

MILLS & REEVE

Your reference:
Our reference: CRLS/3000019-1077
Document number: 226584091_1.docx

Direct line: **Code A**
Direct fax: **Code A**

Bishop J Jones KBE
Gosport Independent Panel
Wellington House
133 - 155 Waterloo Road
London
SE1 8UG

27 February 2018

Dear Bishop

Gosport Independent Panel – search and provision of material

Thank you for your letter of 16 January 2018 addressed to Stuart Knowles of this firm and enclosing a certificate of completeness of search which you asked him to complete.

Mills & Reeve LLP can confirm that it acted upon the instruction of its client, Portsmouth Hospitals NHS Trust, and disclosed to you relevant material held by us that would otherwise attract legal privilege. Prior to doing that we conducted a reasonable search for documents. You may recall that we made a subsequent disclosure to the Panel when a mis-filed folder was discovered.

It is our understanding that Portsmouth Hospitals NHS Trust was one of the few, if not the only, body to waive legal privilege even though there was no obligation on the Trust to do so.

Given our size and the nature of the role of the external legal adviser (including our duties to other clients), we are not able to make the declarations that you seek in your certificate. We trust that the confirmation contained in this letter that we complied with our client's instructions will suffice.

You may be aware that we are in separate communication with Ms Christine Gifford over the redaction of names from the documents we were instructed to provide to the Inquiry.

As Stuart Knowles will be out of the office for a time, please direct any future correspondence to Richard Sykes, whose contact details appear on this letter.

Yours faithfully



Mills & Reeve LLP

Mills & Reeve LLP
78-84 Colmore Row
Birmingham
B3 2AB

Tel: +44(0)121 454 4000
Fax: +44(0)121 200 3028
DX 707290 Birmingham 65
info@mills-reeve.com
www.mills-reeve.com

Birmingham Cambridge Leeds London Manchester Norwich

Mills & Reeve LLP is a limited liability partnership authorised and regulated by the Solicitors Regulation Authority and registered in England and Wales with registered number OC328165. Its registered office is at Monument Place, 24 Monument Street, London, EC3R 8AJ, which is the London office of Mills & Reeve LLP. A list of members may be inspected at any of the LLP's offices. The term "partner" is used to refer to a member of Mills & Reeve LLP.