

NLR/JM/ **I&S** CH

S Cross Esq
Countess of Chester Hospital NHS Foundation Trust
Countess of Chester Health Park
Liverpool Road
Chester
CH2 1UL

11 August 2016

Dear Mr Cross

Re: **Child A** deceased

My Officer has been chasing up missing statements in relation to the above Inquest together with a copy of the Serious Untoward Incident review. Of late I understand that enquiries have been ignored and bearing in mind the fact that it is now over a year since this poor infant died I am prepared to wait no longer. Please note that I require no later than Monday 22 August 2016 the following:-

1. A statement from Dr David Harkness
2. A statement from Dr Theresa McCormick
3. A copy of the Root Cause Analysis/Serious Untoward Incident report
4. All statements or transcripts of interviews produced in relation to the production of the above report with the identities of the individuals making the statements
5. A copy of the full medical notes.

Should I not have received the above by my deadline I will be serving penal notices. I do not like taking such drastic action but the lack of progress in this case is entirely unacceptable.

My intention is to hear the Inquest in October. I intend to call the following witnesses to give evidence:-

1. Dr Gail Beech
2. Dr Rajeev Shukla
3. Dr Christopher Wood
4. Dr David Harkness