



# MDU

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**Chief Executive**

The Rt Reverend James Jones,  
Chair,  
Gosport Independent Panel,  
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Our ref: CMT/GJS

Date: 24<sup>th</sup> November 2017

Dear Bishop,

Thank you for your letter of 9<sup>th</sup> November with the certificate of completeness of search and provision of material to the Panel.

As I know you will understand, given Dr Barton's wish not to waive privilege, it is not possible for us to complete the form as it stands. May I though assist in assuring you of the following:

- A thorough search of materials held by the MDU has been undertaken.
- The materials which are not privileged are we believe available to you through other individuals or organisations, and you have previously agreed that it is unnecessary we then duplicate disclosure.
- The remaining materials are privileged. As you know, Dr Barton has asserted her right to legal privilege. I wrote to you about that on 2<sup>nd</sup> March 2017. Although I have not heard back, I appreciate you will understand this position.

I should add that Dr Barton was and remains content that you should have sight of statements from factual witnesses which would not otherwise be available to the Panel. We have endeavoured to seek consent for the release of those statements, and disclosure has been made of all such statements where consent has been forthcoming.

I hope this is of assistance in assuring you of the completeness of the exercise undertaken by the MDU.

Yours sincerely,

**Code A**

Dr Christine Tomkins  
**Chief Executive**