

1 things did you do when you could?

2 A. I used to regularly attends salsa classes. Used to go
3 out with friends, meet up for lunch. I've been on
4 a quite a few holidays with friends. Gym.

5 Q. Okay. Did you meet up with colleagues from work outside
6 work hours?

7 A. Yes, I did.

8 Q. Were there any particular colleagues that you were or
9 colleagues that you were particularly friendly with?

10 A. Yes.

11 Q. Could you tell us who they were?

12 A. [Nurse E]. Minna Lappalainen. [Dr A].
13 [Nurse A]. Jennifer Jones-Key.

14 Q. You described at the start of your evidence that when
15 you moved to the non-clinical duties, you were able to
16 have some support from some of those people.

17 A. Yes.

18 Q. How important to you was that support at that time?

19 A. Oh, it was very important. They were the only form of
20 support I had, really.

21 Q. [Dr A], who we've seen appearing on various of the
22 texts, when did you first get to know who he was?

23 A. Um, so he started on the unit around September 2015 [redacted].

24 Q. We've seen the texts.

25 A. Yes.

1 Q. How did you get to know one another?
2 A. Just through working together and then at times we would
3 then start to meet socially as well.
4 Q. Was it a friendship?
5 A. It was, yes.
6 Q. Anything more than a friendship?
7 A. No.
8 Q. A close friendship?
9 A. Yes, he was a trusted friend, yes.
10 Q. Did you ever meet outside hospital?
11 A. Yes, we did.
12 Q. We've seen that you got a lift back after you'd had
13 a needlestick injury --
14 A. Yes.
15 Q. -- I think after treatment for [Baby O]. Putting
16 that aside, did you meet outside hospital? You're
17 saying you did.
18 A. Yes, we did.
19 Q. Where would you meet if you did meet?
20 A. Sometimes he would come to my house, sometimes we would
21 go out for meals or coffee or walks.
22 Q. Was there a time when he stopped working at the Countess
23 of Chester neonatal unit?
24 A. Yes. So he finished working there in the September of
25 2016.

1 Q. Where did he go?
2
3 [Redacted]
4
5 [...] did you and he stay in touch?
6 A. We did, yes.
7 Q. Remain friendly?
8 A. Yes.
9 Q. And how long did that friendliness continue for?
10 A. Until the early part of 2018.
11 Q. Then anything in particular happen or did it just end?
12 A. No, it just sort of fizzled out. It was just -- yeah.
13 Q. Fizzled out, all right. Do you like to message people?
14 A. Yes.
15 Q. Text?
16 A. Yes.
17 Q. We'll look at some as we go along. You might not be the
18 only person who does that, but insofar as you do, do you
19 use it for social things?
20 A. Yes.
21 Q. Work-related issues?
22 A. Yes.
23 Q. In your experience, how common was it for you and other
24 nurses on the unit to message one another about what was

1 happening at work?

2 A. Very common. We would all do it at some point, yes.

3 Q. Did you sometimes message when you were at work?

4 A. Yes.

5 Q. Were you the only person on the unit to do that?

6 A. No, all staff would regularly use their phones whilst at

7 work.

8 Q. Were there any rules about where on the unit they could

9 use their phones or any practices about where they could

10 use them?

11 A. Just the general rule would be that you don't use the

12 phone sort of in the clinical areas.

13 Q. In what areas?

14 A. The clinical areas, so the nurseries.

15 Q. Right.

16 A. Otherwise at the nurses' station, the equipment rooms,

17 phones would often be used, yes.

18 Q. Nursing station, equipment rooms?

19 A. Yeah.

20 Q. Where else?

21 A. Break rooms. Anywhere outside of the nurseries.

22 Q. Where's the fridge with the insulin with it?

23 A. The fridge in the equipment room.

24 Q. Do people go in there then to use their phones?

25 A. Yes.

1 Q. Was there any way of knowing when somebody was going to
2 go into the equipment room?

3 A. No. So that room is a very busy room, it's open all the
4 time for people to come and go and collect equipment.
5 It's also where we would go for refreshments as well.

6 Q. When you say refreshments, what sort of refreshments
7 do you mean?

8 A. We're not able to have hot drinks in the nursery, so if
9 you were going to get a coffee or something you would
10 then take it into the equipment room.

11 Q. So people go in there to get equipment?

12 A. Yes.

13 Q. They might go in there to have a hot drink?

14 A. Yes.

15 Q. They might go in there to use their phone?

16 A. Yes.

17 Q. At any time?

18 A. Yes. The door is open at all times, yes.

19 Q. With the families who were on the unit -- is part of
20 neonatal nursing directed towards enabling families to
21 come on to the unit so they can be with their babies as
22 much as possible?

23 A. Yes, very much so. Part of our role is to make them
24 inclusive (sic) as much as possible with their baby.

25 Q. What hours can parents, for example, visit their babies?

1 A. It's open visiting, other than the handover time, so
2 sort of the half hour around shift change, just for
3 privacy really of the other babies, otherwise they can
4 come at any point.

5 Q. How well can you get to know parents on the unit?

6 A. Um... With some families they can be with us for very
7 long periods of time and you get to know them extremely
8 well.

9 Q. By "very long" do you mean weeks?

10 A. We can have babies for months.

11 Q. Right. Obviously we've looked at the babies in this
12 case who feature on this indictment. But did you have
13 other babies who might be there for weeks or months who
14 were no part of this case?

15 A. Yes, very often.

16 Q. Would you get to know parents of babies like that?

17 A. Yes.

18 Q. How close a friendship, if at all, might you have with
19 parents?

20 A. Um... I think it's only ever at a professional level
21 when they're on the unit. There have been a couple of
22 occasions where I have kept in touch with families once
23 they've been discharged from the unit, but on the whole
24 it's a professional relationship.

25 Q. In your knowledge are you the only nurse who's ever, as

1 you put it, kept in touch with families?

2 A. No.

3 Q. Is it something you are aware other staff have done?

4 A. Yes. Once they've been discharged, yes.

5 Q. Do you stop being interested in them the moment they

6 leave the unit?

7 A. No, definitely not.

8 Q. Have you ever looked for parents of babies on Facebook?

9 A. Yes, I have.

10 Q. We've seen various Facebook searches in evidence,

11 Ms Letby. You've seen those on the sequence of events,

12 haven't you?

13 A. Yes.

14 Q. How regular a Facebook user were you?

15 A. Oh, daily. I was always on my phone.

16 Q. Just for the parents of some of the children on this

17 indictment or other people?

18 A. No, for anyone that I might meet or come across.

19 Q. Anyone you might meet?

20 A. Yes.

21 Q. Literally like that?

22 A. Well...

23 Q. I'm not criticising you, I'm just asking: is it

24 literally anyone you might meet, you would look at them

25 on Facebook?

1 A. Potentially, yes. Just out of curiosity.

2 Q. So what sort of people would you look at on Facebook?

3 A. Other colleagues at work. People that I might have met

4 at salsa group. Just... Anybody really.

5 Q. When you've looked at parents of babies on Facebook, is

6 there any reason or reasons why you've done that?

7 A. I just think general curiosity and they've been on my

8 mind.

9 Q. Have you only ever looked for parents relating to this

10 indictment or other parents of babies?

11 A. No. I've looked at other parents as well.

12 Q. We're going to look at some material, which is

13 introduced, my Lord, with the agreement of the

14 prosecution. It's a schedule relating to Facebook. I'd

15 be grateful for Ms Clancy's assistance. There's an

16 agreed fact to read and then we'll go to the schedule

17 and go through parts of it with you in front of the

18 jury, Ms Letby.

19 My Lord, ladies and gentlemen, I'm going to ask that

20 the admission follows on the formal admissions you

21 already have, which are behind divider 3 in jury

22 bundle 1. The schedule will sit just behind this next

23 admission and I'll read it out and we'll have a look at

24 it. You'll need copies of these too, Ms Letby.

25 (Handed)

1 The best thing would be, I suggest, ladies and
2 gentlemen, to go behind divider 3 in jury bundle 1,
3 which is where the admissions are, and to put
4 admission 61 in there, which we'll read into the record,
5 and then we'll have a look at the schedule.

6 We'll start just by reading in agreed fact 61. Have
7 a look at that, please, Ms Letby. It's just underneath
8 the schedule. It says:

9 "The contents of defence document exhibit D27
10 entitled 'Facebook searches by Lucy Letby, June 2015
11 to June 2016' are agreed."

12 Then if we put the searches behind that, that
13 document is the one that you have. I'm grateful,
14 Mr Murphy. We can follow it on the screen as well.
15 We'll go through some of the entries here if we may,
16 please. I'll read the first part of this. Have you all
17 got that filed away, ladies and gentlemen, where you can
18 see it easily? Thank you.

19 I'll go through the wording, Ms Letby, and then
20 we'll actually have a look at some of the content, not
21 everything, but some of the content. It is there to
22 refer to. So it says:

23 "Facebook searches by Lucy Letby, June 2015 to
24 June 2016."

25 Thank you, Mr Murphy. We'll look at the print

1 first.

2 "The table below shows: (i) Facebook searches for
3 parents of the children on the indictment (marked in
4 red) for the period between June 2015 to June 2016.

5 "(ii) Additional Facebook searches made by
6 Lucy Letby for the same period on those specific days
7 where searches are made for parents of children on the
8 indictment.

9 "(iii) Entries with asterisks explain the category
10 of search that was made by Lucy Letby and preserve
11 anonymity.

12 "(iv) A monthly breakdown of the total number of
13 Facebook searches made by Lucy Letby between June 2015
14 and June 2016."

15 You'll see that at the end of each month, ladies and
16 gentlemen, when we go through it.

17 In addition it stays:

18 "It is accepted that throughout the period
19 1 June 2015 to 30 June 2016, Lucy Letby regularly used
20 Facebook to search for: (i) the parents of children
21 other than those on the indictment; (ii) colleagues on
22 the neonatal unit at the Countess of Chester Hospital,
23 both nursing and clinical colleagues; (iii) social and
24 non-work related matters."

25 So that's what this schedule is and, Ms Letby, do

1 you follow that?

2 A. Yes.

3 Q. So it doesn't include, by any means, the entirety of the
4 searches over this period, it includes searches by you
5 in the same period on the specific days --

6 A. That's right.

7 Q. -- where children have been identified, or parents of
8 children, on the indictment?

9 A. Yes.

10 Q. So let's just go and have a look through this now,
11 please. Page 1. It may be a lot of me reading parts of
12 this and then asking you questions, Ms Letby. We have
13 on 9 June 2015, 09.57:

14 "Other mother of child from Liverpool Women's
15 Hospital neonatal unit."

16 As the jury will understands, so far as possible and
17 appropriate, we haven't gone into the personal details
18 of everybody because privacy is preserved as far as
19 possible with this.

20 That was followed a minute later by a search for
21 [Mother of Babies A and B], who is [Baby A]'s mother, and then
22 2 minutes later, by a search for David Harkness. Going
23 back to June 2015, if you can, do you know why you would
24 have been looking at 9.57 for "other mother of child
25 from Liverpool Women's Hospital"? Do you know why you

1 would have been?

2 A. Just curiosity. They were obviously on my mind at that

3 point.

4 Q. Was it unusual for you to look up the parents of a child

5 that you'd been involved with or cared for --

6 A. No.

7 Q. -- or at a hospital where you'd worked?

8 A. No.

9 Q. This is the morning following [Baby A]'s death.

10 Are you able to tell us why it was that you are were

11 looking for [Mother of Babies A and B], his mother, at 9.58 on

12 9 June?

13 A. Just that she was on my mind at that point.

14 Q. David Harkness, 2 minutes later?

15 A. The same.

16 Q. If we carry on that day, we can see there's a number of

17 searches relating to individuals under the category of

18 "social". What sort of people would come under that

19 category? I'm not asking for their names, but how would

20 you encounter people that we're referring to as social?

21 A. That's friends from school, friends from university,

22 people that I had met through the gym or through salsa

23 a wide variety of people.

24 Q. If you met somebody at salsa, for instance, who you'd

25 not met before, would you be interested to look them up?

1 A. Yes.

2 Q. You sound definite about that. Is that something you
3 did?

4 A. Yes, it's general curiosity, I think. I'm of the type
5 where we do a lot on our phones and, yes, I would out of
6 interest look up a lot of people, yeah.

7 Q. And carrying on down that page, 10 June, 21.13:
8 "Other mother of child from Liverpool Women's
9 Hospital NNU."
10 So not related to a parent of a baby on this
11 indictment but why would you be looking at whoever that
12 was?

13 A. Again, it's just curiosity.

14 Q. Going over the page, please, thank you. If we go to the
15 top of the page, we've got, at 23.33 on 10 June 2015,
16 the top entry is for [Mother of Babies A and B]. This is later
17 on the day after [Baby B]'s episode. Why would you be
18 looking at [Mother of Babies A and B]?

19 A. Again, she's on my mind.

20 Q. One minute later, "Other mother of child from COCH". So
21 another mother of a child from the Countess of Chester
22 neonatal unit, nothing to do with this indictment.

23 A. Yes.

24 Q. What's happened there just 2 minutes later? Why are you
25 looking at someone else like that?

1 A. Again it's just general curiosity, flicking through
2 a lot of different names at different times.

3 Q. If we skip forwards, not all entries are here for June,
4 but just to look forwards from there, 14 June, a couple
5 of lines down, we've got at 10.20, a mother of a child
6 from Liverpool Women's Hospital. At 15.52,
7 [Mother of Baby C], and at 15.52, also [Father of Baby C] who
8 are also [Baby C]'s parents. Why would you be
9 looking for them?

10 A. Again, it's just general curiosity.

11 Q. Is it unusual for you to look for people who have
12 crossed your mind for whatever reason?

13 A. No, I do it frequently. It's just normal behaviour for
14 me.

15 Q. For you?

16 A. Yes.

17 Q. And we can see, 14 June 2015 at 17.14, "Other mother of
18 a child from Liverpool Women's". Then a few lines down
19 moving forwards 25 June 2015 at 11.42, "Other mother of
20 child from the Countess of Chester".

21 MR JUSTICE GOSS: Could I just ask, on that page, "Other
22 mother of child from Liverpool Women's Hospital",
23 is that the same mother or are these different mothers?

24 MR MYERS: Some are duplicated, some are the same mother and
25 some are inevitably different. They're not all

1 different.

2 MR JUSTICE GOSS: No, but I mean, we can see this -- I'm
3 going to have a few questions about some of these in any
4 event, but just so that we know. So if there is one
5 particular mother that is being asked -- if there is the
6 same other mother of child from Liverpool Women's
7 Hospital, is it that one that's being looked at on
8 Facebook or are these all different mothers?

9 MR MYERS: No, they're not all different. A number of them
10 repeat, either socially or where it says mother of --
11 other mother of a child or what have you. But a number
12 of them repeat.

13 MR JUSTICE GOSS: All right.

14 MR MYERS: But the underlying information, so your Lordship
15 knows, is available to be used as required by the
16 defence, the prosecution or indeed in answer to
17 your Lordship's questions. But at this point, after
18 careful consideration, presenting it with a minimum of
19 intrusion into people's identity was the way that this
20 was presented.

21 MR JUSTICE GOSS: Yes. I can understand that. Anyway,
22 I don't want to interrupt you. It was becoming very
23 apparent and I just wondered if it was other mother 1,
24 other mother 2, other mother 3 or something from
25 Liverpool Women's or whether it's other mother 1, 1, 1,

1 again. That's what I'm trying to distinguish.

2 MR MYERS: Yes, there are repeats and there's some

3 variations.

4 MR JUSTICE GOSS: All right, there we are.

5 MR MYERS: If we look towards the end of that day, Ms Letby,

6 we've got searches, after a number of social searches,

7 later in the evening for [Mother of Babies A and B], [Mother of

8 Baby D] and [Father of Baby D], [Mother and Father of Baby D]

9 being parents of [Baby D]. Any particular

10 reason why you'd be looking for them at that point?

11 A. No. Again, it's just a pattern of behaviour. They're

12 on my mind. I'm just searching for lots of different

13 people.

14 Q. In the case of [Mother and Father of Baby D], those searches

15 come within a couple of days of [Baby D] dying.

16 Is that in any way relevant to why they were on your

17 mind at that point?

18 A. Yes, because it's a significant event.

19 Q. We can see the total number of searches for June:

20 there are 113, of which these are part.

21 A. Yes.

22 Q. July, 70 searches. Do you see that? We can move on to

23 August 2015. On 6 August, a number of searches, a

24 reference at 12.31 to "mother of a child from Liverpool

25 Women's Hospital"; can you see that?

1 A. Yes.

2 Q. Then "Team AL" at 12.42? What's Team AL? We don't need
3 the name necessarily but could you explain what
4 "#teamal" was?

5 A. Um... I'm not sure at the minute.

6 Q. Right. Was the unit ever involved in activities to
7 raise funds for anything?

8 A. Yes.

9 Q. What sort of things would funds be raised for from the
10 unit?

11 A. So for equipment for the unit or predominantly to save
12 for the new build, so the unit was recently rebuilt.

13 Q. In terms of Team AL, does that help you with what that
14 relates to?

15 A. Yeah, I think that's a fundraising page.

16 Q. And AL the initials of a child, I should say, to assist
17 you.

18 A. Yes.

19 Q. [Mother of Babies E and F] on 6 August 2015 at 19.58. Do you
20 know why you were looking at [Mother of Babies E and F] or
21 searching for [Mother of Babies E and F] on that occasion?

22 A. No.

23 Q. Or a couple of weeks later if we come some lines down,
24 can you say why you were looking there?

25 A. No, just that she's on my mind.

1 Q. [Mother of Babies E and F], of course, the mother of [Baby E] and
2 [Baby F].
3 A. Yes.
4 Q. [Baby F] died on 4 August 2015. That's just to help
5 us with that date.
6 July 2015. Just go over the page, please. The
7 total number of searches. 175.
8 MR JUSTICE GOSS: For August.
9 MR MYERS: I apologise. 175 for August 2015.
10 MR JUSTICE GOSS: If we could just go back. Where it says
11 for 6 August, 22.25, "Work colleague". Is that a work
12 colleague who's not been named in this case?
13 MR MYERS: Yes.
14 MR JUSTICE GOSS: So it's preserving the anonymity of
15 another work colleague.
16 MR MYERS: Yes, someone who hasn't yet been named.
17 MR JUSTICE GOSS: I thought it was, but just to clarify
18 that.
19 MR MYERS: August 2015, two searches out of the 175 relating
20 to a parent of a child on this indictment and they're
21 both for [Mother of Babies E and F]?
22 A. Yes.
23 MR MYERS: My Lord, there are several more pages just to
24 review in this. Although I'm trying to go through it as
25 expeditiously as possible.

1 MR JUSTICE GOSS: There are. If you think it's going to
2 take more than a few minutes.

3 MR MYERS: It will take more than a few minutes. We're
4 getting the measure of it, but it will still take more
5 than a few minutes to get to the end of the document.

6 MR JUSTICE GOSS: If that's a convenient time, we'll break
7 off there then.

8 All right, members of the jury, 2 o'clock, please,
9 just over the hour. Remember your obligations as
10 jurors: no communication by any means with anyone other
11 than all 12 of you together when you're together and no
12 research about anything to do with this case. Thank you
13 very much indeed.

14 (In the absence of the jury)

15 MR JUSTICE GOSS: As before, please, could members of the
16 public leave the courtroom?

17 (Pause)

18 MR JUSTICE GOSS: We're going to do it slightly differently.
19 I'm going to rise at this stage and then the court is
20 closed, so just remain where you are until I've left the
21 courtroom, please. Thank you.

22 (12.59 pm)

23 (The short adjournment)

24 (2.00 pm)

25 MR JUSTICE GOSS: Mr Myers, Mr Johnson, in future we'll have

1 slightly longer lunch breaks for logistical reasons and
2 timings so there can be a proper break for Ms Letby.

3 MR MYERS: Thank you.

4 MR JUSTICE GOSS: So it'll be a minimum of 1 hour and
5 10 minutes/1 hour and 15 minutes.

6 MR MYERS: We're grateful, my Lord, thank you.

7 (In the presence of the jury)

8 MR MYERS: Ms Letby, members of the jury, we were at page 3
9 of the schedule and we'd just looked at the total number
10 of searches for August. If we look at September, which
11 is on the screens. In front of you there, we can see
12 that the total searches, looking at the end of it, for
13 September are 209. So we've only got a few of them in
14 this schedule, haven't we?

15 A. Yes.

16 Q. All right. If we go just to the lower part of the
17 entries we've got 21 September 2015. We can see 01.13,
18 Minna Lappalainen, her name is there. And then also,
19 searches for Ms Lappalainen at 06.58, 14.15 and 21.12.

20 Ms Lappalainen was a friend of yours, wasn't she?

21 A. Yes.

22 Q. And a good friend of yours?

23 A. Yes, a close friend.

24 Q. And we're looking at your use of Facebook in all of
25 this. Why is it you're searching for her on those

1 occasions, if you can remember? Why would you be
2 searching for her on Facebook?

3 A. She's just somebody that's on my mind. She was a big
4 part of my life.

5 Q. And so when it's on your mind then, you go to Facebook
6 and take a look?

7 A. Yes.

8 Q. Just below the 21.12, Minna Lappalainen entry, there's
9 one for 22.30 and it says "AB appeal"; can you see that?

10 A. Yes.

11 Q. Do you remember what that relates to? I'm not asking
12 for the identity of the person involved, but what did
13 that relate to?

14 A. That was a fundraising page for a child that I had met
15 on the children's ward during my training.

16 Q. All right. Then we've got, soon after that at 22.33, a
17 few minutes after that, a search for [Mother of Baby G],
18 who was [Baby G]'s mother.

19 A. Yes.

20 Q. Any particular reason why you looked for [Baby G]'s
21 mum?

22 A. No.

23 Q. And followed 12 minutes later with a search for
24 a colleague, [Nurse B].

25 A. Yes.

1 Q. And again any reason why you can remember why you
2 searched for her?

3 A. No.

4 Q. We can see -- I'm going to have you to ask you to speak
5 up a little bit, please, because the microphone has to
6 pick up what you say. No one is going to mind of your
7 voice is loud.

8 That is followed over the next 11 minutes with
9 reference to "other mother of child from COCH neonatal
10 unit"; do you see that?

11 A. Yes.

12 Q. Any particular reason you can think of now why you're
13 doing those searches like that then?

14 A. No, it's just a normal pattern of behaviour. That's
15 what I would do.

16 Q. And this is just one section on one day, isn't it?

17 A. Yes.

18 Q. We can see that with Minna Lappalainen, for instance,
19 there are repeat searches there, aren't there?

20 A. Yes.

21 Q. And with the mothers or the fathers, parents of children
22 on the indictment, there are repeat searches for some of
23 them, aren't there?

24 A. Yes.

25 Q. Similarly, so we can be quite clear, with regard to

1 parents of children who are not on this indictment,
2 where we've got anonymised entries, can you confirm
3 a number of those are repeat searches, aren't they --
4 A. They are, yes.
5 Q. -- for the same people, some of them? Were any of the
6 parents, I am not talking about the ones on the
7 indictment, any of the parents ever friends of yours or
8 did you have friends --
9 A. Yes, some. Yes.
10 Q. So some of them (inaudible: coughing) were friends;
11 is that correct?
12 A. Yes.
13 Q. Not all but some?
14 A. No.
15 Q. October 2015, if we just go to the total number of
16 searches there, if we go over the page, please, to
17 page 4. The total searches for October is 173.
18 A. Yes.
19 Q. I'm going to move down, we can see it includes some
20 searches for parents for babies on this indictment. If
21 we go down to November 2015, please. I'm going to go to
22 the central part of that table. The lower half of the
23 schedule, please, Mr Murphy.
24 In fact, could we increase before then, please?
25 A little bit higher than that. Thank you.

1 If we just look at that, the second entry down,
2 16.19 on 5 November 2015, from 16.19 through to 17.22,
3 about 10 rows or so below, there's a series of searches,
4 aren't there, in quite quick succession?

5 A. Yes.

6 Q. Some for social contacts. Some for parent or parents of
7 a child not on the indictment. And also for work
8 colleagues who we've encountered in this case and some
9 whose identities we haven't had in the case.

10 A. Yes.

11 Q. Just following it right the way through, is it unusual
12 for you to rapidly go through a number of people over
13 minutes when you're looking at people on Facebook?

14 A. No. That would be my normal pattern of behaviour.
15 I just -- they come into my mind, I quickly search and
16 then I just move on to the next thing.

17 Q. Looking at this section that's open before us there,
18 if we look at 21.40, in fact, 21.20, we've got
19 Ailsa Simpson on 5 November. Can you see that?

20 A. Yes.

21 Q. She's a work colleague, we know. She's given evidence
22 in this case. 21.40, work colleague. 21.42, work
23 colleague. 21.43.

24 Then three of the parents related to children on
25 this indictment at 23.40, 23.41 and 23.44. Certainly

1 for the first two of those searches of a minute or
2 several minutes. Do you see that?

3 A. Yes.

4 Q. Again in terms of spending a minute or just a couple of
5 minutes on somebody when you're searching, is that
6 unusual or is it what you do?

7 A. No, that would be normal for me.

8 Q. Can we go over the page, please. Just noting at the top
9 the total number of searches in fact for November is
10 277. Five of those relate to parents of children on
11 this indictment.

12 December. I'm not going to go through all of them,
13 just going to look at the total. Page 5 into page 6,
14 please. The total number of searches in December is
15 211.

16 Move to January, please, Mr Murphy. Look at the
17 total number of searches for January, 199.

18 We have in this schedule searches in effect
19 bookending the searches of parents relating to children
20 on this indictment; you understand that, don't you,
21 Ms Letby?

22 A. Yes.

23 Q. So it's only certain dates and certain times.

24 A. Yes.

25 Q. Generally speaking, would the pattern of your searches

1 be constant across the month?

2 A. Yes.

3 Q. Can we just go down to February 2016, please. We can

4 see a total of 178 searches recorded for February 2016;

5 do you see that?

6 A. Yes.

7 Q. Only one in fact relating to a parent of a child on this

8 indictment, for [Mother of Baby G] on 12 February 2016;

9 do you see that?

10 A. Yes.

11 Q. That comes at the end of a series of searches which, if

12 we go up, starts with Ailsa Simpson at 23.14 on

13 12 February; can you see that?

14 A. Yes.

15 Q. Then there's a series of searches over the course of

16 several minutes --

17 A. Yes.

18 Q. -- ending with social at 23.19?

19 A. Yes.

20 Q. The searches, are they linked in any way to things -- in

21 this case, anything that you have done to cause harm to

22 [Baby G]?

23 A. No, not at all.

24 Q. Because you understand that's the suggestion that's

25 being made from the sequence of events and the searches

1 and then with the prosecution. You understand that,
2 don't you?

3 A. Yes.

4 Q. That you're looking at these because it's babies that
5 you have hurt in some way and it's connected with that.
6 Is that what these searches are about?

7 A. It's not, no.

8 Q. If we scroll forwards, please, to have a look at March
9 and April. Look at both of those: 211 searches
10 in March, 168 in April.

11 None relating to parents of children on this
12 indictment.

13 Then can we go to the end of May, please, Mr Murphy,
14 on to the next page. Thank you. And June. We can
15 see -- at 23.00 on 29 May, can you see a search for
16 [Mother of Baby I]?

17 A. Yes.

18 Q. Three minutes before that there'd been a search for
19 another mother of a child from the neonatal unit?

20 A. Yes.

21 Q. One minute before the [Mother of Baby I] search, "other mother
22 of child from the neonatal unit". And then a search for
23 "father of child from the neonatal unit" a minute
24 afterwards. Why are you searching for the people that
25 we see here?

1 A. They're just people that have crossed my mind at that
2 time.

3 Q. Is there any sinister reason why you're looking at
4 [Mother of Baby I]?

5 A. No, it's just general curiosity, the same as the reason
6 as I'm looking at a lot of people.

7 Q. Was it your habit to go and look at the parents of
8 babies on this indictment if you'd gone and hurt them or
9 done something to them?

10 A. No.

11 Q. June 2016, 233 searches. But none relating to the
12 parents of children on this indictment.

13 A. No.

14 Q. So would you describe yourself, as far as you can tell,
15 as a pretty regular user of Facebook searches over the
16 period we're looking at?

17 A. Yes, very much so, yes.

18 Q. Did you live on your own for most of the time?

19 A. Yes.

20 Q. We see some of the searches are in the late evening,
21 aren't they?

22 A. Yes.

23 Q. Is it unusual for you to go on to Facebook and look at
24 people or make searches when you're on your own and
25 you've got time on your hands?

1 A. No, I was always on my phone.

2 Q. All right. Thank you for helping us with that. I'm
3 going to move to a different area now to do with your
4 house and items that were found from it.

5 I'd like you to help us next with where you were
6 living and when over the period that you were working
7 at the Countess of Chester. So I'm actually going to go
8 back to 2012. When you had first qualified and started
9 working there, where were you living?

10 A. So I lived on site in the hospital grounds in staff
11 accommodation.

12 Q. Actually on the grounds of the Countess of Chester?

13 A. Yes.

14 Q. I'm going to ask you to keep your voice up if you would,
15 please. Is there a name for that accommodation, the
16 premises? What was it called, the place you lived at?

17 A. Ash House.

18 Q. And that's a hospital accommodation, is it?

19 A. It is, yes, for staff.

20 Q. Did there come a time when you moved out of there and
21 began to live somewhere else?

22 A. Yes.

23 Q. Again, casting your mind back, so take your time to
24 think through the timings, but when did you move out of
25 Ash House?

1 A. Around June 2015, around that time.

2 Q. Was there a time you moved out before then and stayed
3 with somebody in between two dates?

4 A. Yes.

5 Q. All right. You first went to Ash House in 2012?

6 A. Yes.

7 Q. Did you move out to live with somebody at a date after
8 that?

9 A. Not to live with somebody, but I did move premises, yes.

10 Q. Where did you move to?

11 A. I moved to a flat in town.

12 Q. Did anyone else live there?

13 A. No.

14 Q. When was that?

15 A. I think that was 2015.

16 Q. Right. Did you ever live with any of your colleagues
17 from the unit?

18 A. No.

19 Q. Did you ever move back into Ash House?

20 A. Yes.

21 Q. When did you move back into Ash House?

22 A. Towards the end of 2015.

23 Q. All right. I'm going to see if I can help you with
24 something. I'm going to ask if we could put up a page
25 of your 2015 diary. It's t exhibit page J355, please,

1 Mr Murphy. This is the 2015 diary. We have heard there
2 were two diaries when the police came to your house that
3 were seized: one for 2015, one for 2016.

4 This is the 2015 diary. Can you see it says:

5 "Monday, 1 June [asterisk] Ash House"?

6 A. Yes.

7 Q. Does that help you with dates when you moved back to
8 Ash House after you'd moved out?

9 A. Yes.

10 Q. When did you move back?

11 A. So that would be on that date, 1 June.

12 Q. Right. So you'd started off living at Ash House, then
13 you moved out at some point to a flat elsewhere, and
14 then you moved back in on 1 June 2015; is that right?

15 A. I think so, yeah.

16 Q. All right.

17 MR JUSTICE GOSS: It's not a memory test, obviously. She
18 did say she moved out from Ash House, she thought,
19 around June 2015. In fact the diary shows she's
20 apparently moving from wherever she's been back into
21 Ash House at the beginning of June 2015.

22 MR MYERS: Do you remember how long you'd be living away
23 from Ash House before you went back? How long did you
24 stay at this other place about?

25 A. About 6 months.

1 Q. So maybe you moved out of Ash House -- then that would
2 be some time in the middle of 2014 --
3 A. I could be -- I'm not 100% --
4 Q. -- or late 2014?
5 A. -- sure with dates.
6 Q. Then you moved back in on 2015, June.
7 If you just look across from there, can you say it
8 says "Jen's hen party, York" for 5 June?
9 A. That was Jennifer Jones-Key, who was a nursery nurse on
10 the unit. That was her hen weekend which I went to.
11 Q. Right. So that was about the end of the week after
12 you'd moved back to Ash House?
13 A. That's right.
14 Q. We know that when the police arrested you the first time
15 you were living at an address at 41 Westbourne Road in
16 Chester?
17 A. That's right.
18 Q. Do you remember when it was that you moved to that
19 address approximately?
20 A. It was around April 2016.
21 Q. Is that a house that you bought?
22 A. It was, yes.
23 Q. I'm going to ask if we could just to put up an image
24 from the prosecution images at page 16, please. This is
25 again with the diary just to help with dates, Ms Letby.

1 It's page 16. Again, images we have had from the
2 prosecution.

3 Can you see, this is the diary now for 2016. We
4 can't see the date on it but it is the 2016 diary and
5 we can see on Tuesday 5 April it says, "Out of Ash H".

6 A. Yes.

7 Q. So we know you'd gone back into Ash House on
8 1 June 2015. And on 6 April 2016, it says, "Out of
9 Ash H".

10 A. That's right.

11 Q. So where were you moving to then?

12 A. That was when I moved into the property in
13 Westbourne Road.

14 Q. And that's the --

15 A. The house that I bought.

16 Q. And that's where you were living at the time of the
17 arrest, is it, the first arrest --

18 A. It is, yes.

19 Q. -- which took place in July 2018.

20 Just with regard to what was happening round about
21 this time, I am going to go to some messages that we
22 actually had on the [Baby L] sequence of events just
23 to do with you moving house so we can put them in
24 context. I'm going to ask if we could go to tile 48,
25 Mr Murphy, to several tiles, Ms Letby.

1 This is from you to [Nurse E] on Friday,
2 8 April. Just a couple of days, 2 or 3 days after the
3 entry in the diary and you're saying:
4 "Unpacking. Stuff everywhere lol. May do extra
5 shift over weekend."
6 It may be obvious to us now, but what's that
7 relating to?
8 A. That's relating to me having moved into the house and
9 I'm unpacking.
10 Q. Could we go forwards to tile 57, please. It's
11 Sophie Ellis to you on Friday 8 April saying:
12 "How's the house, pal?"
13 And 58, please, Mr Murphy. You reply:
14 "Hi. It feels a bit weird having a whole house but
15 it's good thanks, although stuff everywhere as moved in
16 properly on Tuesday and been at work Wednesday, Thursday
17 and today. Doing tomorrow as an extra so I'll see you
18 tomorrow night. Won't be such an early start for you
19 now back in Chester."
20 And then you said:
21 "Did I hear your grandparents are coming to see
22 you?"
23 If we keep in mind 9 April is a date associated with
24 [Baby M].
25 A. Yes.

1 Q. In fact what was going in your life at that time?

2 A. So I was in the process of moving house whilst working

3 a number of shifts.

4 Q. How big a thing was that on your mind?

5 A. Um... Well, as anybody knows, when you move house it's

6 a lot to take on, isn't it? So I was very occupied with

7 sorting the house out.

8 Q. Yes. I'd like to look at some images of the house. Are

9 you all right with that? I would like to put up D26,

10 please. These are images taken by the police at the

11 time of the first arrest or around that point.

12 Again, just to help us with picturing this, what are

13 we looking at on page 1 of D26?

14 A. That's the front of my property with my car on the

15 drive.

16 Q. That's 41 Westbourne Road, is it?

17 A. Yes.

18 Q. Thank you. Are you all right looking at these?

19 A. It's just quite difficult.

20 Q. All right then. Can we just go to photo 2? So we know,

21 what area is that?

22 A. That's the back garden.

23 Q. And photo 3, please. Likewise?

24 A. Yes.

25 Q. Just towards the left of the photo where we can see the

1 French windows, is that the back of your house?

2 A. It is, yes.

3 Q. Photo 4, please. And photo 5. All right. The

4 eagle-eyed may notice that that green bin moved around

5 in the course of those photos. Do you know how that

6 happened, the moving of the green bin?

7 A. No, that wasn't done by me.

8 Q. No. Were you there when the police were taking these

9 photos?

10 A. No.

11 Q. And photo 6, please. We'll see it's moved back

12 somewhere else in fact. All right.

13 Photo 7, please, Mr Murphy. Again we've seen

14 a similar photo before. Where is this?

15 A. That's the garage.

16 Q. Could we see photo 8 as well, please. That's just the

17 same garage from a different angle?

18 A. Yes.

19 Q. All that stuff in there, is it all yours?

20 A. Some of it. The tools at the back wall that we're

21 seeing there belong to my dad. He would help me out

22 with general maintenance around the property.

23 Q. Did he help you when you moved in with things?

24 A. He did, yes.

25 Q. So his tools are there?

1 A. Yes.

2 Q. Do you recall what's in the bags that are hanging up or
3 do you not recall?

4 A. I don't recall.

5 Q. Did you store stuff in the garage?

6 A. I did, yes.

7 Q. Let's go inside then. Photo 9, please, Mr Murphy.
8 What are we looking at here?

9 A. That's the downstairs, the living room and dining area.

10 Q. The French windows at the end, are they the ones we
11 could see looking in from the garden?

12 A. Yes.

13 Q. Photo 10, please. We've moved forwards in the living
14 room here; is that right?

15 A. Yes.

16 Q. And we can see on the left-hand side there's a door, you
17 can just see it looks narrow here, a doorway on the
18 left-hand side of that picture.

19 A. Yes, that's the doorway to the kitchen.

20 Q. All right. What about the stairs on the right of the --
21 in the middle of the picture. Where do they go?

22 A. They lead to the upstairs of the property.

23 Q. Can we go to photo 11, please. Is that looking into the
24 kitchen?

25 A. Yes.

1 Q. And the back. Photo 12, please. Is this where you were
2 living up to the time of your arrest?

3 A. Yes.

4 Q. Can we look at photo 13, please. Obviously we're being
5 careful with privacy and identities. Can you help us
6 with what it is we have on photo 13?

7 A. This is a noticeboard that I had up in my kitchen, which
8 contains various photographs and letters and just things
9 that are important to me.

10 Q. And this is -- this would have been in situ like this,
11 in position, at the time that the police came and
12 arrested you on 8 July 2018?

13 A. Yes, that's right.

14 Q. I'm in the going to ask you for the names of the people
15 whose faces have been blanked out, not the name, but
16 who's the person in the top left-hand corner?

17 A. That's my cousin and godson.

18 Q. Your cousin and godson. And then we're just going to go
19 round clockwise. It says:

20 "Number 1 godmother. Awarded to Lucy Letby."

21 That's from the godson?

22 A. That was something he had drawn for me.

23 Q. Going across the top on the right-hand side there's
24 something that says, "Auntie Lucy, thank you". Do you
25 recall what that is?

1 A. Yes. So those are another two of my godchildren and it
2 was a thank-you note for some gifts that they'd had at
3 Christmas.

4 Q. Right. Moving down, various items pinned to the board.
5 There's someone with what looks like possibly a school
6 uniform blanked out on the right-hand side. Again, we
7 don't require the name, but who is that person?

8 A. That's another cousin of mine.

9 Q. Another one of your cousins. Can we scroll down the
10 picture, Mr Murphy.

11 I'm not going to ask you about the cuddly toy that's
12 hanging there. Down at the bottom on the left-hand
13 side, this one says "Hay Festival exclusive". Who are
14 the people in that picture?

15 A. That's my mum and dad.

16 Q. Was it actually something from the Telegraph or is it a
17 kind of novelty card that's been --

18 A. No, it's just a novelty card from the Hay Festival,
19 which is just a festival they'd gone to.

20 Q. Scroll back up to where we were. Just above the dolphin
21 figure, who or what is that a photograph of?

22 A. That's a picture of myself and two nurses on the unit.

23 Q. Right. That's you back in 2016?

24 A. Yes.

25 Q. Is that the coloured scrubs that you wear when you're

1 a band 5?

2 A. It is, yes.

3 Q. Thank you.

4 Can we go next, please, to photograph 14? So

5 if we walked past this in your house where you were

6 living at the time, where is this?

7 A. As you go up the stairs, it's the landing area.

8 Q. So landing on the stairway?

9 A. Yes.

10 Q. And the left -- who's in the photograph on the left?

11 Again I'm not asking for names.

12 A. They're the two cousins that I've talked about, so --

13 Q. Is that you with them?

14 A. It is, yes.

15 Q. And over on the right-hand side again blanked out?

16 A. They're the two godchildren that I mentioned in the

17 previous images.

18 Q. Let's go upstairs then, please, to photograph 15.

19 Thank you. Which room is that one?

20 A. That's my bedroom.

21 Q. Actually, we can compare this, we can nip out of these

22 if possible and look at the prosecution images number 2.

23 We can see what's where. If it's possible to look at

24 prosecution image number 2, which is the photo of this

25 room, but shortly after the point of arrest.

1 So this is where you'd been sleeping -- I'll deal
2 with this as quickly as I can, Ms Letby. This is where
3 you'd been sleeping at the time of the arrest, isn't it,
4 and this is your room after you'd been arrested; is that
5 right?

6 A. Yes. That was how they left it.

7 Q. That's how it was left, all right. We can see at the
8 end of the bed, on the bedpost, a kind of pink -- a
9 bright pink cardigan and maybe a paler pink one on the
10 centre of it? Do you see that?

11 A. Yes.

12 Q. We can see the radio on the left-hand side on the
13 cupboards and the books on the right-hand side.

14 Then if we go back then, please, to the photographs
15 we were looking at at page 15, please, Mr Murphy, just
16 with those orientation points, we can see again the
17 pink -- the two pink tops, can't we?

18 A. Yes.

19 Q. And we can see the books over on the other side of the
20 bed. But obviously somebody straightened the bed up for
21 you after your arrest; would that be right?

22 A. Yes.

23 Q. That'd be your dad probably.

24 A. Yes.

25 Q. Maybe that's the room afterwards. Can we go finally on

1 these to page 16. First of all, which room is this
2 cabinet in?

3 A. That's in the downstairs living area.

4 Q. So back to the downstairs. I would like you to explain
5 to us what the files are for that we can see. So
6 if we look at the thickest one with the kind of light
7 blue cover to it on the right-hand side, do you want to
8 use the cursor just so we can be in no doubt what we're
9 talking about, please. If it's working.

10 MR JUSTICE GOSS: It's the one bang in the middle of the
11 lower shelf.

12 MR MYERS: Thank you, my Lord.

13 What did you keep in that?

14 A. So that was general paper documents, like passport,
15 bills, things related to the house, driving licence.

16 Q. What about the thin blue wallet above that, that was
17 that?

18 A. That's a folder that had the medical records of my two
19 cats that I had at the time.

20 Q. What were the names of the cats? We're going to come to
21 it, aren't we? They appear on some of the notes, don't
22 they?

23 A. Tigger and Smudge.

24 Q. All right. And then just going across from there, the
25 bright pink wallet, what did you keep in that?

1 A. I think that was just more general documents. I think
2 it might have had some study day details in and things.
3 Q. Is it unusual to have study day details from courses
4 you've been on or training you've had?
5 A. No, I've kept everything through the whole of my
6 training. I've never thrown anything away.
7 Q. Keeping things -- is keeping things unusual for you?
8 A. No.
9 Q. We're going to have a look at some of the items in the
10 prosecution images we've looked at. I wonder, just to
11 start with, could we look at prosecution -- we've
12 finished with those photographs, Mr Murphy. Could we
13 look at prosecution images page 15. We understand that
14 the diary, the 2016 diary that we've looked at, part of,
15 has come out of that middle -- the top drawer of that
16 middle chest of drawers?
17 A. That's right, yes.
18 Q. Is that where you kept that?
19 A. Yes.
20 Q. If we next look at page 18 of the prosecution images,
21 please, Mr Murphy. So prosecution images page 18.
22 Thank you. There's no issue as to this. This has been
23 moved now for the purpose of being photographed by the
24 police, hasn't it?
25 A. Yes, it's now downstairs on the dining table.

1 Q. So that's been moved for a photograph. The pieces of
2 paper or the sheets of paper tucked behind the 2016
3 diary cover, are those bits of paper that you kept
4 in that diary?

5 A. Yes.

6 Q. The green note we've looked at, was that in the diary as
7 well?

8 A. Yes.

9 Q. What about the item that says Smudge behind it, what's
10 that about?

11 A. That is my vaccination record for one of cats. That
12 would have been in the blue folder that I mentioned
13 in the unit in the kitchen -- in the dining room, sorry.

14 Q. All right.

15 A. Yeah, that was placed there.

16 Q. Let's go through some of the items as we saw them when
17 the prosecution were showing us these. I would like to
18 go first to page 6 of those images, Mr Murphy.

19 I'm going to ask you about the two handbags on the
20 right-hand side of that mirror when we're looking at it,
21 Ms Letby. One is black. What colour would you say the
22 other one is?

23 A. It's pink.

24 Q. Pink, all right. We know which ones we're talking
25 about. What were the handbags for?

1 A. So the pink bag is what I used daily for going to work
2 and then the smaller bag was for more casual use, just
3 socially.

4 Q. Pink bag for work, smaller bag casual use socially.
5 There are a couple or several notes that were taken from
6 these which we're going to come to. That's the
7 significance or potential significance of these. But is
8 this where you kept them in your bedroom as a rule?

9 A. Yes.

10 Q. We know that you had been -- sorry, had you been
11 anywhere in particular shortly before you were arrested?

12 A. Yes, I'd just been on a family holiday with my parents
13 and we'd just come back the day before.

14 Q. The notes that come from these bags, we've actually got
15 set out at page 7 of the prosecution images. I wonder
16 if we could just put that up next. I think it was
17 unclear precisely which bag the note or notes had come
18 from. Do you recall which bag in particular any or all
19 of these notes came from, Ms Letby?

20 A. No, I couldn't say.

21 Q. But you accept they come from one or other of those
22 bags?

23 A. Yes.

24 Q. Both pieces of paper have writing on either side. We're
25 not going to look at all of this but we are going to

1 look at some of it if you're all right with that. The
2 notes -- we asked you about notes earlier. Why did you
3 write notes down in the kind of style that we see here?
4 A. That's something I've done my whole life. I just --
5 I write things down.
6 Q. Did you write down things that you could say to other
7 people?
8 A. No. It was my way of processing my thoughts and
9 emotions that I wouldn't say to anybody else.
10 Q. Was it written in any kind of structured way?
11 A. No, it's very much what would come into my head. It
12 could be very -- just random and sporadically written.
13 Q. We are going to have a look at some of what's on the
14 yellow piece of paper and some of what's on the larger
15 piece of paper, not everything, but it's there for you
16 to be questioned about if there's anything I don't
17 cover.
18 With the yellow piece of paper I'm going to ask if
19 we can go to page 9 of the prosecution images first
20 because that's an enlarged bit of the yellow piece of
21 paper.
22 Out of interest, when you look at this can you look
23 at it and automatically see all the things that are
24 written on it and read it easily?
25 A. No.

1 Q. So is it difficult for you to make --
2 A. It is, yes.
3 Q. -- to read through? Well, we can look at some of the
4 detail on this one. What does it say right at the top,
5 can you help us? The very first joined up letters.
6 A. "Love was all we needed."
7 Q. "Love was all we needed." Where have you got that
8 expression from, if you don't mind me asking?
9 A. It's the lyrics in a song that was obviously just on my
10 mind at that time.
11 Q. By?
12 A. Craig David.
13 Q. Right, "Love is all we needed". Were you saying that to
14 anyone in particular --
15 A. No.
16 Q. -- in the note?
17 A. No, these weren't for anybody to read, they were just an
18 outlet for me.
19 Q. It says under that "[Babies O, P and R]". That's the name
20 of the [Babies O, P and R] triplets, isn't it?
21 A. Yes.
22 Q. Is there any reason why their names appear there?
23 A. I'm thinking of them at this time.
24 Q. I asked you earlier about the impact of deaths of babies
25 on the unit. Is that something that would have an

1 impact on you?

2 A. Yes.

3 Q. Across from there it says "[Dr A]". What does it

4 say under that?

5 A. "My best friend."

6 Q. Is that a reference to [Dr A] at the time that was

7 written?

8 A. I believe so, yes.

9 Q. Does that relate to how you felt about him?

10 A. Yes, he was -- he was a trusted friend at that time,

11 yes.

12 Q. To the left of that, I'm going to hazard a guess.

13 Is that "Love is all we needed" again?

14 A. Yes.

15 Q. We're going to see expressions like that -- it keeps

16 appearing in the note, doesn't it?

17 A. Yes.

18 Q. Why does it keep appearing in the note? If it's

19 possible to say, and if you can't, say so, but is it

20 possible to say why?

21 A. I think that's just how I often write. It's very, very

22 repetitive, very random, just things that are in my mind

23 will just come out on paper. There's no sort of

24 structure, it's just... A release of some sort.

25 Q. When it says under that, under "Love is all we

1 impact on you?

2 A. Yes.

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4 say under that?

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7 written?

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22 repetitive, very random, just things that are in my mind

23 will just come out on paper. There's no sort of

24 structure, it's just... A release of some sort.

25 Q. When it says under that, under "Love is all we

1 needed" --

2 MR JUSTICE GOSS: I think it's "was".

3 MR MYERS: "Love was all we needed."

4 A. Oh yeah, sorry.

5 MR JUSTICE GOSS: Well, that's what you said it was

6 originally, and then you changed --

7 MR MYERS: I think I'm confusing it with another song lyric,

8 my Lord, but, yes, "Love was all we needed".

9 MR JUSTICE GOSS: By the Beatles.

10 MR MYERS: "I can't do this any more" under that. Is that

11 what it says? I don't want to get the words wrong.

12 A. Yes.

13 Q. What are you meaning or what can't you do?

14 A. My life at that time.

15 Q. Right. What does it say under "I can't do this

16 anymore"?

17 A. I think it's further lyrics, "But time let us down".

18 Q. "Time let us down"?

19 A. Yes.

20 Q. Does that follow on in the lyrics from "Love was all we

21 needed"?

22 A. Yes.

23 Q. "Love was all we needed but time let us down."

24 Who's Catherine de Berger?

25 A. So that was a lady I was receiving support from, from

1 occupational health when I was redeployed.

2 Q. The name Tigger, who is that referring to?

3 A. That's one of my cats.

4 Q. The other was Smudge, wasn't it? Can you see it looks

5 like there's the word "today"?

6 A. Yes.

7 Q. Does that say "Today is your birthday"?

8 A. Yes.

9 Q. Who are you writing that about, can you help us? Who

10 are you thinking of?

11 A. So [Baby P] and [Baby O].

12 Q. "Today is your birthday but you [is that] aren't here"?

13 A. Yes.

14 Q. It says, "And I am so sorry..."?

15 A. "So sorry for that."

16 Q. Why are you saying that you're sorry for that? What is

17 it that's making you sorry?

18 (Pause)

19 A. I think this was on their anniversary and I was thinking

20 of them and...

21 Q. And then under that, it's difficult to -- what's the

22 bolder writing, is it TT or something? What does that

23 say?

24 A. Where, sorry?

25 Q. Under "aren't here" and "I am so sorry for that", if you

1 carry on going from left to right, there's slightly
2 darker ink. It might be tiny or Timmy or something.
3 A. It might be Timmy in relation to a dog that I used to --
4 Q. All right.
5 A. I think, yeah, that's Timmy.
6 Q. But under Timmy, it carries on with "I'm sorry that",
7 can you see that?
8 A. Yes.
9 Q. And can you help us with what it says after that? "I am
10 sorry that", what?
11 A. "Sorry that you couldn't have a chance of life. You
12 should have."
13 Q. Carry on, Ms Letby, you should have?
14 A. Um... "And for the pain that your..."
15 Q. Is that parents?
16 A. I can't see parents on there.
17 Q. Can we scroll down? I apologise.
18 A. "... parents must experience every day."
19 Q. All right. This is something you're writing to
20 yourself, isn't it?
21 A. Yes.
22 Q. Yes. And what do you say -- under the scribbled words,
23 the letters, probably following on from the sense of
24 what we've just been reading. After "every day", what
25 do you follow that with? "We [something]."

1 A. "We tried our best and it wasn't enough."
2 Q. Right. So when you said "We tried our best there", what
3 are you talking about?
4 A. Us as a team.
5 Q. And who are you writing this to?
6 A. To no one, to myself.
7 Q. Right. "It wasn't enough." How were you feeling about
8 the fact that if, as this says, you tried your best and
9 it wasn't enough?
10 A. I was distraught, really.
11 Q. Do you recall whether this was written at a time after
12 you'd found that you were being blamed for deaths?
13 A. Yes, it was, yes.
14 Q. How did you feel, being blamed for deaths, when what
15 you're writing here is that you tried your best?
16 A. Just devastated.
17 Q. Under there, where it says "We tried our best and it
18 wasn't enough", there's the words, it looks like,
19 "I can't do it any more"; is that right?
20 A. Yes.
21 Q. What does that mean, "I can't do it any more"?
22 A. Life.
23 Q. What do you continue writing under that, following on
24 from what you'd written above that?
25 A. "I don't know if many people will think of you today or

1 any day, but I do. I will always remember because you
2 should be."

3 Q. Right. Pause there. Is this what was on your mind?

4 A. Very much so, yeah.

5 Q. Could you read through to the end of that, please?

6 A. "I can't do this any more. I want someone to help me
7 but they can't, so what is the point in asking? Hate my
8 life."

9 Q. Right. Is it you that's written "help" in the middle of
10 that?

11 A. Yes.

12 Q. Why have you written "help"?

13 A. Because I just wanted someone to help me and at that
14 point nobody could help me.

15 Q. Can we go over to page 10, which is the other side of
16 this note. The prosecution images, page 10.

17 If we carry on reading this, Ms Letby. It says:
18 "Please help me, please help me, help me."

19 Why were you saying that? Sorry to ask again.

20 A. Because that's what I wanted: I just wanted somebody to
21 help me.

22 Q. You'd been involved with a grievance procedure; is that
23 correct?

24 A. Yes.

25 Q. You'd been taken off the unit; yes? You hadn't asked to

1 be taken off, had you?

2 A. No.

3 Q. We've been over this. And you'd found that people were

4 saying things that held you responsible for deaths on

5 the unit?

6 A. Yes.

7 Q. How hard had you tried to look after the children on

8 that unit who you cared for?

9 A. I only ever did my best.

10 Q. What did it feel like to be accused or to have the

11 finger pointed at you for the things that it was being

12 pointed at you for?

13 A. I don't think you can really put it into words. It --

14 it was just devastating and it changed my whole life.

15 Q. I'm not going to go through all of this, it is here, but

16 I would like to ask you something, if we scroll down the

17 page. In capitals down at the bottom we can see the

18 word "bastards". Can you see that?

19 A. Yeah.

20 Q. We've seen lots of messages from you, Ms Letby, and

21 we've seen lots in the notes. Some people swear with

22 complete abandon and other people don't. Quite

23 a personal thing, swearing. We've not seen you swearing

24 in text messages, have we?

25 A. No, that's not language I would use, no.

1 Q. Why are you using that language in this note that you're
2 writing for yourself?

3 A. Because that's how I felt about some people. And
4 I suppose I could use that word because it was private
5 for me.

6 Q. Was it directed at any people in particular? Who, do
7 you think, looking back?

8 A. Ravi Jayaram and Steve Brearey.

9 Q. Why did you say that about them?

10 A. Because of the things they'd been saying about me.

11 Q. Right. Let's move, please, if we could to page 13,
12 which is the white piece of paper from the bags with
13 lots of items written on it. It's prosecution image,
14 page 13.

15 I'm not going to read every line of this with you,
16 but this contains a lot of names over it, doesn't it?

17 A. Yes, it does, yes.

18 Q. At the top underneath -- thank you. Just underneath the
19 triangle where it's torn, what's the first name that
20 appears up there?

21 A. That's my name and signature.

22 Q. Then underneath that, what does it say?

23 A. "Please help me."

24 Q. What or who is Whiskey?

25 A. Whiskey was a dog, my dog that I had when I was a child.

1 Q. Was Whiskey still alive at the time you were writing
2 this?
3 A. (Inaudible: coughing).
4 Q. So why were you thinking of Whiskey?
5 A. Because he was an important part of my life.
6 Q. And then underneath that, is that:
7 "Love was all we needed but time let us down"?
8 A. Yes.
9 Q. "Please help me."
10 Just looking at that we can see names like
11 [Dr A], Karen Rees, Berger, and various other names
12 you might be able to pick out. Why are you writing
13 names over and over again on this piece of paper?
14 A. Because they're important people to me and they were
15 just on my mind at that time. I would just write about
16 people that were important to me. At that time I had
17 a very limited support network, so these people were
18 very important to me.
19 Q. Can we scroll down to see the remaining part of that
20 note, please. Thanks, Mr Murphy.
21 We've got the names Tigger and Smudge, that's your
22 cats, isn't it, and your name written out repeatedly; is
23 that right? [Dr A].
24 A. Yes.
25 Q. We can see in fact, just towards the left-hand side

1 near the bottom it says "Rees", and we have seen Karen
2 Rees a little bit higher up.

3 A. Yes.

4 Q. We have heard her name before and it's also on this page
5 higher. Who was Karen Rees?

6 A. Karen Rees was the director of nursing at the Countess
7 of Chester, and she was my main support during this time
8 when I was redeployed.

9 Q. Let's go over the page, please, to the back of this
10 piece of paper, which is page 14 in the prosecution
11 images.

12 Just looking at that, why are you writing different
13 inks on this?

14 A. Because it may well have been done at different times.

15 Q. Have you drawn the pink love heart that we can see on
16 the right-hand side?

17 A. Yes.

18 Q. And have you drawn and made all the other marks on
19 there?

20 A. Yes.

21 Q. We've seen a lot about how you were feeling and you've
22 used the word "hate". We can see, to the top left, it
23 has the word "love" in a rectangle. Why have you
24 written that, if you can remember?

25 A. I'm assuming it's the love for the people that were

1 important to me.

2 Q. Right. We can take that down, there's nothing else

3 I want to ask you about that at the moment, but it's

4 there and we can look at it if we need to, or others

5 can.

6 I'm going to ask you about the diary next, please,

7 Ms Letby. Is it unusual for you to keep a diary?

8 A. No, I've always kept a diary.

9 Q. The diaries that cover this period are diaries for 2015

10 and 2016. In general at this time of your life what did

11 you use your diary for?

12 A. For everything, really. I would document my work

13 shifts, any social activities, birthdays, appointments.

14 Everything, really, went into my diary.

15 Q. The bits of paper that we've seen that were tucked into

16 the diary. That's not the one we looked at there, they

17 came from the handbags, but we'll see paper from the

18 diary and that note came from the diary. How did they

19 end up in the diary or why did they end up in the diary?

20 A. So I put them in the diary. So at some point I've been

21 writing them and they have gone into the diary.

22 Q. In the 2016 diary that we looked at in particular,

23 reference was made to some of the babies in this case.

24 A. Yes.

25 Q. So why would you make reference to one of the babies in

1 this case, or any baby, in your diary?

2 A. I would sometimes write down significant events that had
3 happened or something that had stood out in terms of
4 something unusual or a training opportunity on the unit.

5 Q. Right. Let's have a look at page 16, if we could,
6 in the prosecution images. This is the one that's
7 included in the presentation that we have here and it
8 deals with the period 4 April through to 10 April 2016.

9 That's a period that covers the time of the event or
10 events we're looking at with [Babies L and M]. Do you
11 follow that, Ms Letby?

12 A. Yes.

13 Q. What I'm going to do is actually, with your assistance,
14 take a period about five pages before and five pages
15 after this, since we have that diary, just to look at
16 what was in that. Are you okay if we start with that
17 and we'll just go through a number of weeks to see the
18 type of thing that's in the diary?

19 A. Yes.

20 Q. Bookending this, I'm going to ask Mr Murphy if we could
21 go to page 412 from the exhibits. We'll need to flip
22 that round.

23 So this starts on 29 February. That's the date
24 there. 2016. Just going through this, where it says
25 Tuesday and then, is that St David's Day, is there

1 something faintly that you've written in next to that,
2 ID or something?

3 A. I think that's a long day.

4 Q. LD?

5 A. Yes.

6 Q. Long day. Why would you have written that in?

7 A. So sometimes I would write in requests that I had made
8 for shifts to work, so it may have been that that's
9 originally what I thought I was going to be working and
10 it's changed.

11 Q. Then for Wednesday the 2nd it's got salsa. That might
12 be obvious, I won't keep asking you why whenever we see
13 salsa, but just for this first time why have you written
14 salsa in there?

15 A. I would write down when salsa classes or there are
16 parties that we go to, so I'd just write down when it
17 was happening.

18 Q. That's something you enjoyed doing?

19 A. Yes.

20 Q. Was it something you did regularly?

21 A. Yes.

22 Q. Did you have friends there?

23 A. Yes.

24 Q. The N under salsa, what does that stand for?

25 A. Night shift.

1 Q. Then the following day, Thursday the 3rd, we've got N;
2 can you see that?
3 A. Yes.
4 Q. I'm not going to read out all the names that we see when
5 we see them, but there's a name beginning with a K
6 there.
7 A. Yes.
8 Q. Can you see that? Thank you, Mr Murphy.
9 A. Yes.
10 Q. Who does that relate to? What kind of person is that?
11 A. That's a patient on the unit.
12 Q. Why is that in the diary?
13 A. Because something unusual, significant, has happened or
14 I've done something related to training that I've
15 documented.
16 Q. And why would you put it in? Because attention has been
17 pointed to where you put names in, some names, so why
18 would you put the name in if it was something unusual or
19 some training --
20 A. Just for my own reflection and development, really,
21 tracking things that I'd done in my career.
22 Q. And then on the Friday we see the same name next to N.
23 A. Yes.
24 Q. Is that the same reason?
25 A. Yes.

1 Q. Then could we go across to the Saturday, please, on the
2 other side. It's got N. What does that stand for? Is
3 that nights?
4 A. That's night shift.
5 Q. And another night shift?
6 A. Yes.
7 Q. There's four on the Sunday, so that's four night shifts
8 in a row, is it?
9 A. Yes.
10 Q. And the names there, not names of anybody on or
11 connected to this indictment?
12 A. No.
13 Q. Why would you have written those down?
14 A. For the same reasons as I've said: something's happened
15 that was significant or something I wanted to document
16 that I'd learnt from on that day.
17 Q. When you say something's happened, so there's no
18 misunderstanding, are you suggesting there's something
19 sinister when you say something's happened?
20 A. No, I mean something that stands out, so something that
21 maybe I could use as reflection going forwards, a skill
22 that I might have used for the first time, or... More
23 things like that, for me to reflect on babies that I've
24 cared for with different needs.
25 Q. Under "notes" it's got some asterisks and it says in

1 pink ink "Skin patch test". If you can remember, what
2 would that relate to, skin patch test?

3 A. I'm not -- probably, I think it might be a hairdresser's
4 thing.

5 Q. Go over the page, please, 413. Tuesday, 8 March. It
6 says "Stretton Fox at 12.00".

7 A. Yes.

8 Q. What does that refer to?

9 A. The Stretton Fox is a pub that a few of the girls used
10 to meet up for lunch. That's just a reference to that.
11 I met some people for lunch there.

12 Q. When you're not working?

13 A. Yes.

14 Q. What does it say under that, "something email"? It may
15 not say email.

16 A. "Forms arrived."

17 Q. Do you know what the forms are relating to? What was
18 going on in your life at this point?

19 A. Maybe in relation to the house purchase.

20 Q. Because we know you move into the new house round about
21 the 5th or 6 April, don't you?

22 A. Yes.

23 Q. And this is now about a month before March?

24 A. Yes.

25 Q. So salsa and hair and beauty works, is that an

1 appointment on the Wednesday?

2 A. Yes.

3 Q. And then we've got Ellie G, who would that be?

4 A. I went to see Ellie Goulding in concert and stayed at

5 the 30 James St Hotel.

6 Q. Is there any fixed pattern to what colour ink you happen

7 to use for which entry when you're keeping your diary?

8 A. I tended to use blue for work-related things, but

9 otherwise no.

10 Q. Thank you. So "AL" across the top of this week in blue,

11 what would that stand for?

12 A. That's in reference to that I'm on leave from work, so

13 I'm on holiday, annual leave.

14 Q. Right. If we just look at the Sunday, the 13th, it

15 says:

16 "Mum and dad, house, 11.00."

17 What does that relate to?

18 A. I would think that's mum and dad coming to view my house

19 with me.

20 Q. Are you all right if we just carry on for a few more of

21 these perhaps until we get to the end of this sequence?

22 A. Yes.

23 Q. If we pop over the page then, page 414. We can see

24 under Monday, 4 March, it's written in, "Paid full

25 amount". Paid full amount for what, we might be able to

1 guess, but could you tell us?

2 A. I think that's for the house.

3 Q. And then exchange the following day?

4 A. Yes.

5 Q. How big a thing in your life was it, the buying of this

6 house?

7 A. Oh, it was huge, a huge milestone.

8 Q. And were you working nights on the Tuesday, Wednesday,

9 Thursday?

10 A. Yes.

11 Q. "Keys 17.30", down at the bottom. Is that for the new

12 house?

13 A. The time I collected the keys, yes.

14 Q. Just look across the page, please. Salsa Buckley and

15 then a word I'm not too sure about.

16 A. Bachata. It's a form of salsa.

17 Q. Is that something that was happening on the Saturday

18 night, the salsa?

19 A. That's a reference to salsa that has taken place in

20 Buckley and I have ticked it, which means that I've

21 gone, I think.

22 Q. Seeing your mum and dad the next day?

23 A. Yes.

24 Q. I'm going to move to the next page, please. On the

25 Monday what are the notes referring to, "Greencroft and

1 washing machine".

2 A. I'm not sure about Greencroft, but washing machine is

3 obviously having a washing machine delivered to the

4 house.

5 Q. Right. Down at the bottom of the page, what does

6 "Gloucester Keys" refer to on 25 April -- march.

7 A. Gloucester Quays is a place that's somewhere I've gone

8 to.

9 Q. Somewhere you went?

10 A. Yes.

11 Q. Across the page "Zizzi 18.30"?

12 A. Again, I'm in Hereford at this point meeting with

13 friends from school.

14 Q. Let's move to the next page, please. Thank you. It

15 says under Tuesday the 29th, is that -- does it say

16 "bed"?

17 A. Yes. So I've had my bed delivered on that day.

18 Q. All right. And "[Nurse E] PM", who's that a reference to?

19 A. [Nurse E].

20 Q. The entries in blue for Thursday at LD, is that long

21 day?

22 A. Yes.

23 Q. And the Friday, the 1st, the N?

24 A. Yes, so that's nights.

25 Q. Looking across the page, nights also on Saturday and

1 Sunday?

2 A. Yes.

3 Q. So is that in effect four duties in a row?

4 A. Yes.

5 Q. If we go, please, to the next page, which is the page we

6 started at with the prosecution image. We're familiar

7 with this now. Tuesday, 5 April. You can confirm for

8 us, is that you moving out of the hospital

9 accommodation?

10 A. It is, yes.

11 Q. And you moved into 41 Westbourne Road around this time?

12 A. That's right.

13 Q. A long day on the 6th with salsa and then it says LD and

14 then there's a name on Thursday the 7th; can you see

15 that?

16 A. Yes.

17 Q. Is that a baby you cared for?

18 A. Yes.

19 Q. Why is that name in here?

20 A. Again, something has stood out with that baby.

21 Q. That's just something you did, is it, that?

22 A. Yes, it's just for my own reflection.

23 Q. And the 8th, we can see "LD twins". Then also across

24 the page, if we look at both of these:

25 "LD. Extra. Twins resus."

1 Those both coincide with [Babies L and M], don't they?

2 A. Yes.

3 Q. Is that who that refers to?

4 A. Yes, it is, yes.

5 Q. Can we go to the next page, please. Just a handful more

6 pages, Ms Letby, and then we're done going through this

7 and we'll have a break. Is that all right?

8 The 12th, Amie, [Nurse E], Laura. Can you help us with

9 that?

10 A. They're friends that came round to the house at that

11 time.

12 Q. Is that Amie from work?

13 A. No.

14 Q. Is it [Nurse E] from work?

15 A. [Nurse E] is from work, the other two aren't.

16 Q. If we look down at the Wednesday where it says "Minna

17 14.00", that refers to Minna Lappalainen?

18 A. Yes.

19 Q. Then the other duties are marked in on this page, aren't

20 they, on both sides of the page, LD, N?

21 A. Yes, I crossed through the nights because my shifts have

22 changed at that point so I was initially doing nights on

23 the 13th and 14th, but obviously got changed to long

24 days.

25 Q. All right. We're going to move through the next ones

1 a bit more rapidly. Page 419, please, which is the next
2 page in the diary. Again appointments and your social
3 life in pink or red, aren't they?
4 A. Yes.
5 Q. And does blue tend to refer, we can see, to work
6 commitments?
7 A. Yes, blue tended to be work-related, yes.
8 Q. Go to page 420, please. Again social engagements in
9 pink; is that right?
10 A. Yes.
11 Q. Including on the 26th, Tuesday, lunch with Jen at
12 Tatton Park; is that right?
13 A. Yes.
14 Q. Salsa in Mold on the Saturday?
15 A. Yes.
16 Q. Just under the notes where it says various items and
17 "council", is that items you have to pay?
18 A. Yes, that's reminders for me to pay my car tax and
19 council tax and Tesco credit card bill.
20 Q. If we go to 421, please. There's one more after that.
21 And 422.
22 Just looking at this one, which is just at the start
23 of May, can you see under Wednesday, is that LD?
24 A. Yes.
25 Q. And then is that a name written under that?

1 A. Two names.

2 Q. Are those names -- who do those names belong to?

3 A. They relate to children that I was caring for at that

4 time.

5 Q. Not children on this indictment?

6 A. No.

7 Q. And are those the same names that appear on Thursday the

8 12th as well?

9 A. No, so on the Thursday the one name is a student that

10 I was mentoring and the other one is a baby.

11 Q. Right. So as to the babies that appear, the two on the

12 11th and the one on the 12th, again why did you put --

13 make a note of their names?

14 A. So for my own reflection, I've done something with those

15 babies perhaps for the first time or... yeah.

16 Q. If we just look across on the 14th, on the top of the

17 opposite side, again there's two names there.

18 A. That's the same. One of the names is with reference to

19 a student and the other one is a patient.

20 Q. And why would you make a reference to the student in

21 here?

22 A. I would document whenever I worked with a student

23 because you have to keep records of who you've mentored

24 and when. That's just part of my career development.

25 MR MYERS: Thank you for going through those with us,

1 Ms Letby.

2 I wonder, my Lord, if we could take a break at that
3 point.

4 MR JUSTICE GOSS: Certainly. Yes, we'll have a 15-minute
5 break now, members of the jury.

6 (In the absence of the jury)

7 MR JUSTICE GOSS: Yes, general public, please leave.

8 (3.10 pm)

9 (A short break)

10 (3.23 pm)

11 MR MYERS: Just before the jury return, we're endeavouring
12 to sit for about an hour, take a 15-minute break and
13 then sit for a further hour and in the normal course of
14 events that means we would finish round about 4.15.
15 I ran on a little bit there because I wanted to get to
16 the end of the diary entries. May I pick a time around
17 4.15? That is around the time scale we were working
18 with rather than running for an hour from now because
19 that --

20 MR JUSTICE GOSS: Yes. That's absolutely fine.

21 MR MYERS: That would be very helpful. We might be a little
22 short of it, but I'll aim for that.

23 MR JUSTICE GOSS: Just what's a convenient and natural
24 break.

25 MR MYERS: I'm grateful. Thank you, my Lord.