

YOUR REF.

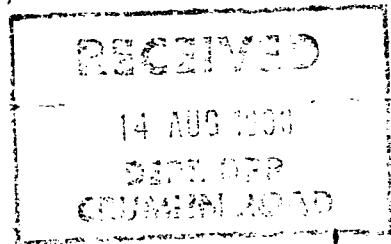
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DATE

RM/JP/5614

12 August 1998

Department of the Director of
Public Prosecutions (Ref. Belfast Crown Court)
Royal Courts of Justice
Chichester Street
BELFAST



Dear Sirs

RE: R V MARC HOBSON
BILL NO: 122/98

The above case is to be mentioned on 11 September.

I confirm that substantial disclosures have been received prior to the return for Trial in this case. However I would draw the following matters to your attention:-

1. The Defence in this particular case would require full and complete Disclosure. Accordingly any outstanding matters should therefore be disclosed forthwith.

2. It would appear clear that matters relating to the basis for Hobson's initial arrest have not been fully disclosed, i.e. details, statements and documents relating to at least two persons who purported to give evidence at some stage have not been disclosed. Also any materials relating to their subsequent discontinuance of evidence or other circumstances have also not been disclosed.

3. It is also apparent that a considerable volume of material relating to the 27 April 1997 and the conduct of Crown witnesses and Police Officers in or about Portadown Police Station and the completion of statements, taking of statements, de-briefing and other matters are within the possession of the Crown but have not been disclosed to the Defence. I put you on Notice that all documents, actions, memoranda, original witness statements, copy witness statements and documents of any nature whatsoever relating to the case and the Police activities of 27 April 1997 should be disclosed forthwith. This should refer not only to Constable Neill and clearly refers to the matter in the depositions but also to each and every Police Officer in anyway involved in the case.

4. Although exact dates are not apparent from Constable Neill's deposition, it is also clear that on at least one other occasion ~~if not more, there were "de-briefings" or the taking of other~~

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statements from not only Constable Neill but other persons relevant to this case and again the Defence require all notes, documents and statements of any nature whatsoever connected with the said taking of other statements relevant to this case which have not yet been disclosed.

5. The Defence also requires full Disclosure of all documents, notes, materials of any nature whatsoever in relation to the identification/confrontation which took place between the Defendant Hobson and Constable Neill at Lurgan Police Station and the steps taken to have Constable Neill attend Lurgan Police Station.

6. There appears to be no reason why these matters cannot all be attended to well before 11 September and I look forward to hearing from you.

All photographs, maps, videos, and other materials which have not yet been supplied should also be supplied - three copies of each please for Solicitor and both Counsel.

The Defence would also require Disclosure of all materials within the possession of the Crown relating to the Civilian witnesses within the depositions and in particular the Girvan families, Hamill families and Mr Prunty which have not been disclosed.

Yours faithfully