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1. INSTRUCTIONS

To examine and comment upon the witness statements in the case of Helena Service. In particular, if they raise issues that would impact upon any expert witness report prepared.

2. **DOCUMENTATION**

This report is based on the following document:

- 2.1 Witness statements to the hospital care and death of Helena Service provided to me by the Hampshire Constabulary (June 2006). In total 19 statements.
- 2.2 Report regarding Helena Service (BJC/72) Dr D Black 6th November 2004.

3. **COMMENTS**

3.1 Comments on Witness Statement (2.1)

3.1.1 I have read all the statements and would note that in paragraph 1.14 of my report, I state that Mrs Service was "continuously breathless". The nursing notes actually state "dyspnoeic on exertion" (298). However I interpret that as "continuously breathless" as Mrs Service was immobile (Barthel 0-4) and needed to be "nursed upright all night"

4. **CONCLUSION**

4.1 Having read all the documents above provided by Hampshire Constabulary, I would wish to above change to be noted. This does not change the overall conclusion of my expert report.