



Mr David Horsley
Coroner
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The Guildhall
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BY LETTER AND FAX

FAX NUMBER: **Code A**

Our Ref: 558203/000001/JCW/RICHARD/HP

Your Ref:

8 December 2010

Dear Sirs

Re: Inquest – Gladys Richards (deceased)

Thank you for providing provisional list of witnesses. Having taken instructions from Mrs Mackenzie, we respond as follows:-

- Mrs Lesley O'Brien (Mrs Mackenzie's sister): we request strongly that Mrs O'Brien is also called to give evidence. Mrs Mackenzie believes that her sister's attendance is essential to substantiate her own allegation that Nurse Beed administered two injections of diamorphine which are not recorded in the medical records.
- Nurse Brewer: we believe that she administered the haloperidol one hour before the late Mrs Richards' fall from her chair when she sustained a fracture of her hip. At the General Medical Council hearing it was examined whether the signature was that of "Beed" or **Code A**. We believe it is important to resolve who administered the haloperidol.
- Police investigation: Mrs Mackenzie questioned whether it is possible to call the investigating Police Officers to give evidence who undertook investigations into the late Mrs Richards case. She is reinforced in her view by such a process having been followed at an Inquest heard in Brighton of which the Coroner may be aware.

Please may we also request the following:-

- (i) That there is a pre-trial review and notice is given which is sufficient for Counsel to attend. We will need sufficient time to take instructions in this case; and
- (ii) Disclosure of a full set of medical records and the witness statements and medical evidence is given in advance of the pre-inquest hearing so that we are in a position to return to the Coroner with substantive responses at the pre-inquest hearing. We confirm that we will be Responsible for the reasonable copying fee for provision of these items.

We would like to thank the Coroner for his continuing thoughtful assistance in this matter and look forward to

hearing from you as soon as possible.

Kind regards.

Yours sincerely

John W

Blake I

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