

# MILLS & REEVE

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## Code A

Mr D C Horsley  
HM Coroner for Portsmouth and South East  
Hampshire  
Coroner's Office  
Room T20  
The Guildhall,  
Guildhall Square  
Portsmouth  
PO1 2AJ

22 August 2011

RECEIVED  
25 AUG 2011  
BY H.M CORONER

Dear Mr Horsley

### G Ric - Inquest

I write further to the pre-inquest review held on 12 May 2011. I note this matter is listed on Tuesday 24 October 2011. I am mindful that this is now only two months away.

Perhaps you would be kind enough to confirm with me the position in respect of the hearing bundle and, in particular, I would be grateful to receive a copy of the relevant documentation.

I understand this will include all the relevant medical records and prescription charts, along with the controlled drug book.

As you are aware, I am assisting Portsmouth Hospitals NHS Trust and also Dr Ian Reid.

I would be grateful for some guidance.

Perhaps you could indicate to me the areas where you feel that Dr Reid might be able to assist and provide evidence to the inquiry. I am mindful of the fact that Dr Reid's statement to the police in respect of this death is less than two pages in length and although he may be in a position to give evidence on general matters, I suspect that he will be unable to assist in respect of the fall and causes thereof.

I would also be grateful for your views on the evidence which you propose to hear from the expert Dr Black. I have a document headed "*Version 6 – A Complete Medical Report marked 02 2011 – Gladys Richards*". I am assuming this is the report of Dr Black, although I cannot see that he has signed this document and indeed the name and details of the expert are missing. Perhaps you would confirm the position with me. Perhaps you would also confirm that this is the only statement from Dr Black.

Having read these comments I feel it reads very much like a "clinical negligence report". Of course, you will be aware you are not in the position to receive such evidence at the hearing. In addition, do you believe this expert will be able to assist in respect of the cause to

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relevance of the treatment, care and drug regime insofar as the fall and its subsequent complications are concerned?

I am mindful of the timescales and I wish to be in a position to assist my client very shortly and perhaps I could ask you to let me have a response as quickly as possible.

Of course, it goes without saying, if I can assist you in any way then you must not hesitate to contact me.

Yours sincerely,

**Code A**