Our reference: SKF/

SKF/ I&S

Your reference:

Please ask for: Sarah Ratcliffe

Email:

sarah.ratcliffe@ I&S

Date:

28th September 2016

Pryers

FAO Mr Nicholas Rheinberg

nrheinberg@ I&S

SENT BY EMAIL

Dear Mr Rheinberg

Inquest concerning the death of

Child A

I write further to disclosure of the one-page summary regarding Child A s death which was today provided by the Countess of Chester Hospital.

We were of the understanding that a full investigation was taking place at the Trust regarding **Child A**'s death, which would result in a report, detailing the chronology of events, the issues involved, whether any errors were made, whether such errors could have caused or contributed to **Child A**'s death, and the lessons learned. We were told in August 2016, that this investigation was on-going and we would be provided with the Serious Untoward Incident Report.

We therefore expected to receive, prior to the Inquest hearing, a fairly lengthy and comprehensive document, dated August or September 2016.

We are therefore very surprised that the Trust has now provided such a short document, describing only the most superficial investigation, and one that bears the date 1st July 2015. Clearly this document is not the result of the major and detailed investigation we were told was still on-going only a few weeks ago.

We are very concerned that with less than two weeks until the Inquest hearing, no proper investigation report has been provided, which is arguably the most crucial piece of evidence in the Inquest. Without it, we and the family's counsel are quite simply unable to prepare sufficiently for the Inquest.

If we do not have such a report by Monday 3rd October 2016, we will very regretfully have to ask you to adjourn the hearing until the report has been provided and all parties have had chance to consider it.

We therefore respectfully invite you to revert to the Trust and see whether the full SUI report can be disclosed as a matter of urgency, if, indeed, that investigation is yet complete.

We look forward to hearing from you as a matter of urgency.

Yours sincerely

PD

Sarah Ratcliffe Pryers Solicitors LLP



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