White, John

To:

Patrick Sadd

Subject:

Gosport - Dr Barton

Attachments:

Gosport wilson barton 02.04.09.rtf



Gosport wilson barton 02.04.09...

Hi!

I have had a good look. Very tricky to play this just right I guess. I do n't think I can really improve on what you have done.

I particularly liked: -

Isn't the position in fact this - that by October 1998 the fact of transfer to Dryad told you all you needed to know, namely that the patient was in terminal decline? You didn't have the necessary time and made assumptions?

I guess that if she will conceed the last point you can then take it back to the expert evidence to set up a line of "unjustified risk taking"

I gather that Tom has a copy of your draft questions too - so you can co-ordinate matters.

Looks as if it will be quite a difficult job. Good luck Best wishes

Code A