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4 November 2010

Our Ref: 516130/000003/JCW/GOSPORT/HP

Your Ref: 86SL0086809/NG/GD

Dear Mr Gibbs

Re: Gosport War Memorial Hospital – Dr Jane Barton

Thank you for your letter dated 7 October 2010.

We do appreciate the difficulties referred to in paragraph 1 of your letter. Unfortunately we do not have a consolidated list of the statements and material. There were ninety-two patients who were the subject of the investigation. Of these we have had contact with sixteen and of those we are presently in contact with six families who have varying degrees of information. We note the rationale behind your suggestion in paragraph 3 but it is impractical from our point of view.

You have made no mention of the experts' reports. Also you have made no mention of the report from Professor Baker, disclosure of which we requested throughout the Inquest and the professional conduct hearing and which we have also requested during these proceedings. Please can you state your position in relation to the experts' reports.

We are aware that the letter from the CPS is dated 16 August 2010 and on that basis it will shortly be three months from the date on which it was issued. We will assert that the timescale for review should not run until we have been provided with disclosure. Nevertheless to avoid uncertainty we do ask if you will:-

- (i) Agree for a general extension of time, terminable on 56 days notice, for review until the disclosure process has been completed; and
- (ii) Suggest a rational and proportionate way in which this can be dealt with.

In relation to Counsel's opinions, clearly this is critical to our consideration of this matter. Please can you site the authority on which you are relying to oppose disclosure.

We look forward to hearing from you as soon as possible.

Yours sincerely

John White

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Pattison, Helen

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