

Defendant
Drabble
Sworn the 24th day of October 1990

Case No. 1987 C6493

IN THE HIGH COURT OF JUSTICE
QUEENS BENCH DIVISION
BETWEEN:

ARTHUR CRITCHLOW

Plaintiff

and

CHIEF CONSTABLE OF SOUTH YORKSHIRE POLICE

Defendant

AFFIDAVIT

I, GEOFFREY DRABBLE of Police Headquarters, Snig Hill,
Sheffield, S3 8LY MAKE OATH and say as follows:-

1. I hold the rank of Chief Inspector and am duly authorised by the Chief Constable to make this Affidavit to comply with the Order of this court dated 30th July 1990.
2. I have been shown a copy of the Order dated 30th July 1990 and the first Affidavit of Rajendra Bhatt sworn on the 22nd June 1990 and the exhibits referred to in that Affidavit. I have been shown a copy of the List of Documents served on behalf of the Chief Constable dated 14th November 1989 and a copy of a letter dated 25th July 1990 from the firm of Hammond Suddards solicitors addressed to the Plaintiffs' solicitors. There is now produced and shown to me marked "GD1" a copy of the List and the Letter of 25th July 1990.

3. Subject to the corrections and clarifications contained in the said letter of 25th July 1990 and to the matters deposed to in this Affidavit I verily believe that the statements made in paragraphs 1 and 3 of the Defendant's List of Documents dated 14th November 1989 are true. The statement of fact made in paragraph 2 of the said List of Documents is correct. To the best of my knowledge, information and belief the statement made in paragraph 5 of the said List is true.

4. I now propose to deal with the matters dealt with in paragraphs 1(b)(i) to (x) in the Order of 30th July 1990.

(i) Record of Detention and Charges

A schedule has been prepared and shown to me marked "GD2" which shows where it has been possible to produce the record of detention and charges for the Plaintiff in this action and in each of the 40 other like actions against the Defendant as specified in paragraph 8 of the Order of 30th July 1990. In respect of certain Plaintiffs it has not proved possible to produce the record of detention and charges and I accept that at one time such documents would have been in existence. However despite a thorough search having been made it has not proved possible to locate the missing documents. I believe they may have become lost over the course of the last six years or may in fact be in the possession of either the Crown Court at Sheffield or the Crown

Prosecution Service having been lodged in connection with the prosecution of individual Plaintiffs.

(ii) Pocket Notebook Entries

Where a police officer was involved in arresting a Plaintiff and made a pocket notebook entry a copy of the relevant entry had been disclosed and provided to the Plaintiff's solicitors. Not every arresting officer made a pocket notebook entry. Certain officers only made statements and where this was the case a copy of the statement has been disclosed and provided to the Plaintiff's solicitors.

(iii) Photographs

I am advised by police officers who were present at Orgreave on the 18th June 1984 that when individual officers made an arrest the prisoner was taken to a prisoner reception area and in most cases a polaroid photograph would be taken of the prisoner and the arresting officer or officers. If the prisoner was subsequently prosecuted and later acquitted I believe that the polaroid photograph was destroyed and is thus no longer in existence. The Defendant's List of Documents does disclose various photographs some of which do in fact show individual Plaintiffs and their arresting officer or officers but these were general photographs taken before the prisoner

reached the prisoner reception area.

(iv) PSU Records

After a thorough search of documents in the possession of the Chief Constable various Police Support Unit (PSU) Operational Records have been located and I have been shown marked "GD3" a list of the PSU Operational Records located. I believe that a PSU Operational Record booklet should have been kept for every PSU present at Orgreave on the 18th June 1984 and as it has not been possible to locate a booklet for every PSU on duty and that there may be PSU Operational Records either in the possession of the Crown Court at Sheffield or the Crown Prosecution Service or such records may have become lost over the last six years. Original PSU Operational Records were produced and handed into the custody of the Crown Prosecution Service and the Sheffield Crown Court during the course of prosecutions arising out of events occurring on 18th June 1984.

(v) Police and emergency service messages

The only document in existence relating to Police and emergency service messages during the course of the day is listed in the Defendant's List of Documents at number 1.13 in Schedule 1 Part 1 being a record of various radio transmissions by the Ground Commander in the police control room at

Orgreave. There are no other documents in existence.

(vi) Written Instructions

The only document in existence under this category is document number 3.2 in schedule 1, part 2 of the List of Documents being a South Yorkshire Police Operational Order for the NUM dispute at Orgreave dated 23rd May 1984 the production of which is objected to on the grounds that the document is and remains privileged from disclosure on grounds of public interest immunity as disclosure would interfere with the proper functioning of the Police Force as the document contains information relating to the policing of mass demonstrations and disclosure could affect the policing of future demonstrations.

*But dated 3 in para 2
I did may 1.*

(vii) Records of preparatory plans

Save as to the item referred to in sub-paragraph (vi). There are no other records of preparatory and/or contingency plans made by or on behalf of the Chief Constable in advance of events of the day.

(viii) Medical Records

Any records which may exist as to medical treatment given to individual Plaintiffs who will be in the power, custody or control of the hospital to which the Plaintiff attended or any

individual police surgeon who may have visited the Plaintiff during his time in custody. There are no such documents in the power, custody or control of the Chief Constable.

(ix) Duty State Records

I understand the reference to Duty State Records to be a reference to what is referred to in the South Yorkshire police as the Duty Sheet. This is a sheet kept for each police station showing where officers working from that police station are deployed on any individual day. There was no Duty Sheet in existence for Orgreave because a Duty Sheet is only kept for each police station. The Duty Sheets for individual police stations in the South Yorkshire Police area are kept for approximately three years and then destroyed but any sheets that would have been in existence relating to the 18th June 1984 would merely have shown that if individual officers were on duty at Orgreave and not at their normal police station they were "on duty elsewhere".

(x) Report and Memos

As to this category of documents I would refer to the document listed at 3.3 in schedule 1, part 2 being a report prepared by the Chief Constable to the Police Committee dated 25th September 1984 entitled "Charges of riot and unlawful assembly". The Chief Constable claims privilege against

disclosure of this document on the grounds of public interest immunity as disclosure would interfere with the proper functioning of the Police Committee. I note from paragraph 4 of Rajendra Bhatt's First Affidavit that the Plaintiffs already have possession of this document but I am not aware as to how this document came into their possession, the Chief Constable still maintains the claim of privilege. As far as the Document listed at 3.1 in Schedule 1 Part 2 I understand that although the document was provided to Counsel representing certain Plaintiffs during the course of criminal proceedings the document was disclosed on the basis it was and remained a privileged Document and the Chief Constable wishes to maintain a claim of public interest immunity against disclosure.

SWORN by the above named GEOFFREY)
DRABBLE this 24th)
day of October 1990)
at Sheffield South Yorkshire)

G. Drabble

Before me... *Margaret Cousins*
~~Solicitor/Commissioner of Oaths~~

Defendant

Drabble

Sworn the day of 1990

Case No. 1987 C6493

IN THE HIGH COURT OF JUSTICE

QUEENS BENCH DIVISION

BETWEEN:

ARTHUR CRITCHLOW

Plaintiff

and

CHIEF CONSTABLE OF SOUTH YORKSHIRE
POLICE

Defendant

AFFIDAVIT

Geoffrey Drabble

Hammond Suddards
Empire House
10 Piccadilly
Bradford
BD1 3LR

Ref: AHMcD/MMI/311

Defendant
Drabble
Sworn the day of 1990

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

BETWEEN:

ARTHUR CRITCHLOW

Plaintiff

and

CHIEF CONSTABLE OF SOUTH YORKSHIRE POLICE

Defendant

This is the exhibit marked "GD1" referred to in the Affidavit.

SWORN Before me
Solicitor/Commissioner of Oaths

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH Division

1987— A—No. 2168

Between

ROY ALDRIDGE

Plaintiff

AND

CHIEF CONSTABLE OF SOUTH YORKSHIRE Defendant

LIST OF DOCUMENTS

The following is a list of the documents relating to the matters in question in this action which are or have been in the possession, custody or power of the above-named

(1) Plaintiffs (or Defendant(s)) A.B.

and which is served in compliance with Order 24, rule 2, of the order herein dated the 19th day of October, 1989.

(2) Plaintiff(s) or Defendant(s).

1 The (2) Defendant has in his possession, custody or power the documents relating to the matters in question in this action enumerated in Schedule 1 hereto

(3) State ground of objection.

2 The (2) Defendant objects to produce the documents enumerated in Part 1 of the said Schedule 1 on the ground that (3) they are by their nature privileged from production.

]

3. The (2) Defendant has had, but has not now, in his possession, custody or power the documents relating to the matters in question in this action enumerated in Schedule 2 hereto.

4. Of the documents in the said Schedule 2, those numbered 1 to 10 in that Schedule were at the time of the service of this list in the possession, custody or power of (1) and the remainder of (2)

(4) Plaintiff's or Defendant's.

(5) State when.

(6) Here state what has become of the said documents and in whose possession they now are.

5. Neither the (2) Defendant nor his Solicitors nor any other person on his behalf, have now, or ever had, in their possession, custody or power any document of any description whatever relating to any matter in question in this action, other than the documents enumerated in Schedules 1 and 2 hereto.

SCHEDULE 1.—Part 1.

(Here enumerate in a convenient order the documents (or bundles of documents, if of the same nature, such as records) in the possession, custody or power of the party in question which he does not object to produce, with a short description of each document or bundle sufficient to identify it.)

Description of Document	Date
See attached Schedule	

SCHEDULE 1.—Part 2.

(Here number as aforesaid the documents in the possession, custody or power of the party in question which he objects to produce)

Description of Document	Date
See attached Schedule	
1. Legal professional privilege.	
2. Public interest privilege.	

SCHEDULE 2.

(Here number as aforesaid the documents which have been, but at the date of service of the list are not, in the possession, custody or power of the party in question.)

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Dated the 14th day of November, 1989.

NOTICE TO INSPECT

Take notice that the documents in the above list, other than those listed in Part 2 of Schedule 1 [and Schedule 2], may be inspected at [the office of the Solicitor of the above-named (7) Defendant on any working day, during normal office hours, by prior appointment.

(7) Plaintiff(s) or Defendant(s) (insert address) or as may be.

on the 15th day of November 1989 between the hours of 10.00 am and 4.00 pm

(8) Defendant(s) (or Plaintiff(s) C.D.

To the (8) Plaintiff } Served the 15th day of November 19 89
by Hammond Suddards
of 10 Piccadilly, Bradford BD1 3LR
Solicitor for the Defendant
and his Solicitors . }

LIST OF DOCUMENTS

SCHEDULE 1 PART 1

UNPRIVILEGED

<u>No.</u>	<u>Item</u>	<u>Date</u>
1.	<u>General Documents</u>	
1.1	Schedule of accused	Undated
1.2	Schedule of witnesses	Undated
1.3	Prisoners List (26)	Undated
1.4	List of Prisoners (27)	Undated
1.5	Map of area around Orgreave Coking Plant	Undated
1.6	Map of Highfield Lane	Undated
1.7	Regina v Greenaway Indictment (2)	Undated
1.8	List of Solicitors acting for MacClaughlan and 54 others	Undated
1.9	Policing the Coal Industry Dispute in South Yorkshire 1984, 1985	Undated
1.10	List of Police Officers & others making statements regarding Orgreave Incident 18/6/84	Undated
1.11	Miscellaneous photographs of Arthur Scargill with P Stones	18.11.84
1.12	Sgt Foster: Description of contents of video taping re Orgreave	18.11.84
1.13	Draft Police log of informations/ events re Orgreave incident	18.11.84
1.14	Daily Mirror article by Paul Foot	05.11.84
1.15	Sheffield Crown Court summons for MacClaughlan and 54 others	02.11.85
1.16	Rotherham Magistrates Court Order for closure of On and Off licences 18.6.84	20.11.85
1.17	Transcripts of R v Greenway and 14 others at Sheffield Crown Court	08.11.85
		et seq

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
1.	<u>General Documents</u>	
1.18	Video South Yorkshire Police Orgreave	18.06.84
2.	<u>General Events at Orgreave 18/06/84:</u> <u>Witness Statements</u>	
2.1	Statement of J E Plant	17.06.84
2.2	Statement of A R Clement Acc (OPS)	18.06.84
2.3	Statement of E Vallance Police Superintendent	18.06.84
2.4	Statement of M Ffelan Chief Inspector	20.06.84
2.5	Statement of J Fairest	18.06.84
2.6	Statement of N Manning	18.06.84
2.7	Statement of Ashton Whittingham	18.06.84
2.8	Statement of L Knott	18.06.84
2.9	Statement of R G Toseland	18.06.84
2.10	Statement of J Reed	18.06.84
2.11	Statement of G T Hurst	18.06.84
2.12	Statement of M Cheetham	18.06.84
2.13	Statement of M Jackson	18.06.84
2.14	Statement of O Toyne	18.06.84
2.15	Statement of P H Rich Police Photographer	18.06.84
2.16	Statement of B Leather	18.06.84
2.17	Statement of R H Nield PC2683	18.06.84
2.18	Statement of R M Simpson Chief Inspector	19.06.84
2.19	Statement of R White PC 548	20.06.84
2.20	Statement of G J Mitchell PC 1881	20.06.84
2.21	Statement of J C Buxton PC 2293	20.06.84
2.22	Statement of L Jeavans PC 3431	20.06.84
2.23	Statement of J C Mercer Inspector	20.06.84
2.24	Statement of P Bodsworth	20.06.84
2.25	Statement of R Thomason PC 2738	20.06.84
2.26	Statement of N J Spencer PC 7569	20.06.84

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
2.	<u>General Events at Orgreave 18/06/84:</u>	
	<u>Witness Statements</u>	
2.27	Statement of E F Earl PC 6784	20.06.84
2.28	Statement of K C Clayton	20.06.84
2.29	Statement of M Tierney	20.06.84
2.30	Statement of B Atkinson	20.06.84
2.31	Statement of A N Johnson PC 2236	20.06.84
2.32	Statement of D M Batty PC 752	21.06.84
2.33	Statement of P A Simmonds PC 1500	21.06.84
2.34	Statement of I D Brounbridge PC 5622	21.06.84
2.35	Statement of D Jones	
	Assistant Division Officer	21.06.84
2.36	Statement of R Lythnall Ambulanceman	21.06.84
2.37	Statement of D R Fidler Ambulanceman	21.06.84
2.38	Statement of R Keeton	21.06.84
2.39	Statement of Albert Page	
	Chief Metropolitan Ambulance Officer	21.06.84
2.40	Statement of K N McNally PC 7471	22.06.84
2.41	Statement of R A Marsh PC	23.06.84
2.42	Statement of F Astwood Health Visitor	23.06.84
2.43	Statement of P Smith PC 2393	25.06.84
2.44	Rotherham HA Accident and Emergency	
	Dept. Form relating to PC P Smith	18.06.84
2.45	Statement of E S McQueen PC	25.06.84
2.46	Statement of J V A Kearns PC	25.06.84
2.47	Rotherham HA Accident & Emergency	
	Dept Form relating to PC JV Kearns	18.06.84
2.48	Statement of D Hayes Police Inspector	25.06.84
2.49	Statement of R Owen Police Inspector	26.06.84
2.50	Statement of F L Stone Electrical	
	Lighting Supervisor	26.06.84
2.51	Statement of S W Lynam PC 6863	28.06.84
2.52	Statement of Wilfred Longstaff PC 2199	28.06.84
2.53	Statement of K T Smith PC 1277	10.07.84
2.54	Statement of M A Bembridge	12.07.84
2.55	Statement of P H Rich	
	Police Photographer	13.07.84
2.56	Statement of K Povey Superintendent	14.07.84

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
1.	<u>General Events at Orgreave 18/06/84:</u>	
	<u>Witness Statements</u>	
2.57	Statement of P Hale Chief Inspector	14.07.84
2.58	Statement of J E Plant Chief Draughting Technician	17.07.84
2.59	Statement of D M Foster PS 646	23.07.84
2.60	Statement of J A Turner PS 2616	24.07.84
2.61	Statement of E Vallance Police Superintendant	31.07.84
2.62	Further statement of A R Clement ACC (OPS)	02.08.84
2.63	Statement of W H Stark Chief Superintendant	13.11.84
2.64	Statement of Derek Smith Detective Inspector	07.05.85
2.65	Statement of S G Knowles	07.06.85
2.66	Statement of M J Hodgkinson	07.06.85
2.	<u>Documents relating to Aldridge</u>	
3.1	Pleadings	Various
3.2	Map of Highfield Lane showing position of arrest and appearances of photographs or video	Undated
3.3	Copy of notebook of R H Nield PC 2683	09.06.84 to 21.06.84
3.4	Statement of R H Nield PC 2683	18.06.84
3.5	Statement of A W Jackson PS 2700	19.06.84
3.6	Miscellaneous photographs taken	18.06.84
3.7	Statement of Mr Dynes PC 2405	13.07.84
4.	<u>Documents relating to Asquith</u>	
4.1	Pleadings	Various
4.2	Map of Highfield Lane showing position of arest and apearances on photograph or video	Undated
4.3	Statement of A Munday PC 1015	18.06.84
4.4	Statement of A Blundell PC	18.06.84

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
5.	<u>Documents relating to Barber</u>	
5.1	Pleadings	Various
5.2	Record of Detention & Charges	Undated
5.3	Copy of notebook of G Gray PC (now PS) 5743 'E'	15.06.84
5.4	Statement of G Gray PC 5443 'E'	18.06.84
5.5	Miscellaneous photographs taken	18.06.84
5.6	Statement of J W Gunn Police Inspector	02.07.84
6.	<u>Documents relating to Bell</u>	
6.1	Pleadings	Various
6.2	Map of Highfield Lane showing position of arrest and appearances on photographs or video	Undated
6.3	Log of arrest on 18.06.84	Undated
6.4	Copy of notebook of B Grundy PC 3650 to	15.06.84 18.06.84
6.5	Copy of notebook of L Holmes PC 456	18.06.84
6.6	Statement of L Holmes PC 456	18.06.84
6.7	Statement of B Grundy PC 3650	18.06.84
6.8	Miscellaneous photographs taken	18.06.84
7.	<u>Documents relating to Broomhead</u>	
7.1	Pleadings	Various
7.2	Map of Highfield Lane showing position of arrest and appearances on photographs or video	Undated
7.3	Record of Detention and Charges	Undated
7.4	Statement of M Martin PC 3711	18.06.84
7.5	Statement of S Johnson PC 218	18.06.84
7.6	Copy of notebook of M Martin PC 3711	18.06.84
7.7	Copy of notebook of S Johnson PC 218	18.06.84
7.8	Photograph of B Broomhead	18.06.84
7.9	Photograph of Police charging at Miners	18.06.84
7.10	Statement of A W Jackson PS 2701	19.06.84

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
8.	<u>Documents relating to Carpenter</u>	
8.1	Pleadings	Various
8.2	Map of Highfield Lane showing position of arrest and appearances on photographs or video	Undated
8.3	Statement of P Ketland PC 9377	18.06.84
8.4	Statement of G Campbell PC 3960	18.06.84
8.5	Copy notebook of G Campbell PC 3960	18.06.84
8.6	Copy notebook of P Ketland PC 9377	18.06.84
8.7	Record of Detention and Charges	18.06.84
9.	<u>Documents relating to Clark</u>	
9.1	Pleadings	Various
9.2	Map of Highfield Lane showing position of arrest and appearance on photographs or video	Undated
9.3	Statement of C J S Coleman PC 1257	18.06.84
9.4	Statement of A W Jackson PS 2700	19.06.84
10.	<u>Documents relating to Crichlow</u>	
10.1	Pleadings	Various
10.2	Map of Highfield Lane showing position of appearance on photo or video	Undated
10.3	Copy of notebook of P E Noms PC 5909	15.06.84
10.4	Copy of notebook of R P Abson PC 2246	16.06.84 to 20.06.84
10.5	Statement of P E Noms PC 5909	18.06.84
10.6	Statement of R P Abson PC 2246	18.06.84
10.7	Miscellaneous photographs	taken 18.08.84
10.8	Statement of J W Gunn Police Inspector	02.07.84
11.	<u>Documents relating to Denton</u>	
11.1	Pleadings	Various
11.2	Statement of B Goucher PC 7877	18.06.84

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
11.3	Statement of S J Williams PC 8974	18.06.84
11.4	Record of Detention and Charges	18.06.84
11.5	Copy of notebook of B Goucher PC 7877	18.06.84
11.6	Miscellaneous photographs taken	18.06.84
11.7	Statement of J W Gunn Police Inspector	02.07.84
12.	<u>Documents relating to Donaldson</u>	
12.1	Pleadings	Various
12.2	Record of Detention and Charges	Undated
12.3	Statement of I Johnston PC 7001 'C'	18.06.84
12.4	Statement of J Stojak PC 2118	18.06.84
12.5	Miscellaneous photographs taken	18.06.84
12.6	Statement of J W Gunn Police Inspector	02.07.84
13.	<u>Documents relating to Fisher</u>	
13.1	Pleadings	Various
13.2	Map of Highfield Lane showing position of arrest and appearance on photographs or video	Undated
13.3	Statement of D Newman PC 5194	18.06.84
13.4	Statement of G L Bevan PC	18.06.84
13.5	Photographs taken	18.06.84
13.6	Copy notebook of D Newman PC 5194	18.06.84
13.7	Record of Detention and charges	18.06.84
13.8	Statement of A W Jackson PS 2700	19.06.84
14.	<u>Documents relating to Foulds</u>	
14.1	Pleadings	Various
14.2	Map of Highfield Lane showing position of arrest and appearance on photos of video	Undated
14.3	Copy of notebook of S G Hill PC 2421 to	09.06.84 26.06.84

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
10.	<u>Documents relating to Foulds</u>	
14.4	Copy of notebook of F R Thompson	17.06.84
	PC 3220 to	17.06.84
14.5	Statement of R Thompson PC 3220	18.06.84
14.6	Statement of S G Hill PC 2421	18.06.84
14.7	Miscellaneous photographs taken	18.06.84
14.8	Statement of J W Gunn	
15.	<u>Documents relating to Gillan</u>	
15.1	Pleadings	Various
15.2	Statement of A C Naismith PC 161	18.06.84
15.3	Statement of N J Priestley PC 581	18.06.84
15.4	Copy of notebook of PC Naismith	18.06.84
	to	21.06.84
15.5	Copy of notebook of PC Priestley	18.06.84
15.6	Photograph taken	18.06.84
15.7	Statement of A W Jackson PS 2700	19.06.84
16.	<u>Documents relating to Goodfellow</u>	
16.1	Pleadings	Various
16.2	Map of Highfield Lane showing position of arrest and appearance on photographs or video	Undated
16.3	Statement of I B Mulcahey PC 7031	18.06.84
16.4	Copy notebook of I B Mulcahey PC 7031	18.06.84
16.5	Miscellaneous photographs taken	18.06.84
16.6	Statement of J W Gunn Police Inspector	02.07.84
16.7	Further statement of I B Mulcahey PC 7031	09.06.89
17.	<u>Documents relating to Greaves</u>	
17.1	Pleadings	Various
17.2	Map of Highfield Lane showing position of arrest and appearance on photographs or video	Undated
17.3	Statement of S Halsall PC 5158	18.06.84

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
17.4	Copy notebook of S Halsall PC 5158	18.06.84
17.5	Police record of injuries	Undated
17.6	Statement of J W Gunn Police Inspector	02.07.84
17.7	Further statement of S Halsall PC 5158	02.06.89
18.	<u>Documents relating to Hargreaves</u>	
18.1	Pleadings	Various
18.2	Map of Highfield Lane showing position of arrest and appearance on photographs or video	Undated
18.3	Record of Detention and Charges	18.06.84
18.4	Statement of J A Warr PC 3771	18.06.84
18.5	Statement of N Taylor Police Inspector 7019	18.06.84
18.6	Copy of notebook of J A Warr	18.06.84
18.7	Copy notebook of N Taylor	18.06.84
18.8	Statement of J W Gunn Police Inspector	02.07.84
19.	<u>Documents relating to Hopkinson</u>	
19.1	Pleadings	Various
19.2	Map of Highfield Lane	Undated
19.3	Copy of notebook of PC Tedder	14.06.84 to 10.06.84
19.4	Copy of notebook of PC White	18.06.84 to 20.06.84
19.5	Statement of D White PC 1400	18.06.84
19.6	Statement of M J Tedder PC2579	18.06.84
19.7	Photographs	taken 18.06.84
19.8	Rotherham H A Accident & Emergency Dept. Form relating to PC White	18.06.84
19.9	Statement of A W Jackson PS 2700	19.06.84
20.	<u>Documents relating to Howe</u>	
20.1	Pleadings	Various
20.2	Map of Highfield Lane showing position of arrest and appearance on photograph or video	Undated

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
	20.3 Statement of C Onions PS 5131	18.06.84
	20.4 Statement of P Ketland PC 9377	18.06.84
	20.5 Copy notebook of P Ketland PC 9377	18.06.84
	20.6 Copy notebook of C Onions PS 5131	18.06.84
21.	<u>Documents relating to Jackson</u>	
	21.1 Pleadings	Various
	21.2 Map of Highfield Lane showing position of arrest and appearance on photo or video	Undated
	21.3 Copy of notebook of PC Davis	16.06.84
		to 21.06.84
	21.4 Copy of notebook of PC Pimblett PC6910	18.06.84
	21.5 Statement of N G Pimblett PC 6910	18.06.84
	21.6 Miscellaneous photographs taken	18.06.84
	21.7 Statement of J W Gunn Police Inspector	02.07.84
22.	<u>Documents relating to James</u>	
	22.1 Pleadings	Various
	22.2 Map of Highfield Lane showing position of arrest and appearance on photo or video	Undated
	22.3 Copy of notebook of PC Fryer	18.06.84
	22.4 Statement of P Dealey PC 3545	18.06.84
	22.5 Statement of H Fryer PC 2783	18.06.84
	22.6 Statement of A W Jackson PS 2700	19.06.84
23.	<u>Documents relating to Lawson</u>	
	23.1 Pleadings	Various
	23.2 Map of Highfield Lane showing position of arrest and appearance on photographs or video	Undated
	23.3 Photograph	
	23.4 Statement of F L Doras PC5642	18.06.84
	23.5 Statement of R I Bird PC 5000	18.06.84

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
23.6	Copy notebook of R I Bird PC 5000	18.06.84
23.7	Record of Detention and charges	18.06.84
23.8	Statement of J W Gunn Police Inspector	02.07.84
24.	<u>Documents relating to Leigh</u>	
24.1	Pleadings	Various
24.2	Map of Highfield Lane showing position of arrest and appearance on photo or video	Undated
24.3	Copy of notebook PC Kay	18.06.84
24.4	Statement of P Kay PC 139	18.06.84
24.5	Miscellaneous photographs taken	10.06.84
24.6	Statement of A W Jackson PS 2700	19.06.84
25.	<u>Documents relating to Lingard</u>	
25.1	Pleadings	
25.2	Map of Highfield Lane showing position of arrest and appearance on photos or video	Undated
25.3	Copy of notebook of PC Deeley	17.06.84
		to 19.06.84
25.4	Statement of S Johnson PC 218	18.06.84
25.5	Statement of P Deeley PC 3545	18.06.84
25.6	Miscellaneous photographs taken	18.06.84
25.7	Statement of A W Jackson PS 2700	18.06.84
26.	<u>Documents relating to MacCloughlan</u>	
26.1	Pleadings	
26.2	Map of Highfield Lane showing position of appearance on photos and videos	Undated
26.3	Copy of notebook of PC Marshall	01.06.84
		to 19.06.84
26.4	Copy of notebook of PC A L Akers	17.06.84
		to 20.06.84

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
26.5	Copy of notebook of PC Sanderson	17.06.84
	to	18.06.84
26.6	Statement of A L Akers PC 1008	18.06.84
26.7	Statement of I K Marshall PC 2715	18.06.84
26.8	Statement of P A Sanderson PC 2705	18.06.84
26.9	Miscellaneous photographs taken	18.06.84
26.10	Statement of N P Robb Dental Surgeon	28.06.84
26.11	Statement of A L Akers PC 1008	09.07.84
26.12	Statement of A W Jackson PS 2700	11.07.84
27.	<u>Documents relating to Marshall</u>	
27.1	Pleadings	Various
27.2	Map of Highfield Lane showing position of arrest	Undated
27.3	Statement of A Bennett Insp 2121 'F'	18.06.84
27.4	Statement of C J MacClaughlan PC 4441 'F'	18.06.84
27.5	Miscellaneous photographs taken	18.06.84
27.6	Statement of J W Gunn Police Inspector	03.07.84
27.7	Statement of A Bennett Insp 2121 'F'	24.07.84
28.	<u>Documents relating to Moore</u>	
28.1	Pleadings	Various
28.2	Maps of Highfield Lane showing position of arrest and appearances on photos or videos	Undated
28.3	Copy of notebook of PC Browning	11.06.84
	to	20.06.84
28.4	Statement of F R Browning PC 4139 'C'	18.06.84
28.5	Record of Detention and Charges	18.06.84
28.6	Miscellaneous photographs taken	18.06.84
28.7	Statement of J W Gunn Police Inspector	02.08.84

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
29.	<u>Documents relating to Morris R</u>	
29.1	Pleadings	Various
29.2	Copy of notebook of PC Myers	15.06.84 to 20.06.84
29.3	Copy of notebook of Insp Young	17.06.84 to 18.06.84
29.4	Copy of notebook of PC Leighton	17.06.84 to 18.06.84
29.5	Statement of D R Myers PC 1987	18.06.84
29.6	Statement of G D Young PS 2444	18.06.84
29.7	Statement of B L Taylor PC 1082	18.06.84
29.8	Copy of notebook of PC Taylor	18.06.84
29.9	Record of Detention and Charges	18.06.84
29.10	Photograph	taken 18.06.84
29.11	Statement of A W Jackson PS 2700	19.06.84
29.12	Statement of M J Brooks PC 503	07.08.84
29.13	Statement of G D Leighton PC 4371	13.08.84
30.	<u>Documents relating to Morris R.W</u>	
30.1	Pleadings	Various
30.2	Map of Highfield Lane showing position of arrest and appearance on photograph or video	Undated
30.3	Statement of G D Young PS	18.06.84
30.4	Statement of B L Taylor PC 1082	18.06.84
30.5	Copy notebook of G D Leighton PC 4371	18.06.84
30.6	Statement of G D Leighton PC 4371	13.08.84
30.7	Record of detention and charges	18.06.84
31.	<u>Documents relating to Newbigging</u>	
31.1	Pleadings	Various
31.2	Map of Highfield Lane	Undated

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
31.3	Statement of P Stannard PC6680 'F'	18.06.84
31.4	Statement of K Barnes PC 4354 'F'	18.06.84
31.5	Statement of J W Gunn Police Inspector	02.07.84
31.6	Defence request medical evidence re Newbigging	01.07.84
31.7	Accident report	01.07.84
32.	<u>Documents relating to Norris</u>	
32.1	Pleadings	Various
32.2	Map of Highfield Lane showing position of arrest and appearance on photograph or video	Undated
32.3	Statement of G J Pearson PC 1591	18.06.84
32.4	Statement of D McIver PC	18.06.84
33.	<u>Documents relating to O'Brien</u>	
33.1	Pleadings	Various
33.2	Map of Highfield Lane showing position of arrest and appearance on photo or video	Undated
33.3	Copy of notebook PC Anderson	15.06.84
		to 19.06.84
33.4	Copy of notebook PC Douglas	18.06.84
		to 21.06.84
33.5	Statement of PC Anderson PC1762	18.06.84
33.6	Statement of P Douglas PC 5316	18.06.84
33.7	Miscellaneous photographs taken	18.06.84
33.8	Statement of J W Gunn Police Inspector	02.07.84
33.9	Computer read-out of criminal record	02.07.85
34.	<u>Documents relating to Pinder</u>	
34.1	Pleadings	Various
34.2	Map of Highfield Lane showing position of arrest	Undated

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
	34.3 Copy of notebook of PC Fenton	18.06.84
		to 21.06.84
	34.4 Copy of notebook of PC Robson	18.06.84
		to 19.06.84
	34.5 Statement of P Robson PC 3270	18.06.84
	34.6 Statement of P Fenton PC 2711	18.06.84
	34.7 Record of Detention and Charges	18.06.84
	34.8 Statement of A W Jackson PS 2700	19.06.84
35.	<u>Document relating to Plant</u>	
	35.1 Pleadings	Various
	35.2 Map of Highfield Lane showing position of arrest and appearance on photographs or video	Undated
	35.3 Photograph	
	35.4 Statement of D Newman PC	18.06.84
	35.5 Statement of G L Bevan PC 5194	18.06.84
	35.6 Copy notebook of G L Bevan PC 5194	18.06.84
	35.7 Statement of A W Jackson PS 2700	19.06.84
36.	<u>Documents relating to Starrs</u>	
	36.1 Pleadings	Various
	36.2 Copy of notebook of Sgt McElvaney	17.06.84
		to 19.06.84
	36.3 Copy of notebook of PC Proud	15.06.84
		to 19.06.84
	36.4 Statement of K S McElvaney PC 2281	18.06.84
	36.5 Statement of I Proud PC 1184	18.06.84
	36.6 Photograph	taken 18.06.84
	36.7 Statement of A W Jackson	19.06.84
37.	<u>Documents relating to Turnbull</u>	
	37.1 Pleadings	Various

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
	37.2 Map of Highfield Lane showing position of arrest and appearance on photograph or video	Undated
	37.3 Statement of N Tolley PC 1402	18.06.84
	37.4 Statement of A T Mulhall PC 8682	18.06.84
	37.5 Copy notebook of A T Mulhall PC 8682	18.06.84
38.	<u>Documents relating to Whysall</u>	
	38.1 Pleadings	Various
	38.2 Map of Highfield Lane showing position of arrest and appearance on photographs or video	Undated
	38.3 Statement of B Yates PS	18.06.84
	38.4 Statement of E Valente PO 6567	18.06.84
	38.5 Copy notebook of B Yates	18.06.84
	38.6 Copy notebook of E Valente	18.06.84
	38.7 Further statement of E Valente	10.06.89
	38.8 Further statement of B Yates	12.06.89
	38.9 Record of Detention and Charges	Undated
39.	<u>Documents relating to Wilkinson</u>	
	39.1 Pleadings	Various
	39.2 Map of Highfield Lane showing position of arrest and appearance on photograph or video	Undated
	39.3 Statement of K West PC 2452	18.06.84
	39.4 Statement of S J Fairclough PC 1535	18.06.84
	39.5 Photographs	
	39.6 Copy notebook of S J Fairclough PC1535	18.06.84
	39.7 Police record of injuries	Undated
	39.8 Statement of A W Jackson PS 2700	19.06.84
40.	<u>Documents relating to Wilson M.</u>	
	40.1 Pleadings	Various
	40.2 Map of Highfield Lane	19.06.84

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
40.3	Copy of notebook of PC Ham	18.06.84
40.4	Statement of W G Stacey Police Inspector 34540	18.06.84
40.5	Statement of A W Jackson PS 2700	19.06.84
40.6	Statement of A R Ham PC 3461 'D'	26.06.84
40.7	Statement of S Edwards CD 823	04.07.84
40.8	Statement of G M Connor DS 1089	04.07.84
41.	<u>Documents relating to Wilson J.</u>	
41.1	Readings	Various
41.2	Map of Eighfield Lane showing position of arrest and appearance on photographs or video	Undated
41.3	Statement of W P J. Dickinson PC 4263	18.06.84
41.4	Copy notebook of W P J Dickinson PC 4263	18.06.84
41.5	Statement of I Griffiths PC 3056	16.07.84
41.6	Police record of injuries	Undated
42.	<u>Documents relating to Wood</u>	
42.1	Pleadings	Various
42.2	Map of Eighfield Lane showing position of arrest and appearance on photograph or video	Undated
42.3	Statement of K G Pearson PC 5665	18.06.84
42.4	Statement of N J Spencer PC 7569	18.06.84
42.5	Copy notebook of K G Pearson PS 5665	18.06.84
42.6	Copy notebook of N J Spencer PC 7569	18.06.84
42.7	Statement of J W Gunn Police Inspector	03.07.84
43.	<u>Documents related to Wysocki</u>	
43.1	Pleadings	Various
43.2	Map of Eighfield Lane showing position of arrest and appearances on photos and video	Undated

LIST OF DOCUMENTS

<u>No.</u>	<u>Item</u>	<u>Date</u>
43.3	Statement of K Kelsey PS 3356	Undated
43.4	Copy of notebook of PC Kelsey	18.06.84
		to 20.06.84
43.5	Copy of notebook of PC Skelton	18.06.84
		to 21.06.84
43.6	Statement of J Skelton PC 9479	18.06.84
43.7	Record of Detention and Charges	18.06.84
43.8	Miscellaneous photographs	taken 18.06.84
43.9	Statement of J W Gunn Police Inspector	02.07.84

LIST OF DOCUMENTS

PRIVILEGED

SCHEDULE 1 PART 11

<u>No.</u>	<u>Item</u>	<u>Date</u>
1.	Memoranda, instructions, letters, advices, notes briefs and opinions passing between the Defendant, his officers and legal advisers in relation to prosecution arising out of the events at Orgreave on 18 June 1984.	
2.	<u>Police Investigation Report into complaint by Russell Brumhead</u>	
3.	<u>Police General Privileged Documentation re - Orgreave Incident</u>	
3.1	Extracts from Tactical Operations Manual "Longshields"	Undated
3.2	South Yorkshire Police Operational Order for Orgreave NUM dispute at Orgreave	23.05.84
3.3	"Charges of Riot and Unlawful Assembly" Report by Chief Constable to Police Committee	25.09.84

1987. — A. — No.
IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH Division

Dated 14th November, 1989.

ROY ALDRIDGE Plaintiff
- and -

CHIEF CONSTABLE OF
SOUTH YORKSHIRE Defendant

List of Documents

Hammond Suddards,
10 Piccadilly,
BRADFORD BD1 3LR.
(Ref. PCM)

Defendant's Solicitor

Solicitor's Reference



The Solicitors' Law Stationery Society plc, Oyez House,
27 Crimscoot Street, London SE1 5TS

2.86 F6048

5048071

High Court B9

HAMMOND SUDDARDS

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OUR REF. AHMcD/MMI/311

YOUR REF. RG/EB/ORGREAVE&ORS

DATE

25th July 1990

Dear Sirs

RE: ALDRIDGE ASQUITH AND OTHERS v SOUTH YORKSHIRE POLICE

We refer to the Defendant's list of documents. After further perusal of the same we have noted a number of clerical errors which are as follows:-

1. From our records it appears the wrong Police Statements were supplied in relation to a number of Plaintiffs. The document numbers concerned are 3.5, 5.6, 7.10, 10.8, 11.7, 12.6, 14.8, 15.7, 16.6, 19.9, 21.7, 22.6, 23.8, 24.6, 25.5, 25.7, 26.12, 29.11 31.5, 33.8, 34.8, 36.7, and 43.9.

We therefore enclose copies of the correct documents which should be substituted for those in your file.

2. Some documents listed in our list under the heading of a named Plaintiff also relate to other Plaintiffs which should be added to the respective number in part 1 schedule 1 of our list. These are:

Messrs. B.M. Bernburg & Co.
Solicitors
DX39903
London

- (i) Document number 13.5 also relates to Fowlds Jackson, and Hargreaves;
 - (ii) Document number 17.5 also relates to Barber, Fowlds, Critchlow and O'Brien;
 - (iii) Document number 39.7 also relates to Starrs, Broomhead and Pinder.
 - (iv) Document number 41.6 also relates to Leigh.
3. A number of documents have been omitted from the list and should be incorporated in it these are:-
- (i) Under category 11 map of Highfield Lane showing position of arrest should be document 11.8.
 - (ii) Under category 22 a photograph, (you have had a copy of this) document 22.7, and a notebook of P.C. Deeley document 22.8 which relates to James as well as Lingard, a copy of this document has been supplied under category number 25.
 - (iii) Under category number 40, there is a further statement of W.G. Stacey dated 29 of September 1984 document 40.9.
 - (iv) Under document number 3, copy notebook of P.C. 2405 Dynes document 3.8.
 - (v) Under category number 13, statement of James William Gunn dated 2nd July 1984 document 13.9.
 - (vi) Under category 41 statement of A.W. Jackson P.S. 2700, dated 19th June 1984, this document was originally listed under document number 40.5 but in fact relates to J. Wilson and not D.M. Wilson. Document 41.7 also to be listed under this document number is, copy notebook of I. Griffiths, (you have a copy of this rather than that of W.P.J. Dickinson).
 - (vii) Under category number 37 photograph, again you have a copy of this document 37.6.
4. Copies of documents under category numbers 10, 27 and 33 have been supplied to you but relate to the criminal proceedings being notes prepared by Counsel for use at the trial and should therefore be privileged. They are not listed on our client's list of documents. Documents numbered 1.12, 31.6 and 31.7 should also be privileged, again being notes prepared for the criminal trial.

5. The documents listed at 29 and 30 are confused as to which relate to Ronald Wayne Morris, referred to as R. Morris and Raymond Wilfred Morris, referred to as R.W. Morris.

The following documents relate to R. Morris and R.W. Morris:-

- (i) Copy notebook of P.C. 4371 Leighton.
- (ii) Statement of P.C. 4371 Leighton.
- (iii) Copy notebook of P.C. 1082 Taylor.
- (iv) Statement of P.C. 1082 Taylor.
- (v) Statement of P.S. 2444 Young.
- (vi) Record of Detention and Charges.

We have a copy notebook of P.S. 2444 Young which relate to R. Morris and the following documents which relate to R.W. Morris:-

- (i) Copy notebook of P.C. 1987 Myers.
- (ii) Statement of P.C. 1987 Myers.
- (iii) Statement of A.W. Jackson P.S. 2700.
- (iv) Statment of M.J. Brooks.
- (v) Photograph.

6. With regard to document 1.10, the copy supplied is a privileged document the correct list of Police Officer and others making statements regarding Orgreave incident is enclosed.
7. It would appear that the documents enumerated 13.8 and 35.5 are non-existent as we cannot trace any copies.
8. With regard to Document Number 2.4, this should be dated 18/06/84.
9. With regard to Document Number 35.6, the notebook should be that of Newman and not Bevan.
10. With regard to Document Number 10.3, this should be copy notebook of P.E. Norris and not "Noms".
11. With regard to documents 2.65 and 2.66, we also have the

original handwritten statements and enclose copies herewith.

12. You have not had copies of documents 19.8 and 28.7 and we therefore enclose copies herewith.

We attach a separate schedule which shows whether we have been able to supply the record of detention and charges for each individual Plaintiff and copy notebook entry of the arresting officer(s). Dealing firstly with the record of detention and charges we are prepared to accept that although in certain cases we have not been able to supply the document it must have at some stage been in existence. It may have become lost over the course of the last six years or more likely it is currently in the possession of either the Crown Court at Sheffield or at the Crown Prosecution Service. The documents would have been required in connection with various prosecutions arising out of this incident and we understand that the documents have been retained both by the Crown Prosecution Service and the Crown Court but such documents are not in the custody, power or control of the Chief Constable.

As far as the notebooks you refer to the notebook of each Police Officer "concerned" with the Plaintiff we have interpreted this to mean the notebook of the arresting Police Officer(s). Where such notebook entries exist you have been supplied with copies, not every arresting officer would have made a pocket note book entry and as you are aware due to the nature of the events on the 18th June it was not possible for each officer to make an individual notebook entry and certain officers only made statements after the arrest and you will have been supplied with copies of such statements.

As far as your category "photographs taken of Plaintiff with his arresting officer prior to being charged" we think you are aware that when officers took those arrested to the prisoner reception area a Polaroid photograph was usually taken of the arrested man with the arresting officer(s) and we take it you refer to these photographs. In our list we have disclosed various photographs some of which do show individual Plaintiffs with their arresting officer(s) but these were general photographs taken before the prisoner was taken to the reception area. As far as the Chief Constable is aware all of these photographs were destroyed after the acquittal of those charged with offences arising out of the incident on 18th June and as such are no longer in existence.

Concerning Police Support Unit (PSU) operational records, we have been able to trace some original documents, any other documents which may still be in existence will be in the possession of the Crown Court at Sheffield or the Crown Prosecution Service having been used during the course of criminal prosecutions arising out of the events of the day.

We are preparing a list of the PSU booklets which we are able to disclose and will forward this during the course of the week.

As far as records on paper and on tape of Police and emergency service messages we would refer you to document number 1.13 which is a written record of various radio transmissions noted by the Ground Commander in the Police Control Room at Orgreave.

As far as written instructions and orders of the day we would refer to privileged document 3.2.

There are no records of preparatory and contingency plans made in advance of the day.

As to records of medical treatment given to individual Plaintiffs any records which exist will be in the power, custody or control of the hospital to which they attended, we assume Rotherham General Hospital or any individual Police surgeon who may have visited a Plaintiff during his time in custody. Again such documents are not in the power, custody or control of the Chief Constable.

As far as duty state records are concerned we understand this to be a reference to what is referred to in the South Yorkshire Police Force as the Duty Sheet. This is a sheet kept for each Police Station showing where officers working from that Police Station are deployed on any individual day. There would be no Duty Sheet in existence for Orgreave as a Duty Sheet is only kept for each Police Station. The Duty Sheets for individual Police Stations in the South Yorkshire Police area are kept for approximately 3 years and then destroyed but any sheets that would have been in existence relating to 18th of June would merely have shown that if individual officers were on duty at Orgreave and not at their normal Police Station they were "on duty elsewhere".

As far as reports and memos prepared for and by senior police officers after the events of the day we would refer to privileged document 3.3 which you in fact have a copy of.

Concerning this document it is the Chief Constable's understanding that this document being prepared for the purposes of the Police Committee was and remains a confidential document which should only have been considered by the Police Committee Members.

Similarly relating to privileged document 3.1 the extract from the Tacticle Operations manual we understand that extracts from this document were supplied to Counsel representing certain of the Plaintiffs who were charged with events arising out of the 18th of June incident but the

document was supplied on the basis that it was to be used only for the purposes of those criminal proceedings and then to be returned.

It seems Schedule Two of our List of Documents was not completed and we attach details.

We have instructed Counsel in connection for the summons for directions and will be opposing your application for the Chief Constable to swear an Affidavit verifying the List of Documents and will similarly be maintaining the claim for privilege relating to privileged document 3.2.

Dealing with paragraph 3 of the Summons for Directions we are not agreeable to photographs and video footage taken on or around 18th June 1984 being admitted in evidence without the person responsible for taking the photographs or video footage being called to give evidence to confirm the time and place that the photographs or video footage were taken.

It would seem sensible however for there to be a sketch plan prepared and admitted in evidence and we wonder whether you are putting in hand arrangements to prepare such a sketch plan or do you think an ordnance survey plan will suffice.

We are considering paragraph 5 of your summons but think we will be able to agree that the official transcript be admitted in evidence without the necessity of calling the shorthand writers.

As to paragraph 6 concerning medical evidence we will be asking for an order that the Plaintiffs do disclose details of any medical evidence relied upon any that the Defendant then has a period of 4 months in which to consider the medical evidence, if appropriate commission a medical report and if the same is to be relied upon disclose the said report. The present position is we have not seen any medical evidence in respect of any of these claims and do not hold any medical evidence ourselves.

As to the consolidation of the 41 sets of proceedings we are currently considering with Counsel whether this will be an appropriate method of proceeding. During our review of the matter we have prepared various schedules and now attach for your information:-

- (a) A schedule of individual Plaintiffs and arresting and charging officers.
- (b) Schedule of arresting officers.
- (c) Schedule of charging officers.
- (d) Schedule of police forces involved.
- (e) Summary of police forces involved.

- (f) A map showing the time and place of arrest of certain Plaintiffs.
- (g) Summary of charges.

We would consider that this would be an appropriate case for an exchange of witness statements, do you agree?

No doubt you will let us have any comments on the contents of this letter. We would also point out we still await your cheque in respect of the cost of the transcript.

Yours faithfully
HAMMOND SUDDARDS

Schedule Two

The original of any letters listed in Schedule One Part 1 which were dispatched to the addressees on the dates of the said letters.

The originals of documents prepared for the purposes of the Criminal Prosecution of Plaintiffs which were passed either to the Clerk of the Magistrates Court relevant to the prosecution, the County Prosecuting Solicitors Department (now the Crown Prosecution Service) and/or the Sheffield Crown Court during the course of the prosecution - such documents will include charge and detention sheets, various photographs, original Criminal Justice Act statements and P.S.U. booklets.

Any Polaroid photographs taken of Plaintiffs and their arresting officers were destroyed after the Plaintiff was acquitted.

Defendant

Drabble

Sworn the day of 1990

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

BETWEEN:

ARTHUR CRITCHLOW

Plaintiff

and

CHIEF CONSTABLE OF SOUTH YORKSHIRE POLICE

Defendant

This is the exhibit marked "GD2" referred to in the Affidavit.

SWORN Before me
Solicitor/Commissioner of Oaths

	<u>RECORD OF DETENTION AND CHARGES SUPPLIED</u>	<u>NOTEBOOK OF POLICE OFFICER(S) SUPPLIED</u>	<u>NOTEBOOK OF POLICE OFFICER(S) NOT SUPPLIED .</u>
<u>PLAINTIFF</u>			
1. ALDRIDGE	X	✓ ✓	
2. ASQUITH	X	X X	Munday and Blundell
3. BARBER	✓	✓	
4. BELL	X	✓ ✓	
5. BROOMHEAD	✓	✓ ✓	
6. CARPENTER	✓	✓ ✓	
7. CLARK	X	X	Coleman
8. CRITCHLOW	X	✓ ✓	
9. DENTON	✓	✓ X	Williams
10. DONALDSON	✓	✓ ✓	
11. FISHER	✓	✓	Bevan
12. FOWLDS	X	✓ ✓	
13. GILLAN	X	✓ ✓	
14. GOODFELLOW	X	✓	
15. GREAVES	X	✓	
16. HARGREAVES	✓	✓ ✓	
17. HOPKINSON	X	✓ ✓	

	<u>RECORD OF DETENTION AND CHARGES SUPPLIED</u>	<u>NOTEBOOK OF POLICE OFFICER(S) SUPPLIED</u>	<u>NOTEBOOK OF POLICE OFFICER(S) NOT SUPPLIED</u>
<u>PLAINTIFF</u>			
18. HOWE	X	✓ ✓	
19. JACKSON	X	✓ ✓	
20. JAMES	X	✓ ✓	
21. LAWSON	✓	✓ X	Doras
22. LEIGH	X	✓	
23. LINGARD	X	✓	Johnson
24. MACLAUCHLAN	X	✓ ✓ ✓	
25. MARSHALL	X	✓ ✓	
26. MOORE	✓	✓	
27. MORRIS RAYMOND	✓	✓ ✓ ✓ ✓	Brook
28. MORRIS RONALD	✓	✓ ✓ ✓	
29. NEWBIGGING	X	✓ ✓	
30. NORRIS	X	X X	Pearson & McIver
31. O'BRIEN	X	✓ ✓	
32. PINDER	✓	✓ ✓	
33. PLANT	X	✓ X	Bevan
34. STARRS	X	✓ ✓	

	<u>RECORD OF DETENTION AND CHARGES SUPPLIED</u>	<u>NOTEBOOK OF POLICE OFFICER(S) SUPPLIED</u>	<u>NOTEBOOK OF POLICE OFFICER(S) NOT SUPPLIED</u>
<u>PLAINTIFF</u>			
35. TURNBULL	x	✓	Tulley
36. WHYSALL	✓	✓ ✓	
37. WILKINSON	x	✓	West
38. WILSON J	x	✓ ✓	
39. WILSON D.M.	x	✓	Stacey, Conner, Edwards
40. WOOD	x	✓ ✓	
41. WYSOCKI	✓	✓ ✓	

LSCHDD3005/PMB (D)

Defendant

Drabble

Sworn the day of 1990

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION

BETWEEN:

ARTHUR CRITCHLOW

Plaintiff

and

CHIEF CONSTABLE OF SOUTH YORKSHIRE POLICE

Defendant

This is the exhibit marked "GD3" referred to in the Affidavit.

SWORN Before me
Solicitor/Commissioner of Oaths

SCHEDULE OF POLICE SUPPORT UNIT OPERATIONAL RECORDS

<u>Force</u>	<u>Unit Number</u>	<u>Officer I/C</u>
Cambridge	6/PZ68	Inspector Bullen
Cleveland	PZ148	Inspector Marchant
Durham	2B - PZ67	Inspector Liddy
Durham	PZ149 - 11C	Inspector Peart
Durham	PZ150	Inspector Aspey
Humberside	PZ191	Inspector Gallagher
Humberside	PZ192	Inspector Woodthorpe
Humberside	PZ193	Inspector Murray
Humberside	PZ194	Inspector Reed
Humberside	PZ195	Inspector Mazingham
Lancashire	PZ1	Inspector Ormeston/C.I FFelan
Lancashire	PZ2	Inspector Birkett/C.I FFellam
Lancashire	PZ146, PZ145, PZ147	Inspector Lawrence/ Inspector Brear/ Inspector Caine
Lincolnshire	PZ23	Inspector Green
Lincolnshire	PZ24	Inspector Hannath
Lincolnshire	PZ25	Inspector Shaw
Lincolnshire	PZ26	Inspector Strickland
Lincolnshire	PZ27	Inspector Harding
Lincolnshire	PZ28	Inspector Knowles
Lincolnshire	PZ29	Inspector Hudson
Lincolnshire	PZ57	Inspector Phillips
Lincolnshire	PZ58 (23A)	Inspector Wintin
Lincolnshire	PZ92	Inspector Patterson
Greater Manchester	PZ15	Inspector Johnson/ Inspector Orrell
Greater Manchester	PZ16	Inspector Campbell/ Inspector Orrell

<u>Force</u>	<u>Unit Number</u>	<u>Officer I/C</u>
Merseyside	MU18	Inspector Webster
Merseyside	MU21	Inspector Stacey
Merseyside	MU22	Inspector Bennett
Merseyside	24	Inspector Owen/Chief Inspector Wilson
Merseyside	MU24/138/183	Inspector Yeardsley/ Chief Inspector Dixon
Merseyside	183	Chief Inspector Dixon Inspector Yeardsley
Merseyside	PZ83 'B' Division	Inspector Brady
Merseyside	PZ84 D Div	Inspector Ferguson
Merseyside	85 G Div	Inspector Holmes
Merseyside	B (134)	Inspector Dixon
West Mercia	PZ76	Inspector Shaw
West Mercia	PZ77	Inspector Howls
West Midlands	PZ7	Inspector Butler
West Midlands	PZ8	Inspector Morris
West Midlands	PZ9	Inspector Saunders
West Midlands	PZ10	Inspector Battison
West Midlands	PZ11	Inspector Ingram
West Midlands	PZ12	Inspector Lewis
West Midlands	PZ14	Inspector Longdon
West Midlands	PZ31	Inspector Darnell/ Chief Inspector Allen
West Midlands	PZ32	Inspector Jarvis
West Midlands	PZ32 or PZ23	Inspector Parkinson
West Midlands	PZ33	Inspector Kirk
West Midlands	PZ69	Inspector Butterworth
West Midlands	PZ70	Inspector Crewe/C.I - Weston
West Midlands	PZ71	Inspector Sanders
West Midlands	PZ72	Inspector James/C.I Weston

<u>Force</u>	<u>Unit Number</u>	<u>Officer I/C</u>
West Midlands	PZ73	Inspector Adams
West Midlands	PZ97	Inspector Rogers
West Midlands	PZ98 or 68	Inspector Biggin
West Midlands	PZ99	Inspector Higginbotham
West Midlands	PZ100	Inspector Denley
West Midlands	PZ126	Inspector Esslemont
West Midlands	Not given	Inspector Esslemont
West Midlands	PZ127	Inspector Beckett
West Midlands	Not given	Inspector Bennett
West Midlands	Mounted	Inspector Dunn
Norfolk	PZ94	Inspector Horne
Norfolk	PZ95	Inspector Hoyle
Norfolk	PZ96	Inspector McDonnell
Northumbria	PZ3	Inspector Ward
Northumbria	PZ4	Inspector McNally/ Superintendent Holder
Northumbria	PZ6	Inspector Taylor
Suffolk	PZ139	Superintendent Norris
Suffolk	PZ141	Inspector Hartup
Suffolk	PZ142	Inspector Lawrence
Suffolk	PZ143	Inspector Arnold
Suffolk	PZ144	Inspector Wilson
Suffolk	Lowestoff No2 (PZ140)	Inspector Lower
North Wales	PZ86	Inspector Davies
North Wales	PZ87	Chief Inspector Davies
South Wales	PZ89	Inspector Parry
South Wales	PZ90	Inspector Stevens/Chief Inspector Symes
South Wales	(PZ91) "B" 1	Inspector Davis
North Yorkshire	P18	Inspector Ward

<u>Force</u>	<u>Unit Number</u>	<u>Officer I/C</u>
North Yorkshire	PZ19	Inspector Prigmore
North Yorkshire	PZ20	Inspector Walters
North Yorkshire	PZ21	Inspector Burns
South Yorkshire	PB1	Inspector Murdoch
South Yorkshire	PB2	Inspector Gray
South Yorkshire	Mounted	Inspector Tuska
West Yorkshire	PZ34	Inspector Gostridge
West Yorkshire	PZ35	Inspector McDougall
West Yorkshire	PZ36	Inspector Hayes
West Yorkshire	PZ37	Inspector Woodall
West Yorkshire	PZ39	Inspector Lee
West Yorkshire	PZ40	Inspector Blackburn
West Yorkshire	PZ41	Inspector Naylor
West Yorkshire	PZ42	Inspector Taylor
West Yorkshire	PZ43	Inspector Farmer
West Yorkshire	PZ44	Inspector Purcell
West Yorkshire	PZ45	Inspector Brooke/ Supt Clarkson
West Yorkshire	PZ188	Inspector Slingsby
West Yorkshire	PZ189	Inspector Carson
West Yorkshire	PZ190	Inspector Evans

SCHEDULE OF POLICE SUPPORT UNIT OPERATIONAL RECORDS

<u>Unit No.</u>	<u>Officer I/C</u>
YP2	Inspector White
PF1	Inspector Calvert
PF2	A/I Baker
PE1	Inspector Mercer
PE2	Inspector Beighton
YP3	Inspector Oughton
PD1	Inspector Bullah
PZ38	Inspector Turner
PZ66	Inspector Errington/ Superintendent Clarkson