

[REDACTED]

SOLICITORS

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Tel:
Fax:

YOUR REF.	OUR REF.	DATE
2209/97CL	RM.JC.5614	18 March 1998

Department of the Director of Public Prosecutions
Royal Courts of Justice
BELFAST
BT1 3NX

Dear Sirs

RE: R -V- PAUL RODNEY MARC HOBSON
MAZE M C: 25-03-98 - PROPOSED SITTING CRAIGAVON M C
20-04-98 AND THEREAFTER

I refer to my letter of the 25th February 1998 and my detailed discussions with your Mr Davidson on 13th March 1998. I confirm I have asked the Craigavon Court Service to commence the mixed committal on Monday 20th April 1998 and suggested to them that it would be appropriate that at least five court days be given over to this complex case.

I confirm and you will be aware, that the Disclosure Unit at Knocknagoney have been asked for many items. These items are the minimum I require to try to carry out a proper preliminary investigation.

I acknowledge your Mr Davidson's comments because of a mix up of the interview documents in this case which comprise about 104 pages will be substantially edited. I trust that immediately the edited copies are available a set will be supplied to me and I accept service on behalf of my client Mr Hobson. Before a copy is sent to the Court, perhaps it would be best if I could see the papers for perhaps seven days to avoid the necessity of any further editing applications if possible.

With regard to the witnesses who appear in the preliminary inquiry papers I would advise you that oral evidence is required from the following:-

1. Jonathan Samuel James Wright.
2. Alan Keith Neill.
3. Robert Atkinson. ✓
4. Edward Hunniford.
5. [REDACTED]

Also at: [REDACTED]

[REDACTED]

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I would also wish full time Reserve Constable Denise Cornett and full time Reserve Constable P40 to give evidence as part of the mixed committal. As discussed with your Mr Davidson both these witnesses are not presently part of the Crown case. If that remains the position I will obviously have the necessary witness summons prepared once a firm date is fixed as the question of effecting service is obviously difficult as I do not know, nor would I particularly wish to know, the home addresses of either police officers.

I would be obliged if the Department can immediately check the availability of both persons for the week commencing 20th April 1998 and confirm firstly that they are available and secondly advise me as to how service of a witness summons may be effected - perhaps at Portadown Police Station.

Naturally any proposed date is subject to the provision of the materials I requested initially in my letter of the 25th February to the Department and secondly in my letter of the 10th March to the Disclosure Unit. It should be stressed that there are undoubtedly substantial written materials concerning Police officers Neill, Cornett, Atkinson and P40 which may well be in a separate file - namely that relating to any complaints made by the Hamill family. I understand there may well be interviews, comments or statements made after caution and I would respectfully submit that same are entirely relevant and could be disclosed at this stage particularly before any committal and cross examination of the above persons during the course of same.

I hope that I have detailed to you a full and complete list of witnesses who are required but matters may arise following the receipt of the disclosures I have asked for. I would wish to reserve any final decision pending same. I appreciate that the Department are doing their best to facilitate the Defence in this case at this time but obviously not every problem can always be quickly solved. If anything arises other than the matters I have sought please contact the writer.

I anticipate I am likely to be involved in court and other matters so it may be difficult to contact me by telephone over the next few days.

Yours faithfully

[REDACTED]