

,1 7+( 6855(< &2521(5¶6 &2857

BEFORE HM SENIOR CORONER FOR SURREY, MR RICHARD TRAVERS

IN THE MATTER OF THE GUILDFORD PUB BOMBINGS 1974

3 3 , 5 \$ ' the Provisional IRA  
3 5 \$ 5 ' ( ' Royal Armament Research & Development Establishment  
3 5 6 & + ' Royal Surrey County Hospital  
3 6 ( & # b

3.3 The remaining disclosure is likely to consist of the remaining pen portraits for the Deceased, and a small number of further witness statements and miscellaneous documents. It will also include the report of Professor Thomas Hennessey.

*Further evidence*

3.4 A draft report from Professor Hennessey was received by the court in May 2022 and has been circulated to IRs. At the time of preparing these submissions CTI have not yet had an opportunity to carry out a detailed review to ensure that all matters outlined in the instructions are addressed. However this work will commence immediately, and CTI will liaise with Professor Hennessey to finalise his report for disclosure on Caselines as soon as possible. IRs are invited to make any submissions orally at the PIR or subsequently via email.

3.5 CTI understand that the MOD has continued to make extensive efforts to locate information in respect of security advice and the threat level system in place around the time of the GPB. Unfortunately, these enquiries have

minor amendments has been circulated along with these written submissions. The following key points are of note:

- 4.2.1 The hearings commence on ~~20~~<sup>15</sup> June 2022 and are listed ~~20~~ days (15<sup>th</sup> July is the final day of the listing).
- 4.2.2 The running order envisages ~~57~~ called witnesses; 51 read witnesses, and 7 TBC witnesses
- 4.2.3 CTI anticipate that ~~of~~ the remaining TBC witnesses ~~up~~ to 3 may be deceased/uncontactable. Accordingly, ~~the~~ numbers of called and read witnesses are now unlikely to change significantly.
- 4.2.4 As matters stand, the evidence is scheduled to conclude ~~Monday~~, 11<sup>th</sup> July 2022 (day 16). This has enabled a number of reserve days to be provided for towards the end of the listing.
- 4.2.5 Further, the latter part of the evidence consists mainly of read statements which CTI anticipate will not require significant court time. Combined with the reserve days, these factors mean that if sudden changes are required to the running order, or the called witnesses take longer than anticipated, this should ~~be~~ manageable

*Medical excusals / videolink*

- 4.3 Of the witnesses who are in the UK and who have previously been identified by CTI as ~~potentially~~ suitable for calling to give live evidence
  - 4.3.1 three seek to be excused ~~from~~ giving evidence ~~for~~ medical reasons; and
  - 4.3.2 three have indicated ~~difficult~~ with travelling for medical reasons, and sought to be excused from giving evidence in person.



5.4 CTI note that the report of Professor Hennessey is currently in draft form and accordingly, it would not be appropriate to disclose it to the media at this time. More generally, as to both reports, although Ms Gupta emphasises that the % % & L asking for these reports now with the intention of preventing the IXOO KHDULQJ WOULD BE THE PIRERS' never & 7. Nevertheless some risk of that occurring if the contents of the reports are reported on or discussed in the public domain prior to being introduced and explored in court. CTI also note that these two reports go to some of the core issues being explored in these inquests. In this regard, it is important that the evidence of Ms Hills and Professor Hennessey is not and will not be contained in their written reports. These indicate what they are likely to say will be given by each of them OLYH LQ RSHQ FRXUW 7KH PHGLD\ V SULPDU\ LQWH of the inquests and they will be able to hear and report on the evidence both witnesses as it is given.

5.5 For those reasons, CTI would not advocate disclosure of these reports in advance of the inquest hearings commencing. However, the need for reputable organisations such as the BBC to follow and report on proceedings accurately is acknowledged, particularly when many persons with an interest in the inquest – including some family members – will not be attending. The reports PD\ DOVR EH FRQVLGHUHG 3FRUH PDWHULD OV´ D recognised the desirability of making such materials available. For those reasons, it may be appropriate to release these materials (in their final form) shortly before or after the witnesses give evidence. CPs are invited to make submissions on that proposal at the PIR hearing if so advised.

*Hearing logistics and final preparatory steps*

- 5.6.1 HMC has previously confirmed that a transcript will be provided for the hearings. The timing of the transcript delivery is yet to be determined.
- 5.6.2 All witnesses whose evidence is to be introduced during the hearing have been contacted, informed whether their evidence is to be called or read, and provided with a copy of the first version of the running order. Called witnesses have also been provided with an expenses claim form. It is proposed that there is a further round of contact prior to the hearing in order to confirm the finalised dates and requirements for attendance (where applicable). This will include a copy of the final running order.
- 5.7 CTI do not feel that another PIR is necessary on any other matters arising out of the correspondence with LPS HU ZLOO and witnesses as appropriate.

OLIVER SANDERS QC

MATTHEW FLINN

ALICE KUZMENKO

*1 Crown Office Row, London*

5<sup>th</sup> May 2022