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**URGENT**

9 January 2009

Our Ref: 516130/000001/JCW/GOSPORT/JUL

Your Ref:

Dear Sirs

**Re: Gosport Inquest**  
**(Application by Mrs Betty Packman, Code A)**  
**Inquest Hearing 9 March 2009 – 6 weeks.**

We would be very grateful if you can link these papers with the Legal Aid Application for exceptional funding to provide representation in respect of Mrs Betty Packman and three other families for this forthcoming Inquest.

As you will be aware from the Application ten families are involved in the Inquest. Four of these have requested representation. One of these, Mrs Packman, has applied for Legal Services Commission funding in "exceptional circumstances". As explained below we also believe there is also a wider public benefit for representation to be provided.

### **Exceptional Circumstances**

We consider that the request is exceptional because:-

1. The Coroner has listed 10 Inquests together.
2. The cases forming the subject matter of the inquest were, we understand, selected by the Home Office.
3. The time estimate is 6 weeks.
4. The deaths occurred around 10 years ago.

We would like to submit further information to be linked up with the Application as follows:-

1. Commission for Health Improvement Report, dated July 2002.
2. Three bundles of disclosed evidence from the Coroner in respect of the ten families.

### **Wider Public Interest**

Ten families are involved in the inquest. We have in addition been approached by family members on behalf of a further 6 families. These persons are:-

1. Mrs Lynn Sharp – in respect of Marjorie Ann Perkins (deceased).
2. Mrs Emily Yeats – in respect of Alice Elizabeth Wilkie (deceased).
3. Mr Stevens – in respect of Jean Irene Stevens (deceased).
4. Mrs Margaret Ward – in respect of Mrs Norma Windsor (deceased).
5. Mr Ian Williamson – in respect of Mrs Ivy Kathleen Williamson (deceased) and in respect of Mr Jack Williamson (deceased).

6. Mrs Gillian Mckenzie – in respect of Gladys Richards (deceased).

We enclose completed questionnaires in respect of the above; save for the case of Gillian McKenzie who has made representations directly to the Coroner that Mrs Gladys Richards (deceased) is a subject of the Inquest.

**Request**

We have requests from four clients, Mrs Packman, Mrs Reeve, Mr Farthing and Mrs Gregory for representation and advice during the Inquest.

We have been in discussion with Counsel. She considers that the cases have legal merit. In particular, both we and Counsel are concerned that the credibility of the process will be undermined if the families are not provided with legal representation so that the issues are properly addressed on their behalf.

**Estimated Costs**

Counsel's estimated costs to prepare for and attend these 6 week Inquests are £15,000.00 + VAT. On a broad estimate we would suggest that we need authorisation of £10,000.00 + VAT to prepare for the Inquest and provide litigation support for the relatives and preparation of documentation for Counsel.

We would be very grateful if this request can be dealt with as a matter of urgency. If representation is not provided then the families will need to make other arrangements as soon as possible. The likelihood is that they will not be represented but we believe they should be made aware of this as soon as possible.

We look forward to hearing from you. Should you have any questions concerning this letter please ask to speak to John White.

Yours faithfully

**Blake Laphorn**

**Encs**