
Transcript of the Inquest

Date: 6th July 2022

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CORONER: Good morning everyone. Mr SANDERS, I think we are starting this morning with Mr FINDLAY, is that right?

MR SANDERS QC: That's correct, sir, yes.

CORONER: (pause) Sorry, my computer is just taking a little moment.

MR SANDERS QC: Oh, sir, while I remember, have you got the video notice to read out?

CORONER: Yes, I have, I have got it here. Sorry, I am just waiting for my computer to link to the wireless. Okay. I think we have two video-link witnesses.

MR SANDERS QC: Yes, sir.

CORONER: Are they both on line?

MRS NIN: They are ready.

CORONER: Right. I shall just read out this warning, and then I will come and we will deal with the witnesses.

I hereby give permission for the use of live video to enable participants to access these court proceedings. It is a contempt of court to record, play, dispose of or publish a recording or transcript of the proceedings. That means it is a criminal offence to make or attempt, or to record or broadcast these proceedings.

Good, thank you. So the first witness is Mr Alexander FINDLAY.

Mr FINDLAY, can you hear me?

MR FINDLAY: Yes.

CORONER: Thank you, we can hear you too, nice and clearly. Thank you for making yourself available this morning. I am sorry there was a delay on the previous day we were hoping to see you. But you are here now, so we will take your evidence. Can you help me, are you going to take the affirmation of the oath this morning?

UNKNOWN MALE: Just say 'the oath'.

MR FINDLAY: Just read that?

UNKNOWN MALE: (inaudible)

MR FINDLAY: Huh?

UNKNOWN MALE: Just say 'the oath'. Just say, tell them 'the oath'.

MR FINDLAY: I'll take the oath.

CORONER: Thank you very much. Have you got it there to read? If you can hold the Bible for me and read the oath at the same time, that would be very helpful. Thank you.

MR ALEXANDER FINDLAY (sworn)

CORONER: Thank you very much. You can put that down. Would you give me your full name, please?

MR FINDLAY: It's Alexander FINDLAY.

CORONER: Thank you. Mr FINDLAY, I am Richard TRAVERS, I am the Senior Coroner here in Surrey, and I am going to pass you over in a moment or two, to Mr SANDERS QC, who will be asking some questions of you on my behalf. Before I do so, can I just ask, please, your voice is nice and clear so just keep going as you are, if you would. Concentrate on the questions you are being asked, please, and I would ask you not to run ahead too quickly, because people will be trying to take a note of what you are saying, and so do not rush ahead too quickly, please. I will pass you over to Mr SANDERS and I will leave him to deal with who is there with you at the moment. Thank you. The camera will move now, Mr

FINDLAY, and will pick Mr SANDERS up, if you just wait a moment. I am just waiting for the camera to move. There we are.

So you will see Mr SANDERS. There. Thank you.

MR SANDERS QC: Good morning, Mr FINDLAY. Can you see and hear me?

MR FINDLAY: Yes.

MR SANDERS QC: Thank you. Can I start by asking you, please, just to let us know, you don't need to give your full home address, but where are you living at the moment?

MR FINDLAY: Rutherglen.

MR SANDERS QC: Thank you very much. And are you working, or are you retired now?

MR FINDLAY: I'm retired.

MR SANDERS QC: Thank you. The first thing I need to do is just to take you back to the three statements you made to the police at the time of the Guildford Pub Bombing, just to confirm that they are your statements and that they show your signature. So they will come up on the screen and I will just ask you to have a look at those. The first one is on our system at 20-21, and it's a statement of the 9th of October 1974. There we go. Mr FINDLAY, can you see that?

MR FINDLAY: Yes.

MR SANDERS QC: And that's got your name, Alexander FINDLAY, in the Household Cavalry at Pirbright, and it's dated the 9th of October. Is that your signature there?

MR FINDLAY: Yes.

MR SANDERS QC: Thank you. And if we just go down to the bottom just to see, at the end, is that your signature again?

MR FINDLAY: Yes.

MR SANDERS QC: Thank you. There is just two more to look at. The next one is 20-26, and that's dated the 14th of October. Is that your signature again there?

MR FINDLAY: I can't see the signature.

MR SANDERS QC: Under the date ...

MR FINDLAY: Yes.

MR SANDERS QC: Thank you. And just down at the bottom again, is that your signature?

MR FINDLAY: Yes.

MR SANDERS QC: Thank you. And finally, it's the next page on the database, 20-27.

MR FINDLAY: Yes.

MR SANDERS QC: Thank you. And then just at the end. There, just where the arrow is pointing, is that your signature there?

MR FINDLAY: No, it doesn't look like it. Oh yes, ah, yes.

MR SANDERS QC: Thank you. Those were obviously three statements that you made to the police in the weeks after the bombing. Am I correct that you have had an opportunity to re-read some typed up versions of those statements to refresh your memory?

MR FINDLAY: Yes.

MR SANDERS QC: Good. And can you confirm that the contents of the statements are true, please?

MR FINDLAY: Yes.

MR SANDERS QC: Very good. Mr FINDLAY, the Guildford Pub Bombings were the 5th of October 1974, and you were 19 at the time, is that right?

MR FINDLAY: That's right.

MR SANDERS QC: And I am just going to ask you to confirm, we have got a couple of photographs of you from the time, and I just want to check that they definitely show you and to remind you of what you looked like at the time, and the first is at 4-215. No, that was it.

MR FINDLAY: Yes.

MR SANDERS QC: Yeah, that's you in ...

MR FINDLAY: That's me.

MR SANDERS QC: ... in hospital with your quite severe burns. And there's another one which is at 4-217. There on the left, is that you?

MR FINDLAY: Yes.

MR SANDERS QC: Excellent, thank you very much. At the time of the Guildford Pub Bombing, you were in the Royal Household Cavalry, correct?

MR FINDLAY: That's correct.

MR SANDERS QC: And when had you joined up? When did you enlist?

MR FINDLAY: '74.

MR SANDERS QC: Was it long before the bombings, or shortly before?

MR FINDLAY: Still in training when the bomb.

MR SANDERS QC: So do you think you might have been in a matter of weeks or a matter of months?

MR FINDLAY: I think it was weeks.

MR SANDERS QC: Weeks.

MR FINDLAY: I think it was weeks of basic training

MR SANDERS QC: Yes, in basic training. The evidence that we have heard is that most of your colleagues had joined up three weeks before the bombing, you were just coming to the end of your third week of training. Does that sound about right?

MR FINDLAY: If I can remember, I went down, down in, three weeks or four weeks before I, I was due to enlist.

MR SANDERS QC: Right? Down to Pirbright?

MR FINDLAY: Down at Pirbright.

MR SANDERS QC: And then you were, what were you doing in those three or four weeks, just staying on the camp?

MR FINDLAY: Yes.

MR SANDERS QC: Right, thank you. Did you stay in the army after the bombings?

MR FINDLAY: I stayed in the army while I was hospitalised. But my mother, she wanted me out the army, after what happened.

MR SANDERS QC: Right, so you left, you never went back to the barracks?

MR FINDLAY: I went back to the barracks, then they, they put me on casuals, out of barracks from Pirbright.

MR SANDERS QC: Right?

MR FINDLAY: So I stayed there till I got out, out of the army. In fact, I was at RAF Chessington, I think when I come out the army. I'm not right sure about all this.

MR SANDERS QC: Right. But you didn't, you didn't stay in, you didn't have a military career, you left the army?

MR FINDLAY: I left the army, yes.

MR SANDERS QC: Right. And how long were you in hospital for, do you remember?

MR FINDLAY: I got operated in Guildford hospital. Then I went to Cambridge Military Hospital for a skin graft. Then I went to RAF Chessington. So I think it was about three or four months.

MR SANDERS QC: Right, thank you very much. Your basic training, you were at Pirbright. Is it right that you were undergoing training together with recruits to other regiments, so that you were together with Guards, Scots Guards, Irish Guards, Welsh Guards, and so on?

MR FINDLAY: That's correct.

MR SANDERS QC: Although your unit was going to be the Household Cavalry?

MR FINDLAY: The Life Guards, Household Cavalry.

MR SANDERS QC: Right, thank you very much. Do you remember how far Pirbright was from Guildford town centre?

MR FINDLAY: No, I can't remember, but I know we had to get a train to Guildford, so I, I don't know what distance it was, I cannot answer that.

MR SANDERS QC: Can you remember what you, what you had done on basic training prior to the bombing, what the course was like?

MR FINDLAY: Well as far as I can remember the course was good, but I couldn't have been on that long, 'cause we were not issued with our weapons yet. We were just getting introduced to weapon training, and that's about that, I cannot remember.

MR SANDERS QC: So had you been doing things like assault courses and marching and drilling, and so on?

MR FINDLAY: Well, doing assault courses, and marching and drilling. Assault course, we went through that a few times.

MR SANDERS QC: Yes. And being taught how to look after your uniform and keep your bunk tidy, and that sort of thing?

MR FINDLAY: Room inspections and locker inspections, things like that.

MR SANDERS QC: Yeah. Do you remember any classroom or lecture-based sessions as part of the basic training?

MR FINDLAY: No, I cannot remember that, I can remember the lecture room, but yeah, safety wise, I think we had a lecture on safety and to be aware of what's going around about you.

MR SANDERS QC: Right, and would that have covered possible service threats, and the IRA, and so on?

MR FINDLAY: Well, that was, that's, yes, that would be correct.

MR SANDERS QC: Right. Do you remember anything about what you were told, what briefing you received about that?

MR FINDLAY: Just to be aware of parcels, and things like that.

MR SANDERS QC: Right. Were you given any guidance about what to do or what not to do when you were in the town when you were off duty?

MR FINDLAY: I never gave it a thought, I was 19 at the time.

MR SANDERS QC: No, I understand. Was the, the night of the bombing, was that the first time you had gone into Guildford?

MR FINDLAY: I think we were in Guildford the week before that, but I'm not right sure on that.

MR SANDERS QC: Right.

MR FINDLAY: That's the first time that I had been in that pub.

MR SANDERS QC: I see. Oh, I think you say in your statement that you had been into the, into another pub in Guildford previously, in the Three Pigeons?

MR FINDLAY: We went in, we went to the Seven Stars first, we went to the Three Pigeons, I was just reading my statement earlier on, but I don't think we got a drink in the Three Pigeons, we just walked up to the Horse and Groom. We were in sort of looking for some of our mates that might have been in the pub, but I, I cannot remember having a drink in it.

MR SANDERS QC: All right, well I am going to come on to what happened on the night in question in a moment, but just before we get there, just a few more questions about your training. Do you have any recollection of there being a thing called the BIKINI alert system at the barracks?

MR FINDLAY: Never heard of it.

MR SANDERS QC: Do you remember ...

MR FINDLAY: (inaudible)

MR SANDERS QC: ... any signs up saying 'black alert' or 'black special', or 'amber alert', anything like that?

MR FINDLAY: Well now you've come to mention, I, I think they had something up at the, the watch room as you, as you went out at Pirbright, but I'm not quite sure on that.

MR SANDERS QC: Right.

MR FINDLAY: They had some kind of ...

MR SANDERS QC: Go on, Mr FINDLAY, sorry, I think you just cut out there.

MR FINDLAY: There was some kind of warning system at the guardhouse as you, you left the barracks, but I cannot remember what it was.

MR SANDERS QC: No. Do you remember any requirement to read part 1 or part 2 orders that might be on a noticeboard in your, one of the buildings?

MR FINDLAY: No, I cannot remember anything like that.

MR SANDERS QC: No. Were you aware when you were at Pirbright that there had been an IRA attack against the Household Cavalry the year before?

MR FINDLAY: Is that the time the bomb went off and they killed the horses, something like that?

MR SANDERS QC: So there was, the Royal Household Cavalry were in camp just outside Pirbright ...

MR FINDLAY: No, I cannot remember.

MR SANDERS QC: No.

MR FINDLAY: Is that (inaudible)? Thank you. (?)

MR SANDERS QC: When you were off duty, were you, were there any requirements or rules about leaving the camp in uniform, or not leaving the camp in uniform, do you remember?

MR FINDLAY: I cannot remember leaving the camp apart from that Saturday night when we were in training.

MR SANDERS QC: Right, but do you remember if there were any rules about not wearing uniform when off duty when out of the camp?

MR FINDLAY: No, I can, I can remember leaving the camp with an army suitcase, but that's about it.

MR SANDERS QC: Right. Do you remember if there were any rules or regulations about where you could go or what you could do when you were off duty and you were off the camp?

MR FINDLAY: No, I cannot remember. We just, we just went out (inaudible) that was that Saturday.

MR SANDERS QC: Yes.

MR FINDLAY: (inaudible)

MR SANDERS QC: On the day of the bombings, Mr FINDLAY, do you remember what you were doing during the day before you went into Guildford?

MR FINDLAY: If I can remember, I think we had an inspection, I'm not right sure, so we had to have that so that we go out on the Saturday night. That's what I can sort of remember, that sticks in my head.

MR SANDERS QC: So you had to pass an inspection in order to be given a pass to leave the camp?

MR FINDLAY: Something like that, my memory recalls me.

MR SANDERS QC: Right. But you, you don't think that this was the first time you had left the camp, because you mentioned having been into the Three Pigeons the week before?

MR FINDLAY: I think we were in Guildford the week before, but I cannot, I don't think I was in the Three Pigeons that week, but it was the second week we went to that Three Pigeons. I didn't even know the name of the pub, till you, till I read it in my statement. But I don't, that second week we went in, I did not have, we did not, I don't, we did not have a drink in it.

MR SANDERS QC: No, no, all right. So just to go back to your statement, I just want to confirm some details with you. You left Pirbright just before six o'clock in the evening to catch a 6.20 train to Guildford, is that right?

MR FINDLAY: That's correct.

MR SANDERS QC: Right, and you were with a group of friends. Do you now remember any of the people you were with?

MR FINDLAY: Barry RUSHTON, Stevie COOPER and John, the, the persons that, that passed away, John and Willy.

MR SANDERS QC: Yes.

MR FINDLAY: And there was somebody else there, I cannot remember that one.

MR SANDERS QC: All right. I am just going to show you some photos, and if you just bear with me while we get them on the screen. So the first two are in the sensitive photos, and the first is a photo of John HUNTER, and it's just his army mug-shot, and it's A78. (pause) Just bear with us, Mr FINDLAY, it'll just take a moment. (pause) There, that is a photo of John HUNTER. Do you recognise him?

MR FINDLAY: John. Yeah, I recognise John.

MR SANDERS QC: Thank you. Sorry, we're just having some technical difficulties at this end, but the next photo is A74, and it's the army mug-shot of William FORSYTH. There, do you recognise William FORSYTH there?

MR FINDLAY: Not really, no. No, I cannot remember, no.

MR SANDERS QC: No, that is all right. I am just going to ask you about the others that you mentioned in your statement. So, this is just in the main album of photos. The first is, we have got Jimmy COOPER. I think you mentioned Stevie COOPER later in your statement, but you mention...

MR FINDLAY: Aye, Jimmy COOPER, I can remember that now.

MR SANDERS QC: Yeah, so Jimmy COOPER, he is at 4-567, please. In the hospital bed, there. Do you see on the right, does he look familiar to you? Is that Jimmy COOPER there?

MR FINDLAY: He looks familiar.

MR SANDERS QC: Yeah, the next ...

MR FINDLAY: I think I was in the bed next to him. I cannot remember.

MR SANDERS QC: You were in the bed next to him?

MR FINDLAY: Aye, no, he was across, across from me.

MR SANDERS QC: All right, that's helpful, thank you. And then Barry RUSHTON is at 4-293.

MR FINDLAY: I remember Barry. He came from Salford in Manchester.

MR SANDERS QC: He came from Salford? Thank you.

MR FINDLAY: Aye, in Manchester, if I remember.

MR SANDERS QC: All right, and then finally Brian SCANLAN. Do you remember Mr SCANLAN?

MR FINDLAY: I've seen that in my statement. I cannot remember a Brian SCANLAN.

MR SANDERS QC: Well let me, well let's see the photos. 4-305.

MR FINDLAY: Not, it does not ring bell, I cannot remember that name.

MR SANDERS QC: No, that's quite all right, Mr FINDLAY. Obviously this is 48 years ago and you weren't in the army for very long, so they weren't people you knew very well. You tell us in your statement that you arrived in Guildford about seven o'clock in the evening, and you went first to the Seven Stars. Do you remember going to the Seven Stars?

MR FINDLAY: Yes.

MR SANDERS QC: And had you ever been there before?

MR FINDLAY: Not that I'm aware of, no, I cannot remember that. I think the Seven Stars was the first pub we went to.

MR SANDERS QC: Do you know who chose it or how you decided to go there?

MR FINDLAY: It was just a group of us, we went into the first pub, 'cause that was the first time they've ever been there, so then we heard about the Horse and Groom.

MR SANDERS QC: Right, so you've heard about the Horse and Groom when you were in the Seven Stars?

MR FINDLAY: Uh huh.

MR SANDERS QC: And you stayed in the Seven Stars for about 40 minutes, about three quarters of an hour, and then you and Barry RUSHTON and Brian SCANLAN went to the Three Pigeons but didn't stay in there for a drink, just to put your heads round the door?

MR FINDLAY: That's what I remember.

MR SANDERS QC: And that was a pub that you had been in before, you had been in there the week before, is that right?

MR FINDLAY: I cannot remember being in it the week before, but, I cannot remember.

MR SANDERS QC: No. Were all the pubs quite close together?

MR FINDLAY: There was a wee walk to the Horse and Groom, but it was not that far.

No, I would say they were all quite close together.

MR SANDERS QC: Yeah, just a couple of minutes away from each other?

MR FINDLAY: Yes.

MR SANDERS QC: All right. So you went from the Three Pigeons up to the Horse and Groom. Do you remember much about the pub?

MR FINDLAY: I can remember it was quite busy. And it was, I thought it was back to back seating. But no, just a bit (?), and it was busy.

MR SANDERS QC: Yes. I am just going to show you a photo of the front of the pub just to see if it prompts any memories. So this is at 7-1352. There. So it's a white building. This is after the building, so you will see it's damaged. But does that look familiar to you as the front of the pub?

MR FINDLAY: Oh, the front of the pub. Aye, I come out the window, and collapsed in the street after it, yeah, but that looks familiar. But no, I, I came out through a window or a door that was blew off, or something like that.

MR SANDERS QC: All right, that's helpful thank you. I just want to ask you about the layout of the pub inside, and I am going to show you a floor plan, which is at 1-3. Do you see that, Mr FINDLAY?

MR FINDLAY: Yes.

MR SANDERS QC: Do you see at the bottom there is North Street? And immediately above where it says North Street, that is where the front door was,

where you would have gone in. And then on the right there was an alcove leading to the gents' toilets. On the left there was a smaller alcove in the corner, and then in the middle on the left there was a larger alcove with a fireplace and a jukebox. And then the bar is on the right. Do you see that?

MR FINDLAY: Yes.

MR SANDERS QC: Does that look familiar to you in terms of the layout of the pub?

MR FINDLAY: It looks quite familiar, but I can remember when we were seated, it was right in front of the jukebox, I can mind (?) that.

MR SANDERS QC: Right, that is very helpful, thank you. I am just going to show you a couple of photos just to help you get your bearings. Before I do that, can you see where it says 'bar', where the bar is? There, where the arrow is moving up and down, that is where the bar is.

MR FINDLAY: Uh huh, yes, yeah, I see it now.

MR SANDERS QC: And do you see just to the left of the bar in the middle of the floor there are two squares, do you see that?

MR FINDLAY: Yes.

MR SANDERS QC: Yeah, that, those are marked pillars. I am just going to show you these pillars, just to try and refresh your memory. So this is a photo, it is at 7-1349. So that is a photo taken from someone inside the front door, with their back to the front door, and that is a photo of the bar on

the right, and then the two pillars on the left, if you just move it down a little bit. There.

MR FINDLAY: Yeah, I see it.

MR SANDERS QC: Does that look familiar to you?

MR FINDLAY: I cannot remember that at all.

MR SANDERS QC: No. And just from the opposite angle, it's at 4-680. Those are the same pillars but taken from, with the bar just in the bottom right hand corner of the photo, and you can see just beyond the pillars, on the left there is the fireplace, and just behind ...

MR FINDLAY: Aye, I see it.

MR SANDERS QC: ... just behind there, the middle pillar, the pillar that is in the foreground, and there is the jukebox. Do you see that?

MR FINDLAY: Where's the jukebox? I cannot ... oh, I, I see it, aye.

MR SANDERS QC: Yeah. And then one more photo. This is at 7-1351. There is the jukebox, there on the left. So this is taken from inside that alcove, where the, where the fireplace was. And you can see the pillars just in front of the bar.

MR FINDLAY: Yeah, I can see it.

MR SANDERS QC: So it wasn't a particularly big pub was it, Mr FINDLAY?

MR FINDLAY: No, it was not really a big, giant pub, but it, it was crowded. I can remember that.

MR SANDERS QC: Do you remember if the majority of the people in there were army personnel?

MR FINDLAY: I would say the biggest majority were army, and from the, the ladies' camp as well.

MR SANDERS QC: Yes, so the ladies' camp was the Women's Royal Army Corps, the WRAC.

MR FINDLAY: Correct.

MR SANDERS QC: So there were recruits from the WRAC in there, correct?

MR FINDLAY: I would say so.

MR SANDERS QC: Yes. And there were also recruits from Pirbright and from other local camps?

MR FINDLAY: Yes, I would imagine so, aye.

MR SANDERS QC: Yeah.

MR FINDLAY: I'd say, I would say most were from Pirbright.

MR SANDERS QC: Right, thank you. Going round the, I have referred to the alcove with the fireplace and the jukebox in it, round the outside of that alcove there was a bench seat that ran from the fireplace all the way round the alcove. Do you remember that? If we just, if we just go back to the plan at 1-3 ...

MR FINDLAY: I cannot remember that.

MR SANDERS QC: Just, if we just zoom into that alcove, if possible. Go a bit further. So
you see where it says ...

MR FINDLAY: Aye, I can mind (?) the alcove.

MR SANDERS QC: Yeah, but you see where it says fireplace, and then running around
that alcove there were some bench seats, and then in front of the bench
seats there were tables, and the tables had stools and chairs around
them. Do you remember that set up there, where you could sit round
the edge of the alcove looking in?

MR FINDLAY: I think, I think I can remember that, 'cause I think I, when the bomb
went off I think I fell over that, and got, got out through the window,
or something like that.

MR SANDERS QC: So the, where it, can you see where the writing says 'bench seat'
facing the fireplace?

MR FINDLAY: Aye, I can see it.

MR SANDERS QC: There. So behind that bench seat there was a partition, which was
some tongue and groove boards with railings above, and when the
bomb went off the partition was just blown away, so you would have
then walked towards the window and out the window.

MR FINDLAY: I believe so, yes.

MR SANDERS QC: Yeah. I just want to, so you have arrived at the pub and it is just
before, it is just around eight o'clock, as you say in your statement,

and you think it was quite busy. I just want to ask you, at the time when you gave your statements to the police, you marked on a plan where you were in the pub, and I just want to ask you about that. So this is at page 3-142. So it's slightly faint and it's a different looking plan, but if we just zoom into the bar, where it says 'counter'.

MR FINDLAY: Yes, I see 'counter'.

MR SANDERS QC: Yeah, just zoom in there. You marked A, B, C, to show that that's where you, Barry RUSHTON and Brian SCANLAN were when you were standing at the bar. Do you remember being at the bar with them?

MR FINDLAY: I can remember being at the bar, but we got a seat.

MR SANDERS QC: And when you got a seat, was that in the alcove where the fireplace was and the jukebox?

MR FINDLAY: Facing the jukebox, if I can remember, 'cause everybody congregated round the jukebox.

MR SANDERS QC: Yes. So if we just go onto that, if we just slide into that alcove, there, it's not very easy to see, but do you see where it is marked 'JC'?

MR FINDLAY: Aye.

MR SANDERS QC: Yeah, so you ...

MR FINDLAY: Yes.

MR SANDERS QC: ... were you sitting around there, facing the fire ...?

MR FINDLAY: We were all sitting together.

MR SANDERS QC: Yes, all sitting together. And you say in your statement that to begin with you were sat between Stevie COOPER and also a girl called Caroline, who you think was one of the girls who died. Is that correct?

MR FINDLAY: Yes, I can mind Caroline. I was talking to Caroline, I think she was woman soldier.

MR SANDERS QC: Yes. And Stephen COOPER, if I just show you a photo of Stevie COOPER, this is at 4-199.

MR FINDLAY: Aye, that's Stevie, and he was in the Scots Guards.

MR SANDERS QC: Yes.

MR FINDLAY: From Wolverhampton.

MR SANDERS QC: He was from Wolverhampton, thank you. So you were ...

MR FINDLAY: Aye, and he was a piper.

MR SANDERS QC: He was a piper. Yes, so we have heard evidence from him. So you were sat between Stevie COOPER and Caroline. Was that the first time that you had met Caroline?

MR FINDLAY: Aye, that was the first time, but I was just sitting talking away, just, just general talk.

MR SANDERS QC: You were just chatting, getting to know each other.

MR FINDLAY: Just chatting.

MR SANDERS QC: Yeah. There came a point when Caroline and her friend went off to go to the Seven Stars, do you remember that?

MR FINDLAY: I'm led to believe it when I was reading the statement, but they came back.

MR SANDERS QC: That's right. So they went to the Seven Stars, but they only had a quick look, and then they came back. And I think what you say in your statement, while they were at the Seven Stars, which was for about 15 minutes or so, two other girls came and sat and took their place. Do you remember that?

MR FINDLAY: Vaguely, I cannot remember that.

MR SANDERS QC: And then Caroline and her friend came back, and you were sat in that alcove. Do you remember going to the gents' toilets and seeing Willy FORSYTH in there?

MR FINDLAY: I can remember, I can remember going to the toilet and probably talking to Willy as he came out, out the toilet. That's what I remember.

MR SANDERS QC: Yes, you say in your statement that he was chatting to an older man in the toilets. Do you remember that at all?

MR FINDLAY: He was talking to somebody. It was just a passing conversation. He was talking to somebody.

MR SANDERS QC: Yes. And on your, just going back to your plan, so this is at 3-142, just back to the alcove, please. Can you zoom in a bit closer, just to that corner, the left hand corner of it? 'Cause it's very hard to see. More? Mr FINDLAY, you say in your statement that you marked 'AA' as the place where you returned to, and I think you can just about make out where it says 'AA', just to the right of where it says 'SC' in darker letters. It may be that you can't see that, but do you think that was about where you went back to sit, in that corner?

MR FINDLAY: I know it was roughly, when we were facing the jukebox, so that looks about right.

MR SANDERS QC: Right. All right, thank you. Do you remember who was either side of you when the bomb went off at all?

MR FINDLAY: When the bomb went off. I think it was Stevie COOPER that came up and says, said, "You'll have to finish your drink, 'cause we've got no glasses up there." I don't know if it was Barry RUSHTON sitting next to me at that particular time, 'cause I know Willy and John were to the left of me, and Caroline was somewhere in the... that poor girl was sitting round about that area.

MR SANDERS QC: Yeah.

MR FINDLAY: But that's what I can remember.

MR SANDERS QC: And so Stevie COOPER came to you and said, “Drink up, because there’s no glasses left at the bar, they need some more glasses”?

MR FINDLAY: Aye, they were running out.

MR SANDERS QC: Right.

MR FINDLAY: They were running out.

MR SANDERS QC: And was this just immediately before the explosion happened?

MR FINDLAY: What I remember, Stevie was standing in front of me when the bomb went off. He took the brunt of it from me, ‘cause he was right in front of me, and that’s when the bomb went off. I always mind that.

MR SANDERS QC: So he shielded you from the worst of the explosion, do you think?

MR FINDLAY: Yes, I do.

MR SANDERS QC: And can you tell us, in your own words, what you remember about the moment of the blast?

MR FINDLAY: What I remember, I just seen a flash. It blew my eardrums away. Then I can remember an electric cable wrapped round my leg. I tried to kick that free, and I did kick it, but I fell. But I don’t know if I went backwards or forwards. Then I seen the ambulances, or the fire brigade, I seen their lights flashing, and I made my way out from there, through the window or through the door, I’m not quite sure.

MR SANDERS QC: Right.

MR FINDLAY: I collapsed outside. That’s what I remember.

MR SANDERS QC: And the cable that was round your leg or your foot, was that live?
Was it, were you getting a shock from it, or not?

MR FINDLAY: I was getting a shock. It kept flashing. I can remember that distinctly and trying to kick it, and I think I kicked it that bad that I done my cartilage in, in my knee.

MR SANDERS QC: And you say in your statement that you were trying to free, that you leg was trapped. Was there anything else on top of you, or on your legs?

MR FINDLAY: No, no, it was just this cable, and it kept flashing.

MR SANDERS QC: Do you think that you were unconscious, that you were knocked out for a time?

MR FINDLAY: I think it was delayed, I don't think it was unconsciousness. But I managed to get up and, and seen the blues and twos, the fire engines, or ambulances, and I says, "I need out of here."

MR SANDERS QC: Do you know ...

MR FINDLAY: And I made my way out.

MR SANDERS QC: Do you know how long it took you from the explosion to actually getting out into the street?

MR FINDLAY: Maybe five, ten minutes.

MR SANDERS QC: All right, so you were trapped in there for a short while.

MR FINDLAY: Roughly.

MR SANDERS QC: Was it dark? Had all the lights gone off?

MR FINDLAY: Everything was dark. I could not see for the, for the dust and the, and the debris, the smoke. But I could see the, the lights, the fire engine or an ambulance, I could see that.

MR SANDERS QC: All right. And do you remember when the bomb had gone off, do you remember it blowing a hole in the floor in front of the fireplace?

MR FINDLAY: I found that out afterwards, with talking to emergency services. If the floor went down there I'd have probably went down, down with it, but I managed to make my way out. But I, I found out after that, that the floor was blown away.

MR SANDERS QC: Yes. Do you remember anyone else being around you, or what was happening when you were still inside the pub?

MR FINDLAY: No, I was just trying to get out. I could not, you could not, you could not see.

MR SANDERS QC: No.

MR FINDLAY: It was, I'd seen the, the blue lights there, the fire engine, or ambulance.

MR SANDERS QC: All right. And what, what injuries did you suffer? You mentioned your eardrums being perforated. Did you, what other injuries did you suffer?

MR FINDLAY: Well I got operated in Guildford for my leg. I think I had two operations on that. That was Guildford hospital. Then I got transferred from there to Cambridge Military Hospital, where I got skin grafts on my ear, and that was injuries that were sustained, and my eardrum was blew apart.

MR SANDERS QC: And presumably also you had cuts to your legs and lacerations, and so on?

MR FINDLAY: Well, I've still got something in the side of my face from what happened, which was not worth operating on. I had burns and ...

MR SANDERS QC: Yes.

MR FINDLAY: That's, that's about it.

MR SANDERS QC: Yeah. I just want to ask you, we have got a plan showing where every, where we think everyone was in the pub, and I just want to check that you agree with your position. So the plan's at 4-69. Just bear with us, Mr FINDLAY, while it loads. So that's the alcove again there, and if we just zoom in so that the alcove takes up as much of the screen as possible. Do you see the bottom left hand corner, we have got the number, we have got a '131', which we think is where you were, does that sound right to you?

MR FINDLAY: That, that looks about right to me, yes.

MR SANDERS QC: And just to your ...

MR FINDLAY: Facing the jukebox.

MR SANDERS QC: Yes, and just to your left is an '87', which is Stevie COOPER, and then next to Stevie COOPER is John HUNTER '472'.

MR FINDLAY: Aye, I see it.

MR SANDERS QC: And then next to, next to John HUNTER is one of the other women who died, which is Ann HAMILTON, and then '471' is Willy FORSYTH, and next to him '470, '479' sorry, is Caroline SLATER. Does that seem about right?

MR FINDLAY: That looks, yes, it does.

MR SANDERS QC: And then just on your right was Jimmy COOPER '84'.

MR FINDLAY: I can mind Jimmy COOPER now. He was a Scots Guards.

MR SANDERS QC: Yes. And then, sorry, I just want to, just to clarify this, next to you we have got '87'. That was Stevie COOPER, and then he moves up and he's standing directly in front of you when the bomb goes off, do you see up at that ...?

MR FINDLAY: That's, that's right.

MR SANDERS QC: That's right, and then I think that Brian SCANLAN's taken his place next to you.

MR FINDLAY: I cannot remember Brian SCANLAN.

MR SANDERS QC: No. All right, that's very helpful, Mr FINDLAY. Could you just help, please, with what you did in terms of your employment after leaving the army, what you went on to do?

MR FINDLAY: Well after that it took me about a year to get myself fit, and I joined the fire brigade. I done 30 years in the fire service, then my injuries were starting to take their toll, so I had to take early retirement. I could not ... I was a fireman for ten years, then I went and did driving. But my leg, my leg was starting to play up, but we went the doctors a few times with my knee, then I retired three years prematurely, but I done 30, just 30 years in the fire service.

MR SANDERS QC: So when did you retire then, Mr FINDLAY?

MR FINDLAY: When I was 52. I'm 67 now.

MR SANDERS QC: All right, thank you, Mr FINDLAY. That has been very helpful. It is very helpful to get your recollections and where you were in the pub and what you remember. If you just wait there, there may be some further questions, but that is all I have to ask you about, thank you.

MS BARTON QC: No, thank you, sir.

MR PLEETH: No, thank you, sir.

CORONER: **Mr FINDLAY, thank you very much. There are no further questions. I am very grateful to you. That has been a very helpful account. Once again, I am sorry there was a bit of a mix up on**

dates to begin with, but thank you very much for making the effort to come in, wherever you are today, your evidence has been very helpful to us. So thank you very much, and I will say goodbye now.

MR FINDLAY: Is that me? Thank you.

CORONER: Thank you, bye bye.

(The witness withdrew)

MR SANDERS QC: I think they will have to disconnect at that end.

CORONER: Yes, I think they might. Good. So we now move on to ...

MR SANDERS QC: Mr GRIFFITHS, sir.

CORONER: Mr GRIFFITHS.

MR SANDERS QC: Yeah.

CORONER: So was Mr GRIFFITHS online, or do I need ...?

MRS NIN: He is, yes, sir.

CORONER: And was he online when I read the warning?

MRS NIN: (inaudible)

CORONER: Thank you. Good morning, Mr GRIFFITHS, can you hear me?

MR GRIFFITHS: Yes, good morning.

CORONER: Good morning to you. Mr GRIFFITHS, my name is Richard TRAVERS, I am the Senior Coroner here in Surrey. Thank you very much for joining us this morning to give your evidence. I am

going to ask just in a moment, are you going to take the oath, Mr GRIFFITHS, or are you giving the affirmation?

MR GRIFFITHS: Affirmation.

CORONER: The affirmation. Do you have the words there in front of you?

MR GRIFFITHS: Yes, I do.

CORONER: Could you read them out for me, please, nice and clearly, not too quickly, just so we can all hear you?

MR RICHARD GRIFFITHS (affirmed)

CORONER: Thank you. Mr GRIFFITHS, the audio is not terribly good. I can just about hear what you are saying, but it is not very clear. I wonder, are you talking into a computer of some sort?

MR GRIFFITHS: An iPad, yes.

CORONER: Oh, well that is better. That was much clearer. So I do not know whether you just moved the iPad slightly, but if you could sort of direct your voice straight to the iPad, that would be really helpful, so we can hear you nice and ...

MR GRIFFITHS: (inaudible)

CORONER: Thank you. Can you give me your full name, please?

MR GRIFFITHS: Richard Keith GRIFFITHS.

CORONER: Thank you. Mr GRIFFITHS, I am going to pass you over in a moment to Mr SANDERS QC, who is going to ask some questions

of you on my behalf. Can I just remind you, it is very important that we can all hear you very clearly, so please direct your voice close to the iPad that you are talking into, and please do not run on with your answers too quickly, because we will be taking some notes of what you are saying. So I will pass you, the camera is going to move now to Mr SANDERS.

MR SANDERS QC: Good morning, Mr GRIFFITHS, can you see and hear me?

MR GRIFFITHS: (inaudible), yes, I can.

MR SANDERS QC: Thank you. Have you got someone in the room with you?

MR GRIFFITHS: My, my wife is here, yes.

MR SANDERS QC: And she is just there to help you?

MR GRIFFITHS: That's right.

MR SANDERS QC: Correct, thank you. I just want to start, please, where are you at the moment? You don't need to say your full address, but whereabouts are you in the country?

MR GRIFFITHS: In Hampshire.

MR SANDERS QC: What town?

MR GRIFFITHS: Fleet in Hampshire.

MR SANDERS QC: Thank you. And is that where you are living at the moment?

MR GRIFFITHS: Yes, it is.

MR SANDERS QC: And are you retired?

MR GRIFFITHS: I am, yes.

MR SANDERS QC: Thank you. When did you retire, Mr GRIFFITHS?

MR GRIFFITHS: Oh, 2000.

MR SANDERS QC: 2000, all right, thank you. I just need to start just by showing you a police statement that you made at the time of the Guildford Pub Bombings, just to verify that this is your statement. So it is going to come up on the screen in front of you, and it is at, on our system it is at page 20-106. There, just stop there. So you see 'Richard Keith GRIFFITHS' there, and it's got the 'ambulance driver attendant', it's got your then address, and then 8th of October, so three days after the bombing, and there's a signature there. Is that your signature?

MR GRIFFITHS: Yeah, it is.

MR SANDERS QC: And if we just go down to the bottom, please. There, is that your signature at the end?

MR GRIFFITHS: Yes, it is.

MR SANDERS QC: Thank you. And can you just confirm that you have had an opportunity to re-read a typed-up version of this statement to refresh your memory?

MR GRIFFITHS: I have read the statement several times, yes.

MR SANDERS QC: Thank you very much. And can you confirm that the contents are true?

MR GRIFFITHS: I cannot remember anything at all about the events of Guildford. I have read the statement several times, and no part of it is in my memory. I do not know, it's a complete blank.

MR SANDERS QC: Do you remember having any involvement with the Guildford Pub Bombing?

MR GRIFFITHS: I'm aware that I was stationed at the Camberley ambulance station. I am aware that, I remember being sent to Guildford. After that, nothing.

MR SANDERS QC: All right, well is it right to assume that the statement that you made to the police at the time was correct when you made it?

MR GRIFFITHS: I'm sure it was, yes.

MR SANDERS QC: Thank you. Well what I will do it, I will try and ask you some general questions and it may be that all I can do after that is just put to you what is said in the statement.

MR GRIFFITHS: I can, I can only apologise to you, and I can only apologise to the Coroner, but I really do not know what has happened, it seems to be a complete mental block. I have no recall, no recollection and no memory of anything whatsoever written in my statement. I said to these evidence people about four times and tried to let you know that I really can't, there's not much I can offer you.

MR SANDERS QC: That is fine, you can only do your best, Mr GRIFFITHS, and we understand. It is obviously almost 50 years ago, and if you don't remember you don't remember. But we have your statement, and I can ask you a few details around it for you to fill in some of the blanks. So at the time of the Guildford Pub Bombing, you were 28 years old, does that sound right?

MR GRIFFITHS: That's right, yes.

MR SANDERS QC: And you were an ambulance attendant, ambulance driver, is that right?

MR GRIFFITHS: That's correct.

MR SANDERS QC: And in that role, is this correct, you would, you were in a two-man, or a two-person team on an ambulance, and one of you would drive and the other one would be the attendant, but you would alternate?

MR GRIFFITHS: That was the routine, yes.

MR SANDERS QC: Yes. When did you join the ambulance service?

MR GRIFFITHS: Oh, (inaudible) apprenticeship, actually. I was in the ambulance service about eight years, so in my early-twenties.

MR SANDERS QC: All right, so you didn't stay in the ambulance service for long after the Guildford Pub Bombing?

MR GRIFFITHS: No, it was a question of money.

MR SANDERS QC: What did you go on to do afterwards?

MR GRIFFITHS: I joined the Hampshire Constabulary, served for 25 years.

MR SANDERS QC: The Hampshire Constabulary?

MR GRIFFITHS: Yes.

MR SANDERS QC: All right, thank you very much. When you were in the ambulance service, what training did you have for your role, do you remember?

MR GRIFFITHS: Oh, in the early stages we have a, we went to a training school and we learnt to drive, and you passed your test if you carried half a bucket of water in the back of an ambulance, and drove around a course. If the water stayed in the bucket, you passed.

MR SANDERS QC: Very good. Did you have any first aid training as part of that course?

MR GRIFFITHS: Ongoing and all the way through, yes.

MR SANDERS QC: Say again, sorry?

MR GRIFFITHS: Ongoing training all the way through my service.

MR SANDERS QC: Thank you. But is it right that at that time ambulance drivers and ambulance attendants didn't fulfil the same paramedic role that they might do now, they weren't trained to that level?

MR GRIFFITHS: Absolutely not, no.

MR SANDERS QC: So it was advanced first aid rather than anything higher than that?

MR GRIFFITHS: That's correct, yes.

MR SANDERS QC: All right. Do you remember what sort of vehicle the ambulance was that you drove?

MR GRIFFITHS: The last one that we had was a, it was spelt with a K, something Karrier. It was big enough to get hospital beds in the back of the ambulance.

MR SANDERS QC: Right, and what equipment did have on board?

MR GRIFFITHS: Just the, the standard things you would expect to have on an ambulance, so a stretcher one side, seating the other, a cupboard with bowls and buckets, dressings, splints, all that kind of thing.

MR SANDERS QC: Right. Did you have any training about responding to major incidents, do you remember?

MR GRIFFITHS: I don't recall, no.

MR SANDERS QC: No. And you were based at, you say in your statement that you were based at the Frimley Road substation?

MR GRIFFITHS: That's correct, yes.

MR SANDERS QC: And that was part of the Camberley Division, was it?

MR GRIFFITHS: That's correct, yes.

MR SANDERS QC: So there was a main station in Camberley, and then you were in one of the substations?

MR GRIFFITHS: The main ambulance station was at Ottershaw in Chertsey. The Camberley station was a two-vehicle substation, that's all.

MR SANDERS QC: I see, so when we talk about Camberley, that was Frimley Road?

MR GRIFFITHS: That's right.

MR SANDERS QC: And there were two vehicles there, were they both ambulances?

MR GRIFFITHS: They were, yes.

MR SANDERS QC: And were they both the same type of ambulance?

MR GRIFFITHS: They were, yes.

MR SANDERS QC: Do you remember any difference between there being 24-hour ambulances and 16-hour ambulances?

MR GRIFFITHS: We were all 24 hours.

MR SANDERS QC: You were all 24 hours?

MR GRIFFITHS: You had, you had in the main station like Chertsey, you had day staff who came in to do the day work, but all the other substations were 24 hours.

MR SANDERS QC: Right, so at Chertsey, was that where they would have had ambulance service Land Rovers, control and equipment vehicles?

MR GRIFFITHS: I never saw a Land Rover during my service, no.

MR SANDERS QC: No. And did you, do you remember vehicles that carried Furley stretchers?

MR GRIFFITHS: Yes.

MR SANDERS QC: Were there Furley stretchers on your ambulance, or was that on another type of vehicle?

MR GRIFFITHS: No, there was one tied at the side of the roof, inside the, inside the back of the ambulance.

MR SANDERS QC: Right. And how far ...

MR GRIFFITHS: That was ...

MR SANDERS QC: Go on.

MR GRIFFITHS: That was used as a, as a spare.

MR SANDERS QC: So were there, were there trolley stretchers inside the ambulance itself?

MR GRIFFITHS: Too early, I'm afraid, for those, no.

MR SANDERS QC: So what sort of stretchers did you, or what sort of beds or stretchers were there in the back of the ambulance?

MR GRIFFITHS: What you're talking, Furley. They used to come out on a pair of runners ...

MR SANDERS QC: Right, on a ...

MR GRIFFITHS: ... and you picked them up off the runners and carried them. No wheels, no, no trolleys.

MR SANDERS QC: I see, thank you. How far was the Frimley Road substation from Guildford? What was the journey time to get to Guildford?

MR GRIFFITHS: Oh, absolutely no idea.

MR SANDERS QC: No. Do you remember covering Guildford very often, or was it outside of your area?

MR GRIFFITHS: No, Guildford was predominantly run by the St John's Ambulance, it's not an area that we would actually work in. We would travel to

hospitals in Guildford with a patient, or bring them home, but we would not work the Guildford area.

MR SANDERS QC: No, so you weren't normally responding to 999 calls in Guildford?

MR GRIFFITHS: Definitely not, no.

MR SANDERS QC: And were you familiar with Guildford town centre at all?

MR GRIFFITHS: Not at all, no.

MR SANDERS QC: No. Can you tell us, please, you mention in your statement a teleprinter, what was the teleprinter?

MR GRIFFITHS: A great big lump of a machine, which used, there was a bell used to ring, and from the headquarters of the ambulance control in Banstead, Surrey, somebody would type jobs you were going to into their machine at Banstead and it would go down to the teleprinter in (inaudible) ambulance station and you would tear the paper off, that was your instruction of what to do for that job.

MR SANDERS QC: Sorry, I think we just lost you at the end there, but I think you said that you would tear the paper off and then that would be your instructions for that job, is that right?

MR GRIFFITHS: Right, yes.

MR SANDERS QC: Thank you. You remember that you were on duty the night of the Guildford Pub Bombings, which was Saturday, the 5th of October '74, that's right?

MR GRIFFITHS: That's right, yes.

MR SANDERS QC: Do you remember who you were on duty with?

MR GRIFFITHS: I know this from my statement, it was a man by the name of STYLES, but no, I don't remember him. I have no recollection. I don't know what he looks like.

MR SANDERS QC: You don't remember him?

MR GRIFFITHS: No.

MR SANDERS QC: So he was Richard STYLES. Another witness has said he was known as Nobby STYLES.

MR GRIFFITHS: I'm sorry, I don't remember.

MR SANDERS QC: Do you, did you have another regular partner on the ambulance that you do remember?

MR GRIFFITHS: Not particularly, no, we used to chop and change around.

MR SANDERS QC: And when you were in a two-person crew on an ambulance, would one of you be the senior partner and one the junior partner, or were you equals?

MR GRIFFITHS: We were both equal.

MR SANDERS QC: All right, and you say in your statement that on the night in question you were, your radio call sign was Camberley 1.

MR GRIFFITHS: That was the vehicle.

MR SANDERS QC: Would effectively there be, there were two ambulances at Camberley, and so there would be Camberley 1 and Camberley 2?

MR GRIFFITHS: That's right.

MR SANDERS QC: But there was no difference between the ambulances or the type of equipment that they were carrying?

MR GRIFFITHS: No, the two vehicles would be stationed at Camberley. One would be operational 24 hours, seven days a week. The second vehicle would be operational Monday to Fridays during the day.

MR SANDERS QC: Right, and would it always be one vehicle that was the 24-hour vehicle and one vehicle that was the day vehicle?

MR GRIFFITHS: That's correct.

MR SANDERS QC: But they carried the same equipment, as you remember?

MR GRIFFITHS: Yes, they did.

MR SANDERS QC: All right. And do you remember what hours the night shift would have been?

MR GRIFFITHS: Well, we used to do 11pm to 7am.

MR SANDERS QC: And so the shift before that, that stopped at 11pm, when did that start?

MR GRIFFITHS: That was 3pm to 11.

MR SANDERS QC: All right. So you say in your statement that you got, and I know you don't remember this Mr GRIFFITHS, but you say in your statement you got a teleprinter message from Banstead at 8.57 saying there had

been a major emergency at the Horse and Groom Public House in Guildford, there had been an explosion. How long did it normally take you to get on the road after you had received the teleprinter message, how quick was that?

MR GRIFFITHS: Only a couple of minutes. We were all dressed and ready, we only had to put our coats on, slam the door and go.

MR SANDERS QC: Right, thank you. So you would have left straight away?

MR GRIFFITHS: Absolutely, yes.

MR SANDERS QC: And you, in your statement you say that you arrived at Guildford at about 9.17?

MR GRIFFITHS: Okay, I don't remember.

MR SANDERS QC: No. Do you remember if you used to have a log where you would keep the timings of when you set off and when you arrived at different places?

MR GRIFFITHS: That's correct, yes, we did.

MR SANDERS QC: Because the times you gave to the police were quite accurate. 8.57 and 9.17, so do you think that you had got that from some notes or from a record book?

MR GRIFFITHS: Every shift you have a log sheet of the work you did across the period. Everything was timed, everything was written down, and those sheets would be handed in to the sub-officer at the end of each shift.

MR SANDERS QC: So do you think that you probably would have had that sheet with you when you were interviewed by the police?

MR GRIFFITHS: I doubt I would have had it in my possession, no.

MR SANDERS QC: But would you have had an opportunity to look at it to check the timings?

MR GRIFFITHS: Oh, that's a really difficult question. There's every possibility, I suppose, I could have asked for it if I had known I was going to be interviewed, but I don't remember.

MR SANDERS QC: No. Do you remember who your colleagues in Frimley Road were, who would have been in Chertsey 2?

MR GRIFFITHS: Well that would be the sub-officer. I don't remember his name, I'm afraid.

MR SANDERS QC: We've got the names Maureen OSBORNE and Philip WHITE. Do you remember either of them?

MR GRIFFITHS: I saw, that was in my statement. I do not remember the names at all.

MR SANDERS QC: All right. So you say in your statement you got to the Horse and Groom pub, but you didn't go inside, and you were obviously there about 25 minutes after the bomb had gone off. But what you do talk about in your statement is seeing two bodies covered with blankets on stretchers on the pavement. Does that ring any bells to you?

MR GRIFFITHS: I read it in my statement. I regret to have to say to you and to the Coroner, absolutely nothing. I have no recall at all.

MR SANDERS QC: No. I understand that, Mr GRIFFITHS, and there is absolutely no need to apologise. It is quite understandable. But I am just going to confirm that this is what you have put in your statement and that you think that that would have been true at the time. So you say in your statement there were two bodies on stretchers on the pavement, just down from the pub, or the wreckage of the pub. There was one nearest the road which was a smaller, lighter body, with part of the right leg and the right foot missing, and there was one nearest the wall, which was a larger and heavier body, with black shoes or boots. And I understand that you don't remember that, but if you said that to the police at the time, that would have been true, wouldn't it?

MR GRIFFITHS: I have read it in my statement. I have no doubt it is perfectly correct, it is perfectly true, and I'm sorry I have no recollection.

MR SANDERS QC: All right. And what happened next is that you carried the lighter body with a fireman to the ambulance, and a policeman and someone else carried the heavier one, and you drove the ambulance to the Royal Surrey County Hospital. And you have already said that you would sometimes go to the Royal Surrey as part of your duties. Correct?

MR GRIFFITHS: That's correct, yes.

MR SANDERS QC: And do you remember where the Royal Surrey was in Guildford?

MR GRIFFITHS: I'm, I know it now, but I don't remember it from 1974. I'm sure it's changed dramatically.

MR SANDERS QC: Yes, absolutely. All right, and so the rest of your statement is just describing that you arrive at the Royal Surrey, you meet someone called James ADAMS. Do you remember an ambulance man called James ADAMS?

MR GRIFFITHS: No, I'm sorry, I don't.

MR SANDERS QC: He was the incident control officer at the hospital and he directed you to place the bodies in a garage opposite the accident centre, and you did that, and then around that time Chertsey 2 pulled in behind. There was already one body in there, you unloaded your two bodies, and then a fourth body was brought in by Maureen OSBORNE and Philip WHITE. And I understand you don't remember that, but that would have been correct at the time?

MR GRIFFITHS: I'm sure it was correct, it's in my statement, but I have no recollection.

MR SANDERS QC: No. All right, Mr GRIFFITHS. Well, it is, we understand that you don't have any recollections of the night, but it is still helpful just to hear some general information about the way that the ambulances operated at the time, 'cause as you say, things have changed a lot now.

MR GRIFFITHS: I think, I think things have changed so much it's not recognisable now.

MR SANDERS QC: No, I don't think that they still have the bucket of water in the back of the ambulances as the test for driving.

MR GRIFFITHS: Oh, (inaudible) a good driving test.

MR SANDERS QC: Yes, all right, well thank you very much, Mr GRIFFITHS. I don't have any questions for you, but if you just wait there, there may be some others.

MS BARTON QC: No, thank you, sir.

MR PLEETH: No, thank you.

CORONER: **Mr GRIFFITHS, thank you very much. You have done your best and I am grateful to you. That concludes your evidence, and so I shall say goodbye, but thank you very much. Thank you.**

MR GRIFFITHS: (inaudible)

(The witness withdrew)

CORONER: **We will take our mid-morning break. When we come back, I think there are some statements to be read. There are a number, but quite short, I think.**

MR SANDERS QC: Yes, apart from the post-mortem report, so they are relatively short.

CORONER: **Yes.**

MR SANDERS QC: And also, I know that we were going to have a brief discussion amongst the advocates in so far as necessary about submissions and conclusions.

CORONER: Yes.

MR SANDERS QC: We have received, I haven't had a chance to read them, some submissions from Ms BARTON, Mr COHEN. Mr PLEETH is obviously here today, so I don't know if it might help for you just to outline what we might do then.

CORONER: All right. Well I will do that when I come back. Ms BARTON, I have read your submissions, the two of you, thank you very much. So I will deal with that when we have dealt with the statements. Thank you very much.

CLERK: Court please rise.

(A short adjournment)

CORONER: I think, Mr FLINN, you are starting with these statements are you?

MR FLINN: That's correct, sir.

CORONER: Good. Thank you.

MR FLINN: Thank you, sir. The first statement I'll read is from Mr James ADAMS. If you just give me one moment I'll bring up the file. So

this is the statement from James Herbert ADAMS. URN S252 and Caselines page reference 2-351.

(Reads statement of James Herbert ADAMS in full)

He states, "At 9.17 pm on Saturday 5th October 1974, following an incident at Guildford, I went to the Accident Centre at the Royal Surrey County Hospital, where I assumed the responsibility of Hospital Incident Officer.

"When I arrived at the hospital, I saw a body on a stretcher placed inside a garage directly opposite the Accident Centre. The body was covered and was quite obviously dead. I decided that this garage, because of its location, was the ideal place to use as a temporary mortuary.

"I met each ambulance as it arrived. Shortly after my arrival, Chertsey 2 arrived. The crew was D/A WHITE and D/A OSBORNE. I was informed by the crew that there was one body on board certified as being dead by a doctor at the scene. I directed the crew to place this body in the garage. I don't know if the body was male or female.

"Sometime later, Camberley 1 arrived. The crew was D/A STYLES and D/A GRIFFITHS. There were two dead on board, and I was informed that they had been certified as such at the scene. I didn't

examine the bodies, but directed the crew to place them in the garage.

This made a total of four bodies in the garage and no more dead arrived.” And, sir, that was signed and dated the 10th October 1974.

CORONER: **I’m sorry, because I may have missed it at the beginning. He gave his occupation as Surrey Ambulance Service, didn’t he, at Chertsey Main Station?**

MR FLINN: Yes, sir.

CORONER: **Thank you. Thank you.**

MR FLINN: The next statement I shall read will be from a Mr John ERSKINE. The URN is S280, the Caselines page reference is 2-430.

MR FLINN: And he states, “At 9.30 pm on ...”

CORONER: **Sorry, can I just ask you to give the occupation, just ...**

MR FLINN: Of course, yes.

CORONER: **... so we have who they are.**

MR FLINN: Of course. So occupation Detective Constable.

CORONER: **Thank you.**

MR FLINN: (Reads the statement in full of Mr John ERSKINE)

“At 9.30 pm on Saturday 5th October 1974, I went to the Royal Surrey County Hospital, Guildford. In an open garage immediately opposite the ambulance entrance to the Accident Centre, I saw four covered

bodies lying on stretchers. I removed the bodies to the hospital mortuary. At the mortuary I uncovered the bodies individually.

“The first body was that of a young female wearing a blue woollen dress. I attached a label to the body and marked it number 1. The second body was again a young female. She was wearing a grey denim jacket and a red skirt. I saw that the right leg was missing from about the knee, and the left foot was also missing. I attached a label to this body and marked it number 2. I uncovered the third body and found it to be that of a young male person. The body was clothed in a black and red checked jacket, a black cardigan and black trousers. There was a surgical plaster on the chest. I attached a label to the body and marked it number 3. I uncovered the fourth body and found it to be that of a young male. The body was clothed in a navy blue jacket and trousers and a white shirt. I attached a label to this body and marked it number 4.

“At 10.05 pm the same day, Dr STEWART attended the hospital mortuary and certified all four bodies as being dead. He signed the labels which I had attached to the bodies.” And, sir, that is signed and dated the 7th October 1974.

MR FLINN:

And I shall now pass over to Ms KUZMENKO to read the next two statements.

MS KUZMENKO: Firstly, we have a statement from Gillian TAYLOR, who was then Second Lieutenant WRAC. We had live evidence from her on day two of the inquest, and it was not proposed to recall her, so I shall read her statement. It is URN S328, found at Caselines 2-573. It states as follows:

(Reads statement in full of Gillian TAYLOR)

“At about 2.40 am on Sunday 6th October 1974, accompanied by Sergeant GIL, I attended the Royal Surrey County Hospital. I was there shown a female body with a label marked number 1 thereon. I identified the body as that of Private HAMILTON, a recruit in my platoon, who had been there in the service for only three weeks.

“I was then shown another female body with a label marked number 2 thereon. I identified this body as that of Private SLATER, a recruit in my platoon who had also only been in the service for three weeks. Private HAMILTON was W/454500 Ann Ray HAMILTON from Crewe. Private SLATER was W/454448 Caroline Jean SLATER from Cannock. I identified both bodies to a police officer.” That’s signed on the 6th October ’74.

CORONER: **Thank you.**

MS KUZMENKO: We then have two statements from Eugenia GIL who was a Sergeant at WRAC. The first is as follows. Sorry, it's at S291, at Caselines 2-487.

(Reads statements of Eugenia GIL in full)

“At 2.40 am on Sunday 6th October 1974, in company with Second Lieutenant TAYLOR, I attended the Royal Surrey County Hospital. I was present when Lieutenant TAYLOR identified a female body, labelled number 1, which I also identified as Private HAMILTON. Also another female body, labelled number 2, which I also identified as Private SLATER. Both were identified to a police officer, DC ATTWELL.” This is signed 6th October '74.

The addendum statement is at 2-488, which I will read for completeness. It states as follows: “I am a Sergeant in the Women's Royal Army Corps stationed at Guildford. On Monday 30th September 1974, I commenced a week's course at Camberley. This course finished on Friday 4th October, but I didn't return to the camp. On the Friday I stayed with Sergeant KILLICK's parents at 2 Forge Cottages, Downside, Cobham.

“At 10.30 pm on Saturday 5th October, I was in Sergeant KILLICK's car, with Sergeant KILLICK, when we heard on the radio that two bombs had gone off at Guildford. We decided to return to camp,

arriving at 11.30 pm. I did not visit Guildford.” That is signed 9th October '74.

MR FLINN:

Sir, I'll now read two short statements from John Stafford GREIG, who was a recruit. The first has URN S22 and Caselines page reference 5-2.

(Reads statements of John GREIG in full).

He states, “At about 3 pm on Saturday 5th October 1974, I left the Guards Depot alone for Guildford. I arrived at Guildford Railway Station at about 4 pm. I walked around the town for a while and bumped into my mates, Callum BRUCE and another lad Alan, who were both recruits. They were with their girlfriends. I tagged along with them for about an hour and a half. We went shopping.

“They went their way and I walked around alone. I just wandered about, and then at about 7.30 pm I went into the Seven Stars. I went into the public bar. There were about 20 or 25 people in there. I had a drink in that bar. I went round into the saloon. I looked around and saw a few people in there, but I saw some of my mates and didn't look at the other people. I went over and chatted with Stephen COOPER, Jim COOPER, HUNTER and a lad I know as Wee Willy.

“At about 7.45, I went alone to the Horse and Groom. I had a swift couple of pints in there in the saloon bar. I saw two civilians sitting

on the shelving bench in the alcove by the bar opposite the door. One of the men was about 20 years, slim build, black/brown collar length hair. He was wearing a light blue jacket and darker trousers, I think. The other man had fairish hair, collar length, about 20 years, stout build, checked jacket.

“I left the pub at about 8 pm and walked down the hill. I met my girlfriend, Vanessa, from the WRAC Centre, outside the Seven Stars. We went off for a walk. We went down the High Street to the bottom, then up North Street. We had been walking about for some time when we heard the bang from up the hill. I saw people running about. I ran up the hill to the sound of the noise, and saw that the Horse and Groom had been damaged by an explosion. I went into the pub to try and help, and helped with the injured. I was instructed to return to the camp, so I saw my girl to the bus stop and then I took the 10.30 pm train back to the camp. I returned to the camp at about 11.30 pm.”

And, sir, that is signed and dated the 6th October 1974.

There is then a short second statement from Mr GREIG. URN S22A, Caselines page reference 2-10.

He states, “I am a recruit at the Guards Depot at Pirbright. I’ve been in the Army since the 12th June 1974.

“At about 2.25 am on Sunday 6th October 1974, I attended the Royal Surrey County Hospital at Guildford. I was shown a male body which I identify as Recruit FORSYTH, a new recruit who had only joined our barracks about four weeks ago. I didn’t know him well as he was a new recruit. He was also in the Scots Guards. FORSYTH’s body was the one marked with the label number 5. I identified the body to Detective Sergeant DONALDSON J GREIG.” Pardon me. So that’s, “Identified the body to Detective Sergeant DONALDSON,” and then it is signed by Mr GREIG, dated 6th October 1974.

The next statement is from a Thomas William STAPLES, a Film Technician. It is URN S325 and Caselines page reference 2-566.

(Reads statement in full of Thomas William STAPLES)

He states, “I am a Film Technician by occupation. On Sunday 6th October 1974, accompanied by Mr GARRARD, my brother-in-law, I attended St Peter’s Hospital, Chertsey. I was there shown a male body labelled number 4, and I identify that body as my brother-in-law, Paul CRAIG of 8 Bristol House, Eldon Avenue, Borehamwood. I identified the body to Detective Sergeant DONALDSON.” And, sir, that is signed and dated the 6th October 1974.

The next statement I will read is from a John Frederick GARRARD, who is identified as an Area Manager. The URN is S332 and the Caselines page reference is 2-579.

(Reads statement of John Frederick GARRARD in full)

He states, "I am an Area Manager by occupation employed by Magnet Joinery. Today, Sunday 6th October 1974, accompanied by Mr STAPLES, my brother-in-law, I went to St Peter's Hospital in Chertsey. I was there shown a body of a male person, which I identify as my brother-in-law, Paul CRAIG of 8 Bristol House, Eldon Avenue, Borehamwood. He was the body with the label marked number 4 thereon. Paul was a Plasterer by trade and had come down to Guildford on Saturday night, the 5th October. They left Borehamwood at 4.15 pm yesterday. They travelled down in Paul's car, a Cortina MK2, OVB 154F, colour white. He came down with a Mr and Mrs BURNS, who are friends. They came down to see Mr and Mrs BURNS' daughter, who was a serving WRAC, as it was her birthday. I identified the body to Detective Sergeant DONALDSON." And, sir, that is signed and dated the 6th October 1974.

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The final statement to be read before post-mortem evidence is from a Mr John MILLIGAN from the Irish Guards. URN S309 and Caselines page reference 2-532.

(Reads statement in full of John MILLIGAN)

He states, "I am a trained soldier stationed at the Guards Depot at Pirbright. I have been in the Army since the 8th September 1970.

At about 2.25 am on Sunday 6th October, I attended the Royal Surrey County Hospital at Guildford. I was there shown a male body, which I identify as Recruit HUNTER of the Scots Guards, one of my barrack room recruits, of which I am in charge. He was the male body with the label marked number 3 thereon. I can't give any more details of him. I identified the body to Detective Sergeant DONALDSON."

And, sir, that is signed and dated the 6th October 1974.

Sir, the final piece of read evidence is from Professor Arthur Keith MANT, who was a Pathologist. For completeness, sir, there were two versions of this document which were found, with two different dates on it. They've been checked and it was only a couple of words difference here and there. The one that I will be reading to the court has the URN S307 and has Caselines page reference 2-518. Sir, these are the examination reports from the post-mortems.

It starts off with a statement of truth, and gives his professional qualifications at the start. The report is prepared by Arthur Keith MANT, MD FRC Pathology; Pathologist; Head of Department of Forensic Medicine, Guy's Hospital, London, SE1 9RT; Professor of

Forensic Medicine, University of London. And then he lists the deceaseds, on whom he has prepared these reports. Sir, I have been asked to read those out, so I'll read them out for completeness.

(Reads statement of Arthur Keith MANT in full)

“On Ann Ray Higgins HAMILTON, aged 19 years; Caroline Jean SLATER, aged 18 years; John Crawford HUNTER, 17 years; Paul CRAIG, 22 years; and William McKenzie FORSYTH, 18 years.

This statement, consisting of four pages, each signed by me, is true to the best of my knowledge and belief, and I make it knowing that if it is tendered in evidence I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

“All five of the deceased were examined at St Peter's Hospital Mortuary on Sunday October 6th 1974 in the presence of Assistant Chief Constable ROWE, Detective Chief Inspector STYLE, Detective Sergeant DONALDSON (Identification), PC MARTIN (Exhibits Officer), PC MASSEY (Assistant Exhibits Officer), PC HALLS (Photographer), and Mr J COOMBS (Photographer).

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“Prior to each autopsy examination, each body had a full x-ray examination in the mortuary. The x-ray plates are in my possession. Each deceased was numbered 1 to 5, as above.

“Examination of body number 1 – Ann Ray Higgins HAMILTON, aged 19 years. The deceased was of a good physique. 5’7” tall. The hair was extensively singed and flash burns were present on the face, across the right shoulder and upper back, right loin, right buttock, backs of the thighs, outer side and front of the left lower leg. Deep laceration of the back and inner side of right leg, extending from the ankle to the lower thigh, with avulsion of the calf muscles. Deep laceration of the back of the right mid-thigh. Two lacerations inner side of right foot. Deep lacerations of outer side of left thigh and upper lower leg. Fracture of left ankle joint. Fracture lower third of left thigh. Fracture dislocation of right knee joint, and fracture of upper fibula. Comminuted fracture of mid-third left humerus. Bruising of lower left face, with fracture of the left ramus of the mandible. Surgical emphysema on left upper and anterior chest wall. Fractures of left ribs 2 to 9 anteriorly, 4 to 7 laterally, and 3 to 12 posteriorly. Traumatic bullae and sub-pleural haemorrhages present on lungs. Left lung extensively crashed, partial crashing of lower lobe of right lung. Haemorrhage into central chest structures. 7th, 8th left intercostal spaces lacerated. Left haemo-pneumothorax. Extensive rupture of the spleen and right lobe of the liver, hemoperitoneum. No natural disease identified.

“Remarks – The deceased received fatal blast injuries consistent with the explosive device having been detonated to her left. Cause of death – blast injuries.

“Examination of body number 2 – Caroline Jean SLATER, aged 18 years. The deceased was of a good physique and approximately 5’6½” tall. Burns of right forehead and nose and below chin. Slight singeing of the hair. Traumatic amputation of left foot, with extensive loss of tissue from the lower leg. Traumatic amputation of the right lower leg through its middle third. Fracture right mid-femur. Fracture of the sacrum and the posterior pelvis on the right. Penetrating wounds of perineum and right buttock, where metallic fragments were recovered. No skull fractures. Moderate traumatic subarachnoid haemorrhage. No fractured ribs. Haemorrhage into central chest structures and left pleural cavity. Lower lobes of both lungs contused. Hemoperitoneum and ruptured spleen. No natural disease identified.

Remarks – The injuries are consistent with the explosive device having been detonated beneath the deceased. Cause of death – blast injuries.

“Examination of body number 3 – John Crawford HUNTER, aged 17 years. The deceased was of a good physique. Clothing - dark trousers with the legs torn away at groin level, socks, check coat and cardigan.

The right chest was strapped with Elastoplast type dressing. Burns to the face with heavy singeing of the hair on the left side. Burns of the legs limited by the socks and trousers, and left lower forearm. Deep bruising of the chest posteriorly and on the left. Fracture of the 4th left rib posteriorly. Penetrating wounds on the outer side of the left knee, and inner of the right knee and lower thigh. Laceration of the upper right lower leg posteriorly. Fracture of the left lower leg above ankle. Perforation of the left eardrum. Traumatic bullae on both legs, which were contused and partly crushed. Haemorrhage into central chest structures and chest cavity, small volume. Ruptured spleen and small hemoperitoneum. No natural disease identified. Remarks – The injuries are consistent with the explosive device having been detonated to the left of the deceased. Cause of death – blast injuries.

“Examination of body number 4 – Paul CRAIG, aged 22 years. The deceased was of a good physique. Height 5’9”. Clothing – Trousers, trunks, socks, left shoe, coat and shirt. Minimal singeing of the hair on the top and right side of the head. Burning of the front and sides of the right lower leg, and outer side and back of the right lower thigh, and inside of the left knee and lower leg. Bruising and superficial laceration of the inner side of the right arm, extending from the elbow to the wrist. Bruising of the right chest from the armpit to the pelvis.

Both ear drums were shattered. Both lungs extensively bruised and with a few traumatic bullae on the pleural surfaces. Haemorrhage into the central chest structures. No natural disease identified. Remarks – The injuries are consistent with the explosive device having been detonated to the right of the deceased. Cause of death – blast injuries.

“Examination of body number 5 – William McKenzie FORSYTH, aged 18 years. The deceased was of a good physique. Very pale. The deceased had plaster of Paris casts applied to his feet and lower legs. The hair was extensively singed. Horizontal 3½ inch laceration of the scalp across the occiput. Patchy burns over the upper face and forehead, on the backs and sides of the thighs and around the lower legs. Laceration of the left forehead and back of the left leg. Bruising over the left elbow and behind the left shoulder. Deep laceration of the outer side and front of the left lower leg and foot, with avulsion of the little toe and fracture of the tarsus. Fracture of the left lower fibula. Fracture upper mid-third left femur. Little oedema of brain. The lungs were bruised with acute traumatic bullae on left lung and haemorrhage into the central chest structures. Massive hemoperitoneum due to rupture of the spleen. No natural disease identified. Remarks – The injuries are consistent with the explosive device having been detonated to the left of the deceased. Cause of

death – blast injuries.” And, sir, those reports are signed and dated the 10th December 1974.

CORONER: **Thank you very much. Mr SANDERS, that concludes the evidence, does it?**

MR SANDERS QC: Subject to one matter, sir, which was there are a collection of sensitive photographs in a separate part of Caselines ...

CORONER: **Yes.**

MR SANDERS QC: ... which have been made available to all the interested persons, and which we’ve referred to but haven’t shown in court. And I think your plan is to admit them into evidence formally now ...

CORONER: **Yes.**

MR SANDERS QC: ... just by way of indication.

CORONER: **Yes. No, I will. I shall admit those ...**

MR SANDERS QC: Thank you.

CORONER: **... that we’ve referred to. Thank you.**

MR SANDERS QC: And that’s all the evidence.

CORONER: **Thank you very much. So that takes us to the next stage of the inquest. Having now had all of the evidence, and I’ve received written submissions from Ms BARTON and Mr COHEN. I’ve also, just a minute ago, received submissions on behalf of the**

Commissioner of the Metropolitan Police, Mr BERRY. Short submissions; a couple of pages, I think.

MR PLEETH: You should also have received some from the Ministry of Defence, sir, which was sent shortly, a few moments ago.

CORONER: Well, I haven't seen those yet, but I'm sure I've got them.

MR PLEETH: Yes.

CORONER: So I will read the submissions, obviously, and take account of them.

What I will do from here, is that I will prepare findings of fact and the Record of Inquest. I will read those in court on Friday 15th July. I will sit at 10.30 and I will read those. If people are able to be here, and want to be here, of course everyone is very welcome. If people can't be here, I understand that. I will simply be reading them out. Once I have read them out, copies will then immediately be made available. So people need not be rushing to take notes and the like.

MS BARTON QC: Sir, may I supplement our written submissions with just a few words, if I may?

CORONER: Yes.

MS BARTON QC: Sir, as you are aware, this inquest is important for the bereaved families and also for Surrey Police as an important historical incident.

We welcome the indication you have given to produce a finding of fact document, because we are very conscious that the bereaved families have not been represented at the hearing, because, despite your best efforts, supported by other IPs, this was not a case in which they could get funding, and so they haven't been able to sit through the substantial volume of evidence which you have called.

It is difficult, sir, in our submission, to distil from the evidence which goes onto the website exactly who is being talked about at any given time. And so we are very conscious, the Surrey Police team having done a lot of work on the documentation to produce for the disclosure to assist your team in this case, that it is possible to distil from the volume of information which is before this court exactly which victim is being talked about and what their experiences were. And it's for that reason that we support the intention that you have of producing a fact finding document, which we are sure will identify the individual experiences of the individual deceased in this case, because it's obviously very important for those who are only able to read it, rather than having had the advantage of being here. Although of course they could have been here, and were invited to be here by you, sir.

On a more personal level, may I make this request? Which I've communicated on a number of occasions to your team that I'm not

able to be here on the 15th July. If it were possible to deliver your conclusions next Thursday, there would be two advantages to that. One, because I would be able to be here, and would very much like to, having been invested in these inquests for some time. But importantly, two, Surrey Police recognises the importance of these inquests to the bereaved families, and to the public that they represent, and would like one of the senior officers, specifically the Deputy Chief Constable, to attend to hear your conclusions, which are obviously an important point in this whole process. He cannot be present on Friday, but could be present on Thursday. Now, I'm very well aware that the convenience of counsel and/or anyone who might want to attend to watch are not the primary concerns, but if that could be accommodated I would be very grateful.

CORONER: All right. Thank you.

MR PLEETH: And, sir, can I also supplement the written submissions which you have, I hope, received, with a few oral submissions as well?

Can I start by thanking you, sir, and the team that sits behind you with the diligent way in which you've conducted this inquest. The MoD also endorses the approach which, sir, you have outlined to deliver an oral summing up or factual findings on the key issues which you've heard during the course of this inquest. And, sir, you will see in my

submissions that I've set out some perceived limitations that may apply to the factual findings which you make.

We are of course cognisant of the restrictions that there are, and we won't be making any submissions on factual issues. But we urge caution in drawing firm factual conclusions on some of the ancillary issues which have been the subject of this investigation. Understandably, the memory of many of the witnesses which you've heard from, recalling events as they have been 50 years ago, was often incomplete and fragmented. To some extent, sir, as we've seen, that difficulty was ameliorated, at least in respect of the events of the 5th October, because they had available to them witness statements and documents from which they could refresh their memory.

The same was not true in respect of some of the ancillary issues which they have been asked about. And, in respect of those issues at least, there was no contemporaneous records and no documents to refresh their memory. Indeed, the first time they'd been asked about many of those issues was during the course of this inquest; some 48 years after the events had occurred. And whilst we recognise that your factual findings may well touch on those issues, we invite you to be cautious before you make any factual findings which place undue weight on the absence of recollection. Sir, that's your factual finding.

Can I then deal very briefly with the staged process and the funnel approach, which no doubt you will adopt to your conclusions? We accept of course that the record of an inquest as a whole must seek and set out as many of the facts concerning the deaths as the public interest requires, and must of course achieve the objectives of the inquest. There are two routes that we say you can achieve that through.

Option one is a short-form conclusion combined with a narrative conclusion. The short-form conclusion, the obvious and probably the only short-form conclusion being one of unlawful killing. And option 2 being a short-form conclusion combined with a box 3 entry, and that's the approach that is endorsed by my learned friend, Ms BARTON, and Surrey Police. In our submission that latter approach would at least, on the face of it, appear to be more consistent with the Chief Coroner's Guidance.

But if you are not persuaded by Surrey Police submissions, and if you do decide to return a narrative conclusion, which of course we accept is available to you, then, sir, you will see that my submissions deal with some of the restrictions we can naturally apply to narrative conclusions in the context of Article 2 inquests; namely that they should not express any judgement or opinion, and they must be

limited to those matters which more than minimally or trivially caused or contributed to the death.

Sir, you know that one of your roles is to apply the Galbraith plus filter to the issues which you've heard in the inquest, and indeed that's the very purpose of the factual findings which you will make. We consider it to be a uncontroversial submission that there is no evidence upon which a Coroner properly directed could conclude that any of the actions or inactions of the Army or Ministry of Defence more than minimally caused or contributed to the deaths, and/or it would be unsafe for any conclusion of that to be reached, and in the circumstances it has no place on the Record of Inquest.

If you are not with us on that submission, and if we are wrong in our understanding that that is an entirely uncontroversial submission, then I would invite some indication of that, such that we could make more detailed submissions as to the correct application of Galbraith plus to the evidence. I've not done that in my submissions because we understand that to be an uncontroversial submission. But, sir, that ...

CORONER:

What you are asking me for is a guarantee that I won't, I am not prepared to give you a guarantee. I have to say I think it's unlikely, perhaps highly unlikely, but without first of all going

through and reviewing all the evidence, no I'm not prepared to do that.

MR PLEETH: Sir, I think an indication that it's highly unlikely is sufficient for our purposes today. Well, sir, other than that, my submissions are made in writing.

CORONER: **All right. Thank you very much.**

MR PLEETH: Sir, unless I can assist you any further at this stage?

CORONER: **Thank you.**

MR PLEETH: Thank you, sir.

CORONER: **Mr SANDERS?**

MR SANDERS QC: Nothing to add, sir. Thank you.

CORONER: **Thank you very much. Ms BARTON, I understand the position with regard to your availability and the Deputy Chief Constable's availability. At the moment I'm going to leave it for Friday. If we are ready prior to that we will let people know. And, if so, we will list it on the Thursday. But at the moment, I'm afraid, it remains in on Friday.**

MS BARTON QC: Thank you for that indication, sir.

CORONER: **Okay. Good. Mr SANDERS, is there anything else that we need to do at this stage?**

MR SANDERS QC: No, thank you, sir.

CORONER: No. Thank you very much. Thank you.

CLERK: Court please rise.

(The court adjourned))