

MONTEITH, LL.B

ATTORNS

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YOUR REF.

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DATE

2209/97CL

PM.JC.5614

25 February 1998

FIRST CLASS

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

Dear Sirs

Re: R -V- PAUL RODNEY MARC HOBSON
CRAIGAVON M C: 13-03-98

I have now received:-

1. The preliminary enquiry papers and:-
2. An initial box of disclosures.

There will be a mixed committal in this case but at this stage I am unable to advise you as to the exact number of witnesses who will be required to give evidence in person. Some will depend on further reading of the papers received to date and whether or not some of the matters contained in this letter can be dealt with by way of correspondence between my office and your office.

During the stages before my client received his PE papers there was extensive discussion between myself and the Assistant Director Mr Kitson. Some of those discussions concerned the nature of the tape recorded interviews with my client and what portions of them should be removed prior to the preparation of the final PE papers. I had certainly been of the impression that a very substantial portion of the transcript of the tape recorded interviews would be edited because it contained matters which were entirely prejudicial and without any probative basis. In addition a substantial portion also contained matters referring to two witnesses who no longer feature in either the PE papers or the disclosed documents received to date. Accordingly, these portions are clearly inadmissible.

I do not propose to go into every word or line of the interviews supplied in the PE papers but suffice to say many dozens of pages should be deleted in view of my above comments. I would also

advise you that my client has not received the first ten pages of the first transcript in his PE papers and they should be supplied to me forthwith. I feel that perusal of the interviews by someone who has knowledge of the file to date will result in substantial editing without any further discussion as the issues are so easily seen. Please confirm.

I would require also by return copies of the notebook entries of the following:-

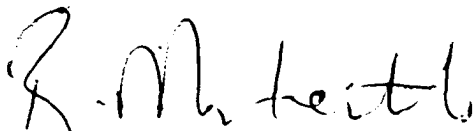
1. Constable Allen Neill.
2. Constable Denise Cornett.
3. Reserve Constable Atkinson.
4. Reserve Constable P40

I would also require copies of their original handwritten statements and any notes, statements, documents, materials or any other matters made by each and all of them at anytime relevant to this enquiry.

I would also require copy notebook entry of PC Gordon Cooke.

Other matters may well arise during the course of dealing with the papers supplied to date and will contact you as and when required.

Yours faithfully



R MONTEITH

