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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 Researdan Developmen Establishment
- ³ 5 6 & + ´ Royal Surrey County Hospiţal

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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 documen**1**s.will also include the report of Professor Thomas Hennessey.

Further evidence

- 3.4 A draft report from Professor Hennessey was received by the cou^htMay4 2022 and has been circulated to MRtsthe time of preparing these submissions CTI have not yet had an opportunity to carry out a detailed retwieewasure that all matters outlined in the instructions are addrested vever this work will commence immediately, an CTI will liaise with Professor Hennessey to finalise his report for disclosure on Caselines as soon as postsible are invited to make may 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 nfortunately, hese enquiries have

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

- 4.2.1 The hearings commence onth20une 2022 and are listed 200 days (15th July is the final day of the listing).
- 4.2.2 The running ordeenvisage \$7 called witnesses; 51 read witnesses, and 7 TBC witnesses
- 4.2.3 CTI anticipate that the remaining TBC witnesses to 3 may be deceased/uncontactable. Accordingly, **the**mbers of called and read witnesses are now unlikely to change significantly.
- 4.2.4 As matters stand, the evidence is scheduled to conclu**kle nod**ay,
 11th 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 willnot 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 are geable

Medical excusals / videolink

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

- 4.4 A summary of the UHDVRQVIRU HDFK ZLWQHVV DQG & 7, ¶V contained in aconfidential Schedule which will be circulated to IPs with these submissions.
- 5. Other issues

BBC application

- 5.1 On 14th April 2022 HMC received a request frol Mrs Tanya Gupta of the BBC for the report of Ms Lorna Hills, which has been circulated to IPs and was discussed at the previous PIR heariAg.an evidential document, the report falls within the scope of § R I + 0 & Inf on a previous application from the BBC for access to material the the provisions of §7(2) of that ruling.
- 5.2 HMC invited Ms Gupta to set out her request in writing, with reasons, so that the matter could be considered **IB**₃**s** and determined by the court at the PIR hearing. A written request weaduly provided on20th April 2022 and subsequently circulated to IPIshis request was expanded to include the report of Professor Hennessey.
- 5.3 The BBCUHIHUV WR WKH & KLHI & RURQHU¶V *XLGDQFH WKH 0HGLD´ DQ (271-+229). ISel2n phases Sthat Datace with WKDW JXLGDQFH WKH %% & LV D ³SURSHU SHUVRQ´ material at issue, and that it is not seek an or privacy of any witness. It explains that it needs access to the material in order to understand and report upon the proceedings propertycites wider issues it is reporting on (beyond the scope of timequest) which could be assisted the report of Lorna Hills, and notes its previous reporting on IRA chronology is whether will be addressed in the report of Professor Hennessey.

- 5.4 CTI note that the report of Professor Hennessey is currently in draft form and accordingly, it would nobe appropriate to disclose it to the media at this time. More generally, as to both reports the ugh Ms Gupta emphasises that %% & L Vaskär@gRoWthese reports now with the intention of empty time the IXOO KHDULQJ Woto the VtXaPtRefretules 'neverTheless some risk of that occurring if the contents of the reports are reported on or discussed in the public domain prior to beign introduced and explored in coutCTI 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 evidence of Ms Hills and Professor Hennessey not and will not be contained their written reports these indicate what they are likely to sabut 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 thenexide both witnesses as it is given.
- 5.5 For those reasons, CTI would not advoctate disclosure of these reports in advance of the inquest hearings commencing. How the enjoy of for reputable organisations such as the BBC to follow and report on provide accurately is acknowledged, particularly whermany persons with an interest in the inquest ±including some family member ±will not be attending The reports PD\ DOVR EH FRQVLGHUHG ³FRUH PDWHULDOV´ D recognised the desirability of making such materials availated to reasons it may be appropriate to release these mate(iiialtheir final form) shortly before or a far the witnesses give evidence Ps are invited to make submissions on that proposal at the PIR hearing if so advised.

Hearing logistics and final preparatory steps

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- 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 acopy of the first version of the running order. Called witnesses have alsee to provided with an expenses claim form. It is proposed that there is a furtheound of contact prior to the hearing in order to confirm the finalised dates and requirements for attendance (where applicable) swill include a copy of the final running order.
- 5.7 CTI do not feel that another PIR is necessônny any other matters arisinolget MXQLRU FRXQVHO WHDP DQG +∈ondestordes Boole and witnesses as appropriate.

OLIVER SANDERS QC MATTHEW FLINN ALICE KUZMENKO I Crown Office Row, London

5th May 2022