, you made further submissions 24 to the Senior Coroner of a supplementary nature, again 25 making, in effect, submissions on scope about the</p> <p style="text-align: center;">Page 10</p>	<p>1 paragraph 32 and following. 2 So there is not a great deal outstanding, is there? 3 MR STANLEY: We have made submissions consistently on scope 4 to get to this process. We have now received the 5 submissions from the other interested persons. We might 6 want to engage with those submissions and to enter into 7 argument on those submissions which I cannot do today. 8 As you know, I haven't got counsel instructed in this 9 matter because they feel under(?) prepared to do so, 10 because of the funding issue. 11 If you propose to go for a decision on the scope, we 12 obviously accept that but we would reserve the right or 13 request to make further submissions as we would see fit 14 to the benefit of our clients. 15 THE CORONER: And when will that be? 16 MR STANLEY: I would say by the end of June. 17 THE CORONER: So from your point of view -- 18 MR STANLEY: That's my point of view, not a corporate 19 KRW Law -- 20 THE CORONER: We will ask the others in a moment how we 21 should proceed, but from your point of view, you have no 22 objection to my hearing submissions from others? 23 MR STANLEY: No. 24 THE CORONER: You would not wish me to rule on those 25 submissions until you have had the opportunity to make</p> <p style="text-align: center;">Page 12</p>

1 further submissions?  
 2 MR STANLEY: Well, I think the question of ruling is  
 3 obviously your decision. But scope remains an open  
 4 issue as further disclosure becomes apparent, as the  
 5 substantive hearings move forward, as we get into the  
 6 issue of the witness list and other disclosure and so  
 7 forth, that there is a flexibility about scope whatever  
 8 you decide at a certain point in time before we get to  
 9 that point. That is how I understand it.  
 10 We have not had the opportunity to interrogate the  
 11 material to a sufficient degree which we think is  
 12 required --  
 13 THE CORONER: Yes.  
 14 MR STANLEY: -- to make comprehensive submissions today.  
 15 THE CORONER: Although most of the material which has now  
 16 been re-provided in a more accessible form was provided  
 17 for the purposes of the resumption of submissions.  
 18 MR STANLEY: You might not need anything more from KRW in  
 19 terms of arguments on scope. You might find the  
 20 submissions that counsel have made, short as they are,  
 21 do the job. I don't think counsel have had the  
 22 opportunity of interrogating the other submissions on  
 23 which they may wish to comment.  
 24 THE CORONER: Is there anything else you would like to say?  
 25 MR STANLEY: Thank you for your time. Thank you for your

Page 13

1 forbearance. If there has been any fault or dropping of  
 2 the ball, from our point of view I apologise on behalf  
 3 of KRW Law. I think it has been a very complicated and  
 4 protracted and intense nature of the work, not  
 5 necessarily just about the inquests but actually to get  
 6 the funding in position at this date, which has been  
 7 complicated. But this is an exceptional inquest.  
 8 We have not raised any issues about the funding  
 9 regime which you and I and all the people here have to  
 10 work within which may be flawed. I'm not going to make  
 11 a submission about that. That's not within your scope.  
 12 But that is the pragmatic statutory constraints which we  
 13 had to get the law changed in order to be standing here  
 14 in any event.  
 15 We have also not entered into any discussion about  
 16 the nature of an inquest or an inquiry or the best  
 17 model, because it is your inquest and we are trying to  
 18 assist you, and obviously represent to the best of our  
 19 ability and to the highest standard those we have  
 20 represented for a long time. And that is really all  
 21 I can say.  
 22 THE CORONER: And of course, Mr Stanley, I welcome  
 23 a cooperative working approach.  
 24 MR STANLEY: As you are aware, we have fed into the process  
 25 consistently, via your solicitor, information,

Page 14

1 witnesses, our own investigations where people have come  
 2 to us and been filtered through us, and so we have  
 3 actually continued right from the start to feed into the  
 4 process, not just to argue the point of law that this  
 5 should be resumed, which it now is, from 1974, but we  
 6 have continued to do the investigative process to the  
 7 best that we are able in the absence, until recently, of  
 8 any certainty about funding, which for a business was  
 9 not sustainable as we have made that argument before.  
 10 As you know, we were asked by the Agency to look at  
 11 Agency agreements with other suppliers in England and  
 12 Wales. That was not seen to be feasible or recommended  
 13 which is why the law was changed.  
 14 THE CORONER: Thank you very much.  
 15 MR STANLEY: Unless I can be of any further assistance?  
 16 THE CORONER: No. Thank you very much, Mr Stanley.  
 17 I do propose to continue to hear submissions on  
 18 scope from others today, unless anybody wishes to  
 19 persuade me otherwise. I would also propose to give  
 20 directions about the participation of KRW Law and  
 21 counsel instructed by them in relation to the scope of  
 22 submissions.  
 23 Does anybody else want to say anything?  
 24 Right. Well, I will rise shortly just to consider  
 25 those directions, and then I will return.

Page 15

1 (10.52 am)  
 2 (A short break)  
 3 (11.01 am)  
 4 DIRECTIONS  
 5 THE CORONER: Having heard Mr Stanley's helpful observations  
 6 this morning on behalf of KRW Law, and in the light of  
 7 his firm's recent submissions on funding and the  
 8 consequential absence of counsel today to argue about  
 9 the two remaining issues on scope, I direct as follows.  
 10 First, that KRW Law will notify me within seven  
 11 days -- that is by 7 June -- through the Solicitor to  
 12 the Inquests of progress on the revised Legal Aid  
 13 contract offer of 26 May 2017, that date having been  
 14 provided by Mr Stanley this morning; and to explain why  
 15 the revised offer of that date, backdated in part to  
 16 22 February, has not been accepted if it has not been  
 17 accepted by then. I shall keep close scrutiny on the  
 18 progress or lack of it. I shall also ask the Legal Aid  
 19 Agency for an update on progress within the same  
 20 timescale.  
 21 Secondly, I will provide KRW Law with the  
 22 opportunity to provide written final submissions on the  
 23 two remaining issues of scope which are to be discussed  
 24 today within ten working days, that is two weeks, of  
 25 acceptance of a Legal Aid contract. Not the six week

Page 16

1 period which I originally envisaged, for the reasons  
 2 which I have already given this morning.  
 3 Thirdly, there will be three working days thereafter  
 4 for any response by the interested persons and Counsel  
 5 to the Inquests if so advised, although some may feel  
 6 that may not be necessary.  
 7 Thereafter, fourth, I will give a ruling.  
 8 Fifth, I will hold the hearing date of 29 June for  
 9 now.  
 10 Sixth, and this is more of an observation than  
 11 a direction: if progress is slow there may come a time  
 12 when I must proceed, as Mr Stanley has realistically  
 13 accepted this morning, because it is in the public  
 14 interest to do so.  
 15 It could be said, Mr Stanley, that I have your  
 16 submissions on the two issues very clearly already and  
 17 there may not be a great deal to add. I could proceed  
 18 on that basis; I don't want to, but I could do.  
 19 MR STANLEY: Thank you, sir.  
 20 THE CORONER: I want to give you the opportunity on behalf  
 21 of your clients, who are the most important people in  
 22 this inquest, to make those further submissions, but on  
 23 that timescale. So I rely on KRW Law to be diligent,  
 24 helpful and prompt. There is considerable urgency about  
 25 this now.

Page 17

1 I also say to the Legal Aid Agency that there is now  
 2 time for resolution in everybody's interests, otherwise  
 3 there may become a real risk that these inquests are  
 4 delayed, which would not be good, and I think you agree.  
 5 MR STANLEY: I do agree, sir.  
 6 THE CORONER: Yes, thank you.  
 7 MR STANLEY: Thank you, sir.  
 8 THE CORONER: Can I also add that of course you can stay if  
 9 you wish, but in any event this hearing will be recorded  
 10 and there will be a transcript of the submissions made  
 11 by others so you won't be disadvantaged in any way.  
 12 MR STANLEY: I will remain, sir.  
 13 THE CORONER: Thank you.  
 14 Yes, so let's move on in one moment.  
 15 Ms Williams, will it be all right to start with you?  
 16 THE CORONER: Good morning, sir.  
 17 MS WILLIAMS: As you are aware, I represent Sean Reilly, who  
 18 is the brother of Eugene Reilly and Desmond -- I'm  
 19 sorry, my learned friend Mr Skelton is standing.  
 20 COUNSEL TO THE INQUESTS: Sorry, sir, I was going to provide  
 21 an update before we started.  
 22 THE CORONER: Yes, I'm sorry --  
 23 COUNSEL TO THE INQUESTS: I'm very sorry to interrupt  
 24 Ms Williams.  
 25 THE CORONER: No, no, my fault.

Page 18

1 MS WILLIAMS: I'm very happy to hear the update, first.  
 2 THE CORONER: Yes, update.  
 3 COUNSEL TO THE INQUESTS: Uncontroversial as it may be.  
 4 The microphones are voice-activated amplification,  
 5 so those lawyers who may be attempted to have what they  
 6 think is a discreet conversation with each other may  
 7 find their conversation amplified across the room. So  
 8 they need to be a little bit wary of that.  
 9 THE CORONER: And transcribed.  
 10 COUNSEL TO THE INQUESTS: Indeed, even worse.  
 11 Update on the Progress of the Inquest by COUNSEL TO THE  
 12 INQUESTS  
 13 COUNSEL TO THE INQUESTS: So, first, sir, I reserve my  
 14 position on the substance of today's hearing, ie the  
 15 scope issues, until after the interested persons have  
 16 spoken, so this is just an update really on what the  
 17 inquests have been doing over the last three months  
 18 since the PIR on 23 February.  
 19 First of all, experts. We have instructed -- or  
 20 your solicitor has instructed on your behalf -- several  
 21 experts. The first in the field of pathology, Mr Nat  
 22 Carey, a forensic pathologist well-known no doubt to  
 23 many people in this room, has been instructed to provide  
 24 an overview report and has done so on a preliminary  
 25 basis. That has been provided to the interested persons

Page 19

1 and it is dated 22 May.  
 2 A further expert, Ms Alison Mansfield, a senior  
 3 forensic case officer, has been instructed. She is  
 4 based at the Forensic Explosives Laboratory in  
 5 Fort Halstead and she has been asked to provide  
 6 a forensic analysis of the devices that were detonated  
 7 at The Mulberry Bush and The Tavern in the Town, and the  
 8 device or devices that were placed at Barclays Bank on  
 9 the Hagley Road. She has also been asked to compare  
 10 these devices to other explosives that were used or  
 11 detonated or recovered in Birmingham and the West  
 12 Midlands between 1973 and 1974, and has been asked to  
 13 comment, insofar as it is within her expertise, on the  
 14 effect of the detonation of these devices.  
 15 In addition to that, a team led by Professor Anthony  
 16 Bull, the Director of the Centre for Blast Injury  
 17 studies at Imperial College London has been instructed  
 18 to look at the bomb attacks on 21 November 1974. He has  
 19 a team of personnel or experts working with him which  
 20 include experts from the Defence Science Technology  
 21 Laboratory and from the Royal Army Medical Corps. They  
 22 will provide an overview report on the internal and  
 23 external effects of a blast wave, ie a wave which is  
 24 consequent on an explosive device, and hopefully that  
 25 will be directed to the issues which are relevant to the

Page 20

<p>1 individuals who died in the bombings.                  2 That is expertise. Turning then to the issue of                  3 disclosure. Your legal team have procured an electronic                  4 database called "Relativity" and disclosure has been                  5 given on that to the interested persons who have been                  6 given licences to access it.                  7 The team has so far disclosed several thousands of                  8 pages of documents on that database, much of which has                  9 previously been provided by West Midlands Police in hard                  10 copy form and is now in an electronic version. The team                  11 has also disclosed documents which were before the                  12 Senior Coroner who heard the application previously, and                  13 that includes post-mortem reports which have been                  14 provided to the IPs, and documents from various sources                  15 including the interested persons and other organisations                  16 such as the BBC and ITV and various press and                  17 photographic sources.                  18 We have also disclosed documents obtained from                  19 a chartered surveyor who has evidence to give about the                  20 buildings in Birmingham which were affected, and your                  21 team has also been looking at materials which are                  22 considered sensitive by West Midlands Police with a view                  23 to trying to disclose such materials as can safely be                  24 disclosed to the interested persons, you yourself having                  25 previously seen such material. That is an ongoing</p> <p style="text-align: center;">Page 21</p>	<p>1 Office, and we will continue that work. Likewise, an                  2 extensive review of the West Midlands Police archive of                  3 materials, in particular the Crown Prosecution Service                  4 used materials -- ie materials that were used for the                  5 purposes of criminal proceedings back in 1975 and                  6 subsequently -- will be reviewed by your team to                  7 ascertain what relevant documents are contained there.                  8 We are also starting work on what I may term the                  9 agent/informant issue, and I will update you on that,                  10 sir, when I come to make my substantive submissions                  11 about the kind of work which we propose -- counsel that                  12 is on your behalf -- to conduct.                  13 Finally, in respect of other matters, your team have                  14 been in contact with a number of unrepresented families,                  15 of whom there are several, and several have made contact                  16 with us directly and your team have spoken to or                  17 corresponded with them.                  18 We have also produced -- which has been                  19 circulated -- a Memorandum of Understanding with West                  20 Midlands Police, the purpose of which was to ensure that                  21 there was transparency of the relationship between your                  22 investigation and the police to ensure that there was no                  23 misunderstanding about the independence of those                  24 organisations and that there could not be any criticism                  25 of any work which West Midlands Police assisted you</p> <p style="text-align: center;">Page 23</p>
<p>1 process of discussion and dialogue with West Midlands                  2 Police.                  3 We will in due course provide redacted versions of                  4 the submissions you received from West Midlands Police,                  5 and indeed Ms Hunt received during the application                  6 process, some of which contain sensitive material which                  7 has previously been redacted. So far as possible such                  8 material will be made public subject to a determination                  9 about sensitivity.                  10 Of course, all of these documents will necessarily                  11 be reviewed, insofar as that is necessary, in light of                  12 your ultimate ruling on the issue of scope; it being the                  13 case, as is always the case with inquests, that only                  14 material which is relevant to scope should be disclosed                  15 to interested persons and used publicly.                  16 I will not detail precisely who we have contacted                  17 for further information but it lists 21 organisations.                  18 They include public organisations like the BBC, and                  19 other media outlets as well as medical facilities, NHS                  20 trusts and the like, all of whom have received requests                  21 and some of whom have started to provide very useful                  22 responses to those requests.                  23 Your team have also undertaken a review of                  24 potentially relevant material held by the National                  25 Archive in Kew, formerly known as the Public Records</p> <p style="text-align: center;">Page 22</p>	<p>1 with.                  2 We have, finally, procured and initiated a website                  3 which it is hoped will be the principal mechanism for                  4 publishing, where appropriate, materials relevant to the                  5 inquest including any rulings which are made and                  6 directions and so on.                  7 So I'm grateful, sir. Thank you for that                  8 opportunity. That is all I propose to say at present.                  9 THE CORONER: Yes, thank you. That is very helpful.                  10 Submissions on behalf of Sean Reilly by MS WILLIAMS                  11 THE CORONER: Yes, Ms Williams. Thank you for your                  12 extensive written submissions of 14 May.                  13 MS WILLIAMS: Thank you, sir. I hope not too extensive but                  14 obviously there are a number of issues to cover.                  15 THE CORONER: Yes. And I have also re-read the previous                  16 submissions of Ms Hill dated 23 November.                  17 MS WILLIAMS: I am grateful, sir.                  18 Sir, before Mr Skelton rose I was just explaining                  19 that I represent Sean Reilly who is the brother of                  20 Eugene Reilly and Desmond Reilly, both of whom were                  21 drinking in the Tavern in the Town before or when the                  22 bomb detonated.                  23 I should say as well because it is not shown on the                  24 sheet but my instructing solicitor, Mr Abrahamson, is                  25 also my junior as it were for the purposes of today and</p> <p style="text-align: center;">Page 24</p>

<p>1 should you have any questions about funding, then he                  2 will deal with that side of matters. I think you have                  3 received a written document from him in the last few                  4 days explaining the funding situation as regards                  5 Jackson Canter.                  6 THE CORONER: Yes.                  7 MS WILLIAMS: To be clear, we are not asking you to do                  8 anything today, sir, it was simply to keep you up to                  9 speed with the situation.                  10 THE CORONER: No, indeed, thank you. I have read that.                  11 MS WILLIAMS: Thank you very much.                  12 So if I may, then, sir, turn to the substance of                  13 scope. I don't intend to repeat what I have already                  14 said in the written submissions so I hope the oral                  15 submissions are complementary to that and should be                  16 taken as a whole. In particular, I would like to                  17 respond to a number of submissions made by other                  18 interested persons, and in particular the submissions of                  19 Counsel to the Inquests.                  20 Before coming to the substance, if I may just make                  21 a few general observations in support, sir, of the                  22 position as you know that we take on behalf of our                  23 client, which is that both the topic of the emergency                  24 response and the topic of perpetrators as defined in                  25 Mr Suter's agenda note should be within the scope of the</p> <p style="text-align: center;">Page 25</p>	<p>1 underestimate the practical challenges that there are.                  2 So I would like, if I may, to make that clear, that we                  3 do make our submissions within an appreciation of those                  4 difficulties, but in essence, at the same time, we say                  5 that those such as my client have waited for so long it                  6 is important to get it right this time.                  7 A general observation about a point that Counsel to                  8 the Inquests make at both paragraphs 5 and 38 of their                  9 submissions is concern is expressed about the risk that                  10 people who are called to give evidence at the inquests                  11 or indeed who are interviewed or statements taken from                  12 them after this long period of time, there is a risk of                  13 that process retraumatising them. Whilst of course,                  14 sir, we completely accept that is a proper concern to                  15 raise and for you to take into account, we do also offer                  16 what may in effect be the counter-balance which is that                  17 for a number of people it may in fact prove cathartic to                  18 have an opportunity to speak in a public forum about                  19 a matter which has troubled them over so many years.                  20 Certainly those of us who were involved in the                  21 Hillsborough inquests know there were various witnesses                  22 expressing precisely that.                  23 We can't say at this stage how it will affect                  24 individual witnesses, but, sir, we do submit it is not                  25 simply a one-way consideration that it will necessarily</p> <p style="text-align: center;">Page 27</p>
<p>1 inquests. So that is the direction in which I am                  2 travelling or the propositions that I seek to support.                  3 As I say, if I may just make briefly a few general                  4 observations before coming to the substance? Firstly,                  5 as you are aware, sir, inquests have never been held                  6 before into the circumstances of these terrible deaths,                  7 and the bereaved have waited a very long time for                  8 answers to the questions that they inevitably have.                  9 Secondly, sir, as has been recognised already, there                  10 is a very strong public interest in these long-standing                  11 concerns and questions being answered as fully as is                  12 reasonably possible at this juncture.                  13 Thirdly, this inquest provides realistically as                  14 matters stand the only opportunity for such matters to                  15 be explored and concerns answered.                  16 Fourthly, sir, you will appreciate -- and it is                  17 a point we have made in our submissions -- that                  18 investigations and disclosure is still ongoing. Whilst                  19 of course we understand that you will keep scope under                  20 review, we do therefore suggest that that in itself                  21 should, if anything, lead to a broad approach to scope                  22 rather than ruling matters out for the purposes of                  23 investigation at this stage.                  24 We of course recognise, sir, as well, the imperative                  25 to proceed in a timely manner. We, of course, do not</p> <p style="text-align: center;">Page 26</p>	<p>1 be retraumatising for all those involved, and that the                  2 balance should be borne in mind that for many it may be                  3 very important to have the opportunity to give their                  4 accounts.                  5 Sir, in relation to forewarning, we simply note in                  6 passing that we did raise in paragraph 32 of our                  7 submissions that we take it that scope in respect of                  8 that topic will not necessarily be limited to the two                  9 potential instances of forewarning that caused the                  10 Senior Coroner to decide to resume the inquests, because                  11 we have been made aware in the earlier submissions to                  12 the coroner made by West Midlands Police of various                  13 other potential instances of advanced warning, two of                  14 which we cite as examples in paragraph 32. It is not                  15 necessary to go into them in further detail at this                  16 stage, sir, but in not addressing the forewarning topic                  17 in any greater detail, we would not want it to be                  18 thought that we were in agreement that it be confined                  19 simply to the two matters that led to the resumption                  20 decision.                  21 So moving on, sir, what I propose to do if I may is                  22 briefly -- and it will be brief -- deal with a few                  23 points of law in relation to scope and then deal in turn                  24 with the emergency response and the perpetrators topic.                  25 In terms of the legal principles and relevant case</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 law, sir, it is, we respectfully submit, largely set out                  2 in paragraphs 9 to 18 of our written submissions which                  3 I don't intend to repeat. There are two cases in                  4 particular which CTI cite -- I am calling counsel to the                  5 inquest CTI by way of shorthand, I hope that is                  6 acceptable and also it is not confusing anyone -- two                  7 cases in particular that they cite that I would like                  8 briefly to place in context. One is the Bubbins                  9 decision which they cite at their paragraph 7. I don't                  10 think it is necessary to turn up the report unless you                  11 want to, sir, but for your cross-reference it is tab 21                  12 in the authorities bundle.                  13 CTI, at their paragraph 7, cite from paragraph 153                  14 of the decision of the European Court of Human Rights,                  15 and specifically --                  16 THE CORONER: Paragraph 7?                  17 MS WILLIAMS: I am sorry, do I have the wrong reference?                  18 THE CORONER: 14. Is it 14?                  19 MS WILLIAMS: Yes, it is. I was just trying to understand                  20 where I have gone wrong there. I am sorry, sir, it is                  21 indeed 14. It is the reference to:                  22 "The coroner is required to confine his                  23 investigation to the matters directly causative of death                  24 and not to extend his inquiry into the broader                  25 circumstances."  <p style="text-align: center;">Page 29</p> </p>	<p>1 issues. Again, whilst one does not quarrel with the                  2 proposition, it is important, we submit, to understand                  3 it in context.                  4 In the interests of time, can I just summarise for                  5 you now? The Allen case is at tab 27. It was a case --                  6 and it is not necessary to turn it up now, sir, unless                  7 you want to -- where the undisputed pathology evidence                  8 indicated that the deceased had died from natural                  9 causes, coronary artery disease, but nonetheless those                  10 representing the deceased's family sought a judicial                  11 review of the coroner's approach not to investigate                  12 various lines of inquiry.                  13 So what was said has to be seen in the context of                  14 what was undoubtedly a natural causes death, although                  15 Article 3 was engaged because the deceased was detained                  16 under the Mental Health Act at the time.                  17 Importantly, as well as paragraph 33, in                  18 paragraph 40 the Court of Appeal stressed, as you will                  19 be familiar with in any event, sir, that implicit in an                  20 investigation where Article 2 is engaged is that what is                  21 being investigated is what caused or may have caused or                  22 contributed to the death, which of course is                  23 a proposition that CTI do acknowledge in paragraph 15 of                  24 their submissions. We have no quarrel at all with what                  25 they say in paragraph 15. We would respectfully suggest  <p style="text-align: center;">Page 31</p> </p>
<p>1 I draw attention to that because although that                  2 citation has a full stop after the word "circumstances",                  3 I invite you to look at in due course the sentence                  4 continues in paragraph 153 of the European Court of                  5 Human Rights decision and therefore places what appears                  6 in paragraph 14 of the submission in context. The                  7 sentence continues, I will just read it for now:                  8 "This does not prevent examination of matters such                  9 as the planning and conduct of, for example, a police                  10 operation which results in loss of life, having regard                  11 in particular to the fact that an essential purpose of                  12 the inquest is to allay rumour and suspicions of how                  13 a death came about."                  14 Sir, if one looks at the reference in paragraph 14                  15 to "directly causative" one might interpret it in                  16 a particular light, but if one sees the full sentence --                  17 albeit that was a police shooting inquest -- one then                  18 understands that the sense in which "directly causative"                  19 is being used is one that contemplates an examination of                  20 the surrounding circumstances.                  21 Sir, the second case I just wanted to refer to very                  22 briefly is the Allen case which CTI cite from in the                  23 paragraph above, paragraph 13 of their submissions.                  24 They cite from paragraph 33, where there is a reference                  25 to the inquest inquiry being focused on the central  <p style="text-align: center;">Page 30</p> </p>	<p>1 a narrower approach has been taken when they come on to                  2 the particular topics. So important, we say, at this                  3 stage, to remember that the investigation can extend                  4 into matters that may have contributed to the deaths.                  5 Lastly, by way of general observation on the law --                  6 I will need to return to the law briefly when we come on                  7 to perpetrators -- but by way of general observation                  8 can I, again without asking you to turn it up, emphasise                  9 a case that we referred to in our submissions which is                  10 the AP decision, which we cited at our paragraph 14,                  11 a decision of Mr Justice Hickinbottom as he then was.                  12 It is at tab 33 in the bundle of authorities. The                  13 relevant passage of his judgment is paragraph 60 whereby                  14 he stresses that an arguable breach of Article 2 is a                  15 low threshold, anything more than fanciful. So we                  16 respectfully suggest it is just as important to bear                  17 that in mind in considering the current state of the                  18 evidence.                  19 Sir, turning then immediately to the topic of                  20 emergency response. We have set out our definition of                  21 the topic at paragraph 34 of our submissions. It is                  22 essentially as per the description of this topic in                  23 Mr Suter's agenda note, save that we have introduced the                  24 element of matters that possibly caused the deaths,                  25 consistent as you will be aware with the relevant case  <p style="text-align: center;">Page 32</p> </p>

<p>1 law.</p> <p>2 We have then, over the succeeding paragraphs, made</p> <p>3 our submissions and they are summarised in paragraph 35</p> <p>4 as to why we say the matter is within scope. Our</p> <p>5 starting point, sir, is that the emergency response --</p> <p>6 and in particular the steps that were or were not taken</p> <p>7 in the immediate aftermath of the bombs being</p> <p>8 detonated -- are so closely connected in time and place</p> <p>9 with the deaths that then ensued that the starting point</p> <p>10 is that it is a matter that one would expect to form</p> <p>11 part of a coroner's investigation, absent very good</p> <p>12 reason for it not to do so in circumstances such as the</p> <p>13 present.</p> <p>14 Rather than, as I say, take up time repeating the</p> <p>15 detail of our submission, I want to deal with the points</p> <p>16 that CTI have made in their submissions in support of</p> <p>17 their contention that this topic at least as a general</p> <p>18 topic should not fall within scope.</p> <p>19 As to that, sir, I would wish, if I may, broadly to</p> <p>20 deal with four sub-topics. The first is that we submit</p> <p>21 their approach is too restrictive as a matter of law,</p> <p>22 because it requires too much by way of evidential proof</p> <p>23 at this stage. We say that that is exemplified by</p> <p>24 paragraph 27 of CTI's submissions, the first few lines,</p> <p>25 where they say:</p> <p style="text-align: center;">Page 33</p>	<p>1 may have seen our written submissions, we are not in any</p> <p>2 way seeking to cast doubt on the tremendous bravery of</p> <p>3 the individuals involved in the emergency response whose</p> <p>4 actions we wholeheartedly admire and commend. It is</p> <p>5 concerns about at an organisational level and at</p> <p>6 a systemic level that we have highlighted.</p> <p>7 We have dealt with them at some length at</p> <p>8 paragraph 39 and the various subparagraphs that follow,</p> <p>9 and I don't therefore think it could assist to repeat</p> <p>10 that today, but they cover matters such as poor or</p> <p>11 potentially poor overall control, lack of direction from</p> <p>12 the central police control rooms, poor dissemination of</p> <p>13 information between emergency services, lack of</p> <p>14 sufficient police and/or fire brigade officers and/or</p> <p>15 ambulance personnel deployed specifically to the Tavern</p> <p>16 in the Town site as opposed to the Mulberry Bush site,</p> <p>17 and the lack of appropriate first aid equipment</p> <p>18 accordingly at that site.</p> <p>19 We note, for example, as reported by his daughter,</p> <p>20 Ms Tomkinson, that the late chief superintendent, John</p> <p>21 Tomkinson, one of the senior police officers involved in</p> <p>22 the emergency response, said he was worried that the</p> <p>23 lack of ambulances and the decisions to use taxis had</p> <p>24 cost some lives. So that is a worry on the part of one</p> <p>25 of the senior officers involved that lives were lost.</p> <p style="text-align: center;">Page 35</p>
<p>1 "We are at present unaware of any evidence that</p> <p>2 establishes a causative link between purported failings</p> <p>3 on behalf of those who responded to the bombings and the</p> <p>4 death of any individual."</p> <p>5 But we respectfully submit, sir, that as you will be</p> <p>6 very well aware given that even at the end point of the</p> <p>7 process after the evidence has been heard and you, the</p> <p>8 coroner, are determining what matters to leave to the</p> <p>9 jury, you can, in the exercise of your discretion, leave</p> <p>10 matters that were possibly causative of death. And that</p> <p>11 is at the very end point after the evidence has been</p> <p>12 investigated, assembled, heard, probed, considered. So</p> <p>13 to require at this point when we are still close to the</p> <p>14 starting point for there to be clear evidence</p> <p>15 establishing a causative link between individual deaths</p> <p>16 and alleged failings in the emergency response is to</p> <p>17 require too much, we respectfully submit, and to take</p> <p>18 too restrictive an approach.</p> <p>19 So that is our first point, sir. Our second point</p> <p>20 is that there is considerable evidence of arguable</p> <p>21 failings, bearing in mind in particular that arguable is</p> <p>22 not a high threshold.</p> <p>23 I say at the outset, lest there be any</p> <p>24 misunderstanding, we have made this clear in our written</p> <p>25 submissions but I appreciate not everyone in court today</p> <p style="text-align: center;">Page 34</p>	<p>1 We have also referred to the lack of efficient triage.</p> <p>2 We respectfully insofar as it is suggested in CTI's</p> <p>3 submissions -- and we appreciate they make other points</p> <p>4 as well -- but insofar as it is suggested, and we have</p> <p>5 in mind in particular their paragraph 31 and their</p> <p>6 annex 1, so far as it is suggested that the reports that</p> <p>7 they refer to put forward a different picture from the</p> <p>8 detail we have set out in our paragraph 39, we say,</p> <p>9 well, firstly at its highest that is a matter of</p> <p>10 evidence. There may be more than one impression that</p> <p>11 the material gives, and that is why one needs to have</p> <p>12 the evidence aired at the inquest to resolve it.</p> <p>13 Certainly the material we have presented reaches the</p> <p>14 arguability threshold.</p> <p>15 Secondly, sir, we respectfully submit there are</p> <p>16 considerable limitations in respect of those reports for</p> <p>17 present purposes. I believe it is fair to say that CTI</p> <p>18 acknowledge a number of those limitations in their</p> <p>19 submissions. They are not independent. They are not</p> <p>20 comprehensive. They don't, in the main, address the</p> <p>21 very issues that we have raised because they weren't</p> <p>22 directed to doing so, or they are simply not focused on</p> <p>23 them.</p> <p>24 So, for example, in the report prepared by</p> <p>25 superintendent -- sorry, it may be Chief</p> <p style="text-align: center;">Page 36</p>

<p>1 Superintendent -- Brannigan, CTI cite in their annex 1                  2 the number of fire appliances and ambulances overall who                  3 Mr Brannigan said attended the scene. That says nothing                  4 at all about, with respect, our point that they were all                  5 concentrated -- resources were nearly all concentrated                  6 around the Mulberry Bush site and there was a lack of                  7 ambulance and other resources to assist those who had                  8 been injured in the blasts at the Tavern.                  9 It is also not clear what material the authors of                  10 those reports had before them when they made those                  11 reports. Were they simply talking as a matter of                  12 personal impressions? We don't know, and there is no                  13 analysis in those reports as against the policy                  14 expectations at the time.                  15 As CTI acknowledged, Mr Mervyn John Frayne, the                  16 senior fire brigade officer who is the author of one of                  17 those three reports, has himself cast doubt on its                  18 contents subsequently. Indeed, interested persons as we                  19 understand it have not yet received disclosure of the                  20 first of those reports, the ones by Mr Brannigan so                  21 I take my observations based on the contents of CTI's                  22 annex 1.                  23 So there are all sorts of reasons, sir, why we                  24 respectfully submit that the arguable failings that we                  25 have identified are not negated by any material that CTI</p> <p style="text-align: center;">Page 37</p>	<p>1 a matter of common sense that an emergency response, the                  2 promptness, the quality, the amount and nature of the                  3 resources that are able to come to the scene and the way                  4 in which they are directed will in turn impact upon                  5 survivability. That in itself in our submission should                  6 raise sufficient to warrant further investigation.                  7 Secondly, in relation to the survivability point,                  8 sir, we observe that logically it is important to                  9 establish what should have happened and whether it did                  10 happen, before really one can assess whether that would                  11 have made a material difference or a possible difference                  12 to people's prospects of survival.                  13 The third point in relation to the survivability                  14 point, sir, is we do emphasise how limited the evidence                  15 is at this stage. As you will be aware, the post-mortem                  16 reports of the time are brief. There are a lack of                  17 statements from hospital personnel, medical records.                  18 Nat Carey, the senior pathologist's, overview report                  19 that we have recently had, highlights that many people                  20 suffered very severe injuries as a result of being in                  21 one or other of these locations at the time when the                  22 bombs were detonated, including for example traumatic                  23 amputations, but did survive.                  24 We don't, as CTI suggests at paragraph 34, for                  25 a minute suggest that that means that that is evidence</p> <p style="text-align: center;">Page 39</p>
<p>1 have produced.                  2 Thirdly, sir -- and this is probably if I may                  3 respectfully say so the nub of CTI's contentions, and                  4 therefore I need to address it. As we understand it,                  5 they say that because there is at this stage a lack of                  6 causal evidence between the failings that -- or                  7 potential failings -- we have identified and individual                  8 deaths, this is not a matter that should come within                  9 scope.                  10 I have already addressed the legal side of it, but                  11 in terms of the factual side of it, we emphasise that we                  12 are at an early stage of the evidence-gathering process                  13 and we submit it would be very much to put the cart                  14 before the horse to determine that these topics are out                  15 of scope at this stage on the basis that there is                  16 insufficient evidence to warrant a more detailed                  17 investigation of the evidence that may be out there.                  18 We observe as well, sir, that it is a matter of                  19 common sense that if there were failings of the kind                  20 that we have suggested the evidence may well indicate in                  21 respect of the emergency response and in particular the                  22 early part of it on the night in question, it is likely                  23 to have had some impact on casualties, save in                  24 a situation where everyone dies almost instantaneously.                  25 And plainly everyone didn't die, thankfully. It is</p> <p style="text-align: center;">Page 38</p>	<p>1 to support the proposition that everyone would survive,                  2 but it certainly raises at the very least a possibility                  3 worthy of investigation that people, even those                  4 proximate to the blast who suffered very severe                  5 injuries, were able to survive.                  6 Sir, it may be said that Mr Carey's last sentence,                  7 which may be easiest to look at CTI's citation of it                  8 rather than to go to Mr Carey's report itself -- sir, it                  9 is paragraph 27 again --                  10 THE CORONER: Yes.                  11 MS WILLIAMS: -- and you will see although there is                  12 a reference above it in any event to "young adults"                  13 having the ability potentially to survive longer, which                  14 is a point of relevance to both Desmond and Eugene                  15 Reilly who were both young men in their early 20s, both                  16 fit and healthy, but a point in particular I want to                  17 draw to your attention is that he makes an observation                  18 in the last sentence which CTI place some reliance on,                  19 namely that in none of the cases was there evidence of                  20 injuries of a kind where long-term survival and                  21 discharge from hospital, particularly if treated within                  22 minutes of the explosion, would have been likely in                  23 those days.                  24 As we understand it, it is said that that relatively                  25 pessimistic conclusion as regards survivability supports</p> <p style="text-align: center;">Page 40</p>

<p>1 the proposition that it is inappropriate at this stage                  2 to embark upon an overarching, as it is called, review                  3 or investigation into the quality of the emergency                  4 response.                  5 As regards that, sir, we emphasise firstly that                  6 Mr Carey has yet to consider in detail and prepare                  7 reports on each of the individual deceased.                  8 Secondly, the way in which he has expressed himself                  9 there, perfectly understandably in terms of preparing an                  10 initial overview report, doesn't address the question                  11 which ultimately -- or doesn't reflect the question                  12 which ultimately you would need to be considering at                  13 this stage, sir. The question is not whether people                  14 would have been in the situation where they could have                  15 been discharged from hospital, and the question at this                  16 stage is not simply what would have been likely, which                  17 is the test that Mr Carey uses, because for the reasons                  18 that I have indicated we are concerned with a broader                  19 position than what would have been likely.                  20 We do not have funding at this juncture to obtain                  21 our own expert evidence. As I say, Mr Carey has yet to                  22 provide -- perfectly understandably, it's not within the                  23 timetable he should have done it yet -- to provide                  24 individual reports.                  25 As Mr Skelton has referred to, we are also awaiting</p> <p style="text-align: center;">Page 41</p>	<p>1 point, survivability.                  2 THE CORONER: Thank you.                  3 MS WILLIAMS: It is one of my supporting points in relation                  4 to that. I am sorry if that was not clear, sir.                  5 THE CORONER: Thank you.                  6 MS WILLIAMS: Paragraph 35 as we understand it is CTI's                  7 proposal that evidence is considered in relation to each                  8 of the individuals separately, and only where necessary,                  9 as they put it -- too high a threshold we respectfully                  10 say, but they say "only as necessary" ie in those                  11 specific cases where it can be said that the emergency                  12 response may be relevant to the person's death -- should                  13 the response be explored further.                  14 We respectfully suggest that that gives rise to                  15 practical problems as well, not least given the                  16 provisional timetable that you have set, sir: we                  17 appreciate at this stage not set in stone, but                  18 a provisional timetable for inquests to commence in the                  19 autumn. If the sequence is to be that the individual                  20 post-mortem analysis in respect of each deceased is to                  21 be obtained from Mr Carey first, those documents are                  22 considered and only then an investigation into emergency                  23 response is begun, then that will raise real                  24 question marks, we would respectfully submit, as to                  25 whether that material would be ready in time for the</p> <p style="text-align: center;">Page 43</p>
<p>1 the report from Professor Bull, a specialist in blast                  2 injuries, and one of the questions that Professor Bull                  3 as we understand it from the letter of instruction has                  4 been asked to consider is the very question of                  5 survivability.                  6 We also understand from the footnote at the end of                  7 CTI's annex 1 that there may be more material to come in                  8 the form of doctor statements which we have not seen                  9 yet.                  10 So for all those reasons, sir, we respectfully                  11 submit that it would be premature to rule the emergency                  12 response as defined out of scope on the basis that there                  13 is a lack of clear link between potential failings and                  14 an individual death at this stage.                  15 There is also, sir, a practical concern -- this is                  16 my next point -- if matters are dealt with in the way                  17 that CTI propose, which is the way that they have set                  18 out paragraph 35, which proposes that the evidence is                  19 assembled in relation to individuals first of all.                  20 Presumably that is a reference to including for example                  21 Mr Carey's report in relation to individuals. Then, if                  22 that raises a --                  23 THE CORONER: I am sorry to interrupt, is this your fourth                  24 point of the --                  25 MS WILLIAMS: No, I'm sorry, I am dealing with the third</p> <p style="text-align: center;">Page 42</p>	<p>1 proposed start date of the inquest and/or the very                  2 undesirable prospect that matters are being received on                  3 this important subject by interested persons very late                  4 in the day. So in a nutshell we say as well it makes                  5 very good sense to be exploring these matters at this                  6 stage, rather than waiting for the individual                  7 post-mortem reports.                  8 One needs to see the bigger picture. To see                  9 a particular report or witness evidence may establish                  10 that person X was only removed from the rubble of                  11 building Y at a particular time, but as to whether that                  12 itself may or may not involve any potential failings one                  13 really has to already have the bigger picture of what                  14 time did the fire brigade arrive, what time did the                  15 ambulances arrive, and what kind of resources were                  16 available to them?                  17 And that material is there, sir, and that comes on                  18 to what is my fourth point under the emergency response                  19 heading which is to address what we also understand to                  20 be a concern of CTI, namely whether it is practical to                  21 consider this topic as an evidential topic at the                  22 inquest and, in particular, their position as we                  23 understand it is summarised in their paragraph 36F,                  24 where they say it is not a practical proposition, that                  25 only short statements were taken from some witnesses,</p> <p style="text-align: center;">Page 44</p>

<p>1 largely back in 1974 and so forth.                  2 THE CORONER: 36F? There isn't an F?                  3 MS WILLIAMS: It is an E, I'm sorry. I can't read my own                  4 writing. It is an E.                  5 THE CORONER: Thank you.                  6 MS WILLIAMS: So we respectfully suggest, then, it is                  7 a practical proposition as far as we have been able to                  8 analyse in the time available. We have seen statements                  9 from 20 police officers who attended and were involved                  10 in the aftermath. Of those, as we understand it -- and                  11 this is from my instructing solicitor's helpful                  12 research -- 18 of those are still alive, and indeed six                  13 of those officers were asked to produce more detailed                  14 statements in 2015/2016 and did so, which go into the                  15 detail of the emergency response on the night. If it is                  16 helpful I can list their names but it is probably                  17 unnecessary to do so for present purposes.                  18 That is not to say that the other officers                  19 necessarily were asked but could not, but it is not                  20 clear that more recent statements have been taken from                  21 those officers. But certainly six officers involved                  22 have given detailed statements in the last couple of                  23 years.                  24 A similar picture in relation to the fire brigade,                  25 where my instructing solicitor's researches indicate</p> <p style="text-align: center;">Page 45</p>	<p>1 were two we referred to in our written submissions,                  2 Mr Kerrigan and Mr Bradshaw, were indeed two ambulance                  3 personnel who were on standby and were unaware of the                  4 position at the Tavern in the Town.                  5 We have seen from a very recent document which was                  6 circulated by Solicitors to the Inquest yesterday, which                  7 is the document which sets out at a very preliminary                  8 stage now the evidence that might be assembled in                  9 relation to each individual deceased. We have seen                  10 names there of certain other ambulance personnel,                  11 including in relation to our clients, which suggest that                  12 there are other ambulance officers as well. We have not                  13 so far located statements on Relativity from those                  14 ambulance officers. I should say in one instance there                  15 is a part of a statement referred to in somebody else's                  16 post-mortem materials.                  17 THE CORONER: I wanted that schedule to be disclosed, even                  18 though not all the statements were yet available to be                  19 disclosed with it.                  20 MS WILLIAMS: Yes, it is very helpful.                  21 THE CORONER: To see what progress was being made and how                  22 that may help in relation to individual deceased.                  23 MS WILLIAMS: Thank you, sir.                  24 For present purposes, the main point is that that                  25 schedule would suggest in relation to our deceased,</p> <p style="text-align: center;">Page 47</p>
<p>1 they have located 17 fire brigade officers who attended                  2 the scene of which we have statements from twelve of                  3 them, and of those 17, 14 are still alive. Within that                  4 group of 14, 12 of them produced statements in 2015 to                  5 2016, and of that twelve, seven go into detail of the                  6 emergency response on the night.                  7 Again, I have the list of the actual names here, so                  8 it is detailed research that has been done by those who                  9 instruct me, but those are just examples that there are                  10 witnesses available who can deal with this matter in                  11 appropriate detail.                  12 Of course people are not going to remember after all                  13 this time the minutiae of precisely what time they were                  14 asked to go where, but it may very well be the case --                  15 and indeed these statements would suggest that it is --                  16 that people strongly remember, for example, being one of                  17 only very few officers at a particular scene, desperate                  18 for more help to arrive. Or remember being an ambulance                  19 stuck on standby waiting on the street for further                  20 direction, completely unaware that there were serious                  21 casualties at The Tavern in the Town. Those important                  22 matters are the kind of things that do stick in people's                  23 minds.                  24 In relation to the ambulances, so far as we can                  25 detect there were very few statements so far. There</p> <p style="text-align: center;">Page 46</p>	<p>1 amongst others, that there are also other ambulance                  2 personnel. There is reference in relation to one of our                  3 two deceased to two ambulance personnel who assisted in                  4 taking him to hospital.                  5 So there is, in our submission, significant evidence                  6 out there that can materially assist with the position                  7 in relation to the emergency response. Indeed, the lack                  8 of ambulance statements that we have seen at this stage                  9 insofar as it is said, "well, you have not directly                  10 pointed to failing A which caused death B", we haven't                  11 got the statements from the ambulance personnel and it                  12 would be very difficult to do so.                  13 Of course there are other documents. We don't, for                  14 a second, as I say, minimise the difficulties. We                  15 accept that there is likely to be less evidence                  16 ultimately than there was in relation to the                  17 Hillsborough Inquest -- a point that CTI makes -- given                  18 the extensive CCTV and video material that was available                  19 in relation to that disaster. But nonetheless it is                  20 also the fact that until the Hillsborough Independent                  21 Panel did its work, there had been little focus on the                  22 emergency response and it was as a result of                  23 investigations that were carried out that considerable                  24 material was assembled that had not previously been                  25 considered.</p> <p style="text-align: center;">Page 48</p>

<p>1 Plainly it is an ongoing process. We have already                  2 heard from Mr Skelton this morning about archives that                  3 are being searched and considered at this stage. We                  4 received -- I believe it was on Friday -- an interesting                  5 document from the Police College referring to                  6 contingency planning for police officers, which                  7 certainly suggests that one would expect there to be                  8 written, documented plans held by West Midlands Police                  9 at the time, and indeed that they would have been                  10 expected to take the lead in co-ordinating the emergency                  11 response. Of course, the court will be assisted in due                  12 course from the other experts' reports that are being                  13 referred to and the other enquiries that are ongoing.                  14 So for all those reasons, sir, we submit of course                  15 it is not going to be straightforward, but it is                  16 a practical proposition to investigate and hear evidence                  17 about such matters.                  18 Sir, those are the points that we seek to make in                  19 relation to the emergency response. If I can turn to                  20 perpetrators next?                  21 We have defined the issue in paragraph 41 of our                  22 submissions but I think it is the same as Mr Suter set                  23 out in the agenda note in any event. We have summarised                  24 our submissions at paragraph 42. Again, I will not go                  25 through the detail of them; I will focus on responding</p> <p style="text-align: center;">Page 49</p>	<p>1 We agree so far, but where we part company with CTI                  2 is the proposition that that position dictates or indeed                  3 even indicates that the topic of who were the                  4 perpetrators should not be explored at the inquest. We                  5 submit that section 10(2) simply provides a restriction                  6 upon how a conclusion is expressed and it is not an                  7 indicator in itself of the proper scope of the                  8 investigation or the evidence to be called.                  9 The case law, in our submission, makes clear that                  10 a verdict of unlawful killing in itself does not offend                  11 section 10(2) or its predecessors provided no one is                  12 named, and even in circumstances where an inference may                  13 be drawn from evidence heard at the inquest or other                  14 surrounding circumstances as to who the individual or                  15 individuals responsible in fact for the killing were.                  16 The fact that a verdict of unlawful killing is                  17 permissible and has been said time and again in the                  18 authorities not to offend section 10(2), or its                  19 equivalent earlier incarnations, itself indicates that                  20 the section does not preclude evidence being heard that                  21 will show that the death was the result of a crime,                  22 because a fortiori it is only possible to reach                  23 a conclusion of unlawful killing if evidence has been                  24 heard in support of that proposition.                  25 Secondly, and perhaps most importantly for present</p> <p style="text-align: center;">Page 51</p>
<p>1 to points made by CTI and other interested persons.                  2 But of course, in general we have emphasised in our                  3 submissions that the planting of the bombs and the                  4 actions immediately around that, including the giving of                  5 the late warning telephone call to the local newspapers                  6 and so forth, are intimately part of the circumstances                  7 of the death in terms of time and place and causal                  8 effect. Therefore, if it is a practical possibility                  9 then our submission is that the starting point is that                  10 these matters, which everyone accepts are of profound                  11 public interest as well of course of interest to the                  12 bereaved, are matters considered within the scope of                  13 this inquest.                  14 So, turning to deal with the points raised by CTI,                  15 I have six short topics to deal with.                  16 Firstly is the significance or otherwise of                  17 section 10(2) of the Coroners Act 2009, which as you                  18 will be very well aware, sir, prevents the naming of any                  19 individual in the context of criminal liability in the                  20 conclusions reached at an inquest.                  21 We agree, as CTI say at their paragraphs 42 to 47,                  22 that the effect of that section is that the inquest                  23 conclusions cannot record by name who committed the                  24 bombings, even if the evidence pointed in a particular                  25 direction once it was heard.</p> <p style="text-align: center;">Page 50</p>	<p>1 purposes, the authorities confirm that if and insofar as                  2 there might appear to be any conflict between                  3 section 10(2) and the coroner's duty to inquire, that                  4 conflict must be resolved in favour of the latter, in                  5 favour of the duty to inquire.                  6 That proposition, which has been expressed in a                  7 number of authorities, in our respectful submission is                  8 inconsistent with CTI's proposition that the existence                  9 of section 10(2) is an indicator that these sort of                  10 matters are not intended to come within the topic of an                  11 inquest.                  12 Respectfully, we say that CTI's approach to                  13 section 10(2) is letting the tail wag the dog. The                  14 authorities in particular that we rely on -- and this is                  15 also covered in paragraphs 45 to 49 of our                  16 submissions -- again, sir, conscious of time can I just                  17 give you the references?                  18 Tab 7, which is the ex parte Gray case, page 479,                  19 letters C to G. Tab 9, which is the ex parte Homber                  20 case, page 369, letters C to D. Tab 10, the Jamieson                  21 case, page 24, letters B to E.                  22 Pausing there for a moment, which is where as you                  23 will recall Lord Justice Bingham, as he was then, set                  24 out what he described as general conclusions, and                  25 general conclusions 3 to 5 are very much on point.</p> <p style="text-align: center;">Page 52</p>

<p>1 General conclusion 5 is the one in which Lord Bingham 2 states, as I have already summarised, that where there 3 is any conflict between the prohibition on naming 4 a person as responsible criminally for the death and the 5 duty to inquire, it is the duty to inquiry that must 6 prevail. 7 THE CORONER: Can I just see that for a moment? 8 MS WILLIAMS: Of course, sir. It is 10. It may be useful 9 to turn it up for another reason as well that 10 I mention -- 11 THE CORONER: Page 24? 12 MS WILLIAMS: Page 24, tab 10, sir, yes. 13 You will see that general conclusion 3 refers to the 14 prohibition -- 15 THE CORONER: Yes. 16 MS WILLIAMS: -- and then you will see conclusion 4, which 17 is worth referring to because CTI cite it in this 18 section of their submissions, is where Lord Bingham 19 said: 20 "This prohibition is fortified by considerations of 21 fairness." 22 And he then refers to various safeguards that would 23 not apply to the inquest -- 24 THE CORONER: And explains why, the public policy behind the 25 prohibition.</p> <p style="text-align: center;">Page 53</p>	<p>1 MS WILLIAMS: No, sir. We don't seek for the names of the 2 perpetrators to be included in the jury's conclusions. 3 THE CORONER: No. Names to be named in the inquest, in the 4 evidence? 5 MS WILLIAMS: Yes, during the course of the evidence, yes. 6 THE CORONER: As I understand your submission, you are 7 saying they can't be named in the conclusion but they 8 can be named every day in the evidence? 9 MS WILLIAMS: Yes, that's correct, sir, yes. But what we 10 also say is that -- 11 THE CORONER: Is it that sentence which gives that 12 permission -- 13 MS WILLIAMS: Yes. 14 THE CORONER: -- or is there any other sentence which you 15 rely on? 16 MS WILLIAMS: The paragraphs in the cases which I also gave 17 you the citations for also cover the same point, sir. 18 THE CORONER: Right. 19 MS WILLIAMS: My Lord, I am slightly hesitant because naming 20 is in a sense a topic for itself. Obviously, as you 21 will be very well aware, coroners have certain powers to 22 grant anonymity in appropriate circumstances. 23 THE CORONER: Yes. 24 MS WILLIAMS: So in a sense naming is not the crux of the 25 matter for now. The crux of the matter for now, in our</p> <p style="text-align: center;">Page 55</p>
<p>1 MS WILLIAMS: Precisely. But it is the prohibition that he 2 is explaining there -- 3 THE CORONER: Yes. 4 MS WILLIAMS: -- not the proposition that an inquest as 5 a matter of scope should not consider who perpetrated 6 the offending that led to the death. 7 THE CORONER: Yes. 8 MS WILLIAMS: You will see at 5, immediately below 4 so its 9 juxtaposition is important as well, that nonetheless 10 having noted the absence of those particular safeguards, 11 Lord Justice Bingham continues at 5: 12 "It may be accepted that in a case of conflict the 13 statutory duty to ascertain how the deceased came by his 14 death must prevail ..." 15 Over the prohibition in what was then Rule 42, but 16 it is in materially the same terms. Then he explains 17 the scope for conflict is small because Rule 42 applies 18 and applies only to the verdict as they were in those 19 days, conclusions now. 20 Plainly the coroner and the jury may explore facts 21 bearing on criminal and civil liability. 22 THE CORONER: Is it that sentence -- 23 MS WILLIAMS: Yes. 24 THE CORONER: -- which you say gives me the power to allow 25 names to be named?</p> <p style="text-align: center;">Page 54</p>	<p>1 respectful submission, is whether CTI are correct to 2 suggest that the existence of section 10(2) is a pointer 3 towards a conclusion that considering evidence as to how 4 somebody came by their death where criminal offending is 5 involved should not be within the purview of an inquest. 6 THE CORONER: So what, in your submission, does that include 7 or exclude? 8 MS WILLIAMS: In our submission, sir, section 10(2) only 9 excludes the naming in the conclusion. It does not 10 provide an indicator as to scope because, as 11 Lord Bingham says quite clearly here and as is said in 12 the other authorities we have referred you to, the duty 13 of the coroner to investigate prevails. 14 So in our respectful submission, sir, your starting 15 point is the usual one of considering whether matters 16 are sufficiently connected or may be connected in terms 17 of time, place, causal relationship and so on. And if 18 as a result of assessing those matters you consider that 19 the topic of perpetrators is within the scope, then you 20 should not then be deflected from that provisional view 21 by the existence of section 10(2). 22 THE CORONER: Yes. But I mean we are talking about names, 23 aren't we? That is what "perpetrators" means? 24 MS WILLIAMS: We understood CTI's submissions to go somewhat 25 broader than that, that it was not just a question of</p> <p style="text-align: center;">Page 56</p>

<p>1 whether the individuals were named --                  2 THE CORONER: I just want your submissions. Your                  3 submissions.                  4 MS WILLIAMS: Yes, but I just want to, if I may sir, just                  5 clarify what I'm responding to.                  6 THE CORONER: Yes.                  7 MS WILLIAMS: My understanding is that CTI's submission is                  8 that the topic, not just the naming of individuals but                  9 the topic of who planted the bombs, how they were                  10 planted, when they were planted, how that came about, is                  11 not a matter for the inquest to consider.                  12 THE CORONER: If those three which you have just listed --                  13 who planted, how planted, how it came about -- are                  14 considered then you are saying individuals -- the                  15 responsibility of individuals can be named and explored                  16 in the evidence?                  17 MS WILLIAMS: Yes, sir. But as I say subject -- of course,                  18 any individual would have the opportunity to make an                  19 anonymity application which you would then have to                  20 consider on its merits.                  21 THE CORONER: Yes.                  22 MS WILLIAMS: But that is a different power which you have.                  23 I am not seeking to pre-empt at this stage or express                  24 a view on the merits of any such application but that's                  25 not a question of scope.</p> <p style="text-align: center;">Page 57</p>	<p>1 available to their clients that they would want to take                  2 advantage of.                  3 But in terms of the scope --                  4 THE CORONER: In practice they would all have to be                  5 represented?                  6 MS WILLIAMS: They would clearly have to be offered the                  7 opportunity of interested person status and the                  8 opportunity of representation. That must be right, sir.                  9 I do appreciate that this would expand significantly                  10 the scope of the inquest. We don't make these                  11 submissions lightly but these are, as I am sure you                  12 understand, important matters for our client.                  13 THE CORONER: Yes.                  14 Will you come to the Birmingham Six separately?                  15 MS WILLIAMS: Yes, I will deal with that point in due                  16 course.                  17 THE CORONER: Thank you.                  18 MS WILLIAMS: Sir, again I don't think we need turn it up if                  19 I can perhaps just give you the references, but two                  20 other cases also on this point. Tab 14, which is a case                  21 my learned friend Mr Johnson has referred to in his                  22 submissions --                  23 THE CORONER: Yes.                  24 MS WILLIAMS: -- the South Derbyshire ex parte Hart Junior                  25 case, which is a case where an individual brought</p> <p style="text-align: center;">Page 59</p>
<p>1 THE CORONER: No.                  2 MS WILLIAMS: I hope that has made it a bit clearer.                  3 THE CORONER: Yes.                  4 So subject to anonymity applications -- let's set                  5 that on one side as that raises different issues -- if                  6 evidence is called about individuals -- we will come to                  7 the Birmingham Six separately, I believe -- but if                  8 evidence is called about other individuals and what                  9 their responsibility was, in your submission that                  10 evidence of their responsibility and who they were could                  11 be explored in detail in the evidence?                  12 MS WILLIAMS: Indeed, sir.                  13 THE CORONER: And published in the press without any                  14 restriction subject to anonymity orders?                  15 MS WILLIAMS: Indeed, sir. Again, there are certain                  16 protections in addition to anonymity orders the                  17 individuals may seek --                  18 THE CORONER: Contempt of Court Act orders.                  19 MS WILLIAMS: Yes.                  20 THE CORONER: Assume they are not in place for the moment.                  21 So they could be, as it were, named and shamed in the                  22 press without restraint?                  23 MS WILLIAMS: Sir, at the risk of repeating myself, it will                  24 obviously be a matter for those representing any such                  25 individuals to consider whether there were protections</p> <p style="text-align: center;">Page 58</p>	<p>1 a judicial review after an inquest complaining that he                  2 had in effect been named and shamed at the inquest, that                  3 questions had been asked by the relevant police force at                  4 the inquest suggesting that he was responsible for                  5 killing the deceased, and his judicial review was                  6 unsuccessful.                  7 Perhaps I can invite you to look at it in due                  8 course, but I just want to give you some references --                  9 THE CORONER: Please.                  10 MS WILLIAMS: Mr Johnson refers to paragraphs 94 and 95,                  11 which are in our submission initial observations which                  12 need to be placed in the context of the reasoning which                  13 Mr Justice Newman then goes through in respect of the                  14 circumstances before him.                  15 Can we invite you, when you have an opportunity to                  16 do so, please, to read paragraphs 118 to 120,                  17 particularly down to the end of the first sentence in                  18 120; then also 123 to 125 and 130. There you will see                  19 Mr Justice Newman's reasoning as to why the questioning                  20 of the applicant for judicial review at the inquest did                  21 not amount in any way to an error of law or procedural                  22 impropriety.                  23 Sir, that was my first subtopic in relation to                  24 perpetrators. The second one I can deal with much more                  25 briefly. It is suggested in Counsel to the Inquiry's</p> <p style="text-align: center;">Page 60</p>

<p>1 submissions at paragraph 51 that there would be a lack 2 of utility, as they put it, in embarking on this process 3 if the perpetrators could not, in any event, be named in 4 the conclusions. 5 In our submissions, there are good reasons to embark 6 on this process. More broadly because of the profound 7 wish of those we represent to find answers; and 8 secondly, because in turn that could lead to meaningful 9 answers to the kind of questions that we have flagged at 10 paragraph 43 of our submissions where we give examples. 11 This is a non-exhaustive list but we give examples of 12 the kind of topics, sub-topics, that could be explored 13 if evidence relating to the perpetrators were called at 14 the inquest. 15 So just to take one obvious example, if there is 16 evidence about how and when the bombs were actually 17 planted in the respective public houses, it becomes 18 a much more meaningful process to assess whether there 19 was opportunity to detect that either before or as it 20 was happening, or any signs that might have alerted any 21 relevant person in the immediate aftermath. 22 Equally in relation to the warning call received by 23 local newspapers at 8.11 pm, shortly before the first 24 bomb detonated: questions around why that warning was 25 not given earlier, questions around why it was vague and</p> <p style="text-align: center;">Page 61</p>	<p>1 about -- 2 THE CORONER: Which paragraph? 3 MS WILLIAMS: 53, sir. There were questions about 4 difficulties if sensitive material had to be gone into. 5 In relation to that, sir, we say well that is simply 6 an unknown at this stage. It is not a reason not to 7 embark on scope when we simply don't know. And 8 obviously inquiries are being made in relation to the 9 informer issue and that might raise sensitive matters. 10 Fifthly, I need to deal with what I apprehend you 11 had in mind, sir, when you referred to the 12 Birmingham Six, and that is the effect of schedule 1, 13 paragraph 8(5) of the Coroners Act. As we understand 14 CTT's submission, it is to raise a concern that that 15 could be offended given the acquittal of the 16 Birmingham Six. 17 Sir, it is instructive to look at the specific 18 wording of schedule 1, paragraph 8(5). 19 THE CORONER: I have it. 20 MS WILLIAMS: It says: 21 "In the case of an investigation resumed under this 22 paragraph ..." 23 Well, that is us. We are an inquest resumed under 24 this paragraph. Then it says: 25 "A determination under section 10(1)(A) may not be</p> <p style="text-align: center;">Page 63</p>
<p>1 didn't in fact identify specifically The Tavern in the 2 Town as a location, can be meaningfully explored if 3 evidence relating to the perpetrators is heard. 4 So that deals with the utility. Third is the point 5 about lack of procedural protection, which is CTT's 6 paragraph 52. We have touched on that, sir, in any 7 event in the discussion that we have just had, so 8 I don't seek to repeat what I have already said about 9 certain applications that could be made by those 10 representing anybody who was potentially on evidence to 11 be called to be considered a potential perpetrator or to 12 have some involvement. 13 There are other protections as well, sir, as you 14 will be very well aware: the privilege against 15 self-incrimination, earlier interviews to the extent 16 that they were conducted would be conducted under 17 caution, legal representation available, interested 18 person status and so on. 19 Without repeating -- well, repeating but very, very 20 briefly, that Lord Justice Bingham in Jamieson, aware of 21 the lesser degree of protections that would operate than 22 in criminal proceedings, nevertheless said what he did 23 in general conclusion 5. 24 The fourth point I can also deal with very, very 25 briefly. CTT's paragraph 53, they raise questions</p> <p style="text-align: center;">Page 62</p>	<p>1 inconsistent with the outcome of the proceedings in 2 respect of the charge or each charge by reason of which 3 the investigation was suspended." 4 Pausing there, we accept the investigation was 5 suspended because of the prosecution of the 6 Birmingham Six. We accept that the verdicts of not 7 guilty ultimately recorded by the Court of Appeal in 8 respect of the Birmingham Six are the relevant outcome 9 for these purposes. But is very important to note that 10 paragraph 8(5) is expressed in terms in respect of 11 a prohibition on a determination under section 10(1)(a) 12 not being inconsistent. 13 If one goes back to section 10(1)(a), as you will be 14 familiar, sir, a determination under section 10(1)(a) is 15 the conclusions that are expressed in respect of the 16 section 5 statutory questions, so the identity of the 17 deceased, the how, well and where and in what 18 circumstances they died. 19 As we know, in relation to those determinations, 20 10(2) specifically prohibits the naming of any 21 individual in respect of criminal liability. So our 22 submission is that there would be no inconsistency 23 between a determination under section 10(1)(a), which 24 could in any event not go further than a reference to 25 unlawful killing, could not name anyone, and the outcome</p> <p style="text-align: center;">Page 64</p>

<p>1 of the proceedings in which not guilty verdicts were 2 entered.</p> <p>3 It is only in relation to the section 10(1)(a) 4 determination that inconsistency is prohibited. If the 5 statutory intention was to prohibit, for example, 6 evidence being called that might raise inconsistency 7 with the earlier outcome, then the section would have 8 said that.</p> <p>9 Sir, it is noteworthy, and you will see it in the 10 case law which I am going to take you to very briefly in 11 a moment, that in the previous incarnation of this 12 provision which I think from memory was section 16, 13 subsection 7 of the 1984 Coroners Act, the wording was 14 "findings" which was the terminology used in those days. 15 So the legislature has very specifically changed the 16 wording in the provision from "findings" to 17 "determination" and it has plainly done that because 18 that is where the prohibition bites, which is only on 19 the determination.</p> <p>20 CTI say, "If we are right about that, well then, 21 8(5) would be otiose. You wouldn't need it." That, 22 respectfully, is not correct, sir, and the authority 23 that I invite you to have regard to will provide an 24 illustration of that.</p> <p>25 Sir, that is the Weatherhead case, which we asked to</p> <p style="text-align: center;">Page 65</p>	<p>1 Home Secretary.</p> <p>2 THE CORONER: I think I know the essence of it, but give me 3 the relevant pages.</p> <p>4 MS WILLIAMS: I will, sir. Page 4, the paragraph on the 5 second half of the page, third line down, you will 6 see it starts: 7 "On 7 April 1994, Mr Heathcliffe, the coroner, wrote 8 to the Home Secretary ..."</p> <p>9 And then you can follow the correspondence through 10 for the next few pages.</p> <p>11 You will see on page 5, that in the letter of 12 22 July -- the one referred to in the middle of the 13 page -- the Home Secretary was initially of the view 14 that in effect equates to CTI's view that there would be 15 an inconsistency between the coroner looking into 16 evidence that the husband had murdered the lady in 17 question after he had been acquitted in the criminal 18 proceedings.</p> <p>19 There was then some further correspondence because 20 the coroner wrote back, you will see bottom of 5 and 21 over to 6, where he said -- and you will see it, 22 subparagraph F -- that he respectfully suggested that 23 the possible verdict of unlawful killing would not 24 conflict with the Crown Court --</p> <p>25 THE CORONER: Which band are these at?</p> <p style="text-align: center;">Page 67</p>
<p>1 be added to the bundle of authorities and hence it 2 appears as the last tab at tab 41. If we could just 3 turn to that very briefly. This was a case where the 4 applicant's sister disappeared after the night before 5 witnesses heard a very loud argument taking place 6 between her and her husband. At least at the time of 7 these proceedings a body had not been recovered but the 8 husband had been arrested and charged with murder.</p> <p>9 Sorry, he was initially arrested, not charged. He 10 subsequently was tape-recorded admitting the murder to 11 an undercover police officer and he was then recharged. 12 He was acquitted at the criminal trial after that 13 confession was excluded from evidence under sections 76 14 and 78 of the Police and Criminal Evidence Act.</p> <p>15 After that, the coroner wrote to the Home Secretary 16 seeking a direction to re-open the inquest under 17 section 15 of the Coroners Act 1988. Because there was 18 no body, that is why the Home Secretary's direction was 19 needed as opposed to the coroner having the decision off 20 their own bat.</p> <p>21 I'm going to take it as fast as I can. I'm really 22 conscious of the time. If I can just take you through 23 the relevant references without going to them in any 24 detail, but you do need to look at the exchange of 25 correspondence between the coroner and the</p> <p style="text-align: center;">Page 66</p>	<p>1 MS WILLIAMS: Sorry, F and 6. So the coroner in effect was 2 advancing our proposition.</p> <p>3 There is then a further exchange of correspondence, 4 next page, February 1995, where the coroner maintained 5 his view. Then the matter was raised in Parliament. 6 You will see at the bottom of page 7, the Under 7 Secretary of State for the Home Department, Mr Nicholas 8 Baker.</p> <p>9 It is important to note within his statement in 10 Parliament, page 9, third paragraph, he says: 11 "Having taken further legal advice on this point, we 12 feel that a verdict of an inquest of unlawful killing 13 would not be inconsistent with an acquittal --"</p> <p>14 THE CORONER: I don't have that. Where is that? Page 8? 15 MS WILLIAMS: Page 9, third paragraph. 16 THE CORONER: Page 9, third photograph. 17 MS WILLIAMS: The Undersecretary said: 18 "Having taken further legal advice on this point, we 19 feel a verdict of an inquest of unlawful killing would 20 not be inconsistent with an acquittal in a criminal 21 trial in every case as the Coroner's Rules precludes 22 a coroner from naming the person who he believes to have 23 committed the unlawful killing." 24 So in effect our point. But he goes on to say -- 25 and I will paraphrase to save time -- in that particular</p> <p style="text-align: center;">Page 68</p>

<p>1 instance because there couldn't be anyone responsible                  2 other than Mr Hall, it was felt that the provision would                  3 be offended.                  4 In effect, the Divisional Court proceeds to endorse                  5 that view. If I just give you the references, it is                  6 Mr Justice May and it is pages 21 to 22.                  7 THE CORONER: Yes.                  8 MS WILLIAMS: Page 24, where he agrees with the                  9 Parliamentary statement and says there is no error of                  10 law, and page 26 he agrees that in general there would                  11 not be an inconsistency but he also agrees that there                  12 would be here because there could be only one                  13 perpetrator if there was a murder.                  14 So that, sir, is the answer to my learned friend                  15 Mr Skelton's submission: there may be circumstances in                  16 which paragraph 8(5) or its predecessors had a utility                  17 and that case provides an example. But here,                  18 obviously -- and I need not rehearse all the various                  19 possible suspects that have been named at one time or                  20 another -- but there are a myriad of possible                  21 perpetrators so we are not in that territory.                  22 There is one case -- I need not take you to it but                  23 I will give you reference -- that CTI cited on this                  24 topic --                  25 THE CORONER: Just give me a moment.</p> <p style="text-align: center;">Page 69</p>	<p>1 particular facts as well the applicant could have been                  2 the only perpetrator of what was an arson, or alleged to                  3 be an arson, that led to the death in question.                  4 So it may be there is no inconsistency between that                  5 and Weatherhead, but if there is any inconsistency, we                  6 respectfully submit that Weatherhead prevails because it                  7 was a case that specifically considered the point in                  8 issue as opposed to the matter being raised by way of an                  9 obiter dicta when submissions are not apparently being                  10 heard on the point and the Weatherhead case had not been                  11 cited.                  12 Sir, you will be relieved to know that takes me                  13 finally to what I said was my sixth point in relation to                  14 perpetrators. Just responding briefly to a point that                  15 CTI make at paragraph 50, last sentence. They say:                  16 "In the absence of any significant information or                  17 evidence as to new or potentially fruitful lines of                  18 inquiry, it is unrealistic to expect anything useful to                  19 be gained by such a course."                  20 That's to say a course of including perpetrators                  21 within the inquest.                  22 Firstly, as we have heard from Mr Skelton this                  23 morning, inquiries are shortly to be embarked on in                  24 relation to the informant issue, and plainly there is an                  25 overlap between that issue -- or a potential overlap --</p> <p style="text-align: center;">Page 71</p>
<p>1 Yes?                  2 MS WILLIAMS: That is the RJ case at tab 38. It is their                  3 footnote 26 to their paragraph 54. It is an observation                  4 made in that case about the import of paragraph 8(5).                  5 If I can do it briefly without taking you to the                  6 case, we pause to note it was not an issue in that case.                  7 The case was about funding and whether funding ought to                  8 be granted on the basis of an argument that the                  9 individual in question would in effect be facing the                  10 equivalent of a criminal charge at the inquest, and the                  11 court rejected that proposition.                  12 If you look through the summary of the submissions,                  13 it is all about that. There is no consideration of this                  14 issue at all, but in an obiter dicta the learned judge                  15 refers to paragraph 8(5). Weatherhead is not cited.                  16 THE CORONER: Sorry, just give me the page reference again.                  17 MS WILLIAMS: Yes, I'm sorry, sir. I will just turn it up.                  18 It is Mr Justice Leggatt and he deals with the                  19 points at paragraph 27.                  20 THE CORONER: Thank you.                  21 MS WILLIAMS: As I said, there is no citation of                  22 Weatherhead: unsurprisingly because it was not a point                  23 in the case, it is simply an obiter dicta observation.                  24 It may be that it is in fact consistent with                  25 Weatherhead in as much as it may be that on those</p> <p style="text-align: center;">Page 70</p>	<p>1 between that issue and who planted the bomb. So that                  2 very much suggests that there are potentially relevant                  3 inquiries in process or about to be in process.                  4 We had understood as well -- and this is                  5 paragraph 56 of our submissions -- that inquiries had                  6 been made of, amongst others, a former high-ranking IRA                  7 intelligence officer. The outcomes of that have been                  8 redacted so we are not privy to the details, but again                  9 the suggestion that there are matters that have been the                  10 subject of recent consideration, and at paragraph 58 of                  11 our submissions we have summarised the position in                  12 relation to various other individuals who have been                  13 named both in publications and in television programmes                  14 and given a degree of prominence as potential                  15 perpetrators. No doubt that naming occurred on a sound                  16 evidential basis.                  17 So whilst we are somewhat hamstrung in terms of the                  18 specific submissions we can make on the investigation,                  19 we respectfully submit that it would be too early at                  20 this stage to close the door on those lines of inquiry.                  21 It is also said that we have not identified any                  22 significant avenues of inquiry that were deficient in                  23 the earlier Devon and Cornwall Police investigations.                  24 Sir, you will appreciate that we have not had disclosure                  25 of the Aston 1 or Aston 2 reports so we are simply not</p> <p style="text-align: center;">Page 72</p>

<p>1 in a position to conduct an analysis of the 2 comprehensiveness or otherwise of those enquiries. 3 THE CORONER: Can I just go back to your fifth submission? 4 Have you finished the sixth? 5 MS WILLIAMS: I have. 6 THE CORONER: Yes. Just coming back to the Birmingham Six 7 case: is it your submission that through your reading of 8 section 10(2) and paragraph 8(5) that the case can be 9 reheard as it were in these proceedings? 10 MS WILLIAMS: Yes, sir. There is nothing to prevent that. 11 There is nothing legally to prevent that happening. 12 THE CORONER: Is that your submission? 13 MS WILLIAMS: I'm slightly cautious about the word "reheard" 14 because obviously there are concerns about some of the 15 evidence at that stage -- 16 THE CORONER: You use that in a general sense? 17 MS WILLIAMS: Yes. I am not suggesting a literal rehearing 18 of that case -- 19 THE CORONER: Relevant evidence from that case as to who the 20 perpetrators were could be revisited and should be 21 revisited? 22 MS WILLIAMS: Yes. Should be revisited, yes. 23 THE CORONER: Does that include, in your submission, the 24 police evidence and the scientific evidence which formed 25 the basis of the successful appeal ultimately?</p> <p style="text-align: center;">Page 73</p>	<p>1 relation to perpetrators should be confined to those 2 individuals. I am answering the particular question you 3 asked me about those individuals -- 4 THE CORONER: Yes. That would obviously apply to those who 5 have not been charged, who were never charged. 6 MS WILLIAMS: Yes. 7 THE CORONER: I am just focusing for the moment on these 8 six. The jury could come to findings, you say, which 9 were different from the ultimate outcome of the final 10 appeal? 11 MS WILLIAMS: Yes. You have my submissions: paragraph 8(5) 12 only prohibits a conflict with the section 10 13 determinations. 14 THE CORONER: Yes. 15 Could they make findings of fact which they record 16 naming persons or only in the conclusion? Let's say 17 they gave a short form conclusion of unlawful killing, 18 which is probably the only conclusion available in 19 a mass murder case: would they be entitled to add words 20 naming individuals? 21 MS WILLIAMS: My instinctive reaction, sir, is no, because 22 that would be part of the conclusions. Even if it is 23 expressed in a narrative way, it would still be part of 24 their conclusions. 25 THE CORONER: But in their deliberations they would be able</p> <p style="text-align: center;">Page 75</p>
<p>1 MS WILLIAMS: Yes, sir, within the broad description of 2 "revisited". Obviously we have not at this stage had an 3 opportunity to conduct a detailed evaluation of every 4 aspect of it. 5 THE CORONER: No, but it is obvious from the third decision 6 of the Court of Appeal in the Birmingham Six case, the 7 McIlkenny report, that they were the two central issues 8 in relation to the appeal ultimately. 9 MS WILLIAMS: Yes. Both of which have been fairly 10 comprehensively discredited by the time of the Court of 11 Appeal's decision, albeit they noted other evidence. 12 THE CORONER: Yes. And it would be your submission that, 13 for example, the police evidence about the use of the 14 notebooks and notes should be heard in evidence? 15 MS WILLIAMS: Yes. It would be relevant matters to hear, 16 sir, yes. 17 THE CORONER: And the jury could come to conclusions or make 18 findings of fact -- perhaps I should choose my words 19 carefully -- about the guilt or innocence of any one of 20 the Birmingham Six, whether alive or no longer alive, 21 but simply not name them? 22 MS WILLIAMS: Yes, sir. 23 Forgive me, because I am sure it is obvious to you 24 but for the benefit of others here as well, can I just 25 make clear we are not suggesting that evidence in</p> <p style="text-align: center;">Page 74</p>	<p>1 to make findings about individuals but just not name 2 them? 3 MS WILLIAMS: As a matter of law, again you have 4 a discretion, sir. It may be at that stage you would 5 choose to direct the jury in a certain way. But it is 6 not uncommon. I am familiar with situations where 7 people are named in findings that are arrived at but are 8 not referred to by name in the conclusions. 9 To take a simple example, for example, where 10 a coroner sits without a jury, the decision given at the 11 end, as you will be very familiar with, sir, normally 12 follows a format where the coroner first of all briefly 13 summarises the evidence heard, indicates their findings 14 of fact, before they then move on distinguishing between 15 that and the conclusions that will happen -- 16 THE CORONER: But juries don't do that. 17 MS WILLIAMS: No. But just to give that example, in that 18 situation persons can be named in the coroner's findings 19 without offending the prohibition on naming them in the 20 conclusions. So I fully accept juries don't do that, 21 but that is an example again of how the prohibition 22 bites only on the conclusions. 23 THE CORONER: So in a non-jury case, the coroner could say 24 in his final remarks -- nobody has yet found a word for 25 those remarks -- but in his final remarks in public,</p> <p style="text-align: center;">Page 76</p>

1 just taking this case, "and I find as a result of this  
 2 evidence which I accept that the following three members  
 3 of the Birmingham Six trial were guilty of murder, mass  
 4 murder, which for these purposes is to be called  
 5 unlawful killing and I therefore record my conclusion as  
 6 unlawful killing"?

7 MS WILLIAMS: Sir, yes.

8 THE CORONER: Without naming the person in that final  
 9 sentence?

10 MS WILLIAMS: As a matter of law the coroner could do that.  
 11 Obviously coroners have a broad discretion. A coroner  
 12 might make the decision at that juncture that it was  
 13 inappropriate to name those individuals at that stage  
 14 and no doubt would face representations from those  
 15 representing them that that was the case. But they  
 16 would have that discretion. They would not, as a matter  
 17 of law, be prohibited from doing so.

18 THE CORONER: So that would be a lawful end to the inquest,  
 19 to say "In my finding" -- the coroner could say "In my  
 20 finding they are guilty of a crime. I call that in my  
 21 conclusion unlawful killing and I name no names"?

22 MS WILLIAMS: Yes, it would be lawful. As I say, I fully  
 23 accept that some coroners might consider it  
 24 inappropriate and exercise their discretion in a way  
 25 that meant that they didn't name them, but it would be

Page 77

1 lawful to do so.

2 THE CORONER: Wouldn't there be a peculiar inconsistency in  
 3 that approach?

4 MS WILLIAMS: Well, section 10(2) creates that.

5 THE CORONER: It creates the possibility for that very  
 6 peculiar inconsistency?

7 MS WILLIAMS: Yes, the legislature could have expressed the  
 8 statutory prohibitions differently. They have been  
 9 a matter of some discussion if not controversy over the  
 10 years and no doubt they were reflected upon before the  
 11 2009 Coroners Act was enacted. As I have already  
 12 pointed out, the wording of paragraph 8(5) has changed  
 13 slightly so there clearly was a reflection upon its  
 14 terminology and extent.

15 THE CORONER: Yes.

16 MS WILLIAMS: Sir, the other matter we raised in our  
 17 submissions in relation to West Midlands Police,  
 18 I apprehend you want to focus to scope at present --

19 THE CORONER: Please, if I may.

20 MS WILLIAMS: I am merely, as it were, reminded to that  
 21 effect.

22 Thank you, sir. I am sorry it has taken rather  
 23 a long time.

24 THE CORONER: No, I am very grateful, thank you.  
 25 Who is next? The West Midlands Police? Mr Johnson?

Page 78

1 Submissions on behalf of the West Midlands Police by  
 2 MR JOHNSON

3 MR JOHNSON: Sir, yes, as you have indicated, I represent --

4 THE CORONER: Just give me a moment to reorganise my papers.

5 MR JOHNSON: Certainly.

6 THE CORONER: I have your submissions of 28 October last  
 7 year, including submissions on scope at paragraphs 17 to  
 8 44.

9 MR JOHNSON: I thought they were 26 October, but I am sure  
 10 we are talking about the same document.

11 THE CORONER: Yes, that is my writing.

12 Then a document of 6 February of this year which  
 13 doesn't say anything about scope; a letter of 19 May to  
 14 say there will be no further submissions, and a recent  
 15 letter of 25 May making one or two observations.

16 MR JOHNSON: Sir, that is exactly right. That is the full  
 17 set of material that we have advanced.

18 It follows from what you have just indicated that  
 19 our substantive submissions on scope are contained in  
 20 our document of October last year. I'm not going to  
 21 rehearse what we there say, and I can be very brief.

22 On the four topics that you are today considering in  
 23 relation to scope, we submit briefly as follows. On the  
 24 question of forewarning, we agree, certainly in the  
 25 light of the Senior Coroner's decision, that the topic

Page 79

1 of forewarning must come within the scope of these  
 2 inquests.

3 We certainly agree that the two sub-topics that led  
 4 the Senior Coroner to decide to resume the inquests must  
 5 come within that overall question of forewarning and  
 6 must be anxiously considered in detail by these  
 7 inquests; but we also respectfully agree with the  
 8 submission advanced by my learned friend Ms Williams  
 9 that the inquest should not necessarily be limited to  
 10 those two topics.

11 We have put a great deal of material before the  
 12 inquests. I know that you are carrying out further  
 13 investigations. It may be that in due course you would  
 14 wish to refine the precise boundaries or ambit of the  
 15 forewarning issue and we simply at this stage make it  
 16 clear that we respectfully agree with the submission  
 17 that just because the Senior Coroner limited her  
 18 decision to two particular areas of evidence, that  
 19 shouldn't foreclose the possibility of other  
 20 investigations.

21 So that is all we say on forewarning. As  
 22 I understand it, there is common agreement that that  
 23 falls within the scope.

24 The second topic was that of agent or informant.  
 25 You, sir, are carrying out further investigations in

Page 80

<p>1 relation to that, and in those circumstances we don't                  2 wish to advance any submissions at this stage. If                  3 submissions become necessary in the light of your                  4 further enquiries, we will advance them at the                  5 appropriate time.                  6 The third topic is that of the emergency response.                  7 On that, we respectfully agree with the submissions that                  8 have been advanced from an independent perspective by                  9 your counsel, Mr Skelton and Mr Hill, at paragraphs 23                  10 to 39 of their submissions.                  11 We agree with Ms Williams that it would be setting                  12 the bar too high to require proof at this stage that                  13 a failure in the emergency response caused a particular                  14 death before deciding to bring the question of the                  15 emergency response within the scope of the inquests. To                  16 use Ms Williams's metaphor that would indeed be putting                  17 the cart before the horse.                  18 But we don't understand Counsel to the Inquests to                  19 be making that submission. Our understanding is they                  20 advanced a far more nuanced and tailored and careful                  21 submission which puts it the other way round and leaves                  22 it open and flexible, depending on where the evidence                  23 goes.                  24 We take the ultimate conclusion, really, of their                  25 submission as being that set out at paragraph 35, where</p> <p style="text-align: center;">Page 81</p>	<p>1 unless you would wish me to do so?                  2 THE CORONER: No. Thank you very much.                  3 Devon and Cornwall? Mr Beer.                  4 Submissions on behalf of Devon and Cornwall Police by                  5 MR BEER                  6 MR BEER: Sir, thank you for allowing us the facility to                  7 make short submissions. You will have seen our                  8 submissions at tab 7 of your bundle.                  9 THE CORONER: Yes, just give me one moment. So in effect it                  10 is your submissions of 15 May.                  11 MR BEER: Yes, thank you.                  12 I have three short points. They are all responsive                  13 to what Ms Williams says. We agree with what your                  14 counsel say at paragraphs 40 to 60 of their submissions                  15 on the perpetrator issue. That is the only issue we                  16 address. We address it because Devon and Cornwall                  17 Police carried out two significant investigations,                  18 Aston 1 and Aston 2 into aspects of the Birmingham Pub                  19 Bombings.                  20 We agree with when what Mr Johnson has just said: as                  21 a police force, a natural instinct is to investigate                  22 crime and identify perpetrators. The issue for you is                  23 rather different; it is whether these inquests should be                  24 the vehicle within which that is done.                  25 The three short points are these. Firstly,</p> <p style="text-align: center;">Page 83</p>
<p>1 they say that where in specific cases it could be said                  2 that the emergency response may be relevant to                  3 an individual's death, then that response should be                  4 explored further.                  5 We agree with that approach, which we submit is                  6 principled and logical, and accords with the statutory                  7 framework. So, in short, we agree with the approach of                  8 Counsel to the Inquests as there set out.                  9 Sir, on the question of perpetrators, the fourth                  10 topic, we did address that in some detail in our written                  11 submissions of last year. Mr Skelton and Mr Hill                  12 addressed the same topic between paragraphs 40 and 60 of                  13 their submissions. We respectfully agree with their                  14 ultimate submission which we take to be summarised at                  15 paragraph 41 and paragraph 60, and effectively for the                  16 reasons they give, and with some real regret on my                  17 clients' part because all of my clients' instincts                  18 follow the submission that Ms Williams makes, and my                  19 client well understands why at a human level her client                  20 and no doubt the clients of KRW Law would fervently wish                  21 this topic to be within the scope of the inquests.                  22 Nevertheless, with some regret, we are driven to                  23 conclude that the analysis set out from an independent                  24 perspective by Counsel to the Inquests is correct.                  25 Sir, I'm not going to make any further submissions</p> <p style="text-align: center;">Page 82</p>	<p>1 addressing Ms Williams's submission on the effect of                  2 section 10(2) of the 2009 Act, she adopts a very                  3 legalistic approach to section 10(2) saying that it is                  4 limited to the determination recorded by the jury, and                  5 the limitation as recorded in the determination has no                  6 consequences at all for the scope of the inquest. That                  7 is the effect of her submission.                  8 It is that approach which led her to say that it                  9 would be lawful for a coroner to identify in side                  10 remarks or closing remarks those he found to be                  11 responsible for murder but then to, through a legal                  12 fiction, pretend as if that was not some public                  13 statement by not naming them in the determinations.                  14 There are two answers to that. Firstly, the answer                  15 that the court gave in Middleton. I wonder whether we                  16 could look at that first, please? It is tab 18 of the                  17 authorities bundle, starting at paragraph 36. The                  18 importance of Middleton --                  19 THE CORONER: Just one moment.                  20 MR BEER: Yes, of course.                  21 THE CORONER: Yes.                  22 MR BEER: The importance of Middleton is that it is                  23 a decision of the House of Lords but concerning the                  24 impact of Article 2 of the Convention. It addresses the                  25 prohibition then contained in Rule 42 of the Coroners'</p> <p style="text-align: center;">Page 84</p>

<p>1 Rules 1984, now in section 10(2) of the 2009 Act.                  2 Could I ask you to turn up paragraph 37 of                  3 Lord Bingham's speech, please, which is on page 202?                  4 Sir, I know you will be very familiar with this, but                  5 this comes within, as a reminder, a part of                  6 Lord Bingham's speech that begins at paragraph 33.                  7 THE CORONER: Yes, and 36 is possibly the most important                  8 paragraph in the lexicon of a coroner in relation to                  9 this kind of case.                  10 MR BEER: It is, exactly. Just to put it in context, if we                  11 go back to paragraph 33, he's addressing here: can the                  12 current regime governing the conduct of inquests in                  13 England and Wales be revised so as to meet the                  14 requirements of the Convention and if so how?                  15 As you rightly said, sir, then comes the important                  16 paragraph 36, but in our case 37 is still important,                  17 because he continues the prohibition in Rule 36 on the                  18 expression of opinion on matters not comprised within                  19 subrule 1 must continue to be respected, but it must be                  20 read with reference to the broader question of how in                  21 section 11(5)(b)(2) and Rule 36(1) and does not preclude                  22 conclusions of fact as opposed to expressions of                  23 opinion.                  24 Then this:                  25 "However the jury's factual conclusion is conveyed,</p> <p style="text-align: center;">Page 85</p>	<p>1 lawfully permissible as well. That has itself found                  2 reflection in the three previous iterations of Coroners                  3 Rules.                  4 Sir, you may be familiar with cases -- indeed                  5 I think you may have been party to the decision-making                  6 on one -- where the coroners have made side comments,                  7 remarks or riders. One concerning in particular the                  8 conduct at a firm of solicitors not recorded on the                  9 record of the inquest but in his closing remarks which                  10 was detrimental to their rights.                  11 The court held that the fact that it hadn't gone on                  12 the record of inquisition was irrelevant; it should not                  13 have been made and contravened the previous version of                  14 section 5(3) of the 2009 Act.                  15 We seem amongst us to have omitted to include that                  16 case in the bundle, but in the light of this                  17 submission --                  18 THE CORONER: Can you remember what it is called?                  19 MR BEER: I can remember the name of the counsel involved.                  20 Farrar.                  21 THE CORONER: Farrar.                  22 MR BEER: Farrar, thank you. So it was quashing of remarks                  23 a coroner made outside the confines of the record of                  24 inquest, rejecting a submission that just because it had                  25 not gone on the form, it didn't matter.</p> <p style="text-align: center;">Page 87</p>
<p>1 Rule 42 should not be infringed. There must be no                  2 finding of criminal liability on the part of a named                  3 person."                  4 So that is an express statement contrary to what                  5 Ms Williams was suggesting may be lawfully permissible,                  6 namely, making a factual statement that is not included                  7 within the determination or conclusion, ie the record of                  8 inquest, but nonetheless stating that the prohibition in                  9 Rule 42, now section 10(5), should not be infringed.                  10 The second answer to Ms Williams's suggestion -- and                  11 one of course appreciates the difficulty that she faced                  12 struggling to identify what the purpose of an inquest                  13 would be, that inquires into the identity of those that                  14 committed mass murder, but then which was prohibited                  15 from expressing a conclusion on who those people were.                  16 The second answer is section 5(3) of the 2009 Act.                  17 If you can turn that up, please, that is in tab 1,                  18 I appreciate, of the same bundle.                  19 Sir, if you have section 5(3), that contains an                  20 additional prohibition preventing the Senior Coroner and                  21 the jury from expressing any opinion on any matter other                  22 than the questions in 1A, 1B, read with subsection 2                  23 where applicable, so the who, how, when and where -- the                  24 "how" meaning sometimes in what circumstances -- so that                  25 would be a prohibition on what Ms Williams said would be</p> <p style="text-align: center;">Page 86</p>	<p>1 THE CORONER: Ms Williams might say that because there will                  2 be a jury, they will not be expressing or making                  3 findings of fact which are declared publicly, except                  4 perhaps in a narrative conclusion should they be minded                  5 to do so, and that therefore any names, although given                  6 extensively perhaps in evidence, would not be named by                  7 the jury. Not just in their conclusion but in anything                  8 else.                  9 MR BEER: Yes.                  10 THE CORONER: Because there would be nothing else other than                  11 the record of inquest.                  12 MR BEER: Yes, I was just addressing her first point.                  13 THE CORONER: I understand that.                  14 MR BEER: Moving on, which is in fact my second point --                  15 THE CORONER: She may not have much of a right of reply.                  16 I am just making that point.                  17 MR BEER: Yes, of course. The jury is restricted to that                  18 which is recorded in the record of inquest, but that                  19 takes me to my second point of reply, which is the                  20 effect of Ms Williams's submissions is that your inquest                  21 would spend months, many months if not the best part of                  22 a year, having regard to what we know as to the previous                  23 investigations that have been carried out only in                  24 relation to the Birmingham Six, less still or more so in                  25 relation to the range of other suspects that have been</p> <p style="text-align: center;">Page 88</p>

<p>1 named been KRW Law.                  2 THE CORONER: Do you mean in practice, let's say there were                  3 10 or 15 separately represented individuals --                  4 MR BEER: Yes.                  5 THE CORONER: -- or the estate --                  6 MR BEER: Or the estate of some of them, because some of                  7 them are dead.                  8 THE CORONER: Or the estates of individuals who have                  9 interested person status, who would be entitled to ask                  10 questions, as interested persons, of witnesses relevant                  11 to any possible participation by them?                  12 MR BEER: Yes. So we would hold an inquest that lasted many                  13 months, if not, as I say, the best part of a year,                  14 creating rumour and suspicion rather than allaying it,                  15 the antithesis to the purpose of an inquest; because all                  16 of that evidence would be focused on a target that could                  17 never materialise, namely a determination in which the                  18 perpetrators of this mass murder event were never                  19 identified.                  20 Ms Williams says there is utility in undertaking                  21 that task. If I can take you to her written                  22 submissions, because she relied upon them today, if you                  23 turn them up, please, I think they are in tab 3 of your                  24 bundle.                  25 THE CORONER: Yes.</p> <p style="text-align: center;">Page 89</p>	<p>1 ensure fairness to the dog. That's because of what Sir                  2 Thomas Bingham said, as he then was, at page 24,                  3 conclusion 4 of Jamieson.                  4 We need not turn it up, we have looked at it                  5 already. It is because an inquest is not like                  6 a criminal or civil trial, it is because it lacks many                  7 of the fundamental protections relevant to fundamental                  8 and constitutional rights of individuals, that the                  9 prohibition exists at all. It is the public policy                  10 reasons that Mr Skelton and Mr Hill rightly highlight.                  11 Lastly, sir, thirdly -- and I appreciate the time,                  12 I can hopefully complete this in three minutes or so --                  13 I should like to address Ms Williams's point that where                  14 a conflict exists between the duty to inquire into how                  15 the deceased died, and here in what circumstances, and                  16 the prohibition in section 10(2), the former duty                  17 prevails over the latter prohibition.                  18 THE CORONER: Point 5 in Jamieson.                  19 MR BEER: In this case there is no conflict because the                  20 prohibition does not prevent an examination or inquiry                  21 into the circumstances in which the deceased came by                  22 their deaths. It may of course be different and the                  23 conflict may exist in other cases where there is                  24 a choice between conclusions. For example, where there                  25 is a choice between an accident or an unlawful killing</p> <p style="text-align: center;">Page 91</p>
<p>1 MR BEER: I am so sorry, tab 4 of your bundle. Please turn                  2 to page 27, it is three lines from the top where she                  3 says:                  4 "We have already highlighted at paragraph 43 some of                  5 the reasons why it would be extremely valuable for the                  6 inquest to examine evidence relating to the perpetrators                  7 even though they would not be named in any conclusion."                  8 So if we go back to 43 to see what the reasons were,                  9 it would be B(?) C and D, effectively. But all of that                  10 is an exercise in a failed utility if it doesn't                  11 culminate in factual findings of a jury.                  12 Incidentally, it has the potential to cause real                  13 unfairness. Here I'm not concerned about fairness to                  14 the suspects; I'm concerned about fairness to all the                  15 witnesses and those others accused of wrongdoing whether                  16 related to the bombings or not.                  17 Ms Williams says that the restriction in                  18 section 10(2) is related to the conclusion or                  19 determinations alone: it has no impact and is irrelevant                  20 to the scope of the evidence that you should hear and                  21 she says it would be letting the tail wag the dog if the                  22 confines of the verdict were to dictate the evidence                  23 that was to be heard.                  24 But the reason why the prohibition is there -- the                  25 reason why the tail contains the prohibition -- is to</p> <p style="text-align: center;">Page 90</p>	<p>1 conclusion, a conclusion of unlawful killing would                  2 inevitably relate to the conduct of an identifiable,                  3 although not identified in the conclusion, individual.                  4 In such a case, the fact that an individual is                  5 identifiable, albeit unidentified in the record of                  6 inquest, is not a reason not to proceed with calling                  7 evidence at the inquest as between the verdicts of                  8 accident or unlawful killing. It is not a reason to                  9 comply with the duty.                  10 But here the inevitable conclusion is unlawful                  11 killing so there is no conflict between that conclusion                  12 which no doubt will be expressed by the jury and your                  13 duty to inquire -- the court's duty to inquire -- into                  14 how the deceased died.                  15 For those reasons, along with those we gave in our                  16 written submissions, we say it would not be lawful to                  17 inquire into the perpetrator issue.                  18 THE CORONER: Yes, thank you very much.                  19 I will rise now until five past two.                  20 (1.07 pm)                  21 (The short adjournment)                  22 (2.05 pm)                  23 Submissions on behalf of the Police Federation by MR DAVIES                  24 THE CORONER: Mr Davies?                  25 MR DAVIES: Sir, I make submissions on behalf of the Police</p> <p style="text-align: center;">Page 92</p>

<p>1 Federation of England and Wales.                  2 THE CORONER: Yes.                  3 MR DAVIES: It has not been designated as an interested                  4 person. Indeed it has not applied for that designation.                  5 For anyone who is not aware, of course, the Federation                  6 represents individual police officers of ranks up to but                  7 not including chief officer rank.                  8 In theory -- and this would be contingent on the                  9 scope of the inquest such as you determine -- certain of                  10 those officers may or may not become those with                  11 a sufficient interest to apply for designation.                  12 To cut straight to the point, the only realistic                  13 basis of engagement for any Police Federation officer                  14 past or present on the existing disclosed material would                  15 be in relation to their roles in relation to the                  16 original investigation leading to the prosecution of the                  17 Birmingham Six. There is no other apparent basis on                  18 which individual Federation members would qualify for                  19 interested person status.                  20 On behalf of the Federation as an organisation, the                  21 headline submission -- and it is paragraphs 24 and 25 of                  22 our written submission of 15 May this year -- and it is                  23 a conclusion we express with regret, but we say that you                  24 must approach the question of perpetrators -- which we                  25 would redefine to mean "responsibility" -- through the</p> <p style="text-align: center;">Page 93</p>	<p>1 I will come on to some short practical points, but                  2 they are no more than illustrations of the point. But                  3 can I take a step back in terms of the general                  4 propositions of law as to which you have been addressed?                  5 The limitations under section 10 need not be                  6 rehearsed again. It is equally obvious that the purpose                  7 of an inquest is to be interpreted narrowly to address                  8 the questions under section 5 of the Act.                  9 Sir, with that said, as a matter of principle -- and                  10 I am stepping back from the specific inquests to the                  11 generality here -- the question of responsibility, we                  12 say, is in principle one that an inquest can consider.                  13 If authority were needed for the point, I'm sorry to                  14 introduce a further authority, it is in the speech of                  15 Lord Bingham in <i>Jordan v Lord Chancellor</i> and another                  16 2007 UKHL 14 at paragraph 37.                  17 He said:                  18 "There was no issue between the parties concerning                  19 the purpose or scope of an inquest. Thus I take it to                  20 be common ground that the purpose of an inquest is to                  21 investigate fully and explore publicly the facts                  22 pertaining to a death occurring in suspicious, unnatural                  23 or violent circumstances ...(Reading to the words)... or                  24 where the deceased was in the custody of the state, with                  25 the help of a jury in some of the most serious classes</p> <p style="text-align: center;">Page 95</p>
<p>1 prism of practicability.                  2 Our conclusion, based on the disclosed material, is                  3 that the nature of the evidence, most specifically that                  4 which is no longer available, including witnesses now                  5 deceased or untraceable, documents that cannot be                  6 sourced, simply memories that have faded, promotes                  7 a conclusion, however unwelcome, that investigation into                  8 the individual perpetrators is now no longer                  9 practicable.                  10 It is made with regret on behalf of the Police                  11 Federation since the importance to the families of the                  12 deceased of resolving the defined issue of who                  13 perpetrated the bombings is both recognised and wholly                  14 legitimate. The wider public and Police Federation                  15 members no doubt share the objective of identifying                  16 those responsible for these acts of mass murder.                  17 But of course, as was stated in <i>Jamieson</i>, the                  18 purpose of an inquest is within the limitations                  19 attaching to conclusions, is to reach reliable findings                  20 of fact on qualifying issues. There can be no purpose                  21 in an inquest embarking on an exercise where it is                  22 obvious from the outset that the evidence will not                  23 produce a basis for reliable findings. We say unhappily                  24 on the question of responsibility that is where we are                  25 now.</p> <p style="text-align: center;">Page 94</p>	<p>1 of case. The coroner must decide how widely the Inquiry                  2 should range to elicit the facts pertinent to the                  3 circumstances of the death and responsibility for it.                  4 This may be a very difficult decision and the inquiry                  5 may, as pointed out above, range more widely than the                  6 verdict or findings. It is on the latter alone that the                  7 parties join issue."                  8 So of course, the particular inquest under review                  9 was in relation to the responsibility potentially of                  10 state agents, but there is no reason in principle, we                  11 say, for the question of responsibility so defined to be                  12 restricted to the conduct of state agents. Inquests sit                  13 in a range of circumstances and the circumstances of                  14 a death -- as apply to the immediate facts issues such                  15 as when and where were the bombs made, when were they                  16 planted and so on -- were it not for the passage of time                  17 those would be considerations, we would argue, that                  18 could legitimately come within the scope of the                  19 circumstances of these deaths. There would be no reason                  20 to exclude them from the type of inquiry, most                  21 particularly under Article 2, that you are engaging in.                  22 There is an application of <i>Jordan</i> in a further                  23 authority: Chief Constable of the PSNI's Application                  24 2010, Northern Ireland Queen's Bench Reports 66,                  25 a ruling of Mr Justice Gillen. I emphasise it is only</p> <p style="text-align: center;">Page 96</p>

<p>1 an application of the principle. The speech of                  2 Lord Bingham is sufficient to introduce the legitimacy                  3 of responsibility as a matter of inquiry.                  4 But if one turns, for example, to paragraphs 27 and                  5 28 of his ruling, he reflects in it on the wide                  6 discretion vested in you as to the procedure you will                  7 adopt in the course of your investigation and rehearses                  8 paragraph 37 from Jordan that I have just read, or at                  9 least part of it, and Mr Justice Gillen at 28 says:                  10 "I find no departure from this broad purposeful                  11 approach in any of the other authorities that have been                  12 quoted to me during this hearing. ...(Reading to the                  13 words)... On the contrary, the approach now adopted in                  14 the instant case by the coroner is securely founded in                  15 a number of authorities."                  16 He goes on to rehearse some.                  17 This was a ruling in the context of applications for                  18 disclosure, or rather resistance to applications for                  19 disclosure. The court upheld the approach of the                  20 coroner.                  21 At paragraphs 33 and 34, there is analysis of the                  22 familiar jurisprudence as to one of the purposes of the                  23 inquest being to allay suspicion and the limitation                  24 placed on that by, as he then was, Sir Thomas Bingham                  25 Master of the Rolls in McKerr, to say that the purpose</p> <p style="text-align: center;">Page 97</p>	<p>1 that the inquiry elicits fact pertinent to the                  2 circumstances of the death and the responsibility for                  3 the death."                  4 Sir, those authorities really, we say, serve to                  5 reinforce the principle that if it were practicable --                  6 and we say it is not -- to investigate the circumstances                  7 in which these bombs were made and by whom they were                  8 planted, and to produce reliable answers to those                  9 questions, albeit those answers could only be given                  10 subject to statutory limitations, then that would be                  11 within your discretion in terms of investigation.                  12 Unhappily, however, we say that is not the position.                  13 Any inquiry into responsibility for making and planting                  14 these bombs will necessarily involve investigation of                  15 the potential culpability of the Birmingham Six. It may                  16 involve investigation of the potential role of others,                  17 I don't know, but it is a fact that even in 1991, the                  18 Court of Appeal in McKenny said no retrial was                  19 possible.                  20 The effect of that decision was not, of course,                  21 a declaration of innocence. The not guilty verdict                  22 under the statute was entered, but they are different                  23 things.                  24 THE CORONER: I don't remember that phrase. Can you remind                  25 me, in McKenny, where that is?</p> <p style="text-align: center;">Page 99</p>
<p>1 should be confined to allaying rumours and suspicions of                  2 how the deceased came by his death, and not to allaying                  3 rumours or suspicions about the broad circumstances by                  4 which the deceased came by his death.                  5 Mr Justice Gillen goes on to observe that those                  6 observations:                  7 "... serve to illustrate a crucial difference                  8 between the nature of the inquest procedure and other                  9 criminal/civil litigation, where the concept of allaying                  10 rumours and suspicions would play no part whatsoever                  11 ...(Reading to the words)... whilst at the same time                  12 recognising the confines of that discretion within the                  13 coronial process. It is a further indication of the                  14 wide discretion vested in a coroner to make a liberal                  15 interpretation of the concept of relevance as                  16 circumstances demand."                  17 At 45, he said:                  18 "It is difficult to conceive of his [that is the                  19 coroner] performing that duty in the area of disclosure                  20 without eschewing matters that are too remote to his                  21 purpose and invoking the criterion of relevance albeit                  22 in the sense of what may be potentially or more                  23 generally relevant as the coroner has done in this                  24 instance. ...(Reading to the words)... While he need not                  25 be hidebound by technicalities, equally he must ensure</p> <p style="text-align: center;">Page 98</p>	<p>1 MR DAVIES: Yes, it is towards the end of the ruling.                  2 The court is considering, you see, under "The role                  3 of the Court of Appeal ..." --                  4 THE CORONER: What page?                  5 MR DAVIES: Page 310.                  6 THE CORONER: Yes.                  7 MR DAVIES: The statutory effect of quashing the conviction.                  8 When we quash the conviction the order operates by                  9 virtue of section 2(3) as a direction to the trial court                  10 to enter a verdict of acquittal, except where a retrial                  11 is ordered under section 7. Nothing in section 2 of                  12 the Act --                  13 THE CORONER: Where are you, on page 310?                  14 MR DAVIES: Yes, I'm in the subparagraph number 2.                  15 THE CORONER: I don't have that. I just have the Criminal                  16 Appeal Reports where the paragraphs are not numbered.                  17 I have two headings on page 310, "Custody records" and                  18 "The role of the court of appeal".                  19 MR DAVIES: Yes, "The role of the Court of Appeal", sir.                  20 I hope within that block --                  21 THE CORONER: I have 1, 2, 3, 4.                  22 MR DAVIES: Within 2 is the passage I have just read.                  23 THE CORONER: So start again.                  24 MR DAVIES: Going on to 311: the court is making, as it was                  25 at pains to do, the point that in allowing the appeal it</p> <p style="text-align: center;">Page 100</p>

<p>1 was expressing -- and did not by implication express any                  2 view on whether "we think the appellant is innocent".                  3 THE CORONER: But they don't say that a retrial is possible                  4 or impossible, do they?                  5 MR DAVIES: They go on --                  6 THE CORONER: Was a retrial possible by statute in those                  7 days?                  8 MR DAVIES: I then go on, under subparagraph 10, on                  9 page 313:                  10 "The difficulty in fresh evidence cases arises where                  11 the retrial is no longer practicable as in the present                  12 case. The difficulty becomes acute when there is no ...                  13 contest ..."                  14 THE CORONER: Yes.                  15 MR DAVIES: Towards the end of that same paragraph:                  16 "Where a retrial is no longer possible, it is the                  17 end of the road."                  18 THE CORONER: Yes, thank you.                  19 MR DAVIES: Sir, what was not possible in 1991 has not                  20 become possible in 2017, and will not become possible.                  21 One of the constituent parts of the investigation                  22 into the Birmingham Six was the confessions of a number                  23 of those accused in writing and in manuscript of                  24 recorded interviews. In other words, at the heart of it                  25 was the reliability or not of those apparent</p> <p style="text-align: center;">Page 101</p>	<p>1 would be so unreliable as to be not a basis for sensible                  2 and reliable findings.                  3 As a (inaudible), it can be demonstrated that that                  4 whole exercise in relation to these confessions can be                  5 conducted so as to produce reliable findings? With no                  6 pleasure we say that reality should be recognised in                  7 your definition of scope. It would neither be fair to                  8 the officers subject to criticism, some of whom are                  9 dead, or fair to those who made the confessions, for an                  10 exercise to be started when its inherent limitations are                  11 so obvious from the beginning and where reliable                  12 findings could not be produced.                  13 Sir, if that question of practicability were not                  14 enough, we then essentially agree with your counsel's                  15 submissions to this extent on this point: the effects of                  16 paragraph 8(5) of schedule 1, particularly in relation                  17 to the Birmingham Six, would produce very obvious                  18 limitations on what could be expressed by way of                  19 determination even at the end of such a flawed exercise.                  20 Not only is the ordinary section 10(2) restriction                  21 in place against appearing to determine criminal                  22 liability for any named individual, a generic finding as                  23 to responsibility without names would serve to implicate                  24 everybody because the jury would not be in a position                  25 either to exclude people by name. This would be an</p> <p style="text-align: center;">Page 103</p>
<p>1 confessions.                  2 Even if it were open to a jury at the end of your                  3 inquest to seek to reflect determinations as to                  4 individuals -- which of course it is not, named                  5 individuals -- that exercise 43 years on of seeking to                  6 reconstitute events in different interview rooms,                  7 different custody suites and so on and so forth, where                  8 the reliability of what is said by the individuals is to                  9 be assessed by reference to their claims of oppression,                  10 to some degree violence although of course that was                  11 largely abandoned on appeal in terms of predating the                  12 confessions, that whole exercise of determining the                  13 reliability of confessions cannot now be conducted with                  14 any reliability.                  15 Most of the actors are dead. Just to take the four                  16 officers who were indicted in relation to that process:                  17 Officers Woodwiss and Morris are known to be dead;                  18 Mr Langford is believed to be alive but his role was                  19 peripheral and proceedings were withdrawn against him                  20 before it got to trial; and the chief superintendent                  21 Reed(?), a central character, was obviously a senior                  22 officer 43 years ago. I cannot say one way or the other                  23 whether he is still alive, but even if he is, he is                  24 likely to be of an age where the reliability and                  25 accuracy of his account, even if he were to give one,</p> <p style="text-align: center;">Page 102</p>	<p>1 inherent unfairness in the process for all concerned.                  2 So, sir, it is really through that prism, we say,                  3 unhappily that we have to view the reality of what could                  4 be achieved 43 years on in terms of the analysis of                  5 responsibility.                  6 We have not seen, we have not read, the Aston 1 and                  7 Aston 2 reports. If there is other evidence tending                  8 directly to implicate any individuals with the                  9 manufacturing or planting of these bombs then we have                  10 not seen it. As matters stand, the evidence appears to                  11 be essentially restricted to that rehearsed by the Court                  12 of Appeal in 1991.                  13 It was not practical then, sir, and reliable                  14 findings, unhappily, cannot be produced now, and indeed                  15 it is possible that you would not be justified in                  16 leaving the sort of questions you would wish to leave as                  17 to responsibility by operation of the statute of                  18 limitations anyway.                  19 Those are our submissions.                  20 THE CORONER: Thank you very much.                  21 Mr O'Donnell, do you wish to say anything?                  22 MR O'DONNELL: Sir, only that I'm here to represent Her                  23 Majesty's Government. We wish to assist you in your                  24 processes but we have no submissions to make on the                  25 subject of scope.</p> <p style="text-align: center;">Page 104</p>

<p>1 THE CORONER: Thank you.                  2 MR DAVIES: Sir, Chief Superintendent Reed, I am told, is                  3 deceased.                  4 THE CORONER: Thank you.                  5 Mr Skelton?                  6 Submissions by COUNSEL TO THE INQUESTS                  7 COUNSEL TO THE INQUESTS: Thank you, sir. You have our                  8 written submissions from Mr Hill and me, but I think it                  9 would be helpful if I lay the scene to them or set the                  10 scene to them not least because they have been referred                  11 to by a number of interested persons during the course                  12 of this morning and indeed this afternoon.                  13 May I say at the outset that we, Mr Hill and I, make                  14 these submissions as Counsel to the Inquest, and it is                  15 important to understand that we are independent                  16 barristers instructed by the Solicitor to the Inquests                  17 to assist you with your work. We assist with both the                  18 preparation of the inquests and with the questioning of                  19 witnesses, but also with submissions on matters such as                  20 this which are essential to the inquests' work. But we                  21 do so as independent counsel and you are free, of                  22 course, to reject any submissions that we make. We do                  23 not speak on behalf of the inquests themselves.                  24 THE CORONER: The decisions are mine.                  25 COUNSEL TO THE INQUESTS: Yes, sir.</p> <p style="text-align: center;">Page 105</p>	<p>1 are restricted by law as to what you can investigate and                  2 what you can address. The inquests will not end with                  3 those responsible for the atrocity being convicted of                  4 a crime or being punished for that crime. They must                  5 not, in law, conclude with a determination that                  6 identifies any individual as being criminally liable for                  7 the events of that night. Those are matters which are                  8 essentially for the criminal courts of this country.                  9 These inquests are bound by law to answer the four                  10 statutory questions set out in the 2010 Act: who died,                  11 when, where, and how they died. These are relatively                  12 narrow and specific questions, and while the                  13 investigation that precedes the resolution of those                  14 questions may stretch more widely, the determination                  15 that the jury will ultimately give must be limited to                  16 those four matters. It would be unlawful for the jury                  17 to express an opinion on any other matter, save for the                  18 particulars required for the death to be registered.                  19 A public inquiry, by contrast, would be able to                  20 range more broadly coming to conclusions on any matter                  21 considered to be relevant to its terms of reference.                  22 But an inquest is not a public inquiry, and its                  23 determinations must not stray beyond its statutory                  24 purpose.                  25 Sir, nearly 43 years have passed since the bombings</p> <p style="text-align: center;">Page 107</p>
<p>1 With that introduction, may I say this, echoing to                  2 some extent the words of the police interested persons,                  3 both West Midlands, Devon and Cornwall Police and indeed                  4 the Federation: the 21 people who died in the bombings                  5 on 21 November 1974, and their loved ones, some of whom                  6 are in court today, have suffered an enduring injustice.                  7 So too have those who were injured and their families                  8 and countless others whose lives were affected directly                  9 or indirectly by the atrocity that occurred.                  10 The pain and grief that they have borne is                  11 exacerbated by the fact, the notorious fact, that no one                  12 has been held accountable in law for its cause. There                  13 is clearly a compelling public interest in seeking to                  14 address that wrong insofar as it is possible to do so.                  15 These inquests, it is hoped, will play a part in                  16 providing some answers to those affected by the events                  17 in 1974, but they will not, in my submission, and they                  18 cannot resolve the injustice that has occurred. We                  19 state that starkly and we state it at the outset because                  20 to do otherwise would be disingenuous to the families,                  21 to the victims and to all those concerned with these                  22 matters. The public interest is not to be served by                  23 promising a conclusion that cannot properly or lawfully                  24 be delivered.                  25 These are, sir, coronial proceedings and as such you</p> <p style="text-align: center;">Page 106</p>	<p>1 and that doesn't lessen the injustice that has endured                  2 but it does make it far harder practically to address                  3 the matters that these inquests are being asked by some                  4 of the interested persons to consider. Evidence has                  5 been lost and it has been destroyed; many of the                  6 forensic and other investigative techniques that are now                  7 routinely employed by investigatory services were not                  8 deployed at the time and cannot now be deployed;                  9 memories have faded and become unreliable; witnesses                  10 have died, are untraceable or are outside the                  11 jurisdiction of your court.                  12 All involved with these inquests will be acutely                  13 aware of the need to minimise the real danger of harm                  14 coming to witnesses and their families by asking them to                  15 relive the events that occurred in 1974. It is notable,                  16 sir -- and I draw no strong inference from it -- that                  17 many families who are directly affected by these events                  18 have chosen not to participate in these inquests. That                  19 is an important factor to bear in mind without it being                  20 determinative.                  21 In short, the passage of time has obscured the                  22 events of 1974 and make them harder -- to some extent                  23 impossible -- to discern at this remove.                  24 These inquests, under your direction, must be full,                  25 fair and fearless. They must produce answers to those</p> <p style="text-align: center;">Page 108</p>

<p>1 four questions and they must address matters of                  2 relevance -- of central relevance -- to them. But they                  3 must be lawful, and those involved with the inquests                  4 must be realistic about what can be achieved in the                  5 proceedings that now occur 40-plus years after the                  6 original event.                  7 No public interest is advanced by attempting to                  8 pursue an unachievable objective. The rights of those                  9 who died will not be vindicated and the hopes of those                  10 who continue to live with the consequences of the                  11 bombings would be further frustrated.                  12 With that introduction may I go on to make                  13 submissions about the particular issues you have asked                  14 us to address?                  15 THE CORONER: Yes. Can I just ask, can you hear at the                  16 back? Is the sound working? Good, thank you.                  17 Yes.                  18 COUNSEL TO THE INQUEST: Sir, the scope of the inquest is                  19 not a phrase which one finds within the statute or the                  20 rules and regulations associated with it, but it has                  21 become a common parlance amongst those who operate in                  22 the field of coronial law.                  23 Essentially, the scope of the inquest is, as I say,                  24 determined by section 5 of the Act: who the deceased                  25 was, how, when and where the deceased came by his or her</p> <p style="text-align: center;">Page 109</p>	<p>1 said in Middleton, in the exercise of your discretion to                  2 determine how best in the particular case to elicit the                  3 jury's conclusion on the central issue or issues.                  4 The scope of the Inquiry is inevitably going to be                  5 wider than is strictly necessary for or required for the                  6 conclusion: for example, to explore potentially                  7 causative matters, ie matters which may be causative                  8 without necessarily ultimately being causative, or to                  9 dispel or confirm public rumour or suspicion as to the                  10 deaths.                  11 When considering scope, sir, I would advise that it                  12 is important to keep in mind the different stages of the                  13 inquests. We are at present, as I outlined in my                  14 submissions this morning, at the investigatory stage.                  15 We are carrying out investigations on your behalf,                  16 looking at documents and finding witnesses and so on,                  17 where you and your team are producing a body of evidence                  18 for your consideration. This is to be followed                  19 ultimately by hearings later this year at which evidence                  20 is to be adduced before a jury who will have been                  21 empanelled specifically for the purpose of hearing this                  22 inquest.                  23 At the end of the hearings, the jury will be asked,                  24 in a way which will no doubt be the subject of                  25 submissions in due course, to return their conclusions</p> <p style="text-align: center;">Page 111</p>
<p>1 death. But in an Article 2 inquest, as you have                  2 directed on a provisional basis this is, that would also                  3 include how each individual died, as in by what means                  4 and in what circumstances.                  5 The inquests are also bound, as has been identified,                  6 not to result in a determination which is framed in such                  7 a way as to appear to determine any question of criminal                  8 liability on the part of a named person, or of civil                  9 liability. In other words, sir, when answering the                  10 questions of how, when and in what circumstances the                  11 deceaseds came by their death, no determination can be                  12 made in such a way as to frame criminal liability in                  13 respect to a named person.                  14 And that applies, in my submission, whether or not                  15 one is talking about "the conclusion" or the facts which                  16 lead to that conclusion. That is part of the                  17 determination of the answer to the statutory question,                  18 both of those matters. The Act does not draw                  19 a distinction, and nor can one logically or in principle                  20 be so drawn.                  21 The case law makes it clear, sir, that you have                  22 a broad discretion as to the scope of the inquest and                  23 that is clear from cases -- the leading cases, for                  24 example Middleton and Allen which I have quoted in our                  25 written submissions. It is for you, as Lord Bingham</p> <p style="text-align: center;">Page 110</p>	<p>1 on the four statutory questions. There are, as you,                  2 sir, are familiar, different ways in which the jury may                  3 approach that task based on your direction.                  4 The metaphor of a funnel has been used previously by                  5 counsel before the High Court in the Court of Appeal,                  6 and it explains in effect how the investigative process                  7 starts off more widely and funnels down towards                  8 a conclusion on the key issues and indeed what used to                  9 be called a verdict. It follows that scope is a matter                  10 that is kept under review throughout the course of the                  11 inquests and interacts with the way that the evidence                  12 itself evolves as and when it is adduced by your team or                  13 provided to you.                  14 It is not contentious but I will mention it that you                  15 are not bound by the Senior Coroner's ruling as to what                  16 she considered to warrant reopening these inquests. We                  17 are where we are. These inquests have been opened and                  18 it is now fully within your discretion to determine what                  19 issues you should keep or add to the scope of those                  20 inquests without reference to what has previously been                  21 considered.                  22 Uncontroversially, sir, the issue of forewarning is                  23 within scope. There are of course two issues which                  24 Ms Hunt, as the Senior Coroner, identified and which are                  25 now under investigation. They are clearly within scope,</p> <p style="text-align: center;">Page 112</p>

<p>1 and as has been rightly said by others, other matters                  2 may, if the evidence is there, also be considered and                  3 will be investigated.                  4 But that doesn't, of course, mean that ultimately                  5 those matters will have to be put to the jury. It may                  6 be that they don't satisfy the evidential test required                  7 to require a proper investigation at that point, but                  8 that is part of the evolving nature of scope.                  9 So the issue of forewarning is within scope.                  10 Likewise the background to the events in November 1974,                  11 notwithstanding that at this stage the issue of                  12 precisely who should be called to deal with that                  13 evidence requires further consideration and discussion,                  14 and those are matters which we will in due course, as                  15 your counsel, make submissions on and we will liaise                  16 with the interested persons in order to understand their                  17 views about those issues.                  18 A further matter which is clearly within scope is                  19 the nature and effect of the explosive devices that                  20 detonated. The following experts have been instructed,                  21 Professor Bull and Dr Carey -- professor Bull and his                  22 team, Dr Carey and Alison Mansfield, who I mentioned                  23 earlier.                  24 The medical cause of death of each of those who died                  25 will be considered by a medical pathologist, Dr Carey,</p> <p style="text-align: center;">Page 113</p>	<p>1 counsel, will report to you on the results of our                  2 inquiries, and it will then be for you as the coroner to                  3 determine how much of that report by us can and should                  4 be disclosed to the IPs before receiving submissions on                  5 that issue.                  6 So that is to sketch out the plan of action in                  7 respect of that issue, which will fall to be determined                  8 no doubt later in the year when our efforts have been                  9 concluded.                  10 Turning then to the two issues that are the focus of                  11 today's submissions. The emergency response first of                  12 all, if I may. Three interrelated principles underlie                  13 our submissions on this issue. First, the inquests must                  14 be directed to answering four statutory questions. This                  15 is not a public inquiry, as I have said. Secondly,                  16 these are inquests into the deaths of 21 individuals.                  17 They are inquests plural. There are 21 inquests under                  18 one umbrella, and they will be heard together as                  19 a matter of procedural propriety and good sense, but                  20 evidence will arise in respect of each death which is                  21 particular to each death, and the jury will ultimately                  22 need to consider the specific circumstances of each of                  23 the deceaseds' deaths before reaching its conclusions.                  24 Some deaths or the circumstances of some deaths may                  25 require a greater explanation of particular matters than</p> <p style="text-align: center;">Page 115</p>
<p>1 and he has produced so far an overview report but will                  2 in due course look at the individuals.                  3 Turning then to the two issues which are                  4 controversial for today's purposes: the emergency                  5 response and the perpetrator issue. Before I do so, may                  6 I just briefly say you have identified, sir, another                  7 issue which requires submissions in due course, but as                  8 the Solicitor to the Inquiry has indicated in his letter                  9 to the interested persons, it is for the time being on                  10 hold. That is the so-called agent/informant issue.                  11 The reason that is on hold is because you have made                  12 a number of requests -- and indeed the Senior Coroner                  13 made a number of requests -- of Government departments,                  14 agencies and the police to provide evidence that may be                  15 relevant to that issue.                  16 Answers have been received from several                  17 organisations, although not all organisations, in                  18 respect of those requests, and it is proposed that we,                  19 as your counsel, will make further inquiries in respect                  20 of those responses by the police, by the Government, and                  21 by other organisations to the requests. That will                  22 include among other things asking for details of the                  23 searches that were conducted in response to the requests                  24 and reviewing the results of those searches.                  25 Thereafter it is proposed that we, again as your</p> <p style="text-align: center;">Page 114</p>	<p>1 others. There may be matters which arise in certain                  2 deaths which are relevant to them but not to others and                  3 one must keep sight of that.                  4 Third, a realistic assessment must be made on what                  5 evidence is available or is likely to be available at                  6 that remove. We are not conducting an investigation in                  7 the abstract. The jury must be asked to come to its                  8 determinations on evidence it has heard and to do so                  9 without speculating.                  10 That, in our submission, is a critical factor for                  11 you to consider when exercising your scope, as I think                  12 several of the interested persons must now and do now                  13 recognise.                  14 How likely is it that sufficient evidence will be                  15 obtained and adduced to allow a full and fair picture to                  16 be presented to the jury on the matters they are                  17 required to determine so as to allow a lawful conclusion                  18 to be reached? That is an important matter for your                  19 consideration, we submit.                  20 We are at present unaware of any evidence that                  21 establishes a causative link between the purported                  22 failings or hypothetical failings on behalf of those who                  23 responded to the bombings and the deaths of any of the                  24 21 individuals. That is an assessment of the available                  25 evidence. That is not to set a legal test, threshold of</p> <p style="text-align: center;">Page 116</p>

<p>1 arguability et cetera; it is an assessment which you, 2 sir, are entitled to make based on the evidence so far 3 before you. 4 Investigatory steps have been taken to look at that 5 issue. I am referring specifically to Dr Carey's 6 preliminary overview report which is quoted in my 7 submissions. I will just read out two sentences from 8 it. He says: 9 "In the case of the majority of the fatalities, the 10 nature of their injuries suggests that death is likely 11 to have occurred within a few minutes of the explosions 12 at the very most." 13 And goes on to conclude: 14 "In none of the cases was there evidence or is there 15 evidence now of injuries of the kind where long-term 16 survival and discharge from hospital, particularly if 17 treated within minutes of the explosion, would have been 18 likely in those days." 19 So on the face of it, sir, that evidence is 20 a powerful indicator at this stage of the inquests that 21 intervention by the emergency services could not have 22 saved these peoples' lives, and that's an important 23 point to bear in mind. We note, however, that that is 24 a preliminary view of Dr Carey. 25 As I said, sir, the inquest must investigate the</p> <p style="text-align: center;">Page 117</p>	<p>1 Rex Pictures and others including the Press Association. 2 We have put some of those on our Relativity database, 3 but today it has not been possible to find any major 4 incident policies beyond the overarching policy that you 5 will have seen from the policing counsel. There are not 6 any specific local policies that we have been provided 7 by any of the organisations who are responsible for 8 implementing an emergency response of the kind that one 9 saw in operation that day. 10 Your legal team have reviewed two contemporaneous or 11 near contemporaneous reports attributed to senior 12 officers from West Midlands Police and from the fire 13 service that were concerned with the emergency response. 14 I will not go into the details of those reports but it 15 is in our submission helpful or relevant to note that 16 they do not suggest that there were any purported 17 failings in the emergency response that may conceivably 18 have caused or contributed to any of the deaths. They 19 are, as must be recognised, not comprehensive and nor 20 are they wholly independent documents, but they are 21 official documents compiled around the time of the event 22 from organisations who could be responsible for or were 23 responsible for the rescue operation of the individuals 24 and who were prominent in those efforts and they are 25 something to which we invite you to attach some weight.</p> <p style="text-align: center;">Page 119</p>
<p>1 circumstances of the individuals and Dr Carey will 2 himself be doing that. He will revisit his conclusion. 3 It is possible that other experts, particularly those on 4 the blast injury side for example, will provide relevant 5 evidence that will go or be relevant to that conclusion. 6 We will go where the evidence leads us in that regard, 7 sir. 8 Inquiries have been made of several organisations 9 who may, or one would suspect, have records or 10 previously held records that are relevant to the issue 11 of the emergency response. They include Birmingham 12 Women's and Children's NHS Foundation Trust. They have 13 previously undertaken searches and have found no 14 documents. They reviewed their searches again and 15 repeated that conclusion. 16 Likewise, University Hospitals Birmingham. They 17 have no documents. West Midlands Ambulance Service have 18 no documents. West Midlands Fire Service hold a small 19 number of documents which have been disclosed to you, 20 but the provenance of them is not always clear and they 21 don't provide anything close to a comprehensive picture 22 of the fire service's response to the events of 23 21 November 1974. 24 We also have a number of photographs, but a paucity 25 of photographs certainly by modern standards, from ITV,</p> <p style="text-align: center;">Page 118</p>	<p>1 Jackson Canter, for one of the interested persons, 2 has identified a number of summaries and extracts and 3 other evidence that in their opinion indicate a host of 4 arguable or potentially arguable failings on the part of 5 the emergency services. Likewise reliance has been 6 placed by KRW on the accounts given by Mr Alan Hill, now 7 deceased, who as a fire fighter attended the scene at 8 The Tavern in the Town. 9 We don't at this point consider it to be appropriate 10 to address in detail each of the points raised, but we 11 would make these overarching points. We note that in 12 some instances the evidence that has been selected as 13 examples of failings may be felt unsurprising in the 14 circumstances of two catastrophic bomb explosions in 15 quick succession that injured hundreds of people in 16 a major city centre on an evening in 1974. Certainly 17 there is some evidence that could be read as suggesting 18 that there were difficulties with the way in which the 19 emergency response was coordinated and organised, but 20 that perhaps is to some extent unsurprising given the 21 circumstances. 22 We make two observations on that. First, there is 23 nothing in the submissions that we have received or the 24 evidence that we have reviewed to date that positively 25 suggests that any of the matters raised by the</p> <p style="text-align: center;">Page 120</p>

<p>1 interested persons in their submissions made, or                  2 potentially made, caused or contributed to the deaths of                  3 any of the 21 individuals.                  4 It is argued or has been argued before you that                  5 instant or rapid death was not inevitable, as is                  6 demonstrated by the fact that two of the 21 people                  7 survived for a few days and that many others were                  8 seriously injured but survived.                  9 But this, with respect, is a misguided argument. It                  10 doesn't logically follow that because some of those who                  11 were caught in an explosion survived, others might have                  12 done. As you will see from the post-mortem evidence as                  13 it appears, albeit that it doesn't contain the level of                  14 detail that one might expect from a modern post-mortem,                  15 it is clear that many of the people suffered                  16 catastrophic injuries right from the beginning and the                  17 cause of death is immediately apparent from that.                  18 In our submission, the correct approach is to                  19 consider the evidence relating to the individuals as                  20 I have said. Only where necessary -- and by that we                  21 mean in those cases where it can be said that the                  22 emergency response may be relevant to that person's                  23 death -- should one embark on an exploration of that                  24 response. So such an approach which is tailored to the                  25 individual investigation doesn't require the level of</p> <p style="text-align: center;">Page 121</p>	<p>1 certain timings we do know -- timings when they may have                  2 arrived in mortuaries, timings when they may have                  3 arrived in hospitals -- but as to the precise timing                  4 when each of the deceased was found, that evidence does                  5 not appear to be available and nor do we believe it                  6 could be made available. It is simply not possible to                  7 elicit that.                  8 Of course the condition in which each of those                  9 deceased were found, whether they appeared to be alive                  10 or dead. Again, that is a critical matter.                  11 We reject the proposition that it would be possible                  12 to reconstruct the events of the emergency response from                  13 eyewitness evidence alone. The statements taken in 1974                  14 were by modern standards short and lacking in detail and                  15 there was no attempt to obtain eyewitness evidence to                  16 scrutinise the emergency response. As you would expect,                  17 the focus was on the investigation of the crime in 1974                  18 and 1975 and not on any failings that may have occurred.                  19 Indeed, it is perhaps important to note in passing                  20 that in contrast to Hillsborough, there has not been                  21 a continuous source of concern, public interest,                  22 criticism of the emergency response over the subsequent                  23 years that have passed. It is, in our submission,                  24 a relatively new aspect of the Birmingham bombings that                  25 there has been a degree of criticism of an emergency</p> <p style="text-align: center;">Page 123</p>
<p>1 broad, overarching investigation of the emergency                  2 response proposed or implied by the interested persons                  3 who have made submissions today.                  4 Second, sir, we respectfully disagree with the                  5 assertion that there remains sufficient material for the                  6 exploration of this issue to be a practical proposition.                  7 I have already identified the fact that many of the                  8 witnesses are likely to be dead and in any event will be                  9 elderly.                  10 The difference between the ability of these inquests                  11 to adduce relevant and detailed evidence is in our view                  12 to be contrasted -- starkly contrasted -- with what                  13 occurred in the Hillsborough inquests. I will not                  14 repeat the differences that are apparent between those                  15 two investigations but to take an example, the                  16 Hillsborough inquest had a wealth of CCTV footage; it                  17 had voluminous medical records; it had witness accounts                  18 of a multitude of people who were still alive and able                  19 to describe what happened, so it was able to produce                  20 very detailed accounts based on an assessment of                  21 detailed evidence in respect of each of the deceased.                  22 That is simply not going to be possible in this case.                  23 We would need reliable evidence about the timings of                  24 when each deceased was found. That evidence, we                  25 anticipate, is unlikely to be forthcoming. There are</p> <p style="text-align: center;">Page 122</p>	<p>1 response which occurred 43 years ago, and that contrasts                  2 very clearly with the Hillsborough position where there                  3 had been continuous concern of a high level, highly                  4 publicised, about the way in which the response was                  5 conducted.                  6 For these reasons then, sir, in summary: causation,                  7 relevance, fairness to those involved, and the practical                  8 realities of the evidence base, we submit that                  9 a broad-ranging inquiry into the way in which the                  10 emergency response was conducted should not be                  11 undertaken by these inquests. As I say, we are                  12 conscious that we are making the submission at                  13 an investigatory stage and we do so because it is                  14 necessary to determine the scope now but we do so                  15 without shutting out the possibility that such                  16 investigations may be appropriate to some extent in the                  17 context of individual deaths.                  18 I would repeat in the context of the potential                  19 witnesses who would be called to identify those issues                  20 that calling them would risk retraumatising them. I do                  21 understand the point Ms Williams made earlier this                  22 morning that for some the process may be cathartic, but                  23 one may, I think with a reasonable degree of confidence,                  24 assume that many of those who attended the scene will                  25 have been gravely affected by it and will not now</p> <p style="text-align: center;">Page 124</p>

<p>1 welcome being asked to give evidence and being called to                  2 give evidence in public about issues which are likely to                  3 be the very worst events which they ever had the                  4 unfortunate cause to be participating in.                  5 May I then, sir, turn to the issue of perpetrators?                  6 As I said at the start of these submissions, the                  7 atrocity of the bombings has been followed and it has                  8 been compounded by an enduring injustice to its victims                  9 and their loved ones, namely that those responsible for                  10 the bombings have not been publicly held accountable for                  11 their acts. There is a manifest public interest in                  12 righting that injustice. The critical question is                  13 whether these inquests are the means by which that can                  14 and should occur.                  15 For the reasons I will now outline, we submit the                  16 answer to that question is no. These inquests are not                  17 as a matter of law the proper vehicle for determining                  18 responsibility for criminal acts of this nature, and nor                  19 would such an outcome be practically achievable so long                  20 after the index events.                  21 It would not be lawful, in our submission, for the                  22 inquest process to be used to achieve what the inquest                  23 outcome cannot achieve: namely, the identification of                  24 the specific person or persons responsible for these                  25 atrocities. That is particularly the case where the</p> <p style="text-align: center;">Page 125</p>	<p>1 prohibition, as you have seen, arises from section 10(2)                  2 of the 2009 Act.                  3 It reflects powerful considerations of public policy                  4 as Lord Bingham identified in Jamieson. In particular,                  5 it ensures that the coronial system remains focused on                  6 answering the four statutory questions and doesn't usurp                  7 or compromise the function of the criminal justice                  8 system. This is reflected in the fact that historically                  9 the power of the coroners to find persons guilty of                  10 murder, manslaughter or infanticide, and to charge them                  11 for such offences, was removed specifically by                  12 Parliament when it passed the Criminal Law Act in 1977.                  13 In other words, at an earlier point in the last                  14 century the legislature determined that the focus of                  15 coronial investigation should be on the narrow statutory                  16 investigation and it should leave alone the function of                  17 the criminal justice system which is to investigate,                  18 identify, prosecute and sentence criminals.                  19 It also reflects the fact that the coronial system,                  20 the system by which inquests are conducted, is not                  21 equipped to carry out criminal investigations. There                  22 are no indictments comprising specific charges and                  23 allegations against named individuals in the coroner's                  24 court. There are no police detectives, scene of crime                  25 officers or as a matter of routine forensic scientists.</p> <p style="text-align: center;">Page 127</p>
<p>1 process itself would be unfair were it to embark upon                  2 that identification.                  3 It is not controversial that the deaths of the 21                  4 people who died and whose deaths are the subject of                  5 these inquests resulted from the two bomb explosions in                  6 The Mulberry Bush and The Tavern in the Town. Those                  7 bombs were placed there in furtherance of a campaign of                  8 terrorism by the Provisional IRA against the civilian                  9 population of the United Kingdom, as was recognised by                  10 the Court of Appeal in the McKenny case.                  11 The explosions were undoubtedly criminal and they                  12 resulted in mass homicide. That is so even if one                  13 leaves aside the possibility that the                  14 perpetrator/perpetrators may have hoped, even expected,                  15 that the warning that was given shortly before the bombs                  16 detonated would have resulted in the successful                  17 evacuation of these victims.                  18 These facts briefly stated will no doubt weigh                  19 heavily in the minds of the jury members when they                  20 determine how and in what circumstances each of the                  21 deceased died. But even though the explosions were                  22 unquestionably criminal, the inquests are prohibited                  23 from resulting in determination which is framed in such                  24 a way as to appear to determine any question of criminal                  25 liability on the part of a named person. That</p> <p style="text-align: center;">Page 126</p>	<p>1 There is no prosecutory body such as the Crown                  2 Prosecution Service or counsel acting on behalf of the                  3 Crown. There are no defendants, no parties, there are                  4 only participants.                  5 Most importantly, you might think, sir, it                  6 prevents -- if one were to go down a route of attempting                  7 to undertake a criminal investigation, it would expose                  8 those who are accused to an inherent procedural                  9 unfairness off having to defend themselves in the                  10 absence of charges and without the due process that                  11 attends or automatically attends a criminal                  12 investigation. The evidential process by which the                  13 police must act and adduce evidence which is reliable                  14 and lawful: the right to cross-examine; the right to                  15 make submissions on the facts which is specifically                  16 precluded by the 2009 statute.                  17 In a criminal case, all of these are the essential                  18 building blocks which allow a fair trial of a defendant                  19 to take place and they don't occur or are not part of                  20 the inquest process.                  21 You were taken to the Jamieson judgment on a number                  22 of occasions and I won't take you back to it now, sir,                  23 but it is quite instructive to look again at the list                  24 that the Master of the Rolls there identified. It is                  25 clear that the focus remains on how someone died and not</p> <p style="text-align: center;">Page 128</p>

<p>1 who killed them, even in circumstances where that person 2 may have been unlawfully killed. 3 That is not to say in a verdict or a conclusion of 4 unlawful killing, a conclusion is prohibited of unlawful 5 killing in circumstances where there is an implication 6 of someone being identifiable. Otherwise it would be 7 very difficult to conceive a circumstance where unlawful 8 killing would be readily available in circumstances 9 where the facts leading to that killing were being under 10 investigation. But it is important to note that there 11 is a clear prohibition in the statute against naming 12 such a person. As I say, sir, that naming applies to 13 the determination which encompasses the facts of the 14 death, including the "how" question. 15 Should the inquests investigate who perpetrated the 16 bombings notwithstanding the statutory prohibition? In 17 our view, no. The answer is you should not exercise 18 your discretion to do so. To do so would take on board 19 the function of the criminal justice system which is not 20 your function. 21 The prosecution of the Birmingham Six was found by 22 the Court of Appeal to be fatally flawed on the basis 23 that the evidence -- the scientific evidence and the 24 defendant's confessions -- were unreliable. But those 25 flaws do not of themselves justify a fundamental</p> <p style="text-align: center;">Page 129</p>	<p>1 In the absence of any identifiable new evidence or 2 information as to new lines of inquiry that may 3 potentially bear fruit, it is unrealistic to expect 4 anything useful to be gained by such a course. It would 5 simply be a repetition of an exercise which has already 6 been conducted and conducted thoroughly. 7 As we have explained, any investigation into the 8 potential perpetrators would be prohibited from 9 achieving what the criminal justice system has failed to 10 deliver, ie the identification and conviction of the 11 perpetrators, and that would put the jury under 12 considerable stricture. 13 It would undermine the utility, the benefit -- the 14 public benefit -- to anyone and the benefit of 15 interested persons of embarking on such a complex 16 investigation if ultimately the process resulted in an 17 anonymous conclusion. 18 We must, accept, though, sir, that the agent and 19 informant issue is still under investigation. It is of 20 course conceivable logically and conceptually that were 21 the agent and informant issue to take us to the point 22 where it ought properly to be included within the scope, 23 because there is evidence, for example, that 24 a perpetrator was an informant, or a person who was 25 involved in the attacks was an informant, then</p> <p style="text-align: center;">Page 131</p>
<p>1 departure or distortion of the statutory function of 2 inquests generally, nor does the ongoing assessment, 3 which we understand still remains, that there is no 4 prospect of the test for prosecution of any person or 5 persons being satisfied. 6 In other words, the fact that a future prosecution 7 does not appear to be a realistic possibility of any 8 person still doesn't justify you taking an unprincipled 9 and unlawful approach and conducting a criminal 10 investigation to try to identify the perpetrators of 11 these attacks. 12 It is abundantly clear and was found by the Court of 13 Appeal that the criminal investigation had significant 14 flaws and, as is now notorious, it didn't ultimately 15 result in the successful prosecution of any person. But 16 that doesn't mean that the entire police investigation 17 was flawed, including a vast amount of police work which 18 has been the subject of a huge amount of evidence which 19 has been put before you and has been provided to the 20 interested persons that has never attracted any 21 significant criticisms. 22 Nor does it warrant another state entity -- namely 23 this court -- attempting to re-do the investigation 24 which has already been done by the primary state entity 25 responsible for investigating crimes, namely the police.</p> <p style="text-align: center;">Page 130</p>	<p>1 a different view might be taken. But that is a bridge 2 which will have to be crossed as and when the evidential 3 basis for it is there. At the moment there is no such 4 evidential basis. 5 A further factor, sir, we would say is that the 6 investigation must be fair to the alleged perpetrators. 7 The allegations that would be levelled against them in 8 examination, in their oral evidence, could not be more 9 serious, but they would not be facing defined charges 10 against them and they would not be able to -- in the 11 case of one of those who has died, for example 12 Mr McKenny -- be able to defend themselves properly. 13 As Mr Davies identified, the Court of Appeal so far 14 back as 1991, said it would not be possible now to have 15 a proper trial of these matters. Having to do that 16 within the context of an inquest which does not have the 17 procedural safeguards or the comprehensive investigatory 18 backup of the criminal courts would be even less fair, 19 less safe. 20 So far as the Birmingham Six are concerned, 21 paragraph 8(1) of Schedule 1 of the 2009 Act prohibits 22 the inquest from resulting in a determination that is 23 inconsistent with the outcome of the criminal 24 proceedings against them, namely their acquittal on 25 charges of murder.</p> <p style="text-align: center;">Page 132</p>

<p>1 There is no doubt, we say, that the investigation of                  2 the perpetration of the bombings, were it to be                  3 conducted by you, sir, would require an investigation or                  4 an examination of the potential culpability of the six                  5 men. That issue was left open by the Court of Appeal in                  6 1991, notwithstanding the fact that the ultimate result                  7 was that the convictions were unsafe and the convictions                  8 did not stand.</p> <p>9 You will appreciate, sir, that in relation to some                  10 of the men, the Court of Appeal raised certain questions                  11 about their evidence, questions which they could not                  12 answer but which they were concerned with. No doubt we                  13 would be invited, and properly should go down the route                  14 of looking at those sorts of questions and other                  15 ancillary questions in order to determine the potential                  16 culpability of the six. But in our view it would be                  17 wrong to embark upon such an exercise in the knowledge                  18 that one of the potential determinations that could be                  19 reached by the jury, namely that some or all of the six                  20 were in fact responsible for the bombings, was not open                  21 to the jury as a matter of law. They could not name                  22 those persons in their conclusions.</p> <p>23 We reject the argument, although not pressed today,                  24 that the outcome of the charges and criminal proceedings                  25 against the Birmingham Six is that there are now no</p> <p style="text-align: center;">Page 133</p>	<p>1 investigation into how and in what circumstances the                  2 deceaseds died.</p> <p>3 As we have explained -- as I have explained -- the                  4 background to the bombings will be explored, including                  5 the campaign of the IRA in the Midlands, including the                  6 issue of forewarnings, including the circumstances of                  7 each individual's death. We do not consider that you                  8 are required either at common law or for the purpose of                  9 Article 2 of the Convention to embark upon such an                  10 investigation.</p> <p>11 In conclusion, then, sir, it is the submission we                  12 make today that the scope of the inquest should not                  13 include an investigation into the identities of those                  14 who planned, planted, procured or authorised the bombs                  15 used on 21 November 1974. I say that, sir, while                  16 recognising again the inevitable frustration that that                  17 must cause amongst those who do not know the answer to                  18 what happened.</p> <p>19 Sir, Mr Hill has reminded me just to mention that we                  20 understand the ambulance service are not represented                  21 here today as their solicitor was unable to attend, but                  22 they have indicated that they were not planning on                  23 making any submissions on these issues, although no                  24 doubt they would want to do so were they to fall within                  25 the scope of the inquests.</p> <p style="text-align: center;">Page 135</p>
<p>1 subsisting convictions in respect of these particular                  2 bombings. The outcome in this context, we would say,                  3 clearly denotes the result of the charges and                  4 proceedings against those individuals and that, in this                  5 case, is acquittal.</p> <p>6 The obvious purpose of such a provision is to                  7 prevent such individuals -- individuals who have been                  8 convicted or acquitted of crimes -- from being unfairly                  9 subject to what is a retrial by proxy in the coroner's                  10 court. That is the clear underlying statutory purpose                  11 of that provision.</p> <p>12 We also reject the argument that the prohibition in                  13 section 10 of the 2009 Act against defining criminal                  14 liability against named individuals nullifies any                  15 inconsistency between the acquittal of the                  16 Birmingham Six and a determination at the inquest that                  17 they were responsible for the bombings. If that were                  18 right, then as a matter of generality there would be no                  19 need for paragraph 8 in Schedule 1: you would not                  20 require a prohibition on an inconsistent conclusion                  21 because you could not have ever got to that conclusion                  22 in the first place.</p> <p>23 We do not consider that the exclusion of the                  24 perpetrator issue from the scope of your inquests will                  25 prevent you from conducting a full, fair and fearless</p> <p style="text-align: center;">Page 134</p>	<p>1 So those, sir, are my submissions on the primary                  2 issues for consideration today. If you are content,                  3 I will now move on to some next steps which we propose                  4 be taken by the inquest team on your behalf.</p> <p>5 Alternatively I'm happy to await instruction.</p> <p>6 THE CORONER: Yes, just a moment.</p> <p>7 Thank you very much.</p> <p>8 MS HAMBLETON: May I speak, sir?</p> <p>9 THE CORONER: Ms Hambleton?</p> <p>10 Submissions on behalf of those families represented by KRW                  11 Solicitors by MS HAMBLETON</p> <p>12 MS HAMBLETON: Julie Hambleton. On behalf of the families                  13 represented by KRW Solicitors, we have not been                  14 instructed by them but we would just like to say some                  15 words, please, just to clarify some points.</p> <p>16 THE CORONER: Usually, since you are represented by                  17 solicitors and sort of by counsel, they would do the                  18 work for you.</p> <p>19 MS HAMBLETON: Yes.</p> <p>20 THE CORONER: But that has not quite worked out today,                  21 I appreciate that, and I appreciate that you are here                  22 and others are here.</p> <p>23 If you would be fairly brief, please, I would like                  24 to hear you.</p> <p>25 MS HAMBLETON: Thank you. Shall I stand up? Can everybody</p> <p style="text-align: center;">Page 136</p>

<p>1 hear me?</p> <p>2 First of all, thank you very much for allowing me to</p> <p>3 speak on behalf of the families who are represented by</p> <p>4 KRW Law. We would just like to clarify and offer our</p> <p>5 sincere apologies to you, sir, and your team for any</p> <p>6 delays that have occurred due to the Legal Aid funding.</p> <p>7 That was not the fault of KRW Law; that was entirely our</p> <p>8 blame because --</p> <p>9 THE CORONER: Ms Hambleton, don't worry, I have moved on</p> <p>10 from that. Thank you for saying that.</p> <p>11 MS HAMBLETON: Many of the families didn't want to fill it</p> <p>12 out, because they are asking us to bare our financial</p> <p>13 souls and what they are basically asking us to do is to</p> <p>14 put a price on the head of our loved ones and that did</p> <p>15 traumatise all the families --</p> <p>16 THE CORONER: I understand that.</p> <p>17 MS HAMBLETON: -- and delayed many of us filling them in.</p> <p>18 THE CORONER: Financial eligibility has now been removed.</p> <p>19 MS HAMBLETON: Yes. But may I clarify -- I have had to make</p> <p>20 notes if you don't mind -- may I clarify that this has</p> <p>21 come directly from the families who are represented by</p> <p>22 KRW Law and we have had no instruction from them. Our</p> <p>23 legal team, however, have always been transparent and</p> <p>24 honest particularly in regards to where they are</p> <p>25 situated in Northern Ireland and the position in</p> <p style="text-align: center;">Page 137</p>	<p>1 us that there are proponents out there who are</p> <p>2 attempting to add caveats to further disrupt us getting</p> <p>3 a transparent inquest. If the murderers are not part of</p> <p>4 the widest scope possible, then we may as well not</p> <p>5 bother having an inquest at all, because if it was not</p> <p>6 for the murderers, our loved ones would not be dead and</p> <p>7 we would not need to be here.</p> <p>8 We would like to thank you, sir, for allowing our</p> <p>9 legal team the time to catch up with everyone else. We</p> <p>10 have waited 43 years and another few weeks, I am sure,</p> <p>11 will do no harm to anybody.</p> <p>12 But I would just like to relate to what, sir, the</p> <p>13 Police Federation counsel said and what Mr Skelton has</p> <p>14 referred to with reference to memories fading and going</p> <p>15 after the perpetrators is no longer practicable.</p> <p>16 The families would wholeheartedly disagree with this</p> <p>17 perspective, because if you were involved and knew</p> <p>18 someone involved in England's biggest atrocity of the</p> <p>19 20th Century, that memory would actually be burned and</p> <p>20 embedded into one's memory rather than, as they have put</p> <p>21 it, faded.</p> <p>22 Time is not the issue here. If it were, those still</p> <p>23 seeking justice for Holocaust victims would have given</p> <p>24 up decades ago, but they have not and they continue to</p> <p>25 search for the perpetrators.</p> <p style="text-align: center;">Page 139</p>
<p>1 relation to the Legal Aid Agency.</p> <p>2 We are seriously concerned and confused that the</p> <p>3 Ministry of Justice actually contacted you last night,</p> <p>4 as we understand that the Legal Aid Agency and KRW Law</p> <p>5 have a very good working relationship and that they are</p> <p>6 totally independent of Government.</p> <p>7 But in reference to scope, as the families we don't</p> <p>8 quite understand an awful lot of what is being said</p> <p>9 here, because if we don't get the widest scope possible</p> <p>10 it will further fuel rumours and conjecture that have</p> <p>11 been in the city and beyond for over 40 years.</p> <p>12 Due to the delay in funding, our legal team have</p> <p>13 been left on the back foot without any opportunity to do</p> <p>14 the necessary research and investigations as is required</p> <p>15 for such a complex and sensitive case as this. Whilst</p> <p>16 the State -- as we can see, their legal teams -- their</p> <p>17 legal teams are not only fully funded but also fully</p> <p>18 prepared. So how is it possible for us to have a full,</p> <p>19 fair, just inquest if our legal team do not have the</p> <p>20 necessary funds, time and staff so that we are able to</p> <p>21 effectively participate as per Article 2 of the Human</p> <p>22 Rights Act, and as per Article 6, a right to a fair</p> <p>23 trial or in this case a fair inquest.</p> <p>24 KRW have been and continue to be totally committed</p> <p>25 in applying to the equity of justice, but it appears to</p> <p style="text-align: center;">Page 138</p>	<p>1 My last note is with reference to what Devon and</p> <p>2 Cornwall Police have said. They have admitted that the</p> <p>3 perpetrators -- this obviously is not verbatim -- have</p> <p>4 never been caught. As such, how can discussing them in</p> <p>5 any way be detrimental, because they are basically</p> <p>6 saying that they have never been (inaudible).</p> <p>7 Part of an inquest is to allay public concerns about</p> <p>8 the violations to innocence. In terms of the emergency</p> <p>9 services, this is important especially when there is</p> <p>10 photographic evidence that is out there that is being in</p> <p>11 all the newspapers where bystanders have been helping</p> <p>12 our remove our loved ones' burned remains, but also when</p> <p>13 one considers that Mr Craig's brother, James, was the</p> <p>14 last one to die ten days later of horrendous, horrendous</p> <p>15 injuries.</p> <p>16 And in saying that, we would still like to thank the</p> <p>17 emergency services, the firemen and the ambulancemen,</p> <p>18 the taxi drivers who were there that night. They</p> <p>19 managed to save many lives with the help of the taxi</p> <p>20 drivers.</p> <p>21 We are thankful to everybody, particularly our legal</p> <p>22 team who have represented us pro bono for two years and</p> <p>23 who have fought endlessly to help us in our fight for</p> <p>24 truth, justice and accountability.</p> <p>25 We beg you, sir, and I beg you on behalf of all the</p> <p style="text-align: center;">Page 140</p>

<p>1 families at KRW, to seriously consider the widest scope                  2 possible because what happened before, during and after                  3 is highly significant to enable us to get to understand                  4 exactly who, what, where, when and how our loved ones                  5 were murdered. My sister, their fathers, their mothers,                  6 their brothers, their sisters, sons and daughters did no                  7 harm to nobody. Imagine, I'm loathe to say this, but                  8 imagine if the Manchester victims were in our position                  9 today, how do you think society would feel then?                  10 Thank you very much, sir.                  11 THE CORONER: Thank you very much, Ms Hambleton.                  12 MS HAMBLETON: Thank you.                  13 THE CORONER: Ms Williams, I have said that your right of                  14 reply might be limited, but is there anything you would                  15 like to briefly add?                  16 MS WILLIAMS: I don't believe so. To be honest, sir, I was                  17 not expecting a right of reply, so to be honest I'm                  18 slightly surprised to be given the invitation, but the                  19 points have been fully ventilated one way or the other.                  20 THE CORONER: I think they have.                  21 MS WILLIAMS: So I should probably just check with my                  22 instructing solicitor/junior for the day.                  23 No, there is nothing that we seek to add at this                  24 stage. I'm grateful for the opportunity, sir, thank                  25 you.</p> <p style="text-align: center;">Page 141</p>	<p>1 of the investigating police force but in the context of                  2 these inquests, and given West Midlands' position as an                  3 interested person, your legal team consider it might be                  4 appropriate to call an officer from another force to                  5 give such evidence to provide, as I say, an overview of                  6 events and coalesce that into a narrative that is                  7 readily understandable by the jury.                  8 The coroner's team will also review the possibility                  9 of identifying and instructing an expert to give                  10 evidence about the response of West Midlands Police --                  11 and, if relevant, other organisations -- to any                  12 forewarnings that may have been given about the attacks                  13 on November 21. Again, that may be coming from a police                  14 expert although that has yet to be given final                  15 consideration.                  16 Disclosure will of course continue via Relativity,                  17 and will be the subject of updates in due course.                  18 We will also continue to investigate the                  19 agent/informant issue along the lines I have identified.                  20 Your team will continue to contact and interview                  21 witnesses who may have evidence to give which is                  22 relevant. That process is already in train.                  23 Perhaps most importantly for those in the room                  24 today, once your ruling has been given, we will engage                  25 in discussions with the interested persons with a view</p> <p style="text-align: center;">Page 143</p>
<p>1 THE CORONER: Yes, thank you.                  2 So, Mr Skelton, you were going to come back to some                  3 next steps?                  4 COUNSEL TO THE INQUESTS: Yes, sir. Obviously the major                  5 next step will be receiving final submissions from KRW                  6 in respect of the scope issue, hopefully on an                  7 expeditious basis, and thereafter your ruling on that                  8 issue.                  9 But in the meantime, it may be worth me explaining                  10 a few of the other things that are going to be going on                  11 and will be required whatever the decision will be.                  12 First of all, our experts, Dr Cary, Professor Bull                  13 and his team, and Ms Mansfield will continue with their                  14 work as per their instructions. There may,                  15 I understand, be some delay because some of their                  16 expertise has been diverted on to more recent events.                  17 As I hope you will appreciate, because of their                  18 particular expertise in explosions, they have been                  19 required elsewhere but hopefully they will nevertheless                  20 continue with their work as soon as possible.                  21 We will consider within the team whether or not it                  22 is appropriate to instruct a professional witness to                  23 give overview evidence on the background to the bombings                  24 and the events of the day. This is information that in                  25 many inquests would ordinarily be provided by a member</p> <p style="text-align: center;">Page 142</p>	<p>1 to identifying key sources of evidence for the different                  2 topics that the inquests will address.                  3 In the first instance, we will provide working                  4 documents listing some of the relevant witnesses and                  5 materials which bear upon the scope of the inquests, and                  6 encouraging those to whom we give those materials to                  7 contribute to their drafting by identifying additional                  8 witnesses or materials that may assist further.                  9 At a later stage, it may be that more formal                  10 submissions will be invited on which witnesses are to be                  11 called or to be read, as is your procedural requirement,                  12 and on which material the jury should rely.                  13 So those are matters which will evolve as the next                  14 few months proceed. It is an exercise which in our view                  15 is of particular importance when it comes to the                  16 evidence to be adduced about the experiences of each                  17 individual who died. Your team has been starting the                  18 process of identifying witnesses and materials that may                  19 be relevant to each person, and it must be emphasised                  20 that some of the evidence by some of the witnesses who                  21 believed that they saw or helped to treat a named person                  22 may be inaccurate, either on points of detail or about                  23 the identification itself, and that would need to be the                  24 subject of discussion with those who receive it.                  25 But at this stage our intention is to list the</p> <p style="text-align: center;">Page 144</p>

<p>1 available evidence that could potentially assist the 2 court in exploring the circumstances of those who died, 3 and to elicit the assistance of those interested persons 4 who can provide such assistance to us in respect of 5 those materials. 6 Depending on your decision on scope, a matter that 7 may need to be considered before the next substantive 8 PIR is summoning a jury. That is a process which may 9 take some time and there may be some issues may arise 10 and on which the interested persons may wish to address 11 you. 12 If required, your legal team can prepare a draft 13 questionnaire inviting responses which could identify 14 possible reasons for recusal of particular jurors which 15 may have a connection with the index events. We will 16 circulate such a list with a limitation to the 17 interested persons to give their observations on that 18 draft before it is circulated. But I would emphasise 19 that is a matter which is further down the line but it 20 is something which needs to be done as soon as possible, 21 because it can take some time. 22 Finally, you, sir, have mentioned that there is 23 another PIR and have indicated that date is to be held 24 for the time being on 29 June. There is also a fifth 25 PIR listed on 27 July, again to be held in court in</p> <p style="text-align: center;">Page 145</p>	<p>1 so it is really perhaps more in the nature of putting 2 down a marker -- as we have said in our submissions we 3 would be concerned about any future investigative role 4 that West Midlands Police were to have for the reasons 5 that we have set out there. 6 I am not sure I can really take it much further than 7 that, because in terms of the next steps outlined today 8 they don't necessarily involve an investigative role for 9 West Midlands Police. So we ask for those matters to be 10 borne in mind should that become a live issue again. 11 THE CORONER: I liked your paragraph 80. 12 MS WILLIAMS: I have forgotten which one that was. 13 THE CORONER: It suggested you were happy to discuss the 14 practical consequences in effect if necessary. 15 MS WILLIAMS: Yes, I understand there has been some 16 communication between Mr Suter and Mr Abrahamson on that 17 topic. 18 THE CORONER: That is obviously the best way of perhaps 19 satisfying yourself. 20 MS WILLIAMS: Sir, again if I may just check, but I don't 21 think it is productive to say more than that at this 22 stage. 23 THE CORONER: Thank you. 24 I shall not be giving my ruling today because 25 I shall give the KRW Law team some time to make written</p> <p style="text-align: center;">Page 147</p>
<p>1 Birmingham, and we will circulate agendas in advance of 2 that hearing and it will undoubtedly address some of the 3 issues which I have just explained. 4 THE CORONER: Yes, thank you very much. 5 Ms Williams, you wanted to raise something? 6 MS WILLIAMS: Sir, the position of West Midlands Police. 7 If I can reassure you, sir, I don't intend to 8 address it all really at length for two reasons, one 9 because we covered it in our written submissions, but 10 secondly, as we there acknowledged, a number of the 11 concerns that we expressed and had expressed -- or those 12 who instruct me have expressed over previous months -- 13 were allayed by the Memorandum of Understanding setting 14 out arrangements going forward between your solicitor's 15 team and West Midlands Police. 16 The concerns that we have raised -- as I say, I will 17 not elaborate them because they are set out in detail in 18 our submissions -- but they were in our respectful 19 submission legitimate and well-founded, in particular 20 given West Midlands Police's additional role as an IP 21 who are taking an active part in these proceedings. 22 That said, as I have acknowledged we do recognise 23 that the memorandum went a considerable way to improving 24 the position, both in terms of transparency and in terms 25 of limiting the role. However, we would be concerned --</p> <p style="text-align: center;">Page 146</p>	<p>1 representations should they wish to do so, although it 2 is clear from the submissions made today that we have 3 covered a lot of ground. One can't think of too many 4 additional arguments to be made but there may be and 5 that opportunity is available. 6 So the decision which I shall make will be my 7 decision and will be given in writing in due course. 8 I will make sure that interested persons and family 9 members who are not interested persons get it first, and 10 then it will be published on the website so it will be 11 available for the press. 12 29 June is the next hearing date, subject to other 13 things happening in between in relation to KRW Law, 14 which of course I will keep an eye upon, but I am 15 anxious in a good way, I hope -- keen -- that we should 16 continue to make progress, continue to set dates which 17 we can keep to if we can, and make sure that progress is 18 being made towards the inquests in the autumn. 19 Thank you all very much for coming, particularly 20 those of you who have travelled some distance. Thank 21 you to all the lawyers for your submissions. 22 (3.32 pm) 23 (The hearing joined until Thursday, 29 June 2017) 24 25 Discussion re representation .....1</p> <p style="text-align: center;">Page 148</p>

1	Update on the Progress of the .....19	
2	Inquest by COUNSEL TO THE	
	INQUESTS	
3		
4	Submissions on behalf of Sean Reilly .....24	
	by MS WILLIAMS	
5	Submissions on behalf of the West .....79	
	Midlands Police by MR JOHNSON	
6		
7	Submissions on behalf of Devon and .....83	
	Cornwall Police by MR BEER	
8	Submissions on behalf of the Police .....92	
	Federation by MR DAVIES	
9		
10	Submissions by COUNSEL TO THE .....105	
	INQUESTS	
11	Submissions on behalf of those .....136	
	families represented by KRW	
12	Solicitors by MS HAMBLETON	
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
Page 149		

<b>A</b>				
<b>abandoned</b> 102:11	<b>achieve</b> 125:22,23	106:14 107:2	6:12,17,25 7:20	<b>allayed</b> 146:13
<b>abeyance</b> 6:12	<b>achieved</b> 5:16	108:2 109:1,14	9:1,6,16 15:10,11	<b>allaying</b> 89:14 98:1
<b>ability</b> 14:19 40:13	104:4 109:4	120:10 144:2	16:19 18:1 138:1	98:2,9
122:10	<b>achieving</b> 131:9	145:10 146:2,8	138:4	<b>allegations</b> 127:23
<b>able</b> 1:20 2:18 4:22	<b>acknowledge</b> 31:23	<b>addressed</b> 38:10	<b>agenda</b> 1:11 25:25	132:7
6:2 15:7 39:3	36:18	82:12 95:4	32:23 49:23	<b>alleged</b> 34:16 71:2
40:5 45:7 75:25	<b>acknowledged</b>	<b>addresses</b> 84:24	<b>agendas</b> 146:1	132:6
107:19 122:18,19	37:15 146:10,22	<b>addressing</b> 28:16	<b>agent</b> 80:24 131:18	<b>Allen</b> 30:22 31:5
132:10,12 138:20	<b>acquittal</b> 63:15	84:1 85:11 88:12	131:21	110:24
<b>Abrahamson</b> 24:24	68:13,20 100:10	<b>adduce</b> 122:11	<b>agent/informant</b>	<b>allow</b> 4:2 5:14
147:16	132:24 134:5,15	128:13	23:9 114:10	54:24 116:15,17
<b>absence</b> 15:7 16:8	<b>acquitted</b> 66:12	<b>adduced</b> 111:20	143:19	128:18
54:10 71:16	67:17 134:8	112:12 116:15	<b>agents</b> 96:10,12	<b>allowing</b> 83:6
128:10 131:1	<b>act</b> 31:16 50:17	144:16	<b>ago</b> 102:22 124:1	100:25 137:2
<b>absent</b> 33:11	58:18 63:13 65:13	<b>adequacy</b> 11:24	139:24	139:8
<b>abstract</b> 116:7	66:14,17 78:11	<b>adjournment</b> 3:24	<b>agree</b> 18:4,5 50:21	<b>Alternatively</b> 136:5
<b>abundantly</b> 130:12	84:2 85:1 86:16	92:21	51:1 79:24 80:3,7	<b>ambit</b> 80:14
<b>accept</b> 12:12 27:14	87:14 95:8 100:12	<b>administered</b> 3:2	80:16 81:7,11	<b>ambulance</b> 35:15
48:15 64:4,6	107:10 109:24	<b>administration</b>	82:5,7,13 83:13	37:7 46:18 47:2
76:20 77:2,23	110:18 127:2,12	9:19 10:4	83:20 103:14	47:10,12,14 48:1
131:18	128:13 132:21	<b>admire</b> 35:4	<b>agreed</b> 1:21 3:19	48:3,8,11 118:17
<b>acceptable</b> 29:6	134:13 138:22	<b>admitted</b> 140:2	10:9	135:20
<b>acceptance</b> 16:25	<b>acting</b> 128:2	<b>admitting</b> 66:10	<b>agreement</b> 9:15	<b>ambulancemen</b>
<b>accepted</b> 1:24 2:4	<b>action</b> 115:6	<b>adopt</b> 97:7	28:18 80:22	140:17
16:16,17 17:13	<b>actions</b> 35:4 50:4	<b>adopted</b> 97:13	<b>agreements</b> 15:11	<b>ambulances</b> 35:23
54:12	<b>active</b> 146:21	<b>adopts</b> 84:2	<b>agrees</b> 69:8,10,11	37:2 44:15 46:24
<b>accepts</b> 50:10	<b>actors</b> 102:15	<b>adults</b> 40:12	<b>aid</b> 1:22 2:21,23,25	<b>amended</b> 4:18 5:24
<b>access</b> 21:6	<b>acts</b> 94:16 125:11	<b>advance</b> 1:10 81:2	4:21 5:23,23 6:3	<b>amount</b> 39:2 60:21
<b>accessible</b> 13:16	125:18	81:4 146:1	6:17,25 7:20	130:17,18
<b>accident</b> 91:25 92:8	<b>actual</b> 46:7	<b>advanced</b> 28:13	16:12,18,25 18:1	<b>amplification</b> 19:4
<b>accords</b> 82:6	<b>acute</b> 101:12	79:17 80:8 81:8	35:17 137:6 138:1	<b>amplified</b> 19:7
<b>account</b> 27:15	<b>acutely</b> 108:12	81:20 109:7	138:4	<b>amputations</b> 39:23
102:25	<b>add</b> 17:17 18:8	<b>advancing</b> 68:2	<b>aired</b> 36:12	<b>analyse</b> 45:8
<b>accountability</b>	75:19 112:19	<b>advantage</b> 59:2	<b>Alan</b> 120:6	<b>analysis</b> 20:6 37:13
140:24	139:2 141:15,23	<b>advice</b> 68:11,18	<b>albeit</b> 30:17 74:11	43:20 73:1 82:23
<b>accountable</b> 106:12	<b>added</b> 66:1	<b>advise</b> 111:11	92:5 98:21 99:9	97:21 104:4
125:10	<b>addition</b> 20:15	<b>advised</b> 9:22 17:5	121:13	<b>ancillary</b> 133:15
<b>accounts</b> 28:4	58:16	<b>affect</b> 27:23	<b>alerted</b> 61:20	<b>and/or</b> 35:14,14
120:6 122:17,20	<b>additional</b> 86:20	<b>aftermath</b> 33:7	<b>Alison</b> 20:2 113:22	44:1
<b>accreditation</b> 5:10	144:7 146:20	45:10 61:21	<b>alive</b> 45:12 46:3	<b>annex</b> 36:6 37:1,22
<b>accuracy</b> 102:25	148:4	<b>afternoon</b> 105:12	74:20,20 102:18	42:7
<b>accused</b> 90:15	<b>address</b> 1:14 2:1	<b>age</b> 102:24	102:23 122:18	<b>anonymity</b> 55:22
101:23 128:8	36:20 38:4 41:10	<b>agencies</b> 114:14	123:9	57:19 58:4,14,16
<b>achievable</b> 125:19	44:19 82:10 83:16	<b>agency</b> 1:22 3:4,8	<b>allay</b> 30:12 97:23	<b>anonymous</b> 131:17
	83:16 91:13 95:7	3:12,20 5:23 6:9	140:7	<b>answer</b> 69:14 84:14

86:10,16 107:9 110:17 125:16 129:17 133:12 135:17 <b>answered</b> 26:11,15 <b>answering</b> 75:2 110:9 115:14 127:6 <b>answers</b> 26:8 61:7 61:9 84:14 99:8,9 106:16 108:25 114:16 <b>Anthony</b> 20:15 <b>anticipate</b> 122:25 <b>antithesis</b> 89:15 <b>anxious</b> 148:15 <b>anxiously</b> 80:6 <b>anybody</b> 15:18,23 62:10 139:11 <b>anyway</b> 104:18 <b>AP</b> 32:10 <b>apologies</b> 137:5 <b>apologise</b> 4:5 8:21 14:2 <b>apparent</b> 13:4 93:17 101:25 121:17 122:14 <b>apparently</b> 71:9 <b>appeal</b> 31:18 64:7 73:25 74:6,8 75:10 99:18 100:3 100:16,18,19,25 102:11 104:12 112:5 126:10 129:22 130:13 132:13 133:5,10 <b>Appeal's</b> 74:11 <b>appear</b> 52:2 110:7 123:5 126:24 130:7 <b>appeared</b> 123:9 <b>appearing</b> 103:21 <b>appears</b> 30:5 66:2 104:10 121:13 138:25	<b>appellant</b> 101:2 <b>appliances</b> 37:2 <b>applicable</b> 2:25 86:23 <b>applicant</b> 60:20 71:1 <b>applicant's</b> 66:4 <b>application</b> 6:6,11 6:17,18,19 7:11 7:12,18,25 9:13 21:12 22:5 57:19 57:24 96:22,23 97:1 <b>applications</b> 6:8,10 7:17 58:4 62:9 97:17,18 <b>applied</b> 5:8 93:4 <b>applies</b> 54:17,18 110:14 129:12 <b>apply</b> 6:3 53:23 75:4 93:11 96:14 <b>applying</b> 4:24 6:7 138:25 <b>appreciate</b> 3:3 26:16 34:25 36:3 43:17 59:9 72:24 86:18 91:11 133:9 136:21,21 142:17 <b>appreciates</b> 86:11 <b>appreciation</b> 27:3 <b>apprehend</b> 63:10 78:18 <b>approach</b> 14:23 26:21 31:11 32:1 33:21 34:18 52:12 78:3 82:5,7 84:3,8 93:24 97:11,13,19 112:3 121:18,24 130:9 <b>appropriate</b> 24:4 35:17 46:11 55:22 81:5 120:9 124:16 142:22 143:4 <b>April</b> 6:24 7:14,16 7:20 8:1 67:7	<b>archive</b> 22:25 23:2 <b>archives</b> 49:2 <b>area</b> 98:19 <b>areas</b> 80:18 <b>arguability</b> 36:14 117:1 <b>arguable</b> 32:14 34:20,21 37:24 120:4,4 <b>argue</b> 15:4 16:8 96:17 <b>argued</b> 121:4,4 <b>argument</b> 12:7 15:9 66:5 70:8 121:9 133:23 134:12 <b>arguments</b> 13:19 148:4 <b>arises</b> 101:10 127:1 <b>Army</b> 20:21 <b>arrangement</b> 2:22 <b>arrangements</b> 146:14 <b>arrested</b> 66:8,9 <b>arrive</b> 44:14,15 46:18 <b>arrived</b> 76:7 123:2 123:3 <b>arson</b> 71:2,3 <b>artery</b> 31:9 <b>Article</b> 9:18 31:15 31:20 32:14 84:24 96:21 110:1 135:9 138:21,22 <b>ascertain</b> 23:7 54:13 <b>aside</b> 126:13 <b>asked</b> 3:22 5:22 8:18 15:10 20:5,9 20:12 42:4 45:13 45:19 46:14 60:3 65:25 75:3 108:3 109:13 111:23 116:7 125:1 <b>asking</b> 4:1 9:24	25:7 32:8 108:14 114:22 137:12,13 <b>aspect</b> 74:4 123:24 <b>aspects</b> 83:18 <b>assembled</b> 34:12 42:19 47:8 48:24 <b>assertion</b> 122:5 <b>assess</b> 39:10 61:18 <b>assessed</b> 102:9 <b>assessing</b> 56:18 <b>assessment</b> 7:22 116:4,24 117:1 122:20 130:2 <b>assist</b> 2:13 14:18 35:9 37:7 48:6 104:23 105:17,17 144:8 145:1 <b>assistance</b> 15:15 145:3,4 <b>assisted</b> 23:25 48:3 49:11 <b>associated</b> 109:20 <b>Association</b> 119:1 <b>assume</b> 58:20 124:24 <b>assure</b> 5:17 <b>Aston</b> 72:25,25 83:18,18 104:6,7 <b>atrocities</b> 125:25 <b>atrocious</b> 106:9 107:3 125:7 139:18 <b>attach</b> 119:25 <b>attaching</b> 94:19 <b>attacks</b> 20:18 130:11 131:25 143:12 <b>attempt</b> 123:15 <b>attempted</b> 19:5 <b>attempting</b> 109:7 128:6 130:23 139:2 <b>attend</b> 135:21 <b>attendance</b> 11:1 <b>attended</b> 37:3 45:9	46:1 120:7 124:24 <b>attends</b> 128:11,11 <b>attention</b> 30:1 40:17 <b>attracted</b> 130:20 <b>attributed</b> 119:11 <b>author</b> 37:16 <b>authorised</b> 135:14 <b>authorities</b> 29:12 32:12 51:18 52:1 52:7,14 56:12 66:1 84:17 97:11 97:15 99:4 <b>authority</b> 65:22 95:13,14 96:23 <b>authors</b> 37:9 <b>automatically</b> 128:11 <b>autumn</b> 43:19 148:18 <b>available</b> 44:16 45:8 46:10 47:18 48:18 59:1 62:17 75:18 94:4 116:5 116:5,24 123:5,6 129:8 145:1 148:5 148:11 <b>avenues</b> 72:22 <b>await</b> 136:5 <b>awaiting</b> 41:25 <b>aware</b> 14:24 18:17 26:5 28:11 32:25 34:6 39:15 50:18 55:21 62:14,20 93:5 108:13 <b>awful</b> 138:8
<b>B</b>				
<b>B</b> 48:10 52:21 90:9 <b>back</b> 2:19 10:14 23:5 45:1 64:13 67:20 73:3,6 85:11 90:8 95:3 95:10 109:16 128:22 132:14				

138:13 142:2 <b>backdated</b> 1:23 8:17 16:15 <b>background</b> 113:10 135:4 142:23 <b>backup</b> 132:18 <b>Baker</b> 68:8 <b>balance</b> 28:2 <b>ball</b> 7:22 8:22 14:2 <b>band</b> 67:25 <b>Bank</b> 20:8 <b>bar</b> 81:12 <b>Barclays</b> 20:8 <b>bare</b> 137:12 <b>barristers</b> 105:16 <b>base</b> 124:8 <b>based</b> 20:4 37:21 94:2 112:3 117:2 122:20 <b>basically</b> 137:13 140:5 <b>basis</b> 2:8 3:6,7 9:22 17:18 19:25 38:15 42:12 70:8 72:16 73:25 93:13,17 94:23 103:1 110:2 129:22 132:3,4 142:7 <b>bat</b> 66:20 <b>BBC</b> 21:16 22:18 <b>bear</b> 32:16 108:19 117:23 131:3 144:5 <b>bearer</b> 2:10 <b>bearing</b> 34:21 54:21 <b>Beer</b> 83:3,5,6,11 84:20,22 85:10 87:19,22 88:9,12 88:14,17 89:4,6 89:12 90:1 91:19 149:7 <b>beg</b> 140:25,25 <b>begging</b> 9:24	<b>beginning</b> 103:11 121:16 <b>begins</b> 85:6 <b>begun</b> 43:23 <b>behalf</b> 11:5 14:2 16:6 17:20 19:20 23:12 24:10 25:22 34:3 79:1 83:4 92:23,25 93:20 94:10 105:23 111:15 116:22 128:2 136:4,10,12 137:3 140:25 149:3,5,6,8,11 <b>Belfast</b> 8:22 <b>believe</b> 36:17 49:4 58:7 123:5 141:16 <b>believed</b> 102:18 144:21 <b>believes</b> 68:22 <b>Bench</b> 96:24 <b>benefit</b> 12:14 74:24 131:13,14,14 <b>bereaved</b> 26:7 50:12 <b>best</b> 9:19,20 10:3,4 14:16,18 15:7 88:21 89:13 111:2 147:18 <b>better</b> 2:10 <b>beyond</b> 4:8 107:23 119:4 138:11 <b>bigger</b> 44:8,13 <b>biggest</b> 139:18 <b>Bingham</b> 52:23 53:1,18 54:11 56:11 62:20 91:2 95:15 97:2,24 110:25 127:4 <b>Bingham's</b> 85:3,6 <b>Birmingham</b> 11:2 11:4 20:11 21:20 58:7 59:14 63:12 63:16 64:6,8 73:6 74:6,20 77:3	83:18 88:24 93:17 99:15 101:22 103:17 118:11,16 123:24 129:21 132:20 133:25 134:16 146:1 <b>bit</b> 19:8 58:2 <b>bites</b> 65:18 76:22 <b>blame</b> 137:8 <b>blast</b> 20:16,23 40:4 42:1 118:4 <b>blasts</b> 37:8 <b>block</b> 100:20 <b>blocks</b> 128:18 <b>board</b> 129:18 <b>body</b> 66:7,18 111:17 128:1 <b>bomb</b> 11:13 20:18 24:22 61:24 72:1 120:14 126:5 <b>bombings</b> 21:1 34:3 50:24 83:19 90:16 94:13 106:4 107:25 109:11 116:23 123:24 125:7,10 129:16 133:2,20 134:2,17 135:4 142:23 <b>bombs</b> 33:7 39:22 50:3 57:9 61:16 96:15 99:7,14 104:9 126:7,15 135:14 <b>bono</b> 4:9 140:22 <b>borne</b> 28:2 106:10 147:10 <b>bother</b> 139:5 <b>bottom</b> 67:20 68:6 <b>bound</b> 107:9 110:5 112:15 <b>boundaries</b> 80:14 <b>Bradshaw</b> 47:2 <b>Brannigan</b> 37:1,3 37:20 <b>bravery</b> 35:2	<b>breach</b> 32:14 <b>break</b> 16:2 <b>bridge</b> 132:1 <b>brief</b> 4:8 11:10 28:22 39:16 79:21 136:23 <b>briefly</b> 11:20 26:3 28:22 29:8 30:22 32:6 60:25 62:20 62:25 65:10 66:3 70:5 71:14 76:12 79:23 114:6 126:18 141:15 <b>brigade</b> 35:14 37:16 44:14 45:24 46:1 <b>bring</b> 81:14 <b>broad</b> 26:21 74:1 77:11 97:10 98:3 110:22 122:1 <b>broad-ranging</b> 124:9 <b>broader</b> 29:24 41:18 56:25 85:20 <b>broadly</b> 33:19 61:6 107:20 <b>brother</b> 18:18 24:19 140:13 <b>brothers</b> 141:6 <b>brought</b> 59:25 <b>Bubbins</b> 29:8 <b>building</b> 1:7 44:11 128:18 <b>buildings</b> 21:20 <b>Bull</b> 20:16 42:1,2 113:21,21 142:12 <b>bundle</b> 29:12 32:12 66:1 83:8 84:17 86:18 87:16 89:24 90:1 <b>burned</b> 139:19 140:12 <b>Bush</b> 20:7 35:16 37:6 126:6 <b>business</b> 15:8	<b>bystanders</b> 140:11 <hr/> <b>C</b> <b>C</b> 52:19,20 90:9 <b>call</b> 50:5 61:22 77:20 143:4 <b>called</b> 1:17 21:4 27:10 41:2 51:8 58:6,8 61:13 62:11 65:6 77:4 87:18 112:9 113:12 124:19 125:1 144:11 <b>calling</b> 29:4 92:6 124:20 <b>campaign</b> 126:7 135:5 <b>Canter</b> 25:5 120:1 <b>careful</b> 81:20 <b>carefully</b> 74:19 <b>Carey</b> 19:22 39:18 41:6,17,21 43:21 113:21,22,25 117:24 118:1 <b>Carey's</b> 40:6,8 42:21 117:5 <b>carried</b> 48:23 83:17 88:23 <b>carry</b> 127:21 <b>carrying</b> 80:12,25 111:15 <b>cart</b> 38:13 81:17 <b>Cary</b> 142:12 <b>case</b> 3:16 4:19 11:3 20:3 22:13,13 28:25 30:21,22 31:5,5 32:9,25 46:14 51:9 52:18 52:20,21 54:12 59:20,25,25 63:21 65:10,25 66:3 68:21 69:17,22 70:2,4,6,6,7,23 71:7,10 73:7,8,18 73:19 74:6 75:19
---	--	--	--	--

76:23 77:1,15 85:9,16 87:16 91:19 92:4 96:1 97:14 101:12 110:21 111:2 117:9 122:22 125:25 126:10 128:17 132:11 134:5 138:15,23 <b>cases</b> 29:3,7 40:19 43:11 55:16 59:20 82:1 87:4 91:23 101:10 110:23,23 117:14 121:21 <b>cast</b> 35:2 37:17 <b>casualties</b> 38:23 46:21 <b>catastrophic</b> 120:14 121:16 <b>catch</b> 139:9 <b>cathartic</b> 27:17 124:22 <b>caught</b> 121:11 140:4 <b>causal</b> 38:6 50:7 56:17 <b>causation</b> 124:6 <b>causative</b> 29:23 30:15,18 34:2,10 34:15 111:7,7,8 116:21 <b>cause</b> 90:12 106:12 113:24 121:17 125:4 135:17 <b>caused</b> 28:9 31:21 31:21 32:24 48:10 81:13 119:18 121:2 <b>causes</b> 31:9,14 <b>caution</b> 62:17 <b>cautious</b> 73:13 <b>caveats</b> 139:2 <b>CCTV</b> 48:18 122:16 <b>central</b> 30:25 35:12	74:7 102:21 109:2 111:3 <b>centre</b> 20:16 120:16 <b>century</b> 127:14 139:19 <b>certain</b> 13:8 47:10 55:21 58:15 62:9 76:5 93:9 116:1 123:1 133:10 <b>certainly</b> 27:20 36:13 40:2 45:21 49:7 79:5,24 80:3 118:25 120:16 <b>certainty</b> 15:8 <b>certificates</b> 2:19 3:7 5:16 <b>cetera</b> 117:1 <b>challenges</b> 27:1 <b>Chancellor</b> 2:20,21 95:15 <b>Chancellor's</b> 9:7 <b>changed</b> 9:17 10:8 14:13 15:13 65:15 78:12 <b>changing</b> 2:7 <b>character</b> 102:21 <b>charge</b> 64:2,2 70:10 127:10 <b>charged</b> 66:8,9 75:5,5 <b>charges</b> 127:22 128:10 132:9,25 133:24 134:3 <b>chartered</b> 21:19 <b>chasing</b> 6:25 7:13 8:8 <b>check</b> 141:21 147:20 <b>chief</b> 35:20 36:25 93:7 96:23 102:20 105:2 <b>Children's</b> 118:12 <b>choice</b> 91:24,25 <b>choose</b> 74:18 76:5	<b>chosen</b> 108:18 <b>chronology</b> 6:22 <b>circulate</b> 145:16 146:1 <b>circulated</b> 1:10,19 23:19 47:6 145:18 <b>circumstance</b> 129:7 <b>circumstances</b> 26:6 29:25 30:2,20 33:12 50:6 51:12 51:14 55:22 60:14 64:18 69:15 81:1 86:24 91:15,21 95:23 96:3,13,13 96:19 98:3,16 99:2,6 110:4,10 115:22,24 118:1 120:14,21 126:20 129:1,5,8 135:1,6 145:2 <b>citation</b> 30:2 40:7 70:21 <b>citations</b> 55:17 <b>cite</b> 28:14 29:4,7,9 29:13 30:22,24 37:1 53:17 <b>cited</b> 32:10 69:23 70:15 71:11 <b>city</b> 120:16 138:11 <b>civil</b> 54:21 91:6 110:8 <b>civilian</b> 126:8 <b>claims</b> 102:9 <b>clarify</b> 10:19 57:5 136:15 137:4,19 137:20 <b>classes</b> 95:25 <b>clear</b> 2:15 25:7 27:2 34:14,24 37:9 42:13 43:4 45:20 51:9 74:25 80:16 110:21,23 118:20 121:15 128:25 129:11 130:12 134:10	148:2 <b>clearer</b> 58:2 <b>clearly</b> 17:16 56:11 59:6 78:13 106:13 112:25 113:18 124:2 134:3 <b>client</b> 25:23 27:5 59:12 82:19,19 <b>clients</b> 5:17 7:3 8:9 8:15,21 9:21,21 10:4 11:5 12:14 17:21 47:11 59:1 82:20 <b>clients'</b> 82:17,17 <b>close</b> 16:17 34:13 72:20 118:21 <b>closed</b> 4:3 <b>closely</b> 33:8 <b>closing</b> 84:10 87:9 <b>co-ordinating</b> 49:10 <b>coalesce</b> 143:6 <b>collate</b> 7:10 <b>collating</b> 7:2 <b>College</b> 20:17 49:5 <b>come</b> 15:1 17:11 23:10 32:1,6 38:8 39:3 42:7 52:10 58:6 59:14 74:17 75:8 80:1,5 95:1 96:18 116:7 137:21 142:2 <b>comes</b> 44:17 85:5 85:15 144:15 <b>coming</b> 1:5,16 25:20 26:4 73:6 107:20 108:14 143:13 148:19 <b>commence</b> 43:18 <b>commend</b> 35:4 <b>comment</b> 13:23 20:13 <b>comments</b> 87:6 <b>committed</b> 50:23 68:23 86:14	138:24 <b>common</b> 38:19 39:1 80:22 95:20 109:21 135:8 <b>communication</b> 147:16 <b>company</b> 51:1 <b>compare</b> 20:9 <b>compelling</b> 106:13 <b>compiled</b> 119:21 <b>complaining</b> 60:1 <b>complementary</b> 25:15 <b>complete</b> 7:21 91:12 <b>completely</b> 27:14 46:20 <b>complex</b> 131:15 138:15 <b>compliant</b> 9:18 <b>complicated</b> 9:8 14:3,7 <b>comply</b> 92:9 <b>compounded</b> 125:8 <b>comprehensive</b> 13:14 36:20 118:21 119:19 132:17 <b>comprehensively</b> 74:10 <b>comprehensiven...</b> 73:2 <b>comprised</b> 85:18 <b>comprising</b> 127:22 <b>compromise</b> 127:7 <b>conceivable</b> 131:20 <b>conceivably</b> 119:17 <b>conceive</b> 98:18 129:7 <b>concentrated</b> 37:5 37:5 <b>concept</b> 98:9,15 <b>conceptually</b> 131:20 <b>concern</b> 27:9,14
---	--	---	---	--

42:15 44:20 63:14 123:21 124:3 <b>concerned</b> 41:18 90:13,14 104:1 106:21 119:13 132:20 133:12 138:2 146:25 147:3 <b>concerning</b> 84:23 87:7 95:18 <b>concerns</b> 26:11,15 35:5 73:14 140:7 146:11,16 <b>conclude</b> 82:23 107:5 117:13 <b>concluded</b> 115:9 <b>conclusion</b> 40:25 51:6,23 53:1,13 53:16 55:7 56:3,9 62:23 75:16,17,18 77:5,21 81:24 85:25 86:7,15 88:4,7 90:7,18 91:3 92:1,1,3,10 92:11 93:23 94:2 94:7 106:23 110:15,16 111:3,6 112:8 116:17 118:2,5,15 129:3 129:4 131:17 134:20,21 135:11 <b>conclusions</b> 50:20 50:23 52:24,25 54:19 55:2 61:4 64:15 74:17 75:22 75:24 76:8,15,20 76:22 85:22 91:24 94:19 107:20 111:25 115:23 133:22 <b>condition</b> 123:8 <b>conduct</b> 23:12 30:9 73:1 74:3 85:12 87:8 92:2 96:12 <b>conducted</b> 62:16,16	102:13 103:5 114:23 124:5,10 127:20 131:6,6 133:3 <b>conducting</b> 116:6 130:9 134:25 <b>confession</b> 66:13 <b>confessions</b> 101:22 102:1,12,13 103:4 103:9 129:24 <b>confidence</b> 124:23 <b>confident</b> 4:16 <b>confine</b> 29:22 <b>confined</b> 28:18 75:1 98:1 <b>confines</b> 87:23 90:22 98:12 <b>confirm</b> 52:1 111:9 <b>conflict</b> 52:2,4 53:3 54:12,17 67:24 75:12 91:14,19,23 92:11 <b>confused</b> 138:2 <b>confusing</b> 29:6 <b>conjecture</b> 138:10 <b>connected</b> 33:8 56:16,16 <b>connection</b> 145:15 <b>conscious</b> 52:16 66:22 124:12 <b>consequences</b> 8:6 84:6 109:10 147:14 <b>consequent</b> 20:24 <b>consequential</b> 16:8 <b>consider</b> 15:24 41:6 42:4 44:21 54:5 56:18 57:11,20 58:25 77:23 95:12 108:4 115:22 116:11 120:9 121:19 134:23 135:7 141:1 142:21 143:3 <b>considerable</b> 17:24	34:20 36:16 48:23 131:12 146:23 <b>consideration</b> 27:25 70:13 72:10 111:18 113:13 116:19 136:2 143:15 <b>considerations</b> 53:20 96:17 127:3 <b>considered</b> 21:22 34:12 43:7,22 48:25 49:3 50:12 57:14 62:11 71:7 80:6 107:21 112:16,21 113:2 113:25 145:7 <b>considering</b> 32:17 41:12 56:3,15 79:22 100:2 111:11 <b>considers</b> 140:13 <b>consistent</b> 32:25 70:24 <b>consistently</b> 12:3 14:25 <b>Constable</b> 96:23 <b>constituent</b> 101:21 <b>constitutional</b> 91:8 <b>constraints</b> 14:12 <b>consultation</b> 4:15 <b>contact</b> 23:14,15 143:20 <b>contacted</b> 22:16 138:3 <b>contain</b> 22:6 121:13 <b>contained</b> 23:7 79:19 84:25 <b>contains</b> 86:19 90:25 <b>contemplates</b> 30:19 <b>contemporaneous</b> 119:10,11 <b>Contempt</b> 58:18 <b>content</b> 136:2	<b>contention</b> 33:17 <b>contentions</b> 38:3 <b>contentious</b> 112:14 <b>contents</b> 37:18,21 <b>contest</b> 101:13 <b>context</b> 29:8 30:6 31:3,13 50:19 60:12 85:10 97:17 124:17,18 132:16 134:2 143:1 <b>contingency</b> 49:6 <b>contingent</b> 93:8 <b>continue</b> 9:20 15:17 23:1 85:19 109:10 138:24 139:24 142:13,20 143:16,18,20 148:16,16 <b>continued</b> 15:3,6 <b>continues</b> 30:4,7 54:11 85:17 <b>continuing</b> 2:5 <b>continuous</b> 123:21 124:3 <b>contract</b> 1:22 2:16 2:19,22 3:6,13 4:18,19,24 5:6,9 5:10,15 8:5,10,19 8:20 9:2,3 16:13 16:25 <b>contrary</b> 86:4 97:13 <b>contrast</b> 107:19 123:20 <b>contrasted</b> 122:12 122:12 <b>contrasts</b> 124:1 <b>contravened</b> 87:13 <b>contribute</b> 144:7 <b>contributed</b> 31:22 32:4 119:18 121:2 <b>control</b> 35:11,12 <b>controversial</b> 114:4 126:3 <b>controversy</b> 78:9	<b>Convention</b> 84:24 85:14 135:9 <b>conversation</b> 19:6 19:7 <b>conveyed</b> 85:25 <b>convicted</b> 107:3 134:8 <b>conviction</b> 100:7,8 131:10 <b>convictions</b> 133:7,7 134:1 <b>cooperative</b> 14:23 <b>coordinated</b> 120:19 <b>copy</b> 21:10 <b>Cornwall</b> 72:23 83:3,4,16 106:3 140:2 149:7 <b>coronary</b> 31:9 <b>coroner</b> 1:4,16 2:2 2:9 3:11,15 4:10 4:13,23 5:4,6,13 5:19 6:16,19,24 7:6,9,13,16,20,25 8:3,7,10,14,17,23 9:11 10:2,6,11,16 10:24 11:19 12:15 12:17,20,24 13:13 13:15,24 14:22 15:14,16 16:5 17:20 18:6,8,13 18:16,22,25 19:2 19:9 21:12 24:9 24:11,15 25:6,10 28:10,12 29:16,18 29:22 34:8 40:10 42:23 43:2,5 45:2 45:5 47:17,21 53:7,11,15,24 54:3,7,20,22,24 55:3,6,11,14,18 55:23 56:6,13,22 57:2,6,12,21 58:1 58:3,13,18,20 59:4,13,17,23 60:9 63:2,19
---	---	---	--	--

66:15,19,25 67:2 67:7,15,20,25 68:1,4,14,16,22 69:7,25 70:16,20 73:3,6,12,16,19 73:23 74:5,12,17 75:4,7,14,25 76:10,12,16,23,23 77:8,10,11,18,19 78:2,5,15,19,24 79:4,6,11 80:4,17 83:2,9 84:9,19,21 85:7,8 86:20 87:18,21,23 88:1 88:10,13,15 89:2 89:5,8,25 91:18 92:18,24 93:2 96:1 97:14,20 98:14,19,23 99:24 100:4,6,13,15,21 100:23 101:3,6,14 101:18 104:20 105:1,4,24 109:15 112:24 114:12 115:2 136:6,9,16 136:20 137:9,16 137:18 141:11,13 141:20 142:1 146:4 147:11,13 147:18,23 <b>coroner's</b> 6:12 31:11 33:11 52:3 68:21 76:18 79:25 112:15 127:23 134:9 143:8 <b>coroners</b> 50:17 55:21 63:13 65:13 66:17 77:11,23 78:11 87:2,6 127:9 <b>Coroners'</b> 84:25 <b>coronial</b> 98:13 106:25 109:22 127:5,15,19 <b>corporate</b> 12:18	<b>Corps</b> 20:21 <b>correct</b> 55:9 56:1 65:22 82:24 121:18 <b>corresponded</b> 23:17 <b>correspondence</b> 66:25 67:9,19 68:3 <b>cost</b> 35:24 <b>counsel</b> 4:5 5:17 12:8 13:20,21 15:21 16:8 17:4 18:20,23 19:3,10 19:11,13 23:11 25:19 27:7 29:4 60:25 81:9,18 82:8,24 83:14 87:19 105:6,7,14 105:21,25 109:18 112:5 113:15 114:19 115:1 119:5 128:2 136:17 139:13 142:4 149:2,9 <b>counsel's</b> 103:14 <b>counter-balance</b> 27:16 <b>countless</b> 106:8 <b>country</b> 107:8 <b>couple</b> 45:22 <b>course</b> 2:3 14:22 18:8 22:3,10 26:19,24,25 27:13 30:3 31:22 46:12 48:13 49:11,12,14 50:2,11 53:8 55:5 57:17 59:16 60:8 71:19,20 80:13 84:20 86:11 88:17 91:22 93:5 94:17 96:8 97:7 99:20 102:4,10 105:11 105:22 111:25 112:10,23 113:4	113:14 114:2,7 123:8 131:4,20 143:16,17 148:7 148:14 <b>court</b> 7:23 29:14 30:4 31:18 34:25 49:11 58:18 64:7 67:24 69:4 70:11 74:6,10 84:15 87:11 97:19 99:18 100:2,3,9,18,19 100:24 104:11 106:6 108:11 112:5,5 126:10 127:24 129:22 130:12,23 132:13 133:5,10 134:10 145:2,25 <b>court's</b> 92:13 <b>courts</b> 107:8 132:18 <b>cover</b> 3:17 24:14 35:10 55:17 <b>covered</b> 52:15 146:9 148:3 <b>Craig's</b> 140:13 <b>creates</b> 78:4,5 <b>creating</b> 89:14 <b>crime</b> 51:21 77:20 83:22 107:4,4 123:17 127:24 <b>crimes</b> 130:25 134:8 <b>criminal</b> 23:5 50:19 54:21 56:4 62:22 64:21 66:12,14 67:17 68:20 70:10 86:2 91:6 100:15 103:21 107:8 110:7,12 125:18 126:11,22,24 127:7,12,17,21 128:7,11,17 129:19 130:9,13 131:9 132:18,23	133:24 134:13 <b>criminal/civil</b> 98:9 <b>criminally</b> 53:4 107:6 <b>criminals</b> 127:18 <b>criterion</b> 98:21 <b>critical</b> 116:10 123:10 125:12 <b>criticism</b> 23:24 103:8 123:22,25 <b>criticisms</b> 130:21 <b>cross-examine</b> 128:14 <b>cross-reference</b> 29:11 <b>crossed</b> 132:2 <b>Crown</b> 23:3 67:24 128:1,3 <b>crucial</b> 98:7 <b>crux</b> 55:24,25 <b>CTI</b> 29:4,5,13 30:22 31:23 33:16 36:17 37:1,15,25 39:24 40:18 42:17 44:20 48:17 50:1 50:14,21 51:1 53:17 56:1 65:20 69:23 71:15 <b>CTI's</b> 33:24 36:2 37:21 38:3 40:7 42:7 43:6 52:8,12 56:24 57:7 62:5 62:25 63:14 67:14 <b>culminate</b> 90:11 <b>culpability</b> 99:15 133:4,16 <b>current</b> 32:17 85:12 <b>custody</b> 95:24 100:17 102:7 <b>cut</b> 93:12	<b>danger</b> 108:13 <b>database</b> 21:4,8 119:2 <b>date</b> 5:8 6:1 11:5,17 14:6 16:13,15 17:8 44:1 120:24 145:23 148:12 <b>dated</b> 1:23 11:17 20:1 24:16 <b>dates</b> 148:16 <b>daughter</b> 35:19 <b>daughters</b> 141:6 <b>Davies</b> 92:23,24,25 93:3 100:1,5,7,14 100:19,22,24 101:5,8,15,19 105:2 132:13 149:8 <b>day</b> 5:24 44:4 55:8 119:9 141:22 142:24 <b>day-to-day</b> 2:8 <b>days</b> 16:11,24 17:3 25:4 40:23 54:19 65:14 101:7 117:18 121:7 140:14 <b>dead</b> 89:7 102:15 102:17 103:9 122:8 123:10 139:6 <b>deal</b> 12:2 17:17 25:2 28:22,23 33:15,20 46:10 50:14,15 59:15 60:24 62:24 63:10 80:11 113:12 <b>dealing</b> 11:20 42:25 <b>deals</b> 62:4 70:18 <b>dealt</b> 35:7 42:16 <b>death</b> 29:23 30:13 31:14,22 34:4,10 42:14 43:12 48:10 50:7 51:21 53:4 54:6,14 56:4 71:3
--	---	---	---	--

81:14 82:3 95:22 96:3,14 98:2,4 99:2,3 107:18 110:1,11 113:24 115:20,21 117:10 121:5,17,23 129:14 135:7 <b>deaths</b> 26:6 32:4,24 33:9 34:15 38:8 91:22 96:19 111:10 115:16,23 115:24,24 116:2 116:23 119:18 121:2 124:17 126:3,4 <b>decades</b> 139:24 <b>deceased</b> 1:13 31:8 31:15 41:7 43:20 47:9,22,25 48:3 54:13 60:5 64:17 91:15,21 92:14 94:5,12 95:24 98:2,4 105:3 109:24,25 120:7 122:21,24 123:4,9 126:21 <b>deceased's</b> 31:10 <b>deceaseds</b> 110:11 135:2 <b>deceaseds'</b> 115:23 <b>December</b> 9:5 <b>decide</b> 13:8 28:10 80:4 96:1 <b>deciding</b> 81:14 <b>decision</b> 6:13 12:11 13:3 28:20 29:9 29:14 30:5 32:10 32:11 66:19 74:5 74:11 76:10 77:12 79:25 80:18 84:23 96:4 99:20 142:11 145:6 148:6,7 <b>decision-making</b> 87:5 <b>decisions</b> 35:23	105:24 <b>declaration</b> 99:21 <b>declared</b> 88:3 <b>Defence</b> 20:20 <b>defend</b> 128:9 132:12 <b>defendant</b> 128:18 <b>defendant's</b> 129:24 <b>defendants</b> 128:3 <b>deficient</b> 72:22 <b>defined</b> 25:24 42:12 49:21 94:12 96:11 132:9 <b>defining</b> 134:13 <b>definition</b> 32:20 103:7 <b>deflected</b> 56:20 <b>degree</b> 13:11 62:21 72:14 102:10 123:25 124:23 <b>delay</b> 138:12 142:15 <b>delayed</b> 18:4 137:17 <b>delays</b> 137:6 <b>deliberations</b> 75:25 <b>deliver</b> 131:10 <b>delivered</b> 106:24 <b>demand</b> 98:16 <b>demonstrated</b> 103:3 121:6 <b>denotes</b> 134:3 <b>Department</b> 68:7 <b>departments</b> 114:13 <b>departure</b> 97:10 130:1 <b>depending</b> 81:22 145:6 <b>deployed</b> 35:15 108:8,8 <b>Derbyshire</b> 59:24 <b>describe</b> 122:19 <b>described</b> 11:16,19 52:24	<b>description</b> 32:22 74:1 <b>designated</b> 93:3 <b>designation</b> 93:4,11 <b>Desmond</b> 18:18 24:20 40:14 <b>desperate</b> 46:17 <b>destroyed</b> 108:5 <b>detail</b> 11:22 22:16 28:15,17 33:15 36:8 41:6 45:15 46:5,11 49:25 58:11 66:24 80:6 82:10 120:10 121:14 123:14 144:22 146:17 <b>detailed</b> 11:25 38:16 45:13,22 46:8 74:3 122:11 122:20,21 <b>details</b> 7:19 8:19 72:8 114:22 119:14 <b>detained</b> 31:15 <b>detect</b> 46:25 61:19 <b>detectives</b> 127:24 <b>determination</b> 22:8 63:25 64:11,14,23 65:4,17,19 84:4,5 86:7 89:17 103:19 107:5,14 110:6,11 110:17 126:23 129:13 132:22 134:16 <b>determinations</b> 64:19 75:13 84:13 90:19 102:3 107:23 116:8 133:18 <b>determinative</b> 108:20 <b>determine</b> 38:14 93:9 103:21 110:7 111:2 112:18 115:3 116:17	124:14 126:20,24 133:15 <b>determined</b> 109:24 115:7 127:14 <b>determining</b> 34:8 102:12 125:17 <b>detonated</b> 20:6,11 24:22 33:8 39:22 61:24 113:20 126:16 <b>detonation</b> 20:14 <b>detrimental</b> 87:10 140:5 <b>device</b> 20:8,24 <b>devices</b> 20:6,8,10 20:14 113:19 <b>Devon</b> 72:23 83:3,4 83:16 106:3 140:1 149:6 <b>dialogue</b> 22:1 <b>dicta</b> 70:14,23 71:9 <b>dictate</b> 90:22 <b>dictates</b> 51:2 <b>die</b> 38:25 140:14 <b>died</b> 21:1 31:8 64:18 91:15 92:14 106:4 107:10,11 108:10 109:9 110:3 113:24 126:4,21 128:25 132:11 135:2 144:17 145:2 <b>dies</b> 38:24 <b>difference</b> 39:11,11 98:7 122:10 <b>differences</b> 122:14 <b>different</b> 3:5 36:7 57:22 58:5 75:9 83:23 91:22 99:22 102:6,7 111:12 112:2 132:1 144:1 <b>differently</b> 78:8 <b>difficult</b> 48:12 96:4 98:18 129:7 <b>difficulties</b> 27:4	48:14 63:4 120:18 <b>difficulty</b> 86:11 101:10,12 <b>diligent</b> 17:23 <b>direct</b> 16:9 76:5 <b>directed</b> 20:25 36:22 39:4 110:2 115:14 <b>direction</b> 17:11 26:1 35:11 46:20 50:25 66:16,18 100:9 108:24 112:3 <b>directions</b> 15:20,25 16:4 24:6 <b>directly</b> 23:16 29:23 30:15,18 48:9 104:8 106:8 108:17 137:21 <b>Director</b> 9:16 20:16 <b>disadvantaged</b> 18:11 <b>disagree</b> 122:4 139:16 <b>disappeared</b> 66:4 <b>disaster</b> 48:19 <b>discern</b> 108:23 <b>discharge</b> 40:21 117:16 <b>discharged</b> 41:15 <b>disclose</b> 21:23 <b>disclosed</b> 21:7,11 21:18,24 22:14 47:17,19 93:14 94:2 115:4 118:19 <b>disclosure</b> 13:4,6 21:3,4 26:18 37:19 72:24 97:18 97:19 98:19 143:16 <b>discredited</b> 74:10 <b>discreet</b> 19:6 <b>discretion</b> 34:9 76:4 77:11,16,24 97:6 98:12,14
---	---	--	---	---

99:11 110:22 111:1 112:18 129:18 <b>discuss</b> 8:18 147:13 <b>discussed</b> 16:23 <b>discussing</b> 140:4 <b>discussion</b> 1:3 14:15 22:1 62:7 78:9 113:13 144:24 148:24 <b>discussions</b> 143:25 <b>disease</b> 31:9 <b>disingenuous</b> 106:20 <b>dispel</b> 111:9 <b>disrupt</b> 139:2 <b>dissemination</b> 35:12 <b>distance</b> 148:20 <b>distinction</b> 110:19 <b>distinguishing</b> 76:14 <b>distortion</b> 130:1 <b>diverted</b> 142:16 <b>Divisional</b> 69:4 <b>doctor</b> 42:8 <b>document</b> 1:17 2:2 2:6 11:6,23 25:3 47:5,7 49:5 79:10 79:12,20 <b>documented</b> 49:8 <b>documents</b> 21:8,11 21:14,18 22:10 23:7 43:21 48:13 94:5 111:16 118:14,17,18,19 119:20,21 144:4 <b>dog</b> 52:13 90:21 91:1 <b>doing</b> 19:17 36:22 77:17 118:2 <b>door</b> 72:20 <b>doubt</b> 19:22 35:2 37:17 72:15 77:14 78:10 82:20 92:12	94:15 111:24 115:8 126:18 133:1,12 135:24 <b>Dr</b> 113:21,22,25 117:5,24 118:1 142:12 <b>draft</b> 1:22 8:10 145:12,18 <b>drafting</b> 144:7 <b>draw</b> 30:1 40:17 108:16 110:18 <b>drawn</b> 51:13 110:20 <b>drinking</b> 24:21 <b>driven</b> 82:22 <b>drivers</b> 140:18,20 <b>dropping</b> 8:21 14:1 <b>due</b> 22:3 30:3 49:11 59:15 60:7 80:13 111:25 113:14 114:2,7 128:10 137:6 138:12 143:17 148:7 <b>duty</b> 52:3,5 53:5,5 54:13 56:12 91:14 91:16 92:9,13,13 98:19 <hr/> <b>E</b> <b>E</b> 45:3,4 52:21 <b>earlier</b> 28:11 51:19 61:25 62:15 65:7 72:23 113:23 124:21 127:13 <b>early</b> 38:12,22 40:15 72:19 <b>easiest</b> 40:7 <b>echoing</b> 106:1 <b>effect</b> 10:19,25 20:14 27:16 50:8 50:22 60:2 63:12 67:14 68:1,24 69:4 70:9 78:21 83:9 84:1,7 88:20 99:20 100:7 112:6	113:19 147:14 <b>effective</b> 9:19 <b>effectively</b> 11:20 82:15 90:9 138:21 <b>effects</b> 20:23 103:15 <b>efficient</b> 36:1 <b>efforts</b> 115:8 119:24 <b>either</b> 3:22 61:19 103:25 135:8 144:22 <b>elaborate</b> 146:17 <b>elderly</b> 122:9 <b>electronic</b> 21:3,10 <b>element</b> 32:24 <b>elicit</b> 96:2 111:2 123:7 145:3 <b>elicits</b> 99:1 <b>eligibility</b> 8:14 137:18 <b>else's</b> 47:15 <b>email</b> 4:11 6:23 <b>emailed</b> 5:23 7:20 <b>embark</b> 41:2 61:5 63:7 121:23 126:1 133:17 135:9 <b>embarked</b> 71:23 <b>embarking</b> 61:2 94:21 131:15 <b>embedded</b> 139:20 <b>emergency</b> 10:21 11:1,1,11,21,24 25:23 28:24 32:20 33:5 34:16 35:3 35:13,22 38:21 39:1 41:3 42:11 43:11,22 44:18 45:15 46:6 48:7 48:22 49:10,19 81:6,13,15 82:2 114:4 115:11 117:21 118:11 119:8,13,17 120:5 120:19 121:22	122:1 123:12,16 123:22,25 124:10 140:8,17 <b>empanelled</b> 111:21 <b>emphasise</b> 32:8 38:11 39:14 41:5 96:25 145:18 <b>emphasised</b> 50:2 144:19 <b>employed</b> 108:7 <b>enable</b> 141:3 <b>enacted</b> 78:11 <b>encompasses</b> 129:13 <b>encouraging</b> 144:6 <b>endlessly</b> 140:23 <b>endorse</b> 69:4 <b>endured</b> 108:1 <b>enduring</b> 106:6 125:8 <b>engage</b> 12:6 143:24 <b>engaged</b> 31:15,20 <b>engagement</b> 93:13 <b>engaging</b> 96:21 <b>England</b> 3:1,2 15:11 85:13 93:1 <b>England's</b> 139:18 <b>enquiries</b> 49:13 73:2 81:4 <b>ensued</b> 33:9 <b>ensure</b> 23:20,22 91:1 98:25 <b>ensures</b> 127:5 <b>enter</b> 2:18,21 3:14 12:6 100:10 <b>entered</b> 14:15 65:2 99:22 <b>entire</b> 130:16 <b>entirely</b> 137:7 <b>entitled</b> 75:19 89:9 117:2 <b>entity</b> 130:22,24 <b>envisaged</b> 17:1 <b>equally</b> 61:22 95:6 98:25	<b>equates</b> 67:14 <b>equipment</b> 35:17 <b>equipped</b> 127:21 <b>equity</b> 138:25 <b>equivalent</b> 51:19 70:10 <b>error</b> 60:21 69:9 <b>eschewing</b> 98:20 <b>especially</b> 140:9 <b>essence</b> 27:4 67:2 <b>essential</b> 30:11 105:20 128:17 <b>essentially</b> 10:13 32:22 103:14 104:11 107:8 109:23 <b>establish</b> 39:9 44:9 <b>establishes</b> 34:2 116:21 <b>establishing</b> 34:15 <b>estate</b> 89:5,6 <b>estates</b> 89:8 <b>et</b> 117:1 <b>Eugene</b> 18:18 24:20 40:14 <b>European</b> 29:14 30:4 <b>evacuation</b> 126:17 <b>evaluation</b> 74:3 <b>evening</b> 120:16 <b>event</b> 14:14 18:9 31:19 40:12 49:23 61:3 62:7 64:24 89:18 109:6 119:21 122:8 <b>events</b> 5:20 102:6 106:16 107:7 108:15,17,22 113:10 118:22 123:12 125:3,20 142:16,24 143:6 145:15 <b>everybody</b> 103:24 136:25 140:21 <b>everybody's</b> 18:2
---	--	---	--	---

<b>evidence</b> 11:3 21:19 27:10 31:7 32:18 34:1,7,11 34:14,20 36:10,12 38:6,16,17,20 39:14,25 40:19 41:21 42:18 43:7 44:9 47:8 48:5,15 49:16 50:24 51:8 51:13,20,23 55:4 55:5,8 56:3 57:16 58:6,8,10,11 61:13,16 62:3,10 65:6 66:13,14 67:16 71:17 73:15 73:19,24,24 74:11 74:13,14,25 76:13 77:2 80:18 81:22 88:6 89:16 90:6 90:20,22 92:7 94:3,22 101:10 104:7,10 108:4 111:17,19 112:11 113:2,13 114:14 115:20 116:5,8,14 116:20,25 117:2 117:14,15,19 118:5,6 120:3,12 120:17,24 121:12 121:19 122:11,21 122:23,24 123:4 123:13,15 124:8 125:1,2 128:13 129:23,23 130:18 131:1,23 132:8 133:11 140:10 142:23 143:5,10 143:21 144:1,16 144:20 145:1	<b>evolves</b> 112:12 <b>evolving</b> 113:8 <b>ex</b> 52:18,19 59:24 <b>exacerbated</b> 106:11 <b>exactly</b> 79:16 85:10 141:4 <b>examination</b> 30:8 30:19 91:20 132:8 133:4 <b>examine</b> 90:6 <b>example</b> 30:9 35:19 36:24 39:22 42:20 46:16 61:15 65:5 69:17 74:13 76:9 76:9,17,21 91:24 97:4 110:24 111:6 118:4 122:15 131:23 132:11 <b>examples</b> 28:14 46:9 61:10,11 120:13 <b>exceptional</b> 6:11 9:17 14:7 <b>exchange</b> 66:24 68:3 <b>exclude</b> 56:7 96:20 103:25 <b>excluded</b> 66:13 <b>excludes</b> 56:9 <b>exclusion</b> 134:23 <b>excuses</b> 9:14 <b>exemplified</b> 33:23 <b>exercise</b> 34:9 77:24 90:10 94:21 102:5 102:12 103:4,10 103:19 111:1 129:17 131:5 133:17 144:14 <b>exercising</b> 116:11 <b>exhaustive</b> 11:19 <b>exist</b> 91:23 <b>existence</b> 52:8 56:2 56:21 <b>existing</b> 93:14 <b>exists</b> 91:9,14	<b>expand</b> 59:9 <b>expect</b> 33:10 49:7 71:18 121:14 123:16 131:3 <b>expectation</b> 5:15 <b>expectations</b> 37:14 <b>expected</b> 49:10 126:14 <b>expecting</b> 141:17 <b>expedited</b> 3:19,21 4:20 <b>expediting</b> 2:14 <b>expeditious</b> 142:7 <b>experiences</b> 144:16 <b>expert</b> 20:2 41:21 143:9,14 <b>expertise</b> 20:13 21:2 142:16,18 <b>experts</b> 19:19,21 20:19,20 113:20 118:3 142:12 <b>experts'</b> 49:12 <b>explain</b> 16:14 <b>explained</b> 131:7 135:3,3 146:3 <b>explaining</b> 24:18 25:4 54:2 142:9 <b>explains</b> 53:24 54:16 112:6 <b>explanation</b> 115:25 <b>exploration</b> 121:23 122:6 <b>explore</b> 54:20 95:21 111:6 <b>explored</b> 26:15 43:13 51:4 57:15 58:11 61:12 62:2 82:4 135:4 <b>exploring</b> 44:5 145:2 <b>explosion</b> 40:22 117:17 121:11 <b>explosions</b> 117:11 120:14 126:5,11 126:21 142:18	<b>explosive</b> 20:24 113:19 <b>explosives</b> 20:4,10 <b>expose</b> 128:7 <b>express</b> 57:23 86:4 93:23 101:1 107:17 <b>expressed</b> 27:9 41:8 51:6 52:6 64:10,15 75:23 78:7 92:12 103:18 146:11,11,12 <b>expressing</b> 27:22 86:15,21 88:2 101:1 <b>expression</b> 85:18 <b>expressions</b> 85:22 <b>extend</b> 29:24 32:3 <b>extensive</b> 6:10 7:5 23:2 24:12,13 48:18 <b>extensively</b> 88:6 <b>extent</b> 62:15 78:14 103:15 106:2 108:22 120:20 124:16 <b>external</b> 20:23 <b>extracts</b> 120:2 <b>extremely</b> 90:5 <b>eye</b> 148:14 <b>eyewitness</b> 123:13 123:15	88:14 92:4 94:20 99:17 106:11,11 121:6 122:7 127:8 127:19 130:6 133:6,20 <b>factor</b> 108:19 116:10 132:5 <b>facts</b> 54:20 71:1 95:21 96:2,14 110:15 126:18 128:15 129:9,13 <b>factual</b> 38:11 85:25 86:6 90:11 <b>faded</b> 94:6 108:9 139:21 <b>fading</b> 139:14 <b>failed</b> 90:10 131:9 <b>failing</b> 48:10 <b>failings</b> 34:2,16,21 37:24 38:6,7,19 42:13 44:12 116:22,22 119:17 120:4,13 123:18 <b>failure</b> 81:13 <b>fair</b> 36:17 103:7,9 108:25 116:15 128:18 132:6,18 134:25 138:19,22 138:23 <b>fairly</b> 2:6 11:20,25 74:9 136:23 <b>fairness</b> 53:21 90:13,14 91:1 124:7 <b>fall</b> 33:18 115:7 135:24 <b>falls</b> 80:23 <b>false</b> 11:3 <b>familiar</b> 31:19 64:14 76:6,11 85:4 87:4 97:22 112:2 <b>families</b> 1:13 23:14 94:11 106:7,20 108:14,17 136:10
<b>F</b>				
			<b>F</b> 45:2 67:22 68:1 <b>face</b> 77:14 117:19 <b>faced</b> 86:11 <b>facilities</b> 22:19 <b>facility</b> 83:6 <b>facing</b> 70:9 132:9 <b>fact</b> 6:20 27:17 30:11 48:20 51:15 51:16 62:1 70:24 74:18 75:15 76:14 85:22 87:11 88:3	

136:12 137:3,11 137:15,21 138:7 139:16 141:1 149:11 <b>family</b> 31:10 148:8 <b>fanciful</b> 32:15 <b>far</b> 21:7 22:7 36:6 45:7 46:24,25 47:13 51:1 81:20 108:2 114:1 117:2 132:13,20 <b>Farrar</b> 87:20,21,22 <b>fast</b> 66:21 <b>fatalities</b> 117:9 <b>fatally</b> 129:22 <b>fathers</b> 141:5 <b>fault</b> 14:1 18:25 137:7 <b>favour</b> 52:4,5 <b>fax</b> 99:1 <b>fearless</b> 108:25 134:25 <b>feasible</b> 15:12 <b>February</b> 1:7,23 3:17 6:21 8:17 16:16 19:18 68:4 79:12 <b>fed</b> 14:24 <b>Federation</b> 92:23 93:1,5,13,18,20 94:11,14 106:4 139:13 149:8 <b>feed</b> 15:3 <b>feel</b> 3:24 7:5 12:9 17:5 68:12,19 141:9 <b>felt</b> 69:2 120:13 <b>fervently</b> 82:20 <b>fiction</b> 84:12 <b>field</b> 19:21 109:22 <b>fifth</b> 17:8 73:3 145:24 <b>Fifthly</b> 63:10 <b>fight</b> 140:23 <b>fighter</b> 120:7	<b>fill</b> 137:11 <b>filling</b> 137:17 <b>filtered</b> 15:2 <b>final</b> 11:20 16:22 75:9 76:24,25 77:8 142:5 143:14 <b>finally</b> 23:13 24:2 71:13 145:22 <b>financial</b> 7:1,2,19 8:14 137:12,18 <b>find</b> 13:19 19:7 61:7 77:1 97:10 119:3 127:9 <b>finding</b> 77:19,20 86:2 103:22 111:16 <b>findings</b> 65:14,16 74:18 75:8,15 76:1,7,13,18 88:3 90:11 94:19,23 96:6 103:2,5,12 104:14 <b>finds</b> 109:19 <b>finished</b> 73:4 <b>fire</b> 35:14 37:2,16 44:14 45:24 46:1 118:18,22 119:12 120:7 <b>firemen</b> 140:17 <b>firm</b> 3:4 5:23 6:25 7:16,21 8:4,11 9:14 87:8 <b>firm's</b> 7:22 16:7 <b>first</b> 1:12 3:5 16:10 19:1,13,19,21 33:20,24 34:19 35:17 37:20 42:19 43:21 60:17,23 61:23 76:12 84:16 88:12 115:11,13 120:22 134:22 137:2 142:12 144:3 148:9 <b>firstly</b> 26:4 36:9 41:5 50:16 71:22	83:25 84:14 <b>fit</b> 12:13 40:16 <b>five</b> 92:19 <b>flagged</b> 61:9 <b>flawed</b> 14:10 103:19 129:22 130:17 <b>flaws</b> 129:25 130:14 <b>flexibility</b> 13:7 <b>flexible</b> 81:22 <b>focus</b> 48:21 49:25 78:18 115:10 123:17 127:14 128:25 <b>focused</b> 30:25 36:22 89:16 127:5 <b>focusing</b> 75:7 <b>follow</b> 35:8 67:9 82:18 121:10 <b>followed</b> 111:18 125:7 <b>following</b> 4:15 5:24 6:13 12:1 77:2 113:20 <b>follows</b> 16:9 76:12 79:18,23 112:9 <b>foot</b> 138:13 <b>footage</b> 122:16 <b>footnote</b> 42:6 70:3 <b>forbearance</b> 14:1 <b>force</b> 60:3 83:21 143:1,4 <b>foreclose</b> 80:19 <b>forensic</b> 19:22 20:3 20:4,6 108:6 127:25 <b>forewarning</b> 28:5,9 28:16 79:24 80:1 80:5,15,21 112:22 113:9 <b>forewarning/pre...</b> 11:11 <b>forewarnings</b> 135:6 143:12	<b>Forgive</b> 74:23 <b>forgotten</b> 147:12 <b>form</b> 9:3 13:16 21:10 33:10 42:8 75:17 87:25 <b>formal</b> 144:9 <b>format</b> 76:12 <b>formed</b> 73:24 <b>former</b> 72:6 91:16 <b>formerly</b> 22:25 <b>Fort</b> 20:5 <b>forth</b> 13:7 45:1 50:6 102:7 <b>forthcoming</b> 122:25 <b>fortified</b> 53:20 <b>fortiori</b> 51:22 <b>forum</b> 27:18 <b>forward</b> 4:20 5:14 8:20 9:15 13:5 36:7 146:14 <b>fought</b> 140:23 <b>found</b> 76:24 84:10 87:1 118:13 122:24 123:4,9 129:21 130:12 <b>Foundation</b> 118:12 <b>founded</b> 97:14 <b>four</b> 1:9,10 10:9 11:21 33:20 79:22 102:15 107:9,16 109:1 112:1 115:14 127:6 <b>fourth</b> 17:7 42:23 44:18 62:24 82:9 <b>Fourthly</b> 26:16 <b>frame</b> 110:12 <b>framed</b> 110:6 126:23 <b>framework</b> 82:7 <b>Frayne</b> 37:15 <b>free</b> 105:21 <b>fresh</b> 10:18 101:10 <b>Friday</b> 2:16 3:13 49:4	<b>friend</b> 18:19 59:21 69:14 80:8 <b>fruit</b> 131:3 <b>fruitful</b> 71:17 <b>frustrated</b> 109:11 <b>frustration</b> 135:16 <b>fuel</b> 138:10 <b>full</b> 30:2,16 79:16 108:24 116:15 134:25 138:18 <b>fully</b> 4:4 9:21 26:11 76:20 77:22 95:21 112:18 138:17,17 141:19 <b>function</b> 127:7,16 129:19,20 130:1 <b>fundamental</b> 91:7 91:7 129:25 <b>funded</b> 138:17 <b>funding</b> 1:18,20 2:18 3:7,16 4:20 6:7,11 10:7 12:10 14:6,8 15:8 16:7 25:1,4 41:20 70:7 70:7 137:6 138:12 <b>funds</b> 138:20 <b>funnel</b> 112:4 <b>funnels</b> 112:7 <b>further</b> 4:2 10:23 11:6,14 12:13 13:1,4 15:15 17:22 20:2 22:17 28:15 39:6 43:13 46:19 64:24 67:19 68:3,11,18 79:14 80:12,25 81:4 82:4,25 95:14 96:22 98:13 109:11 113:13,18 114:19 132:5 138:10 139:2 144:8 145:19 147:6 <b>furtherance</b> 126:7 <b>future</b> 9:25 130:6
---	--	--	--	--

147:3	101:5,8 109:12	<b>half</b> 67:5	148:12,23	<b>Homber</b> 52:19
<hr/> <b>G</b> <hr/>	118:5,6 119:14	<b>Hall</b> 69:2	<b>hearings</b> 13:5	<b>Home</b> 6:14 9:8
<b>G</b> 52:19	128:6 133:13	<b>Halstead</b> 20:5	111:19,23	66:15,18 67:1,8
<b>gained</b> 71:19 131:4	<b>goes</b> 60:13 64:13	<b>Hambleton</b> 136:8,9	<b>heart</b> 101:24	67:13 68:7
<b>general</b> 25:21 26:3	68:24 81:23 97:16	136:11,12,12,19	<b>Heathcliffe</b> 67:7	<b>homicide</b> 126:12
27:7 32:5,7 33:17	98:5 117:13	136:25 137:9,11	<b>heavily</b> 126:19	<b>honest</b> 137:24
50:2 52:24,25	<b>going</b> 9:13 14:10	137:17,19 141:11	<b>held</b> 1:6 6:11 22:24	141:16,17
53:1,13 62:23	18:20 46:12 49:15	141:12 149:12	26:5 49:8 87:11	<b>hope</b> 2:5 24:13
69:10 73:16 95:3	65:10 66:21,23	<b>hamstrung</b> 72:17	106:12 118:10	25:14 29:5 58:2
<b>generality</b> 95:11	79:20 82:25	<b>happen</b> 39:10	125:10 145:23,25	100:20 142:17
134:18	100:24 111:4	76:15	<b>help</b> 46:18 47:22	148:15
<b>generally</b> 98:23	122:22 139:14	<b>happened</b> 39:9	95:25 140:19,23	<b>hoped</b> 24:3 106:15
130:2	142:2,10,10	122:19 135:18	<b>helped</b> 144:21	126:14
<b>generic</b> 103:22	146:14	141:2	<b>helpful</b> 16:5 17:24	<b>hopefully</b> 2:10
<b>getting</b> 139:2	<b>good</b> 1:4 3:20 4:2	<b>happening</b> 2:8	24:9 45:11,16	20:24 91:12 142:6
<b>Gillen</b> 96:25 97:9	18:4,16 33:11	61:20 73:11	47:20 105:9	142:19
98:5	44:5 61:5 109:16	148:13	119:15	<b>hopes</b> 109:9
<b>give</b> 15:19 17:7,20	115:19 138:5	<b>happy</b> 3:13 19:1	<b>helpfully</b> 11:13	<b>horrendous</b> 140:14
21:19 27:10 28:3	148:15	136:5 147:13	<b>helping</b> 140:11	140:14
52:17 59:19 60:8	<b>governing</b> 85:12	<b>hard</b> 21:9	<b>hesitant</b> 55:19	<b>horse</b> 38:14 81:17
61:10,11 67:2	<b>Government</b>	<b>harder</b> 108:2,22	<b>Hickinbottom</b>	<b>hospital</b> 39:17
69:5,23,25 70:16	104:23 114:13,20	<b>harm</b> 108:13	32:11	40:21 41:15 48:4
76:17 79:4 82:16	138:6	139:11 141:7	<b>hidebound</b> 98:25	117:16
83:9 102:25	<b>grace</b> 4:2	<b>Hart</b> 59:24	<b>high</b> 34:22 43:9	<b>hospitals</b> 118:16
107:15 125:1,2	<b>grant</b> 2:18 55:22	<b>head</b> 137:14	81:12 112:5 124:3	123:3
142:23 143:5,9,21	<b>granted</b> 4:21 5:16	<b>heading</b> 44:19	<b>high-ranking</b> 72:6	<b>host</b> 120:3
144:6 145:17	70:8	<b>headings</b> 100:17	<b>highest</b> 5:18 14:19	<b>House</b> 84:23
147:25	<b>grateful</b> 24:7,17	<b>headline</b> 93:21	36:9	<b>houses</b> 61:17
<b>given</b> 17:2 21:5,6	78:24 141:24	<b>Health</b> 31:16	<b>highlight</b> 91:10	<b>huge</b> 130:18
34:6 43:15 45:22	<b>gravely</b> 124:25	<b>healthy</b> 40:16	<b>highlighted</b> 35:6	<b>human</b> 29:14 30:5
48:17 61:25 63:15	<b>Gray</b> 52:18	<b>hear</b> 15:17 19:1	90:4	82:19 138:21
72:14 76:10 88:5	<b>great</b> 5:13 12:2	49:16 74:15 90:20	<b>highlights</b> 39:19	<b>hundreds</b> 120:15
99:9 120:6,20	17:17 80:11	109:15 136:24	<b>highly</b> 124:3 141:3	<b>Hunt</b> 22:5 112:24
126:15 139:23	<b>greater</b> 28:17	137:1	<b>Hill</b> 24:16 81:9	<b>hurdle</b> 5:13
141:18 143:2,12	115:25	<b>heard</b> 16:5 21:12	82:11 91:10 105:8	<b>husband</b> 66:6,8
143:14,24 146:20	<b>grief</b> 106:10	34:7,12 49:2	105:13 120:6	67:16
148:7	<b>ground</b> 95:20 148:3	50:25 51:13,20,24	135:19	<b>hypothetical</b>
<b>gives</b> 36:11 43:14	<b>group</b> 46:4	62:3 66:5 71:10	<b>Hillsborough</b> 6:15	116:22
54:24 55:11	<b>guilt</b> 74:19	71:22 74:14 76:13	27:21 48:17,20	<hr/> <b>I</b> <hr/>
<b>giving</b> 50:4 147:24	<b>guilty</b> 64:7 65:1	90:23 115:18	122:13,16 123:20	<b>identifiable</b> 92:2,5
<b>go</b> 12:11 28:15 40:8	77:3,20 99:21	116:8	124:2	129:6 131:1
45:14 46:5,14	127:9	<b>hearing</b> 1:6 3:18,23	<b>historically</b> 127:8	<b>identification</b>
49:24 56:24 64:24	<hr/> <b>H</b> <hr/>	12:22 17:8 18:9	<b>hold</b> 17:8 89:12	125:23 126:2
73:3 85:11 90:8	<b>Hagley</b> 11:13 20:9	19:14 97:12	114:10,11 118:18	131:10 144:23
		111:21 146:2	<b>Holocaust</b> 139:23	

<b>identified</b> 37:25 38:7 72:21 89:19 92:3 110:5 112:24 114:6 120:2 122:7 127:4 128:24 132:13 143:19	59:12 64:9 68:9 85:7,15,16 105:15 108:19 111:12 116:18 117:22 123:19 129:10 140:9	64:1,12 68:13,20 132:23 134:20	114:2 115:16 116:24 118:1 119:23 121:3,19 127:23 134:4,7,7 134:14	36:12 44:1,22 47:6 48:17 50:13 50:20,22 51:4,13 52:11 53:23 54:4 55:3 56:5 57:11 59:10 60:1,2,4,20 61:14 63:23 66:16 68:12,19 70:10 71:21 77:18 80:9 84:6 86:8,12 87:9 87:24 88:11,18,20 89:12,15 90:6 91:5 92:6,7 93:9 94:18,21 95:7,12 95:19,20 96:8 97:23 98:8 102:3 105:14 107:22 109:18,18,23 110:1,22 111:22 117:25 122:16 125:22,22 128:20 132:16,22 134:16 135:12 136:4 138:19,23 139:3,5 140:7 149:2
<b>identifies</b> 107:6	<b>importantly</b> 31:17	<b>independence</b> 23:23	<b>inevitable</b> 92:10 121:5 135:16	<b>inquests</b> 4:13 10:18 14:5 16:12 17:5 18:3,20,23 19:3 19:10,12,13,17 22:13 25:19 26:1 26:5 27:8,10,21 28:10 43:18 80:2 80:4,7,12 81:15 81:18 82:8,21,24 83:23 85:12 95:10 96:12 105:6,7,16 105:18,23,25 106:15 107:2,9 108:3,12,18,24 109:3 110:5 111:13 112:11,16 112:17,20 115:13 115:16,17,17 117:20 122:10,13 124:11 125:13,16
<b>identify</b> 62:1 83:22 84:9 86:12 124:19 127:18 130:10 145:13	51:25 128:5 143:23	<b>independent</b> 36:19 48:20 81:8 82:23 105:15,21 119:20 138:6	<b>inevitably</b> 26:8 92:2 111:4	
<b>identifying</b> 94:15 143:9 144:1,7,18	<b>impossible</b> 101:4 108:23	<b>index</b> 125:20 145:15	<b>infanticide</b> 127:10	
<b>identities</b> 135:13	<b>impression</b> 36:10	<b>indicate</b> 38:20 45:25 120:3	<b>inference</b> 51:12 108:16	
<b>identity</b> 64:16 86:13	<b>impressions</b> 37:12	<b>indicated</b> 31:8 41:18 79:3,18 114:8 135:22 145:23	<b>informant</b> 71:24 80:24 131:19,21 131:24,25	
<b>illustrate</b> 98:7	<b>impropriety</b> 60:22	<b>indicates</b> 51:3,19 76:13	<b>information</b> 5:21 6:4,7,25 7:1,3,4,7 7:11,14,21 8:3,8 14:25 22:17 35:13 71:16 131:2 142:24	
<b>illustration</b> 65:24	<b>improving</b> 146:23	<b>indication</b> 98:13	<b>informed</b> 6:2	
<b>illustrations</b> 95:2	<b>inaccurate</b> 144:22	<b>indicator</b> 51:7 52:9 56:10 117:20	<b>informer</b> 63:9	
<b>imagine</b> 141:7,8	<b>inadequate</b> 11:1 77:13,24	<b>indicted</b> 102:16	<b>infringed</b> 86:1,9	
<b>immediate</b> 33:7 61:21 96:14	<b>inappropriate</b> 41:1 77:13,24	<b>indictments</b> 127:22	<b>inherent</b> 103:10 104:1 128:8	
<b>immediately</b> 32:19 50:4 54:8 121:17	<b>inaudible</b> 103:3 140:6	<b>indirectly</b> 106:9	<b>initial</b> 41:10 60:11	
<b>imminent</b> 4:16	<b>incarnation</b> 65:11	<b>individual</b> 7:17 8:8 27:24 34:4,15 38:7 41:7,24 42:14 43:19 44:6 47:9,22 50:19 51:14 57:18 59:25 64:21 70:9 92:3,4 93:6,18 94:8 103:22 107:6 110:3 121:25 124:17 144:17	<b>initially</b> 66:9 67:13	
<b>impact</b> 38:23 39:4 84:24 90:19	<b>incarnations</b> 51:19	<b>individual's</b> 82:3 135:7	<b>initiated</b> 24:2	
<b>imperative</b> 26:24	<b>incident</b> 119:4	<b>individuals</b> 7:5 21:1 35:3 42:19 42:21 43:8 51:15 57:1,8,14,15 58:6 58:8,17,25 72:12 75:2,3,20 76:1 77:13 89:3,8 91:8 102:4,5,8 104:8	<b>injured</b> 37:8 106:7 120:15 121:8	
<b>Imperial</b> 20:17	<b>Incidentally</b> 90:12		<b>injuries</b> 39:20 40:5 40:20 42:2 117:10 117:15 121:16 140:15	
<b>implementing</b> 119:8	<b>include</b> 10:21 20:20 22:18 56:6 73:23 87:15 110:3 114:22 118:11 135:13		<b>innocence</b> 74:19 99:21 140:8	
<b>implicate</b> 103:23 104:8	<b>included</b> 5:25 55:2 86:6 131:22		<b>innocent</b> 101:2	
<b>implication</b> 101:1 129:5	<b>includes</b> 21:13		<b>inquest</b> 9:17 14:7 14:16,17 17:22 19:11 24:5 26:13 29:5 30:12,17,25	
<b>implicit</b> 31:19	<b>including</b> 11:21 21:15 24:5 39:22 42:20 47:11 50:4 71:20 79:7 93:7 94:4 119:1 129:14 130:17 135:4,5,6			
<b>implied</b> 122:2	<b>inconsistency</b> 64:22 65:4,6 67:15 69:11 71:4 71:5 78:2,6 134:15			
<b>import</b> 70:4	<b>inconsistent</b> 52:8			
<b>importance</b> 84:18 84:22 94:11 144:15				
<b>important</b> 4:7 17:21 27:6 28:3 31:2 32:2,16 39:8 44:3 46:21 54:9				

126:5,22 127:20 129:15 130:2 134:24 135:25 142:4,25 143:2 144:2,5 148:18 149:2,10 <b>inquests'</b> 105:20 <b>inquire</b> 52:3,5 53:5 91:14 92:13,13,17 <b>inquires</b> 86:13 <b>inquiries</b> 63:8 71:23 72:3,5 114:19 115:2 118:8 <b>inquiry</b> 14:16 29:24 30:25 31:12 53:5 71:18 72:20 72:22 91:20 96:1 96:4,20 97:3 99:1 99:13 107:19,22 111:4 114:8 115:15 124:9 131:2 <b>Inquiry's</b> 60:25 <b>inquisition</b> 87:12 <b>insofar</b> 20:13 22:11 36:2,4 48:9 52:1 106:14 <b>instance</b> 47:14 69:1 98:24 144:3 <b>instances</b> 28:9,13 120:12 <b>instant</b> 97:14 121:5 <b>instantaneously</b> 38:24 <b>instinct</b> 83:21 <b>instinctive</b> 75:21 <b>instincts</b> 82:17 <b>instruct</b> 46:9 142:22 146:12 <b>instructed</b> 2:12 9:21 12:8 15:21 19:19,20,23 20:3 20:17 105:16 113:20 136:14	<b>instructing</b> 24:24 45:11,25 141:22 143:9 <b>instruction</b> 42:3 136:5 137:22 <b>instructions</b> 142:14 <b>instructive</b> 63:17 128:23 <b>insufficient</b> 38:16 <b>intelligence</b> 72:7 <b>intend</b> 25:13 29:3 146:7 <b>intended</b> 52:10 <b>intense</b> 14:4 <b>intention</b> 65:5 144:25 <b>interacts</b> 112:11 <b>interest</b> 2:14 3:25 17:14 26:10 50:11 50:11 93:11 106:13,22 109:7 123:21 125:11 <b>interested</b> 1:19 12:5 17:4 19:15 19:25 21:5,15,24 22:15 25:18 37:18 44:3 50:1 59:7 62:17 89:9,10 93:3,19 105:11 106:2 108:4 113:16 114:9 116:12 120:1 121:1 122:2 130:20 131:15 143:3,25 145:3,10 145:17 148:8,9 <b>interesting</b> 49:4 <b>interests</b> 10:3,4 18:2 31:4 <b>internal</b> 20:22 <b>interpret</b> 30:15 <b>interpretation</b> 98:15 <b>interpreted</b> 95:7 <b>interrelated</b> 115:12	<b>interrogate</b> 13:10 <b>interrogating</b> 13:22 <b>interrupt</b> 18:23 42:23 <b>intervention</b> 117:21 <b>interview</b> 102:6 143:20 <b>interviewed</b> 27:11 <b>interviews</b> 62:15 101:24 <b>intimately</b> 50:6 <b>introduce</b> 95:14 97:2 <b>introduced</b> 32:23 <b>introduction</b> 106:1 109:12 <b>investigate</b> 31:11 49:16 56:13 83:21 95:21 99:6 107:1 117:25 127:17 129:15 143:18 <b>investigated</b> 31:21 34:12 113:3 <b>investigating</b> 130:25 143:1 <b>investigation</b> 11:14 23:22 26:23 29:23 31:20 32:3 33:11 38:17 39:6 40:3 41:3 43:22 51:8 63:21 64:3,4 72:18 93:16 94:7 97:7 99:11,14,16 101:21 107:13 112:25 113:7 116:6 121:25 122:1 123:17 127:15,16 128:7 128:12 129:10 130:10,13,16,23 131:7,16,19 132:6 133:1,3 135:1,10 135:13	<b>investigations</b> 15:1 26:18 48:23 72:23 80:13,20,25 83:17 88:23 111:15 122:15 124:16 127:21 138:14 <b>investigative</b> 15:6 108:6 112:6 147:3 147:8 <b>investigatory</b> 108:7 111:14 117:4 124:13 132:17 <b>invitation</b> 141:18 <b>invite</b> 30:3 60:7,15 65:23 119:25 <b>invited</b> 133:13 144:10 <b>inviting</b> 145:13 <b>invoking</b> 98:21 <b>involve</b> 44:12 99:14 99:16 147:8 <b>involved</b> 27:20 28:1 35:3,21,25 45:9 45:21 56:5 87:19 108:12 109:3 124:7 131:25 139:17,18 <b>involvement</b> 62:12 <b>IP</b> 146:20 <b>IPs</b> 21:14 115:4 <b>IRA</b> 72:6 126:8 135:5 <b>Ireland</b> 3:5,8,9 96:24 137:25 <b>irrelevant</b> 87:12 90:19 <b>issue</b> 4:8 11:2,11 12:10 13:4,6 21:2 22:12 23:9 49:21 63:9 70:6,14 71:8 71:24,25 72:1 80:15 83:15,15,22 92:17 94:12 95:18 96:7 111:3 112:22 113:9,11 114:5,7	114:10,15 115:5,7 115:13 117:5 118:10 122:6 125:5 131:19,21 133:5 134:24 135:6 139:22 142:6,8 143:19 147:10 <b>issued</b> 3:13 <b>issues</b> 1:9,10 10:19 10:22 11:21 14:8 16:9,23 17:16 19:15 20:25 24:14 31:1 36:21 58:5 74:7 94:20 96:14 109:13 111:3 112:8,19,23 113:17 114:3 115:10 124:19 125:2 135:23 136:2 145:9 146:3 <b>iterations</b> 87:2 <b>ITV</b> 21:16 118:25 <hr/> <b>J</b> <hr/> <b>Jackson</b> 25:5 120:1 <b>James</b> 140:13 <b>Jamieson</b> 52:20 62:20 91:3,18 94:17 127:4 128:21 <b>January</b> 5:22,25 6:2,9,20 8:1 11:7 <b>job</b> 13:21 <b>John</b> 35:20 37:15 <b>Johnson</b> 59:21 60:10 78:25 79:2 79:3,5,9,16 83:20 149:5 <b>join</b> 96:7 <b>joined</b> 148:23 <b>Jordan</b> 95:15 96:22 97:8 <b>judge</b> 70:14 <b>judgment</b> 32:13
--	--	---	---	---

128:21	<b>keen</b> 148:15	<b>LAA</b> 4:15	110:23 129:9	<b>letting</b> 52:13 90:21
<b>judicial</b> 31:10 60:1	<b>keep</b> 16:17 25:8	<b>Laboratory</b> 20:4	<b>leads</b> 118:6	<b>level</b> 35:5,6 82:19
60:5,20	26:19 111:12	20:21	<b>learned</b> 18:19	121:13,25 124:3
<b>Julie</b> 136:12	112:19 116:3	<b>lack</b> 8:3,23,25	59:21 69:14 70:14	<b>levelled</b> 132:7
<b>July</b> 67:12 145:25	148:14,17	16:18 35:11,13,17	80:8	<b>Lexcel</b> 3:1
<b>junction</b> 26:12	<b>kept</b> 112:10	35:23 36:1 37:6	<b>leave</b> 34:8,9 104:16	<b>lexicon</b> 85:8
41:20 77:12	<b>Kerrigan</b> 47:2	38:5 39:16 42:13	127:16	<b>liability</b> 50:19
<b>June</b> 3:17 6:13 11:9	<b>Kew</b> 22:25	48:7 61:1 62:5	<b>leaves</b> 81:21 126:13	54:21 64:21 86:2
12:16 16:11 17:8	<b>key</b> 112:8 144:1	<b>lacking</b> 123:14	<b>leaving</b> 104:16	103:22 110:8,9,12
145:24 148:12,23	<b>killed</b> 129:1,2	<b>lacks</b> 91:6	<b>led</b> 8:6 20:15 28:19	126:25 134:14
<b>junior</b> 24:25 59:24	<b>kill</b> 51:10,15,16	<b>lady</b> 67:16	54:6 71:3 80:3	<b>liable</b> 107:6
<b>juries</b> 76:16,20	51:23 60:5 64:25	<b>Langford</b> 102:18	84:8	<b>liaise</b> 113:15
<b>jurisdiction</b> 6:1	67:23 68:12,19,23	<b>largely</b> 29:1 45:1	<b>left</b> 133:5 138:13	<b>liberal</b> 98:14
11:8 108:11	75:17 77:5,6,21	102:11	<b>legal</b> 1:22 2:21,23	<b>licences</b> 21:6
<b>jurisprudence</b>	91:25 92:1,8,11	<b>lasted</b> 89:12	2:25 3:8 4:21	<b>life</b> 30:10
97:22	129:4,5,8,9	<b>Lastly</b> 32:5 91:11	5:23,23 6:3,17,24	<b>light</b> 16:6 22:11
<b>jurors</b> 145:14	<b>kind</b> 23:11 38:19	<b>late</b> 35:20 44:3 50:5	7:20 16:12,18,25	30:16 79:25 81:3
<b>jury</b> 34:9 54:20	40:20 44:15 46:22	<b>law</b> 1:12,24 2:4 3:2	18:1 21:3 28:25	87:16
74:17 75:8 76:5	61:9,12 85:9	3:10 8:24 9:16	38:10 62:17 68:11	<b>lightly</b> 59:11
76:10 84:4 86:21	117:15 119:8	10:13 12:19 14:3	68:18 84:11	<b>liked</b> 147:11
88:2,7,17 90:11	<b>kindly</b> 5:6	14:13 15:4,13,20	116:25 119:10	<b>Likewise</b> 23:1
92:12 95:25 102:2	<b>Kingdom</b> 126:9	16:6,10,21 17:23	137:6,23 138:1,4	113:10 118:16
103:24 107:15,16	<b>knew</b> 139:17	28:23 29:1 32:5,6	138:12,16,17,19	120:5
111:20,23 112:2	<b>know</b> 9:4 12:8	33:1,21 51:9	139:9 140:21	<b>limitation</b> 84:5
113:5 115:21	15:10 25:22 27:21	60:21 65:10 69:10	143:3 145:12	97:23 145:16
116:7,16 126:19	37:12 63:7 64:19	76:3 77:10,17	<b>legalistic</b> 84:3	<b>limitations</b> 36:16
131:11 133:19,21	67:2 71:12 80:12	82:20 89:1 95:4	<b>legally</b> 73:11	36:18 94:18 95:5
143:7 144:12	85:4 88:22 99:17	106:12 107:1,5,9	<b>Leggatt</b> 70:18	99:10 103:10,18
145:8	123:1 135:17	109:22 110:21	<b>legislature</b> 65:15	104:18
<b>jury's</b> 55:2 85:25	<b>knowledge</b> 133:17	125:17 127:12	78:7 127:14	<b>limited</b> 28:8 39:14
111:3	<b>known</b> 22:25	133:21 135:8	<b>legitimacy</b> 97:2	80:9,17 84:4
<b>justice</b> 9:7,19 10:5	102:17	137:4,7,22 138:4	<b>legitimate</b> 94:14	107:15 141:14
32:11 52:23 54:11	<b>KRW</b> 1:12,24 2:4	147:25 148:13	146:19	<b>limiting</b> 146:25
60:13,19 62:20	2:20 8:24 9:20	<b>lawful</b> 77:18,22	<b>legitimately</b> 96:18	<b>line</b> 67:5 145:19
69:6 70:18 96:25	12:19 13:18 14:3	78:1 84:9 92:16	<b>length</b> 35:7 146:8	<b>lines</b> 31:12 33:24
97:9 98:5 127:7	15:20 16:6,10,21	109:3 116:17	<b>lengthy</b> 4:15	71:17 72:20 90:2
127:17 129:19	17:23 82:20 89:1	125:21 128:14	<b>lessen</b> 108:1	131:2 143:19
131:9 138:3,25	120:6 136:10,13	<b>lawfully</b> 86:5 87:1	<b>lesser</b> 62:21	<b>link</b> 34:2,15 42:13
139:23 140:24	137:4,7,22 138:4	106:23	<b>lest</b> 34:23	116:21
<b>justified</b> 104:15	138:24 141:1	<b>lawyers</b> 1:21 19:5	<b>let's</b> 18:14 58:4	<b>list</b> 11:22 13:6
<b>justify</b> 129:25	142:5 147:25	148:21	75:16 89:2	45:16 46:7 61:11
130:8	148:13 149:11	<b>lay</b> 105:9	<b>letter</b> 8:11 9:15	128:23 144:25
<b>juxtaposition</b> 54:9		<b>lead</b> 26:21 49:10	42:3 67:11 79:13	145:16
		61:8 110:16	79:15 114:8	<b>listed</b> 1:9 11:13,21
		<b>leading</b> 8:5 93:16	<b>letters</b> 52:19,20,21	57:12 145:25
	<b>L</b>			
<b>K</b>	<b>LA</b> 8:18			

<b>listing</b> 144:4	62:20 85:3,6	<b>Master</b> 97:25	108:3 109:1	<b>Mervyn</b> 37:15
<b>lists</b> 22:17	95:15,15 97:2	128:24	110:18 111:7,7	<b>metaphor</b> 81:16
<b>literal</b> 73:17	110:25 127:4	<b>material</b> 13:11,15	113:1,5,14 115:25	112:4
<b>litigation</b> 98:9	<b>Lords</b> 84:23	21:25 22:6,8,14	116:1,16 120:25	<b>microphones</b> 19:4
<b>little</b> 19:8 48:21	<b>loss</b> 30:10	22:24 36:11,13	132:15 144:13	<b>middle</b> 67:12
<b>live</b> 109:10 147:10	<b>lost</b> 35:25 108:5	37:9,25 39:11	147:9	<b>Middleton</b> 84:15
<b>lives</b> 35:24,25	<b>lot</b> 138:8 148:3	42:7 43:25 44:17	<b>McIlkenny</b> 74:7	84:18,22 110:24
106:8 117:22	<b>loud</b> 66:5	48:18,24 63:4	99:18,25 126:10	111:1
140:19	<b>loved</b> 106:5 125:9	79:17 80:11 93:14	132:12	<b>Midlands</b> 20:12
<b>loathe</b> 141:7	137:14 139:6	94:2 122:5 144:12	<b>McKerr</b> 97:25	21:9,22 22:1,4
<b>local</b> 50:5 61:23	140:12 141:4	<b>materialise</b> 89:17	<b>mean</b> 10:6 56:22	23:2,20,25 28:12
119:6	<b>low</b> 32:15	<b>materially</b> 48:6	89:2 93:25 113:4	49:8 78:17,25
<b>located</b> 46:1 47:13		54:16	121:21 130:16	79:1 106:3 118:17
<b>location</b> 62:2	<b>M</b>	<b>materials</b> 21:21,23	<b>meaning</b> 86:24	118:18 119:12
<b>locations</b> 39:21	<b>main</b> 36:20 47:24	23:3,4,4 24:4	<b>meaningful</b> 61:8,18	135:5 143:10
<b>lodged</b> 6:20	<b>maintained</b> 9:5,6	47:16 144:5,6,8	<b>meaningfully</b> 62:2	146:6,15,20 147:4
<b>logical</b> 82:6	68:4	144:18 145:5	<b>means</b> 7:19 39:25	147:9 149:5
<b>logically</b> 39:8	<b>Majesty's</b> 104:23	<b>matter</b> 10:13 12:9	56:23 110:3	<b>Midlands'</b> 143:2
110:19 121:10	<b>major</b> 119:3 120:16	27:19 33:4,10,21	125:13	<b>mind</b> 28:2 32:17
131:20	142:4	36:9 37:11 38:8	<b>meant</b> 77:25	34:21 36:5 63:11
<b>London</b> 20:17	<b>majority</b> 117:9	38:18 39:1 46:10	<b>mechanism</b> 24:3	108:19 111:12
<b>long</b> 14:20 26:7	<b>making</b> 10:25	54:5 55:25,25	<b>media</b> 22:19	117:23 137:20
27:5,12 78:23	79:15 81:19 86:6	57:11 58:24 68:5	<b>medical</b> 20:21	147:10
125:19	88:2,16 99:13	71:8 76:3 77:10	22:19 39:17	<b>mindful</b> 88:4
<b>long-awaited</b> 1:8	100:24 124:12	77:16 78:9,16	113:24,25 122:17	<b>minds</b> 46:23 126:19
<b>long-standing</b>	135:23	86:21 87:25 95:9	<b>meet</b> 85:13	<b>mine</b> 105:24
26:10	<b>managed</b> 3:12	97:3 107:17,20	<b>meeting</b> 8:18	<b>minimise</b> 48:14
<b>long-term</b> 40:20	140:19	112:9 113:18	<b>member</b> 142:25	108:13
117:15	<b>Manchester</b> 141:8	115:19 116:18	<b>members</b> 3:9 77:2	<b>Ministry</b> 9:7 138:3
<b>longer</b> 40:13 74:20	<b>manifest</b> 125:11	123:10 125:17	93:18 94:15	<b>minute</b> 39:25
94:4,8 101:11,16	<b>manner</b> 26:25	127:25 133:21	126:19 148:9	<b>minutes</b> 40:22
139:15	<b>Mansfield</b> 20:2	134:18 145:6,19	<b>memorandum</b>	91:12 117:11,17
<b>look</b> 15:10 20:18	113:22 142:13	<b>matters</b> 11:14	23:19 146:13,23	<b>minutiae</b> 46:13
30:3 40:7 60:7	<b>manslaughter</b>	23:13 25:2 26:14	<b>memories</b> 94:6	<b>misguided</b> 121:9
63:17 66:24 70:12	127:10	26:14,22 28:19	108:9 139:14	<b>missing</b> 7:21
84:16 114:2 117:4	<b>manufacturing</b>	29:23 30:8 32:4	<b>memory</b> 65:12	<b>misunderstanding</b>
128:23	104:9	32:24 34:8,10	139:19,20	23:23 34:24
<b>looked</b> 91:4	<b>manuscript</b> 101:23	35:10 42:16 44:2	<b>men</b> 40:15 133:5,10	<b>model</b> 6:15 14:17
<b>looking</b> 10:14	<b>March</b> 10:23	44:5 46:22 49:17	<b>Mental</b> 31:16	<b>modern</b> 118:25
21:21 67:15	<b>mark</b> 2:25 3:1	50:10,12 52:10	<b>mention</b> 53:10	121:14 123:14
111:16 133:14	<b>marker</b> 147:2	56:15,18 59:12	112:14 135:19	<b>moment</b> 4:5 12:20
<b>looks</b> 30:14	<b>marks</b> 43:24	63:9 72:9 74:15	<b>mentioned</b> 113:22	18:14 52:22 53:7
<b>Lord</b> 2:20,21 9:7	<b>mass</b> 75:19 77:3	85:18 98:20	145:22	58:20 65:11 69:25
52:23 53:1,18	86:14 89:18 94:16	104:10 105:19	<b>merely</b> 78:20	75:7 79:4 83:9
54:11 55:19 56:11	126:12	106:22 107:7,16	<b>merits</b> 57:20,24	84:19 132:3 136:6

<b>month</b> 6:5	134:14 144:21	134:19 139:7	<b>notify</b> 16:10	<b>obtained</b> 21:18
<b>months</b> 5:1,10	<b>names</b> 45:16 46:7	144:23 145:7	<b>notorious</b> 106:11	43:21 116:15
19:17 88:21,21	47:10 54:25 55:1	<b>needed</b> 66:19 95:13	130:14	<b>obtaining</b> 4:25
89:13 144:14	55:3 56:22 77:21	<b>needs</b> 36:11 44:8	<b>notwithstanding</b>	<b>obvious</b> 61:15 74:5
146:12	88:5 103:23	145:20	113:11 129:16	74:23 94:22 95:6
<b>morning</b> 1:4 2:11	<b>naming</b> 50:18 53:3	<b>negated</b> 37:25	133:6	103:11,17 134:6
16:6,14 17:2,13	55:19,24 56:9	<b>negotiations</b> 2:4	<b>November</b> 11:10	<b>obviously</b> 3:9 9:4
18:16 49:2 71:23	57:8 64:20 68:22	6:14	20:18 24:16 106:5	12:12 13:3 14:18
105:12 111:14	72:15 75:16,20	<b>neither</b> 103:7	113:10 118:23	24:14 55:20 58:24
124:22	76:19 77:8 84:13	<b>never</b> 26:5 75:5	135:15 143:13	63:8 69:18 73:14
<b>Morris</b> 102:17	129:11,12	89:17,18 130:20	<b>nuanced</b> 81:20	74:2 75:4 77:11
<b>mortuaries</b> 123:2	<b>narrative</b> 75:23	140:4,6	<b>nub</b> 38:3	102:21 140:3
<b>mothers</b> 141:5	88:4 143:6	<b>nevertheless</b> 62:22	<b>nullifies</b> 134:14	142:4 147:18
<b>move</b> 4:20 5:14	<b>narrow</b> 107:12	82:22 142:19	<b>number</b> 1:13 6:8	<b>occasions</b> 128:22
8:20 9:14 13:5	127:15	<b>new</b> 3:13 9:1 71:17	10:17,19 11:4	<b>occur</b> 109:5 125:14
18:14 76:14 136:3	<b>narrower</b> 32:1	123:24 131:1,2	23:14 24:14 25:17	128:19
<b>moved</b> 137:9	<b>narrowly</b> 95:7	<b>Newman</b> 60:13	27:17 36:18 37:2	<b>occurred</b> 72:15
<b>moving</b> 28:21	<b>Nat</b> 19:21 39:18	<b>Newman's</b> 60:19	52:7 97:15 100:14	106:9,18 108:15
88:14	<b>National</b> 22:24	<b>news</b> 2:10	101:22 105:11	117:11 122:13
<b>Mulberry</b> 20:7	<b>natural</b> 31:8,14	<b>newspapers</b> 50:5	114:12,13 118:19	123:18 124:1
35:16 37:6 126:6	83:21	61:23 140:11	118:24 120:2	137:6
<b>multitude</b> 122:18	<b>nature</b> 2:22 9:13	<b>NHS</b> 22:19 118:12	128:21 146:10	<b>occurring</b> 95:22
<b>murder</b> 66:8,10	10:24 14:4,16	<b>Nicholas</b> 68:7	<b>numbered</b> 100:16	<b>October</b> 79:6,9,20
69:13 75:19 77:3	39:2 94:3 98:8	<b>night</b> 38:22 45:15	<b>nutshell</b> 44:4	<b>offences</b> 127:11
77:4 84:11 86:14	113:8,19 117:10	46:6 66:4 107:7		<b>offend</b> 51:10,18
89:18 94:16	125:18 147:1	138:3 140:18	<b>O</b>	<b>offended</b> 63:15
127:10 132:25	<b>near</b> 119:11	<b>non-attendance</b> 4:6	<b>O'Donnell</b> 104:21	69:3
<b>murdered</b> 67:16	<b>nearly</b> 37:5 107:25	<b>non-exhaustive</b>	104:22	<b>offending</b> 54:6 56:4
141:5	<b>necessarily</b> 14:5	61:11	<b>obiter</b> 70:14,23	76:19
<b>murderers</b> 139:3,6	22:10 27:25 28:8	<b>non-jury</b> 76:23	71:9	<b>offer</b> 1:22 2:17 4:14
<b>myriad</b> 69:20	45:19 80:9 99:14	<b>normally</b> 76:11	<b>objection</b> 12:22	4:16,17 16:13,15
	111:8 147:8	<b>north</b> 3:4	<b>objective</b> 94:15	27:15 137:4
<b>N</b>	<b>necessary</b> 5:9 17:6	<b>Northern</b> 3:8,9	109:8	<b>offered</b> 59:6
<b>name</b> 50:23 64:25	22:11 28:15 29:10	96:24 137:25	<b>obscured</b> 108:21	<b>offering</b> 2:22
74:21 76:1,8	31:6 43:8,10 81:3	<b>notable</b> 108:15	<b>observation</b> 17:10	<b>Office</b> 9:7 23:1
77:13,21,25 87:19	111:5 121:20	<b>note</b> 25:25 28:5	27:7 32:5,7 40:17	<b>officer</b> 20:3 37:16
103:25 133:21	124:14 138:14,20	32:23 35:19 49:23	70:3,23	66:11 72:7 93:7
<b>named</b> 51:12 54:25	147:14	64:9 68:9 70:6	<b>observations</b> 16:5	93:13 102:22
55:3,7,8 57:1,15	<b>need</b> 8:11 13:18	117:23 119:15	25:21 26:4 37:21	143:4
58:21 60:2 61:3	19:8 32:6 38:4	120:11 123:19	60:11 79:15 98:6	<b>officers</b> 35:14,21
69:19 72:13 76:7	41:12 59:18 60:12	129:10 140:1	120:22 145:17	35:25 45:9,13,18
76:18 86:2 88:6	63:10 65:21 66:24	<b>notebooks</b> 74:14	<b>observe</b> 38:18 39:8	45:21,21 46:1,17
89:1 90:7 102:4	69:18,22 91:4	<b>noted</b> 54:10 74:11	98:5	47:12,14 49:6
103:22 110:8,13	95:5 98:24 108:13	<b>notes</b> 74:14 137:20	<b>obtain</b> 41:20	93:6,10 102:16,17
126:25 127:23	115:22 122:23	<b>noteworthy</b> 65:9	123:15	103:8 119:12

127:25 <b>official</b> 119:21 <b>omitted</b> 87:15 <b>once</b> 4:1 50:25 143:24 <b>one's</b> 139:20 <b>one-off</b> 3:7 <b>one-way</b> 27:25 <b>ones</b> 4:8 37:20 106:5 125:9 137:14 139:6 141:4 <b>ones'</b> 140:12 <b>ongoing</b> 21:25 26:18 49:1,13 130:2 <b>open</b> 13:3 81:22 102:2 133:5,20 <b>opened</b> 112:17 <b>operate</b> 62:21 109:21 <b>operates</b> 100:8 <b>operation</b> 30:10 104:17 119:9,23 <b>opinion</b> 85:18,23 86:21 107:17 120:3 <b>opportunity</b> 10:19 12:25 13:10,22 16:22 17:20 24:8 26:14 27:18 28:3 57:18 59:7,8 60:15 61:19 74:3 138:13 141:24 148:5 <b>opposed</b> 7:12 35:16 66:19 71:8 85:22 <b>oppression</b> 102:9 <b>oral</b> 4:7 25:14 132:8 <b>order</b> 14:13 100:8 113:16 133:15 <b>ordered</b> 100:11 <b>orders</b> 58:14,16,18 <b>ordinarily</b> 142:25	<b>ordinary</b> 103:20 <b>organisation</b> 93:20 <b>organisational</b> 35:5 <b>organisations</b> 21:15 22:17,18 23:24 114:17,17 114:21 118:8 119:7,22 143:11 <b>organised</b> 120:19 <b>original</b> 93:16 109:6 <b>originally</b> 10:6 17:1 <b>otiose</b> 65:21 <b>ought</b> 70:7 131:22 <b>outcome</b> 64:1,8,25 65:7 75:9 125:19 125:23 132:23 133:24 134:2 <b>outcomes</b> 72:7 <b>outlets</b> 22:19 <b>outline</b> 125:15 <b>outlined</b> 111:13 147:7 <b>outset</b> 34:23 94:22 105:13 106:19 <b>outside</b> 6:1 87:23 108:10 <b>outstanding</b> 7:18 10:22 12:2 <b>overall</b> 35:11 37:2 80:5 <b>overarching</b> 41:2 119:4 120:11 122:1 <b>overlap</b> 71:25,25 <b>overview</b> 19:24 20:22 39:18 41:10 114:1 117:6 142:23 143:5	69:8,10 70:16 85:3 90:2 91:2 100:4,5,13,17 101:9 <b>pages</b> 10:17 21:8 67:3,10 69:6 <b>pain</b> 106:10 <b>pains</b> 100:25 <b>Panel</b> 48:21 <b>papers</b> 79:4 <b>paragraph</b> 12:1 28:6,14 29:9,13 29:13,16 30:4,6 30:14,23,23,24 31:17,18,23,25 32:10,13,21 33:3 33:24 35:8 36:5,8 39:24 40:9 42:18 43:6 44:23 49:21 49:24 61:1,10 62:6,25 63:2,13 63:18,22,24 64:10 67:4 68:10,15 69:16 70:3,4,15 70:19 71:15 72:5 72:10 73:8 75:11 78:12 81:25 82:15 82:15 84:17 85:2 85:6,8,11,16 90:4 95:16 97:8 101:15 103:16 132:21 134:19 147:11 <b>paragraphs</b> 27:8 29:2 33:2 50:21 52:15 55:16 60:10 60:16 79:7 81:9 82:12 83:14 93:21 97:4,21 100:16 <b>paraphrase</b> 68:25 <b>parlance</b> 109:21 <b>Parliament</b> 68:5,10 127:12 <b>Parliamentary</b> 69:9 <b>part</b> 1:11,23 8:24	16:15 33:11 35:24 38:22 47:15 50:6 51:1 75:22,23 82:17 85:5 86:2 88:21 89:13 97:9 98:10 106:15 110:8,16 113:8 120:4 126:25 128:19 139:3 140:7 146:21 <b>parte</b> 52:18,19 59:24 <b>participants</b> 128:4 <b>participate</b> 108:18 138:21 <b>participating</b> 125:4 <b>participation</b> 15:20 89:11 <b>particular</b> 2:24 23:3 25:16,18 29:4,7 30:11,16 32:2 33:6 34:21 36:5 38:21 40:16 44:9,11,22 46:17 50:24 52:14 54:10 68:25 71:1 75:2 80:18 81:13 87:7 96:8 109:13 111:2 115:21,25 127:4 134:1 142:18 144:15 145:14 146:19 <b>particularly</b> 40:21 60:17 96:21 103:16 117:16 118:3 125:25 137:24 140:21 148:19 <b>particulars</b> 107:18 <b>parties</b> 95:18 96:7 128:3 <b>Partly</b> 8:5 <b>parts</b> 101:21 <b>party</b> 2:23 87:5 <b>passage</b> 32:13	96:16 100:22 108:21 <b>passed</b> 107:25 123:23 127:12 <b>passing</b> 28:6 123:19 <b>pathologist</b> 19:22 113:25 <b>pathologist's</b> 39:18 <b>pathology</b> 19:21 31:7 <b>paucity</b> 118:24 <b>pause</b> 70:6 <b>Pausing</b> 52:22 64:4 <b>peculiar</b> 78:2,6 <b>people</b> 2:12 14:9 15:1 17:21 19:23 27:10,17 39:19 40:3 41:13 46:12 46:16 76:7 86:15 103:25 106:4 120:15 121:6,15 122:18 126:4 <b>people's</b> 39:12 46:22 <b>peoples'</b> 117:22 <b>perfectly</b> 41:9,22 <b>performing</b> 98:19 <b>period</b> 3:17 17:1 27:12 <b>peripheral</b> 102:19 <b>permissible</b> 51:17 86:5 87:1 <b>permission</b> 9:24 55:12 <b>perpetrated</b> 54:5 94:13 129:15 <b>perpetration</b> 133:2 <b>perpetrator</b> 62:11 69:13 71:2 83:15 92:17 114:5 131:24 134:24 <b>perpetrator/perp...</b> 126:14 <b>perpetrators</b> 10:22
	<b>P</b>			
	<b>page</b> 52:18,20,21 53:11,12 67:4,5 67:11,13 68:4,6 68:10,14,15,16			

11:2,25 25:24 28:24 32:7 49:20 51:4 55:2 56:19 56:23 60:24 61:3 61:13 62:3 69:21 71:14,20 72:15 73:20 75:1 82:9 83:22 89:18 90:6 93:24 94:8 125:5 130:10 131:8,11 132:6 139:15,25 140:3 <b>person</b> 44:10 53:4 59:7 61:21 62:18 68:22 77:8 86:3 89:9 93:4,19 110:8,13 125:24 126:25 129:1,12 130:4,8,15 131:24 143:3 144:19,21 <b>person's</b> 43:12 121:22 <b>personal</b> 7:1 37:12 <b>personnel</b> 20:19 35:15 39:17 47:3 47:10 48:2,3,11 <b>persons</b> 1:19 12:5 17:4 19:15,25 21:5,15,24 22:15 25:18 37:18 44:3 50:1 75:16 76:18 89:10 105:11 106:2 108:4 113:16 114:9 116:12 120:1 121:1 122:2 125:24 127:9 130:5,20 131:15 133:22 143:25 145:3,10,17 148:8 148:9 <b>perspective</b> 81:8 82:24 139:17 <b>persuade</b> 15:19 <b>pertaining</b> 95:22	<b>pertinent</b> 96:2 99:1 <b>pessimistic</b> 40:25 <b>photograph</b> 68:16 <b>photographic</b> 21:17 140:10 <b>photographs</b> 118:24,25 <b>phrase</b> 99:24 109:19 <b>picture</b> 36:7 44:8 44:13 45:24 116:15 118:21 <b>Pictures</b> 119:1 <b>PIR</b> 19:18 145:8,23 145:25 <b>place</b> 29:8 33:8 40:18 50:7 56:17 58:20 66:5 103:21 128:19 134:22 <b>placed</b> 9:20 20:8 60:12 97:24 120:6 126:7 <b>places</b> 30:5 <b>plainly</b> 38:25 49:1 54:20 65:17 71:24 <b>plan</b> 3:16 4:19 115:6 <b>planned</b> 135:14 <b>planning</b> 3:18 30:9 49:6 135:22 <b>plans</b> 49:8 <b>planted</b> 57:9,10,10 57:13,13 61:17 72:1 96:16 99:8 135:14 <b>planting</b> 50:3 99:13 104:9 <b>play</b> 98:10 106:15 <b>please</b> 60:9,16 78:19 84:16 85:3 86:17 89:23 90:1 136:15,23 <b>pleasure</b> 103:6 <b>plural</b> 115:17 <b>pm</b> 61:23 92:20,22	148:22 <b>point</b> 2:1 9:9 12:17 12:18,21 13:8,9 14:2 15:4 26:17 27:7 33:5,9 34:6 34:11,13,14,19,19 37:4 39:7,13,14 40:14,16 42:16,24 43:1 44:18 47:24 48:17 50:9 52:25 55:17 56:15 59:15 59:20 62:4,24 68:11,18,24 70:22 71:7,10,13,14 88:12,14,16,19 91:13,18 93:12 95:2,13 100:25 103:15 113:7 117:23 120:9 124:21 127:13 131:21 <b>pointed</b> 3:3 5:2,2 48:10 50:24 78:12 96:5 <b>pointer</b> 56:2 <b>points</b> 10:9,12 11:23 28:23 33:15 36:3 43:3 49:18 50:1,14 70:19 83:12,25 95:1 120:10,11 136:15 141:19 144:22 <b>police</b> 11:3 21:9,22 22:2,4 23:2,20,22 23:25 28:12 30:9 30:17 35:12,14,21 45:9 49:5,6,8 60:3 66:11,14 72:23 73:24 74:13 78:17 78:25 79:1 83:4 83:17,21 92:23,25 93:6,13 94:10,14 106:2,3 114:14,20 119:12 127:24 128:13 130:16,17	130:25 139:13 140:2 143:1,10,13 146:6,15 147:4,9 149:5,7,8 <b>Police's</b> 146:20 <b>policies</b> 119:4,6 <b>policing</b> 119:5 <b>policy</b> 37:13 53:24 91:9 119:4 127:3 <b>poor</b> 35:10,11,12 <b>population</b> 126:9 <b>position</b> 1:18,25 4:6 10:8 14:6 19:14 25:22 41:19 44:22 47:4 48:6 51:2 72:11 73:1 99:12 103:24 124:2 137:25 141:8 143:2 146:6 146:24 <b>positively</b> 120:24 <b>possibility</b> 40:2 50:8 78:5 80:19 124:15 126:13 130:7 143:8 <b>possible</b> 22:7 26:12 39:11 51:22 67:23 69:19,20 89:11 99:19 101:3,6,16 101:19,20,20 104:15 106:14 118:3 119:3 122:22 123:6,11 132:14 138:9,18 139:4 141:2 142:20 145:14,20 <b>possibly</b> 32:24 34:10 85:7 <b>post-mortem</b> 21:13 39:15 43:20 44:7 47:16 121:12,14 <b>potential</b> 28:9,13 38:7 42:13 44:12 62:11 71:25 72:14 90:12 99:15,16	124:18 131:8 133:4,15,18 <b>potentially</b> 22:24 35:11 40:13 62:10 71:17 72:2 96:9 98:22 111:6 120:4 121:2 131:3 145:1 <b>power</b> 54:24 57:22 127:9 <b>powerful</b> 117:20 127:3 <b>powers</b> 55:21 <b>practicability</b> 94:1 103:13 <b>practicable</b> 94:9 99:5 101:11 139:15 <b>practical</b> 27:1 42:15 43:15 44:20 44:24 45:7 49:16 50:8 95:1 104:13 122:6 124:7 147:14 <b>practically</b> 108:2 125:19 <b>practice</b> 59:4 89:2 <b>practising</b> 3:4 <b>pragmatic</b> 14:12 <b>pre-empt</b> 57:23 <b>pre-inquest</b> 1:6 <b>precedes</b> 107:13 <b>precise</b> 80:14 123:3 <b>precisely</b> 22:16 27:22 46:13 54:1 113:12 <b>preclude</b> 51:20 85:21 <b>precluded</b> 128:16 <b>precludes</b> 68:21 <b>predating</b> 102:11 <b>predecessors</b> 51:11 69:16 <b>preliminary</b> 11:16 19:24 47:7 117:6 117:24
--	---	---	---	--

<p><b>premature</b> 42:11  <b>preparation</b> 105:18  <b>prepare</b> 41:6  145:12  <b>prepared</b> 2:17 4:4  5:18 10:1 12:9  36:24 138:18  <b>preparing</b> 41:9  <b>present</b> 24:8 33:13  34:1 36:17 45:17  47:24 51:25 78:18  93:14 101:11  111:13 116:20  <b>presented</b> 36:13  116:16  <b>press</b> 21:16 58:13  58:22 119:1  148:11  <b>pressed</b> 133:23  <b>Presumably</b> 42:20  <b>pretend</b> 84:12  <b>prevail</b> 53:6 54:14  <b>prevails</b> 56:13 71:6  91:17  <b>prevent</b> 30:8 73:10  73:11 91:20 134:7  134:25  <b>preventing</b> 86:20  <b>prevents</b> 50:18  128:6  <b>previous</b> 24:15  65:11 87:2,13  88:22 146:12  <b>previously</b> 21:9,12  21:25 22:7 48:24  112:4,20 118:10  118:13  <b>price</b> 137:14  <b>primary</b> 130:24  136:1  <b>principal</b> 24:3  <b>principle</b> 95:9,12  96:10 97:1 99:5  110:19  <b>principled</b> 82:6</p>	<p><b>principles</b> 28:25  115:12  <b>prism</b> 94:1 104:2  <b>privilege</b> 62:14  <b>privy</b> 72:8  <b>pro</b> 4:9 140:22  <b>probably</b> 38:2  45:16 75:18  141:21  <b>probed</b> 34:12  <b>problem</b> 1:12 3:12  <b>problems</b> 7:2 9:12  43:15  <b>procedural</b> 60:21  62:5 115:19 128:8  132:17 144:11  <b>procedure</b> 97:6  98:8  <b>proceed</b> 1:20 12:21  17:12,17 26:25  92:6 144:14  <b>proceedings</b> 23:5  62:22 64:1 65:1  66:7 67:18 73:9  102:19 106:25  109:5 132:24  133:24 134:4  146:21  <b>proceeds</b> 69:4  <b>process</b> 2:13 12:4  14:24 15:4,6 22:1  22:6 27:13 34:7  38:12 49:1 61:2,6  61:18 72:3,3  98:13 102:16  104:1 112:6  124:22 125:22  126:1 128:10,12  128:20 131:16  143:22 144:18  145:8  <b>processes</b> 104:24  <b>procured</b> 21:3 24:2  135:14  <b>produce</b> 45:13</p>	<p>94:23 99:8 103:5  103:17 108:25  122:19  <b>produced</b> 23:18  38:1 46:4 103:12  104:14 114:1  <b>producing</b> 111:17  <b>productive</b> 147:21  <b>professional</b>  142:22  <b>professor</b> 20:15  42:1,2 113:21,21  142:12  <b>profound</b> 50:10  61:6  <b>programmes</b> 72:13  <b>progress</b> 2:14 4:22  16:12,18,19 17:11  19:11 47:21  148:16,17 149:1  <b>prohibit</b> 65:5  <b>prohibited</b> 65:4  77:17 86:14  126:22 129:4  131:8  <b>prohibition</b> 53:3,14  53:20,25 54:1,15  64:11 65:18 76:19  76:21 84:25 85:17  86:8,20,25 90:24  90:25 91:9,16,17  91:20 127:1  129:11,16 134:12  134:20  <b>prohibitions</b> 78:8  <b>prohibits</b> 64:20  75:12 132:21  <b>prominence</b> 72:14  <b>prominent</b> 119:24  <b>promising</b> 106:23  <b>promotes</b> 94:6  <b>prompt</b> 17:24  <b>promptness</b> 39:2  <b>proof</b> 33:22 81:12  <b>proper</b> 27:14 51:7</p>	<p>113:7 125:17  132:15  <b>properly</b> 106:23  131:22 132:12  133:13  <b>proponents</b> 139:1  <b>proposal</b> 43:7  <b>propose</b> 12:11  15:17,19 23:11  24:8 28:21 42:17  136:3  <b>proposed</b> 44:1  114:18,25 122:2  <b>proposes</b> 42:18  <b>proposition</b> 31:2,23  40:1 41:1 44:24  45:7 49:16 51:2  51:24 52:6,8 54:4  68:2 70:11 122:6  123:11  <b>propositions</b> 26:2  95:4  <b>propriety</b> 115:19  <b>prosecute</b> 127:18  <b>prosecution</b> 23:3  64:5 93:16 128:2  129:21 130:4,6,15  <b>prosecutory</b> 128:1  <b>prospect</b> 44:2  130:4  <b>prospects</b> 39:12  <b>protection</b> 62:5  <b>protections</b> 58:16  58:25 62:13,21  91:7  <b>protracted</b> 6:13 9:9  14:4  <b>prove</b> 27:17  <b>provenance</b> 118:20  <b>provide</b> 10:18  16:21,22 18:20  19:23 20:5,22  22:3,21 41:22,23  56:10 65:23  114:14 118:4,21</p>	<p>143:5 144:3 145:4  <b>provided</b> 6:4 7:16  8:4,11 13:16  16:14 19:25 21:9  21:14 51:11  112:13 119:6  130:19 142:25  <b>provides</b> 26:13  51:5 69:17  <b>providing</b> 106:16  <b>provision</b> 65:12,16  69:2 134:6,11  <b>provisional</b> 43:16  43:18 56:20 110:2  126:8  <b>proximate</b> 40:4  <b>proxy</b> 134:9  <b>PSNI's</b> 96:23  <b>Pub</b> 83:18  <b>public</b> 1:18 2:14,25  3:24 17:13 22:8  22:18,25 26:10  27:18 50:11 53:24  61:17 76:25 84:12  91:9 94:14 106:13  106:22 107:19,22  109:7 111:9  115:15 123:21  125:2,11 127:3  131:14 140:7  <b>publications</b> 72:13  <b>publicised</b> 124:4  <b>publicly</b> 22:15 88:3  95:21 125:10  <b>published</b> 58:13  148:10  <b>publishing</b> 24:4  <b>punished</b> 107:4  <b>purported</b> 34:2  116:21 119:16  <b>purpose</b> 23:20  30:11 86:12 89:15  94:18,20 95:6,19  95:20 97:25 98:21  107:24 111:21</p>
--	---	--	---	--

134:6,10 135:8 <b>purposeful</b> 97:10 <b>purposes</b> 1:9 13:17 23:5 24:25 26:22 36:17 45:17 47:24 52:1 64:9 77:4 97:22 114:4 <b>pursue</b> 109:8 <b>purview</b> 56:5 <b>put</b> 4:19 10:11 36:7 38:13 43:9 61:2 80:11 85:10 113:5 119:2 130:19 131:11 137:14 139:20 <b>puts</b> 81:21 <b>putting</b> 81:16 147:1	26:11 42:2 60:3 61:9,24,25 62:25 63:3 64:16 86:22 89:10 95:8 99:9 104:16 107:10,12 107:14 109:1 110:10 112:1 115:14 127:6 133:10,11,14,15 <b>quick</b> 120:15 <b>quite</b> 11:4 56:11 128:23 136:20 138:8 <b>quoted</b> 97:12 110:24 117:6	104:6 117:7 120:17 144:11 <b>readily</b> 129:8 143:7 <b>reading</b> 73:7 95:23 97:12 98:11,24 <b>ready</b> 43:25 <b>real</b> 18:3 43:23 82:16 90:12 108:13 <b>realistic</b> 93:12 109:4 116:4 130:7 <b>realistically</b> 17:12 26:13 <b>realities</b> 124:8 <b>reality</b> 103:6 104:3 <b>really</b> 14:20 19:16 39:10 44:13 66:21 81:24 99:4 104:2 146:8 147:1,6 <b>reason</b> 7:8 33:12 53:9 63:6 64:2 90:24,25 92:6,8 96:10,19 114:11 <b>reasonable</b> 124:23 <b>reasonably</b> 2:5 26:12 <b>reasoning</b> 60:12,19 <b>reasons</b> 17:1 37:23 41:17 42:10 49:14 61:5 82:16 90:5,8 91:10 92:15 124:6 125:15 145:14 146:8 147:4 <b>reassure</b> 146:7 <b>recall</b> 52:23 <b>receive</b> 144:24 <b>received</b> 1:14,17 5:9,21,22 6:5 12:4 22:4,5,20 25:3 37:19 44:2 49:4 61:22 114:16 120:23 <b>receiving</b> 115:4 142:5 <b>recharged</b> 66:11	<b>recognise</b> 26:24 116:13 146:22 <b>recognised</b> 9:18 26:9 94:13 103:6 119:19 126:9 <b>recognising</b> 98:12 135:16 <b>recommended</b> 15:12 <b>reconstitute</b> 102:6 <b>reconstruct</b> 123:12 <b>record</b> 50:23 75:15 77:5 86:7 87:9,12 87:23 88:11,18 92:5 <b>recorded</b> 18:9 64:7 84:4,5 87:8 88:18 101:24 <b>records</b> 22:25 39:17 100:17 118:9,10 122:17 <b>recovered</b> 20:11 66:7 <b>recusal</b> 145:14 <b>redacted</b> 22:3,7 72:8 <b>redefine</b> 93:25 <b>Reed</b> 102:21 105:2 <b>refer</b> 30:21 36:7 <b>reference</b> 29:17,21 30:14,24 40:12 42:20 48:2 64:24 69:23 70:16 85:20 102:9 107:21 112:20 138:7 139:14 140:1 <b>references</b> 52:17 59:19 60:8 66:23 69:5 <b>referred</b> 32:9 36:1 41:25 47:1,15 49:13 56:12 59:21 63:11 67:12 76:8 105:10 139:14 <b>referring</b> 49:5	53:17 117:5 <b>refers</b> 53:13,22 60:10 70:15 <b>refine</b> 80:14 <b>reflect</b> 41:11 102:3 <b>reflected</b> 78:10 127:8 <b>reflection</b> 78:13 87:2 <b>reflects</b> 97:5 127:3 127:19 <b>regard</b> 30:10 65:23 88:22 118:6 <b>regards</b> 25:4 40:25 41:5 137:24 <b>regime</b> 14:9 85:12 <b>registered</b> 107:18 <b>regret</b> 82:16,22 93:23 94:10 <b>regulated</b> 2:23 3:5 3:8 <b>regulations</b> 5:24 109:20 <b>reheard</b> 73:9,13 <b>rehearing</b> 73:17 <b>rehearse</b> 69:18 79:21 97:16 <b>rehearsed</b> 95:6 104:11 <b>rehearses</b> 97:7 <b>Reilly</b> 18:17,18 24:10,19,20,20 40:15 149:3 <b>reinforce</b> 99:5 <b>reject</b> 105:22 123:11 133:23 134:12 <b>rejected</b> 6:15 70:11 <b>rejecting</b> 87:24 <b>relate</b> 92:2 139:12 <b>related</b> 11:23 90:16 90:18 <b>relating</b> 61:13 62:3 90:6 121:19 <b>relation</b> 5:7 9:2
<hr/> <b>Q</b> <hr/> <b>qualify</b> 93:18 <b>qualifying</b> 94:20 <b>quality</b> 2:24,25 4:23 5:7 39:2 41:3 <b>quarrel</b> 31:1,24 <b>quash</b> 100:8 <b>quashing</b> 87:22 100:7 <b>Queen's</b> 96:24 <b>question</b> 4:24 13:2 38:22 41:10,11,13 41:15 42:4 43:24 56:25 57:25 67:17 70:9 71:3 75:2 79:24 80:5 81:14 82:9 85:20 93:24 94:24 95:11 96:11 103:13 110:7,17 125:12,16 126:24 129:14 <b>questioning</b> 60:19 105:18 <b>questionnaire</b> 145:13 <b>questions</b> 25:1 26:8	<hr/> <b>R</b> <hr/> <b>raise</b> 27:15 28:6 39:6 43:23 62:25 63:9,14 65:6 146:5 <b>raised</b> 14:8 36:21 50:14 68:5 71:8 78:16 120:10,25 133:10 146:16 <b>raises</b> 40:2 42:22 58:5 <b>range</b> 88:25 96:2,5 96:13 107:20 <b>rank</b> 93:7 <b>ranks</b> 93:6 <b>rapid</b> 121:5 <b>re-do</b> 130:23 <b>re-open</b> 66:16 <b>re-provided</b> 13:16 <b>re-read</b> 24:15 <b>reach</b> 51:22 94:19 <b>reached</b> 50:20 116:18 133:19 <b>reaches</b> 36:13 <b>reaching</b> 115:23 <b>reaction</b> 75:21 <b>read</b> 25:10 30:7 45:3 60:16 85:20 86:22 97:8 100:22			

11:13 15:21 28:5 28:23 39:7,13 42:19,21 43:3,7 45:24 46:24 47:9 47:11,22,25 48:2 48:7,16,19 49:19 60:23 61:22 63:5 63:8 64:19 65:3 71:13,24 72:12 74:8 75:1 78:17 79:23 81:1 85:8 88:24,25 93:15,15 96:9 102:16 103:4 103:16 133:9 138:1 148:13 <b>relationship</b> 23:21 56:17 138:5 <b>relationships</b> 3:20 9:5,6 <b>relatively</b> 40:24 107:11 123:24 <b>Relativity</b> 21:4 47:13 119:2 143:16 <b>relevance</b> 40:14 98:15,21 109:2,2 124:7 <b>relevant</b> 5:8 20:25 22:14,24 23:7 24:4 28:25 32:13 32:25 43:12 60:3 61:21 64:8 66:23 67:3 72:2 73:19 74:15 82:2 89:10 91:7 98:23 107:21 114:15 116:2 118:4,5,10 119:15 121:22 122:11 143:11,22 144:4 144:19 <b>reliability</b> 101:25 102:8,13,14,24 <b>reliable</b> 94:19,23 99:8 103:2,5,11 104:13 122:23	128:13 <b>reliance</b> 40:18 120:5 <b>relied</b> 89:22 <b>relieved</b> 71:12 <b>relive</b> 108:15 <b>rely</b> 17:23 52:14 55:15 144:12 <b>remain</b> 18:12 <b>remaining</b> 16:9,23 <b>remains</b> 13:3 122:5 127:5 128:25 130:3 140:12 <b>remarks</b> 76:24,25 76:25 84:10,10 87:7,9,22 <b>remember</b> 32:3 46:12,16,18 87:18 87:19 99:24 <b>remind</b> 99:24 <b>reminded</b> 78:20 135:19 <b>reminder</b> 85:5 <b>remote</b> 98:20 <b>remove</b> 108:23 116:6 140:12 <b>removed</b> 44:10 127:11 137:18 <b>reopening</b> 112:16 <b>reorganise</b> 79:4 <b>repeat</b> 25:13 29:3 35:9 62:8 122:14 124:18 <b>repeated</b> 118:15 <b>repeating</b> 33:14 58:23 62:19,19 <b>repetition</b> 131:5 <b>reply</b> 88:15,19 141:14,17 <b>report</b> 19:24 20:22 29:10 36:24 39:18 40:8 41:10 42:1 42:21 44:9 74:7 114:1 115:1,3 117:6	<b>reported</b> 35:19 <b>reports</b> 21:13 36:6 36:16 37:10,11,13 37:17,20 39:16 41:7,24 44:7 49:12 72:25 96:24 100:16 104:7 119:11,14 <b>represent</b> 1:13 2:12 7:3 14:18 18:17 24:19 61:7 79:3 104:22 <b>representation</b> 1:3 59:8 62:17 148:24 <b>representations</b> 77:14 148:1 <b>represented</b> 14:20 59:5 89:3 135:20 136:10,13,16 137:3,21 140:22 149:11 <b>representing</b> 9:4,20 31:10 58:24 62:10 77:15 <b>represents</b> 93:6 <b>request</b> 4:1 12:13 <b>requested</b> 3:23 <b>requests</b> 22:20,22 114:12,13,18,21 114:23 <b>require</b> 34:13,17 81:12 113:7 115:25 121:25 133:3 134:20 <b>required</b> 5:5 7:5,21 13:12 29:22 107:18 111:5 113:6 116:17 135:8 138:14 142:11,19 145:12 <b>requirement</b> 144:11 <b>requirements</b> 85:14 <b>requires</b> 33:22	113:13 114:7 <b>rescue</b> 119:23 <b>research</b> 45:12 46:8 138:14 <b>researches</b> 45:25 <b>reserve</b> 12:12 19:13 <b>resistance</b> 97:18 <b>resolution</b> 18:2 107:13 <b>resolve</b> 36:12 106:18 <b>resolved</b> 52:4 <b>resolving</b> 94:12 <b>resources</b> 37:5,7 39:3 44:15 <b>respect</b> 23:13 28:7 36:16 37:4 38:21 43:20 60:13 64:2 64:8,10,15,21 110:13 114:18,19 115:7,20 121:9 122:21 134:1 142:6 145:4 <b>respected</b> 85:19 <b>respectful</b> 52:7 56:1,14 146:18 <b>respectfully</b> 29:1 31:25 32:16 34:5 34:17 36:2,15 37:24 38:3 42:10 43:9,14,24 45:6 52:12 65:22 67:22 71:6 72:19 80:7 80:16 81:7 82:13 122:4 <b>respective</b> 61:17 <b>respond</b> 25:17 <b>responded</b> 34:3 116:23 <b>responding</b> 49:25 57:5 71:14 <b>response</b> 4:11 11:22,24 17:4 25:24 28:24 32:20 33:5 34:16 35:3	35:22 38:21 39:1 41:4 42:12 43:12 43:13,23 44:18 45:15 46:6 48:7 48:22 49:11,19 81:6,13,15 82:2,3 114:5,23 115:11 118:11,22 119:8 119:13,17 120:19 121:22,24 122:2 123:12,16,22 124:1,4,10 143:10 <b>responses</b> 22:22 114:20 145:13 <b>responsibility</b> 57:15 58:9,10 93:25 94:24 95:11 96:3,9,11 97:3 99:2,13 103:23 104:5,17 125:18 <b>responsible</b> 51:15 53:4 60:4 69:1 84:11 94:16 107:3 119:7,22,23 125:9 125:24 130:25 133:20 134:17 <b>responsive</b> 83:12 <b>restraint</b> 58:22 <b>restricted</b> 88:17 96:12 104:11 107:1 <b>restriction</b> 51:5 58:14 90:17 103:20 <b>restrictive</b> 33:21 34:18 <b>result</b> 39:20 48:22 51:21 56:18 77:1 110:6 130:15 133:6 134:3 <b>resulted</b> 126:5,12 126:16 131:16 <b>resulting</b> 126:23 132:22 <b>results</b> 30:10
---	---	--	---	---

<p>114:24 115:1  <b>resume</b> 28:10 80:4  <b>resumed</b> 15:5  63:21,23  <b>resumption</b> 10:16  11:9 13:17 28:19  <b>retraumatising</b>  27:13 28:1 124:20  <b>retrial</b> 99:18  100:10 101:3,6,11  101:16 134:9  <b>return</b> 15:25 32:6  111:25  <b>reveal</b> 7:7  <b>review</b> 1:6 22:23  23:2 26:20 31:11  41:2 60:1,5,20  96:8 112:10 143:8  <b>reviewed</b> 22:11  23:6 118:14  119:10 120:24  <b>reviewing</b> 114:24  <b>revised</b> 16:12,15  85:13  <b>revisit</b> 4:4 118:2  <b>revisited</b> 73:20,21  73:22 74:2  <b>Rex</b> 119:1  <b>riders</b> 87:7  <b>right</b> 6:7 7:13  12:12 15:3,24  18:15 27:6 55:18  59:8 65:20 79:16  88:15 121:16  128:14,14 134:18  138:22 141:13,17  <b>righting</b> 125:12  <b>rightly</b> 85:15 91:10  113:1  <b>rights</b> 29:14 30:5  87:10 91:8 109:8  138:22  <b>rise</b> 15:24 43:14  92:19  <b>risk</b> 18:3 27:9,12</p>	<p>58:23 124:20  <b>RJ</b> 70:2  <b>road</b> 11:13 20:9  101:17  <b>role</b> 99:16 100:2,18  100:19 102:18  146:20,25 147:3,8  <b>roles</b> 93:15  <b>Rolls</b> 97:25 128:24  <b>room</b> 19:7,23  143:23  <b>rooms</b> 35:12 102:6  <b>rose</b> 24:18  <b>round</b> 81:21  <b>route</b> 128:6 133:13  <b>routine</b> 127:25  <b>routinely</b> 108:7  <b>Royal</b> 20:21  <b>rubble</b> 44:10  <b>rule</b> 12:24 42:11  54:15,17 84:25  85:17,21 86:1,9  <b>rules</b> 68:21 85:1  87:3 109:20  <b>ruling</b> 13:2 17:7  22:12 26:22 96:25  97:5,17 100:1  112:15 142:7  143:24 147:24  <b>rulings</b> 24:5  <b>rumbling</b> 8:1  <b>rumour</b> 30:12  89:14 111:9  <b>rumours</b> 98:1,3,10  138:10</p> <hr/> <p style="text-align: center;"><b>S</b></p> <hr/> <p><b>safe</b> 132:19  <b>safeguards</b> 53:22  54:10 132:17  <b>safely</b> 21:23  <b>satisfied</b> 130:5  <b>satisfy</b> 113:6  <b>satisfying</b> 147:19  <b>save</b> 32:23 38:23</p>	<p>68:25 107:17  140:19  <b>saved</b> 117:22  <b>saw</b> 119:9 144:21  <b>saying</b> 5:2,23 8:11  55:7 57:14 84:3  137:10 140:6,16  <b>says</b> 1:19 2:3 5:7  9:16 37:3 56:11  63:20,24 68:10  69:9 83:13 89:20  90:3,17,21 97:9  117:8  <b>scene</b> 37:3 39:3  46:2,17 105:9,10  120:7 124:24  127:24  <b>schedule</b> 47:17,25  63:12,18 103:16  132:21 134:19  <b>scheduled</b> 1:7  <b>Science</b> 20:20  <b>scientific</b> 73:24  129:23  <b>scientists</b> 127:25  <b>scope</b> 1:8 3:18 4:3,3  4:8 9:25 10:20,25  11:12,21 12:3,11  13:3,7,19 14:11  15:18,21 16:9,23  19:15 22:12,14  25:13,25 26:19,21  28:7,23 33:4,18  38:9,15 42:12  50:12 51:7 54:5  54:17 56:10,19  57:25 59:3,10  63:7 78:18 79:7  79:13,19,23 80:1  80:23 81:15 82:21  84:6 90:20 93:9  95:19 96:18 103:7  104:25 109:18,23  110:22 111:4,11  112:9,19,23,25</p>	<p>113:8,9,18 116:11  124:14 131:22  134:24 135:12,25  138:7,9 139:4  141:1 142:6 144:5  145:6  <b>scrutinise</b> 123:16  <b>scrutiny</b> 16:17  <b>Sean</b> 18:17 24:10  24:19 149:3  <b>search</b> 139:25  <b>searched</b> 49:3  <b>searches</b> 114:23,24  118:13,14  <b>second</b> 30:21 34:19  48:14 60:24 67:5  80:24 86:10,16  88:14,19 122:4  <b>secondly</b> 16:21  26:9 36:15 39:7  41:8 51:25 61:8  115:15 146:10  <b>Secretary</b> 6:14 9:8  66:15 67:1,8,13  68:7  <b>Secretary's</b> 66:18  <b>section</b> 50:17,22  51:5,11,18,20  52:3,9,13 53:18  56:2,8,21 63:25  64:11,13,14,16,23  65:3,7,12 66:17  73:8 75:12 78:4  84:2,3 85:1,21  86:9,16,19 87:14  90:18 91:16 95:5  95:8 100:9,11,11  103:20 109:24  127:1 134:13  <b>sections</b> 66:13  <b>securely</b> 97:14  <b>see</b> 12:13 40:11  44:8,8 47:21 53:7  53:13,16 54:8  60:18 65:9 67:6</p>	<p>67:11,20,21 68:6  90:8 100:2 121:12  138:16  <b>seek</b> 26:2 49:18  55:1 58:17 62:8  102:3 141:23  <b>seeking</b> 35:2 57:23  66:16 102:5  106:13 139:23  <b>seen</b> 6:23 15:12  21:25 31:13 35:1  42:8 45:8 47:5,9  48:8 83:7 104:6  104:10 119:5  127:1  <b>sees</b> 30:16  <b>selected</b> 120:12  <b>self-incrimination</b>  62:15  <b>senior</b> 6:12 10:16  10:24 20:2 21:12  28:10 35:21,25  37:16 39:18 79:25  80:4,17 86:20  102:21 112:15,24  114:12 119:11  <b>sense</b> 30:18 38:19  39:1 44:5 55:20  55:24 73:16 98:22  115:19  <b>sensible</b> 103:1  <b>sensitive</b> 7:1 21:22  22:6 63:4,9  138:15  <b>sensitivity</b> 22:9  <b>sent</b> 5:6  <b>sentence</b> 30:3,7,16  40:6,18 54:22  55:11,14 60:17  71:15 77:9 127:18  <b>sentences</b> 117:7  <b>separate</b> 6:16  <b>separately</b> 43:8  58:7 59:14 89:3  <b>September</b> 10:15</p>
---	--	---	---	--

<p><b>sequence</b> 5:19 43:19</p> <p><b>serious</b> 46:20 95:25 132:9</p> <p><b>seriously</b> 121:8 138:2 141:1</p> <p><b>serve</b> 98:7 99:4 103:23</p> <p><b>served</b> 106:22</p> <p><b>service</b> 11:24 23:3 118:17,18 119:13 128:2 135:20</p> <p><b>service's</b> 118:22</p> <p><b>services</b> 2:23 3:8 10:21 11:1,12 35:13 108:7 117:21 120:5 140:9,17</p> <p><b>set</b> 29:1 32:20 36:8 42:17 43:16,17 49:22 52:23 58:4 79:17 81:25 82:8 82:23 105:9 107:10 116:25 146:17 147:5 148:16</p> <p><b>sets</b> 47:7</p> <p><b>setting</b> 10:20 81:11 146:13</p> <p><b>seven</b> 16:10 46:5</p> <p><b>severe</b> 39:20 40:4</p> <p><b>shamed</b> 58:21 60:2</p> <p><b>share</b> 94:15</p> <p><b>sheet</b> 24:24</p> <p><b>shooting</b> 30:17</p> <p><b>short</b> 13:20 16:2 44:25 50:15 75:17 82:7 83:7,12,25 92:21 95:1 108:21 123:14</p> <p><b>shorthand</b> 29:5</p> <p><b>shortly</b> 15:24 61:23 71:23 126:15</p> <p><b>show</b> 8:23 51:21</p> <p><b>shown</b> 24:23</p>	<p><b>shutting</b> 124:15</p> <p><b>side</b> 25:2 38:10,11 58:5 84:9 87:6 118:4</p> <p><b>sight</b> 116:3</p> <p><b>sign</b> 4:18 8:12,20</p> <p><b>signed</b> 4:24 5:15</p> <p><b>significance</b> 50:16</p> <p><b>significant</b> 48:5 71:16 72:22 83:17 130:13,21 141:3</p> <p><b>significantly</b> 59:9</p> <p><b>signs</b> 61:20</p> <p><b>similar</b> 45:24</p> <p><b>simple</b> 76:9</p> <p><b>simply</b> 4:23 25:8 27:25 28:5,19 36:22 37:11 41:16 51:5 63:5,7 70:23 72:25 74:21 80:15 94:6 122:22 123:6 131:5</p> <p><b>sincere</b> 137:5</p> <p><b>sir</b> 1:15 2:1 3:22 17:19 18:5,7,12 18:16,20 19:13 23:10 24:7,13,17 24:18 25:8,12,21 26:5,9,16,24 27:14,24 28:5,16 28:21 29:1,11,20 30:14,21 31:6,19 32:19 33:5,19 34:5,19 36:15 37:23 38:2,18 39:8,14 40:6,8 41:5,13 42:10,15 43:4,16 44:17 47:23 49:14,18 50:18 52:16 53:8 53:12 55:1,9,17 56:8,14 57:4,17 58:12,15,23 59:8 59:18 60:23 62:6 62:13 63:3,5,11</p>	<p>63:17 64:14 65:9 65:22,25 67:4 69:14 70:17 71:12 72:24 73:10 74:1 74:16,22 75:21 76:4,11 77:7 78:16,22 79:3,16 80:25 82:9,25 83:6 85:4,15 86:19 87:4 91:1 91:11 92:25 95:9 97:24 99:4 100:19 101:19 103:13 104:2,13,22 105:2 105:7,25 106:25 107:25 108:16 109:18 110:9,21 111:11 112:2,22 114:6 117:2,19,25 118:7 122:4 124:6 125:5 128:5,22 129:12 131:18 132:5 133:3,9 135:11,15,19 136:1,8 137:5 139:8,12 140:25 141:10,16,24 142:4 145:22 146:6,7 147:20</p> <p><b>sister</b> 66:4 141:5</p> <p><b>sisters</b> 141:6</p> <p><b>sit</b> 96:12</p> <p><b>site</b> 35:16,16,18 37:6</p> <p><b>sits</b> 76:10</p> <p><b>situated</b> 137:25</p> <p><b>situation</b> 25:4,9 38:24 41:14 76:18</p> <p><b>situations</b> 76:6</p> <p><b>six</b> 4:25 5:10 6:24 10:7 11:2,4 16:25 45:12,21 50:15 58:7 59:14 63:12 63:16 64:6,8 73:6 74:6,20 75:8 77:3</p>	<p>88:24 93:17 99:15 101:22 103:17 129:21 132:20 133:4,16,19,25 134:16</p> <p><b>sixth</b> 17:10 71:13 73:4</p> <p><b>Skelton</b> 18:19 24:18 41:25 49:2 71:22 81:9 82:11 91:10 105:5 139:13 142:2</p> <p><b>Skelton's</b> 69:15</p> <p><b>sketch</b> 115:6</p> <p><b>slightly</b> 55:19 73:13 78:13 141:18</p> <p><b>slippage</b> 7:4</p> <p><b>slow</b> 17:11</p> <p><b>small</b> 54:17 118:18</p> <p><b>so-called</b> 114:10</p> <p><b>society</b> 3:2,10 141:9</p> <p><b>solicitor</b> 4:13 14:25 16:11 19:20 24:24 105:16 114:8 135:21</p> <p><b>solicitor's</b> 45:11,25 146:14</p> <p><b>solicitor/junior</b> 141:22</p> <p><b>solicitors</b> 47:6 87:8 136:11,13,17 149:12</p> <p><b>somebody</b> 47:15 56:4</p> <p><b>somewhat</b> 10:8 56:24 72:17</p> <p><b>sons</b> 141:6</p> <p><b>soon</b> 142:20 145:20</p> <p><b>sorry</b> 18:19,20,22 18:23 29:17,20 36:25 42:23,25 43:4 45:3 66:9 68:1 70:16,17 78:22 90:1 95:13</p>	<p><b>sort</b> 52:9 104:16 136:17</p> <p><b>sorts</b> 37:23 133:14</p> <p><b>sought</b> 31:10</p> <p><b>souls</b> 137:13</p> <p><b>sound</b> 72:15 109:16</p> <p><b>source</b> 123:21</p> <p><b>sourced</b> 94:6</p> <p><b>sources</b> 21:14,17 144:1</p> <p><b>South</b> 59:24</p> <p><b>speak</b> 2:3 27:18 105:23 136:8 137:3</p> <p><b>specialist</b> 42:1</p> <p><b>specific</b> 9:3 43:11 63:17 72:18 82:1 95:10 107:12 115:22 119:6 125:24 127:22</p> <p><b>specifically</b> 29:15 35:15 62:1 64:20 65:15 71:7 94:3 111:21 117:5 127:11 128:15</p> <p><b>speculating</b> 116:9</p> <p><b>speech</b> 85:3,6 95:14 97:1</p> <p><b>speed</b> 25:9</p> <p><b>spend</b> 88:21</p> <p><b>spoken</b> 19:16 23:16</p> <p><b>staff</b> 138:20</p> <p><b>stage</b> 26:23 27:23 28:16 32:3 33:23 38:5,12,15 39:15 41:1,13,16 42:14 43:17 44:6 47:8 48:8 49:3 57:23 63:6 72:20 73:15 74:2 76:4 77:13 80:15 81:2,12 111:14 113:11 117:20 124:13 141:24 144:9,25 147:22</p>
--	---	---	--	--

<p><b>staged</b> 7:12</p> <p><b>stages</b> 111:12</p> <p><b>staggered</b> 7:12</p> <p><b>stand</b> 26:14 104:10 133:8 136:25</p> <p><b>standard</b> 2:24,24 3:5 4:23,25 5:3,5 5:7,8,16,18 14:19</p> <p><b>standards</b> 118:25 123:14</p> <p><b>standby</b> 46:19 47:3</p> <p><b>standing</b> 14:13 18:19</p> <p><b>Stanley</b> 1:14,15 2:1 2:7,10 3:12,16 4:12,17 5:2,5,12 5:14 6:8,18,22 7:1 7:7,10,15,18,24 8:2,5,8,13,16,18 8:25 9:12 10:3,10 11:18 12:3,16,18 12:23 13:2,14,18 13:25 14:22,24 15:15,16 16:14 17:12,15,19 18:5 18:7,12</p> <p><b>Stanley's</b> 16:5</p> <p><b>starkly</b> 106:19 122:12</p> <p><b>start</b> 15:3 18:15 44:1 100:23 125:6</p> <p><b>started</b> 7:25 18:21 22:21 103:10</p> <p><b>starting</b> 5:11 23:8 33:5,9 34:14 50:9 56:14 84:17 144:17</p> <p><b>starts</b> 67:6 112:7</p> <p><b>state</b> 32:17 68:7 95:24 96:10,12 106:19,19 130:22 130:24 138:16</p> <p><b>stated</b> 11:23 94:17 126:18</p> <p><b>statement</b> 47:15</p>	<p>68:9 69:9 84:13 86:4,6</p> <p><b>statements</b> 27:11 39:17 42:8 44:25 45:8,14,20,22 46:2,4,15,25 47:13,18 48:8,11 123:13</p> <p><b>states</b> 53:2</p> <p><b>stating</b> 86:8</p> <p><b>status</b> 59:7 62:18 89:9 93:19</p> <p><b>statute</b> 99:22 101:6 104:17 109:19 128:16 129:11</p> <p><b>statutory</b> 14:12 54:13 64:16 65:5 78:8 82:6 99:10 100:7 107:10,23 110:17 112:1 115:14 127:6,15 129:16 130:1 134:10</p> <p><b>stay</b> 18:8</p> <p><b>step</b> 95:3 142:5</p> <p><b>stepping</b> 95:10</p> <p><b>steps</b> 33:6 117:4 136:3 142:3 147:7</p> <p><b>stick</b> 46:22</p> <p><b>stone</b> 43:17</p> <p><b>stop</b> 30:2</p> <p><b>straight</b> 93:12</p> <p><b>straightforward</b> 49:15</p> <p><b>stray</b> 107:23</p> <p><b>street</b> 46:19</p> <p><b>stressed</b> 31:18</p> <p><b>stresses</b> 32:14</p> <p><b>stretch</b> 107:14</p> <p><b>strictly</b> 111:5</p> <p><b>stricture</b> 131:12</p> <p><b>strong</b> 26:10 108:16</p> <p><b>strongly</b> 46:16</p> <p><b>struggling</b> 86:12</p>	<p><b>stuck</b> 46:19</p> <p><b>studies</b> 20:17</p> <p><b>sub-topics</b> 33:20 61:12 80:3</p> <p><b>subject</b> 4:21 22:8 44:3 57:17 58:4 58:14 72:10 99:10 103:8 104:25 111:24 126:4 130:18 134:9 143:17 144:24 148:12</p> <p><b>submission</b> 1:9 11:6 14:11 30:6 33:15 39:5 48:5 50:9 51:9 52:7 55:6 56:1,6,8,14 57:7 58:9 60:11 63:14 64:22 69:15 73:3,7,12,23 74:12 80:8,16 81:19,21,25 82:14 82:18 84:1,7 87:17,24 93:21,22 106:17 110:14 116:10 119:15 121:18 123:23 124:12 125:21 135:11 146:19</p> <p><b>submissions</b> 1:8,17 2:15 4:2,7 9:25 10:14,16,18,20,23 10:25 11:5,10,12 11:15,16,25 12:3 12:5,6,7,13,22,25 13:1,14,17,20,22 15:17,22 16:7,22 17:16,22 18:10 22:4 23:10 24:10 24:12,16 25:14,15 25:17,18 26:17 27:3,9 28:7,11 29:2 30:23 31:24 32:9,21 33:3,16 33:24 34:25 35:1</p>	<p>36:3,19 47:1 49:22,24 50:3 52:16 53:18 56:24 57:2,3 59:11,22 61:1,5,10 70:12 71:9 72:5,11,18 75:11 78:17 79:1 79:6,7,14,19 81:2 81:3,7,10 82:11 82:13,25 83:4,7,8 83:10,14 88:20 89:22 92:16,23,25 103:15 104:19,24 105:6,8,14,19,22 109:13 110:25 111:14,25 113:15 114:7 115:4,11,13 117:7 120:23 121:1 122:3 125:6 128:15 135:23 136:1,10 142:5 144:10 146:9,18 147:2 148:2,21 149:3,5,6,8,9,11</p> <p><b>submit</b> 27:24 29:1 31:2 33:20 34:5 34:17 36:15 37:24 38:13 42:11 43:24 49:14 51:5 71:6 72:19 79:23 82:5 116:19 124:8 125:15</p> <p><b>submitted</b> 3:17 6:9</p> <p><b>subparagraph</b> 67:22 100:14 101:8</p> <p><b>subparagraphs</b> 35:8</p> <p><b>subrule</b> 85:19</p> <p><b>subsection</b> 65:13 86:22</p> <p><b>subsequent</b> 123:22</p> <p><b>subsequently</b> 6:15 23:6 37:18 66:10</p> <p><b>subsisting</b> 134:1</p>	<p><b>substance</b> 19:14 25:12,20 26:4</p> <p><b>substantive</b> 4:7 9:25 13:5 23:10 79:19 145:7</p> <p><b>subtopic</b> 60:23</p> <p><b>succeeding</b> 33:2</p> <p><b>successful</b> 73:25 126:16 130:15</p> <p><b>succession</b> 120:15</p> <p><b>suffered</b> 39:20 40:4 106:6 121:15</p> <p><b>sufficient</b> 13:11 35:14 39:6 93:11 97:2 116:14 122:5</p> <p><b>sufficiently</b> 56:16</p> <p><b>suggest</b> 26:20 31:25 32:16 39:25 43:14 45:6 46:15 47:11 47:25 56:2 119:16</p> <p><b>suggested</b> 36:2,4,6 38:20 60:25 67:22 147:13</p> <p><b>suggesting</b> 60:4 73:17 74:25 86:5 120:17</p> <p><b>suggestion</b> 72:9 86:10</p> <p><b>suggests</b> 39:24 49:7 72:2 117:10 120:25</p> <p><b>suites</b> 102:7</p> <p><b>summaries</b> 120:2</p> <p><b>summarise</b> 2:2,7 31:4</p> <p><b>summarised</b> 33:3 44:23 49:23 53:2 72:11 82:14</p> <p><b>summarises</b> 2:5 76:13</p> <p><b>summary</b> 1:19 70:12 124:6</p> <p><b>summoning</b> 145:8</p> <p><b>superintendent</b> 35:20 36:25 37:1</p>
---	--	---	--	--

102:20 105:2 <b>supplementary</b> 10:24 <b>supplier</b> 2:23 <b>suppliers</b> 3:1 15:11 <b>support</b> 25:21 26:2 33:16 40:1 51:24 <b>supporting</b> 6:6 43:3 <b>supports</b> 40:25 <b>sure</b> 59:11 74:23 79:9 139:10 147:6 148:8,17 <b>surprised</b> 141:18 <b>surrounding</b> 30:20 51:14 <b>surveyor</b> 21:19 <b>survivability</b> 39:5,7 39:13 40:25 42:5 43:1 <b>survival</b> 39:12 40:20 117:16 <b>survive</b> 39:23 40:1 40:5,13 <b>survived</b> 121:7,8 121:11 <b>suspect</b> 118:9 <b>suspects</b> 69:19 88:25 90:14 <b>suspended</b> 64:3,5 <b>suspicion</b> 89:14 97:23 111:9 <b>suspicious</b> 30:12 98:1,3,10 <b>suspicious</b> 95:22 <b>sustainable</b> 15:9 <b>Suter</b> 49:22 147:16 <b>Suter's</b> 25:25 32:23 <b>system</b> 127:5,8,17 127:19,20 129:19 131:9 <b>systemic</b> 9:12 35:6	32:12 52:18,19,20 53:12 59:20 66:2 66:2 70:2 83:8 84:16 86:17 89:23 90:1 <b>tail</b> 52:13 90:21,25 <b>tailored</b> 81:20 121:24 <b>take</b> 25:22 27:15 28:7 33:14 34:17 37:21 49:10 59:1 61:15 65:10 66:21 66:22 69:22 76:9 81:24 82:14 89:21 95:3,19 102:15 122:15 128:19,22 129:18 131:21 145:9,21 147:6 <b>taken</b> 25:16 27:11 32:1 33:6 44:25 45:20 68:11,18 78:22 117:4 123:13 128:21 132:1 136:4 <b>takes</b> 71:12 88:19 <b>talking</b> 6:16 37:11 56:22 79:10 110:15 <b>tape-recorded</b> 66:10 <b>target</b> 89:16 <b>task</b> 89:21 112:3 <b>Tavern</b> 20:7 24:21 35:15 37:8 46:21 47:4 62:1 120:8 126:6 <b>taxi</b> 140:18,19 <b>taxis</b> 35:23 <b>team</b> 20:15,19 21:3 21:7,10,21 22:23 23:6,13,16 111:17 112:12 113:22 119:10 136:4 137:5,23 138:12 138:19 139:9	140:22 142:13,21 143:3,8,20 144:17 145:12 146:15 147:25 <b>teams</b> 138:16,17 <b>technicalities</b> 98:25 <b>technicality</b> 4:22 <b>technically</b> 4:17 <b>techniques</b> 108:6 <b>Technology</b> 20:20 <b>telephone</b> 50:5 <b>television</b> 72:13 <b>ten</b> 7:3 16:24 140:14 <b>tending</b> 104:7 <b>term</b> 23:8 <b>terminology</b> 65:14 78:14 <b>terms</b> 5:14 13:19 28:25 38:11 41:9 50:7 54:16 56:16 59:3 64:10 72:17 95:3 99:11 102:11 104:4 107:21 140:8 146:24,24 147:7 <b>terrible</b> 26:6 <b>territory</b> 9:1 69:21 <b>terrorism</b> 126:8 <b>test</b> 7:19 9:20 41:17 113:6 116:25 130:4 <b>thank</b> 1:4,16 13:25 13:25 15:14,16 17:19 18:6,7,13 24:7,9,11,13 25:10,11 43:2,5 45:5 47:23 59:17 70:20 78:22,24 83:2,6,11 87:22 92:18 101:18 104:20 105:1,4,7 109:16 136:7,25 137:2,10 139:8 140:16 141:10,11	141:12,24 142:1 146:4 147:23 148:19,20 <b>thankful</b> 140:21 <b>thankfully</b> 38:25 <b>theory</b> 93:8 <b>things</b> 46:22 99:23 114:22 142:10 148:13 <b>think</b> 4:17 6:4 8:25 9:1 10:17 11:17 13:2,11,21 14:3 18:4 19:6 25:2 29:10 35:9 49:22 59:18 65:12 67:2 87:5 89:23 101:2 105:8 116:11 124:23 128:5 141:9,20 147:21 148:3 <b>third</b> 39:13 42:25 62:4 67:5 68:10 68:15,16 74:5 81:6 116:4 <b>thirdly</b> 17:3 26:13 38:2 91:11 <b>Thomas</b> 91:2 97:24 <b>thoroughly</b> 131:6 <b>thought</b> 28:18 79:9 <b>thousands</b> 21:7 <b>three</b> 6:10 17:3 19:17 37:17 57:12 77:2 83:12,25 87:2 90:2 91:12 115:12 <b>threshold</b> 32:15 34:22 36:14 43:9 116:25 <b>Thursday</b> 148:23 <b>time</b> 7:4,10 10:7 13:8,25 14:20 17:11 18:2 26:7 27:4,6,12 31:4,16 33:8,14 37:14 39:16,21 43:25	44:11,14,14 45:8 46:13,13 49:9 50:7 51:17 52:16 56:17 66:6,22 68:25 69:19 74:10 78:23 81:5 91:11 96:16 98:11 108:8 108:21 114:9 119:21 138:20 139:9,22 145:9,21 145:24 147:25 <b>timely</b> 26:25 <b>timescale</b> 16:20 17:23 <b>timetable</b> 41:23 43:16,18 <b>timing</b> 4:14 123:3 <b>timings</b> 122:23 123:1,1,2 <b>today</b> 1:7 3:17 4:9 9:9 12:7 13:14 15:18 16:8,24 24:25 25:8 34:25 35:10 79:22 89:22 106:6 119:3 122:3 133:23 135:12,21 136:2,20 141:9 143:24 147:7,24 148:2 <b>today's</b> 19:14 114:4 115:11 <b>told</b> 6:19 105:2 <b>Tomkinson</b> 35:20 35:21 <b>top</b> 90:2 <b>topic</b> 25:23,24 28:8 28:16,24 32:19,21 32:22 33:17,18 44:21,21 51:3 52:10 55:20 56:19 57:8,9 69:24 79:25 80:24 81:6 82:10,12,21 147:17 <b>topics</b> 32:2 38:14
<b>T</b>				
<b>tab</b> 29:11 31:5				

50:15 61:12 79:22 80:10 144:2 <b>totally</b> 138:6,24 <b>touched</b> 62:6 <b>Town</b> 20:7 24:21 35:16 46:21 47:4 62:2 120:8 126:6 <b>train</b> 143:22 <b>transcribed</b> 19:9 <b>transcript</b> 18:10 <b>transparency</b> 23:21 146:24 <b>transparent</b> 137:23 139:3 <b>traumatic</b> 39:22 <b>traumatise</b> 137:15 <b>travelled</b> 148:20 <b>travelling</b> 26:2 <b>treat</b> 144:21 <b>treated</b> 40:21 117:17 <b>tremendous</b> 35:2 <b>triage</b> 36:1 <b>trial</b> 11:4 66:12 68:21 77:3 91:6 100:9 102:20 128:18 132:15 138:23 <b>troubled</b> 27:19 <b>Trust</b> 118:12 <b>trusts</b> 22:20 <b>truth</b> 140:24 <b>try</b> 130:10 <b>trying</b> 14:17 21:23 29:19 <b>turn</b> 25:12 28:23 29:10 31:6 32:8 39:4 49:19 53:9 59:18 61:8 66:3 70:17 85:2 86:17 89:23 90:1 91:4 125:5 <b>turning</b> 21:2 32:19 50:14 114:3 115:10	<b>turns</b> 97:4 <b>twelve</b> 46:2,5 <b>two</b> 3:21 10:12,22 16:9,23,24 17:16 28:8,13,19 29:3,6 47:1,2 48:3,3 59:19 74:7 79:15 80:3,10,18 83:17 84:14 92:19 100:17 112:23 114:3 115:10 117:7 119:10 120:14,22 121:6 122:15 126:5 140:22 146:8 <b>type</b> 96:20 <hr/> <b>U</b> <b>UKHL</b> 95:16 <b>ultimate</b> 22:12 75:9 81:24 82:14 133:6 <b>ultimately</b> 41:11,12 48:16 64:7 73:25 74:8 107:15 111:8 111:19 113:4 115:21 130:14 131:16 <b>umbrella</b> 115:18 <b>unable</b> 135:21 <b>unachievable</b> 109:8 <b>unaware</b> 34:1 46:20 47:3 116:20 <b>uncommon</b> 76:6 <b>Uncontroversial</b> 19:3 <b>Uncontroversially</b> 112:22 <b>undated</b> 11:7 <b>undercover</b> 66:11 <b>underestimate</b> 27:1 <b>underlie</b> 115:12 <b>underlying</b> 134:10 <b>undermine</b> 131:13 <b>Undersecretary</b> 68:17	<b>understand</b> 1:24 2:13 7:6 13:9 26:19 29:19 31:2 37:19 38:4 40:24 42:3,6 43:6 44:19 44:23 45:10 55:6 59:12 63:13 80:22 81:18 88:13 105:15 113:16 124:21 130:3 135:20 137:16 138:4,8 141:3 142:15 147:15 <b>understandable</b> 143:7 <b>understandably</b> 41:9,22 <b>understanding</b> 23:19 57:7 81:19 146:13 <b>understands</b> 30:18 82:19 <b>understood</b> 56:24 72:4 <b>undertake</b> 128:7 <b>undertaken</b> 22:23 118:13 124:11 <b>undertaking</b> 89:20 <b>undesirable</b> 44:2 <b>undisputed</b> 31:7 <b>undoubtedly</b> 31:14 126:11 146:2 <b>unfair</b> 126:1 <b>unfairly</b> 134:8 <b>unfairness</b> 90:13 104:1 128:9 <b>unfortunate</b> 125:4 <b>unfortunately</b> 9:23 <b>unhappily</b> 94:23 99:12 104:3,14 <b>unidentified</b> 92:5 <b>United</b> 126:9 <b>University</b> 118:16 <b>unknown</b> 63:6 <b>unlawful</b> 51:10,16	51:23 64:25 67:23 68:12,19,23 75:17 77:5,6,21 91:25 92:1,8,10 107:16 129:4,4,7 130:9 <b>unlawfully</b> 129:2 <b>unnatural</b> 95:22 <b>unnecessary</b> 45:17 <b>unprincipled</b> 130:8 <b>unquestionably</b> 126:22 <b>unrealistic</b> 71:18 131:3 <b>unreliable</b> 103:1 108:9 129:24 <b>unrepresented</b> 23:14 <b>unsafe</b> 133:7 <b>unsuccessful</b> 60:6 <b>unsurprising</b> 120:13,20 <b>unsurprisingly</b> 70:22 <b>untraceable</b> 94:5 108:10 <b>unwelcome</b> 94:7 <b>update</b> 16:19 18:21 19:1,2,11,16 23:9 149:1 <b>updates</b> 143:17 <b>upheld</b> 97:19 <b>urgency</b> 8:24,25 17:24 <b>use</b> 35:23 73:16 74:13 81:16 <b>useful</b> 22:21 53:8 71:18 131:4 <b>uses</b> 41:17 <b>usual</b> 56:15 <b>Usually</b> 136:16 <b>usurp</b> 127:6 <b>utility</b> 61:2 62:4 69:16 89:20 90:10 131:13	<hr/> <b>V</b> <hr/> <b>v</b> 95:15 <b>vacate</b> 3:23 <b>vague</b> 61:25 <b>valuable</b> 90:5 <b>various</b> 21:14,16 27:21 28:12 31:12 35:8 53:22 69:18 72:12 <b>vast</b> 130:17 <b>vehicle</b> 83:24 125:17 <b>ventilated</b> 141:19 <b>verbatim</b> 140:3 <b>verdict</b> 51:10,16 54:18 67:23 68:12 68:19 90:22 96:6 99:21 100:10 112:9 129:3 <b>verdicts</b> 64:6 65:1 92:7 <b>version</b> 21:10 87:13 <b>versions</b> 22:3 <b>vested</b> 97:6 98:14 <b>victims</b> 106:21 125:8 126:17 139:23 141:8 <b>video</b> 48:18 <b>view</b> 12:17,18,21 14:2 21:22 56:20 57:24 67:13,14 68:5 69:5 101:2 104:3 117:24 122:11 129:17 132:1 133:16 143:25 144:14 <b>views</b> 113:17 <b>vindicated</b> 109:9 <b>violations</b> 140:8 <b>violence</b> 102:10 <b>violent</b> 95:23 <b>virtue</b> 100:9 <b>voice-activated</b> 19:4 <b>voluminous</b> 122:17
--	--	--	--	--

<b>W</b>	16:25	58:19,23 59:6,15	<b>words</b> 74:18 75:19	<b>year</b> 5:20 11:9 79:7
<b>wag</b> 52:13 90:21	<b>weeks</b> 3:21 6:24	59:18,24 60:10	95:23 97:13 98:11	79:12,20 82:11
<b>waited</b> 26:7 27:5	10:7 16:24 139:10	63:3,20 67:4 68:1	98:24 101:24	88:22 89:13 93:22
139:10	<b>weigh</b> 126:18	68:15,17 69:8	106:2 110:9	111:19 115:8
<b>waiting</b> 7:19 44:6	<b>weight</b> 119:25	70:2,17,21 73:5	127:13 130:6	<b>years</b> 9:10 27:19
46:19	<b>welcome</b> 14:22	73:10,13,17,22	136:15	45:23 78:10 102:5
<b>waived</b> 8:14	125:1	74:1,9,15,22 75:6	<b>work</b> 3:6,6 5:18	102:22 104:4
<b>Wales</b> 3:1,2 15:12	<b>well-founded</b>	75:11,21 76:3,17	14:4,10 23:1,8,11	107:25 109:5
85:13 93:1	146:19	77:7,10,22 78:4,7	23:25 48:21	123:23 124:1
<b>want</b> 7:7 10:3 12:6	<b>well-known</b> 19:22	78:16,20 80:8	105:17,20 130:17	138:11 139:10
15:23 17:18,20	<b>went</b> 146:23	81:11 82:18 83:13	136:18 142:14,20	140:22
28:17 29:11 31:7	<b>weren't</b> 36:21	86:5,25 88:1	<b>workable</b> 2:20	<b>yesterday</b> 1:14,17
33:15 40:16 57:2	<b>West</b> 20:11 21:9,22	89:20 90:17	<b>worked</b> 136:20	4:11 5:21 47:6
57:4 59:1 60:8	22:1,4 23:2,19,25	124:21 141:13,16	<b>working</b> 3:20 14:23	<b>young</b> 40:12,15
78:18 135:24	28:12 49:8 78:17	141:21 146:5,6	16:24 17:3 20:19	
137:11	78:25 79:1 106:3	147:12,15,20	109:16 138:5	<b>Z</b>
<b>wanted</b> 30:21 47:17	118:17,18 119:12	149:4	144:3	<b>0</b>
146:5	143:2,10 146:6,15	<b>Williams's</b> 81:16	<b>worried</b> 35:22	<b>1</b>
<b>warning</b> 28:13 50:5	146:20 147:4,9	84:1 86:10 88:20	<b>worry</b> 35:24 137:9	<b>1</b> 6:13 11:9 36:6
61:22,24 126:15	149:5	91:13	<b>worse</b> 19:10	37:1,22 42:7
<b>warrant</b> 38:16 39:6	<b>whatsoever</b> 98:10	<b>Winters</b> 4:11	<b>worst</b> 125:3	63:12,18 72:25
112:16 130:22	<b>whilst</b> 26:18 27:13	<b>wish</b> 12:24 13:23	<b>worth</b> 53:17 142:9	83:18 85:19 86:17
<b>wary</b> 19:8	31:1 72:17 98:11	18:9 33:19 61:7	<b>worthy</b> 40:3	100:21 103:16
<b>wave</b> 20:23,23	138:15	80:14 81:2 82:20	<b>wouldn't</b> 65:21	104:6 132:21
<b>way</b> 18:11 29:5	<b>wholeheartedly</b>	83:1 104:16,21,23	78:2	134:19 148:24
32:5,7 33:22 35:2	35:4 139:16	145:10 148:1	<b>writing</b> 45:4 79:11	<b>1.07</b> 92:20
39:3 41:8 42:16	<b>wholly</b> 94:13	<b>wishes</b> 15:18	101:23 148:7	<b>10</b> 2:12 52:20 53:8
42:17 60:21 71:8	119:20	<b>withdrawn</b> 102:19	<b>written</b> 4:3,7 16:22	53:12 75:12 89:3
75:23 76:5 77:24	<b>wide</b> 97:5 98:14	<b>witness</b> 13:6 44:9	24:12 25:3,14	95:5 101:8 134:13
81:21 102:22	<b>widely</b> 96:1,5	122:17 142:22	29:2 34:24 35:1	<b>10(1)(a)</b> 63:25
103:18 110:7,12	107:14 112:7	<b>witnesses</b> 15:1	47:1 49:8 82:10	64:11,13,14,23
111:24 112:11	<b>wider</b> 94:14 111:5	27:21,24 44:25	89:21 92:16 93:22	65:3
120:18 124:4,9	<b>widest</b> 138:9 139:4	46:10 66:5 89:10	105:8 110:25	<b>10(2)</b> 50:17 51:5,11
126:24 140:5	141:1	90:15 94:4 105:19	146:9 147:25	51:18 52:3,9,13
141:19 146:23	<b>Williams</b> 18:15,17	108:9,14 111:16	<b>wrong</b> 29:17,20	56:2,8,21 64:20
147:18 148:15	18:24 19:1 24:10	122:8 124:19	106:14 133:17	73:8 78:4 84:2,3
<b>ways</b> 112:2	24:11,13,17 25:7	143:21 144:4,8,10	<b>wrongdoing</b> 90:15	85:1 90:18 91:16
<b>wealth</b> 122:16	25:11 29:17,19	144:18,20	<b>wrote</b> 66:15 67:7	103:20 127:1
<b>Weatherhead</b>	40:11 42:25 43:3	<b>Women's</b> 118:12	67:20	<b>10(5)</b> 86:9
65:25 70:15,22,25	43:6 45:3,6 47:20	<b>wonder</b> 84:15		<b>10.30</b> 1:2
71:5,6,10	47:23 53:8,12,16	<b>Woodwiss</b> 102:17	<b>X</b>	<b>10.52</b> 16:1
<b>website</b> 24:2	54:1,4,8,23 55:1,5	<b>word</b> 30:2 73:13	<b>X</b> 44:10	<b>105</b> 149:9
148:10	55:9,13,16,19,24	76:24	<b>Y</b>	<b>11(5)(b)(2)</b> 85:21
<b>Wednesday</b> 1:1	56:8,24 57:4,7,17	<b>wording</b> 63:18	<b>Y</b> 44:11	
<b>week</b> 2:16 4:15	57:22 58:2,12,15	65:13,16 78:12		

11.01 16:3	104:7 110:1 135:9	<u>3</u>	479 52:18	68:10,15,16
118 60:16	138:21	3 1:23 4:21 8:10	49 52:15	92 149:8
12 7:16 46:4	2(3) 100:9	31:15 52:25 53:13		94 60:10
120 60:16,18	2.05 92:22	89:23 100:21	<u>5</u>	95 60:10
123 60:18	20 7:20 45:9	3.32 148:22	5 27:8 52:25 53:1	
125 60:18	2007 95:16	30 10:23	54:8,11 62:23	
13 30:23	2009 50:17 78:11	31 1:1 36:5	64:16 67:11,20	
130 60:18	84:2 85:1 86:16	310 100:5,13,17	91:18 95:8 109:24	
136 149:11	87:14 127:2	311 100:24	5(3) 86:16,19 87:14	
14 24:12 29:18,18	128:16 132:21	313 101:9	50 71:15	
29:21 30:6,14	134:13	32 12:1 28:6,14	51 61:1	
32:10 46:3,4	2010 96:24 107:10	33 30:24 31:17	52 62:6	
59:20 95:16	2014 9:5	32:12 85:6,11	53 62:25 63:3	
15 4:8 11:17 31:23	2015 10:15,15 46:4	97:21	54 70:3	
31:25 66:17 83:10	2015/2016 45:14	34 32:21 39:24	56 72:5	
89:3 93:22	2016 6:9 10:23 46:5	97:21	58 72:10	
153 29:13 30:4	2017 1:1 16:13	35 33:3 42:18 43:6		
15th 11:18	101:20 148:23	81:25	<u>6</u>	
16 65:12	202 85:3	36 84:17 85:7,16,17	6 67:21 68:1 79:12	
17 46:1,3 79:7	20s 40:15	36(1) 85:21	138:22	
18 29:2 45:12 84:16	20th 139:19	369 52:20	60 32:13 82:12,15	
19 79:13 149:1	21 20:18 22:17	36F 44:23 45:2	83:14	
1973 20:12	29:11 69:6 106:4	37 85:2,16 95:16	66 96:24	
1974 15:5 20:12,18	106:5 115:16,17	97:8		
45:1 106:5,17	116:24 118:23	38 27:8 70:2	<u>7</u>	
108:15,22 113:10	121:3,6 126:3	39 35:8 36:8 81:10	7 16:11 29:9,13,16	
118:23 120:16	135:15 143:13		52:18 65:13 67:7	
123:13,17 135:15	22 1:23 3:17 6:21	<u>4</u>	68:6 83:8 100:11	
1975 23:5 123:18	8:17 16:16 20:1	4 53:16 54:8 67:4	76 66:13	
1977 127:12	67:12 69:6	90:1 91:3 100:21	78 66:14	
1984 65:13 85:1	23 1:7 19:18 24:16	40 31:18 82:12	79 149:5	
1988 66:17	81:9	83:14 138:11		
1991 99:17 101:19	24 11:10 52:21	40-plus 109:5	<u>8</u>	
104:12 132:14	53:11,12 69:8	41 49:21 66:2 82:15	8 6:24 7:14 68:14	
133:6	91:2 93:21 149:3	42 49:24 50:21	134:19	
1994 67:7	25 79:15 93:21	54:15,17 84:25	8(1) 132:21	
1995 68:4	26 5:22 11:7 16:13	86:1,9	8(5) 63:13,18 64:10	
1A 86:22	69:10 70:3 79:9	43 61:10 90:4,8	65:21 69:16 70:4	
1B 86:22	27 5:24 6:2,20 8:1	102:5,22 104:4	70:15 73:8 75:11	
	31:5 33:24 40:9	107:25 124:1	78:12 103:16	
<u>2</u>	70:19 90:2 97:4	139:10	8.11 61:23	
2 9:18 31:20 32:14	145:25	44 79:8	80 147:11	
72:25 83:18 84:24	28 79:6 97:5,9	45 10:17 52:15	83 149:6	
86:22 96:21	29 17:8 145:24	98:17		
100:11,14,21,22	148:12,23	47 50:21	<u>9</u>	
			9 10:15 29:2 52:19	