things did you do when you could?

- A. I used to regularly attends salsa classes. Used to go out with friends, meet up for lunch. I've been on a quite a few holidays with friends. Gym.
- Q. Okay. Did you meet up with colleagues from work outside work hours?
- A. Yes, I did.
- Q. Were there any particular colleagues that you were or colleagues that you were particularly friendly with? A. Yes.
- Q. Could you tell us who they were?
- A. [Nurse E). Minna Lappalainen. [Dr A].

[Nurse A]. Jennifer Jones-Key.

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

 A. Yes.
- Q. How important to you was that support at that time?
 A. Oh, it was very important. They were the only form of support I had, really.
- A. [Dr A], who we've seen appearing on various of the texts, when did you first get to know who he was?
- A. Um, so he started on the unit around September 2015 [redacted].
- Q. We've seen the texts.
- A. Yes.
- Q. How did you get to know one another?
- A. Just through working together and then at times we would then start to meet socially as well.
- Q. Was it a friendship?
- A. It was, yes.
- Q. Anything more than a friendship?
- A. No.
- Q. A close friendship?
- A. Yes, he was a trusted friend, yes.
- Q. Did you ever meet outside hospital?
- A. Yes, we did.
- Q. We've seen that you got a lift back after you'd had a needlestick injury $\ensuremath{\mathsf{--}}$
- A. Yes.
- Q. -- I think after treatment for (Baby 01. Putting that aside, did you meet outside hospital? You're saying you did.
- A. Yes, we did.
- Q. Where would you meet if you did meet?
- A. Sometimes he would come to my house, sometimes we would

go out for meals or coffee or walks.

- Q. Was there a time when he stopped working at the Countess of Chester neonatal unit?
- ${\tt A.}$ Yes. So he finished working there in the September of 2016.
- Q. Where did he go?

[Redacted]

[-..] did you and he stay in touch?

- A. We did, yes.
- Q. Remain friendly?
- A. Yes.
- Q. And how long did that friendliness continue for?
- A. Until the early part of 2018.
- Q. Then anything in particular happen or did it just end?
- A. No, it just sort of fizzled out. It was just -- yeah.
- Q. Fizzled out, all right. Do you like to message people?
- A. Yes.
- O. Text?
- A. Yes.
- Q. We'll look at some as we go along. You might not be the only person who does that, but insofar as you do, do you use it for social things?
- A. Yes.

Q.

Work-related issues?

- A. Yes.
- Q. In your experience, how common was it for you and other nurses on the unit to message one another about what was happening at work?
- A. Very common. We would all do it at some point, yes.
- Q. Did you sometimes message when you were at work?
- A. Yes.
- Q. Were you the only person on the unit to do that?
- A. No, all staff would regularly use their phones whilst at work.
- Q. Were there any rules about where on the unit they could use their phones or any practices about where they could use them?
- A. Just the general rule would be that you don't use the phone sort of in the clinical areas.
- Q. In what areas?
- A. The clinical areas, so the nurseries.
- Q. Right.
- A. Otherwise at the nurses' station, the equipment rooms,

phones would often be used, yes.

- Q. Nursing station, equipment rooms?
- A. Yeah.
- Q. Where else?
- A. Break rooms. Anywhere outside of the nurseries.
- & Where's the fridge with the insulin with it?
- A. The fridge in the equipment room.
- Q. Do people go in there then to use their phones?
- A. Yes.
- Q. Was there any way of knowing when somebody was going to go into the equipment room?
- A. No. So that room is a very busy room, it's open all the time for people to come and go and collect equipment. It's also where we would go for refreshments as well.
- Q. When you say refreshments, what sort of refreshments do you mean?
- A. We're not able to have hot drinks in the nursery, so if you were going to get a coffee or something you would then take it into the equipment room.
- Q. So people go in there to get equipment?
- A. Yes.
- & They might go in there to have a hot drink?
- A. Yes.
- Q. They might go in there to use their phone?
- A. Yes.
- Q. At any time?
- A. Yes. The door is open at all times, yes.
- Q. With the families who were on the unit -- is part of neonatal nursing directed towards enabling families to come on to the unit so they can be with their babies as much as possible?
- A. Yes, very much so. Part of our role is to make them inclusive (sic) as much as possible with their baby.
- Q. What hours can parents, for example, visit their babies? A. It's open visiting, other than the handover time, so sort of the half hour around shift change, just for privacy really of the other babies, otherwise they can come at any point.
- Q. How well can you get to know parents on the unit? A. Um... With some families they can be with us for very long periods of time and you get to know them extremely well.
- Q. By "very long" do you mean weeks?
- A. We can have babies for months.
- Q. Right. Obviously we've looked at the babies in this

case who feature on this indictment. But did you have other babies who might be there for weeks or months who were no part of this case?

- A. Yes, very often.
- Q. Would you get to know parents of babies like that? A Yes
- Q. How close a friendship, if at all, might you have with parents?
- A. Um... I think it's only ever at a professional level when they're on the unit. There have been a couple of occasions where I have kept in touch with families once they've been discharged from the unit, but on the whole it's a professional relationship.
- Q. In your knowledge are you the only nurse who's ever, as you put it, kept in touch with families?
 A. No.
- Q. Is it something you are aware other staff have done?
- A. Yes. Once they've been discharged, yes.
- Q. Do you stop being interested in them the moment they leave the unit?
- A. No, definitely not.
- Q. Have you ever looked for parents of babies on Facebook?
- A. Yes, I have.
- Q. We've seen various Facebook searches in evidence, Ms Letby. You've seen those on the sequence of events, haven't you?
- A. Yes.
- &. How regular a Facebook user were you?
- A. Oh, daily. I was always on my phone.
- Q. Just for the parents of some of the children on this indictment or other people?
- A. No, for anyone that I might meet or come across.
- Q. Anyone you might meet?
- A. Yes.
- Q. Literally like that?
- A. Well
- Q. I'm not criticising you, I'm just asking: is it literally anyone you might meet, you would look at them on Facebook?
- A. Potentially, yes. Just out of curiosity.
- Q. So what sort of people would you look at on Facebook?
- A. Other colleagues at work. People that I might have met at salsa group. Just... Anybody really.
- Q. When you've looked at parents of babies on Facebook, is there any reason or reasons why you've done that?

- A. I just think general curiosity and they've been on my mind.
- Q. Have you only ever looked for parents relating to this indictment or other parents of babies?
- A. No. I've looked at other parents as well.
- Q. We're going to look at some material, which is introduced, my Lord, with the agreement of the prosecution. It's a schedule relating to Facebook. I'd be grateful for Ms Clancy's assistance. There's an agreed fact to read and then we'll go to the schedule and go through parts of it with you in front of the jury, Ms Letby.

My Lord, ladies and gentlemen, I'm going to ask that the admission follows on the formal admissions you already have, which are behind divider 3 in jury bundle 1. The schedule will sit just behind this next admission and I'll read it out and we'll have a look at it. You'll need copies of these too, Ms Letby. (Handed)

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

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

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

Then if we put the searches behind that, that document is the one that you have. I'm grateful,

Mr Murphy. We can follow it on the screen as well.

We'll go through some of the entries here if we may, please. I'll read the first part of this. Have you all got that filed away, ladies and gentlemen, where you can see it easily? Thank you.

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

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

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

"The table below shows: (1) Facebook searches for parents of the children on the indictment (marked in red) for the period between June 2015 to June 2016.

- "(ii) Additional Facebook searches made by Lucy Letby for the same period on those specific days where searches are made for parents of children on the indictment.
- "(iii) Entries with asterisks explain the category of search that was made by Lucy Letby and preserve anonymity.
- "(iv) A monthly breakdown of the total number of Facebook searches made by Lucy Letby between June and June 2016."

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

In addition it stays:

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

So that's what this schedule is and, Ms Letby, do you follow that? $\,$

A. Yes.

- Q. So it doesn't include, by any means, the entirety of the searches over this period, it includes searches by you in the same period on the specific days -- A. That's right.
- Q. -- where children have been identified, or parents of children, on the indictment? A. Yes.
- Q. So let's just go and have a look through this now, please. Page 1. It may be a lot of me reading parts of this and then asking you questions, Ms Letby. We have on 9 June 2015, 09.57:

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

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

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

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

- Q. Was it unusual for you to look up the parents of a child that you'd been involved with or cared for -- A. No.
- Q. -- or at a hospital where you'd worked? A. No.
- Q. This is the morning following [Baby A]'s death. Are you able to tell us why it was that you are were looking for [Mother of Babies A and B], his mother, at 9.58 on 9 June?
- A. Just that she was on my mind at that point.
- 8. David Harkness, 2 minutes later?
- A. The same.

- Q. If we carry on that day, we can see there's a number of searches relating to individuals under the category of "social". What sort of people would come under that category? I'm not asking for their names, but how would you encounter people that we're referring to as social? A. That's friends from school, friends from university, people that I had met through the gym or through salsa a wide variety of people.
- Q. If you met somebody at salsa, for instance, who you'd not met before, would you be interested to look them up? A. Yes.
- Q. You sound definite about that. Is that something you did?
- A. Yes, it's general curiosity, I think. I'm of the type where we do a lot on our phones and, yes, I would out of interest look up a lot of people, yeah.
- Q. And carrying on down that page, 10 June, 21.13: "Other mother of child from Liverpool Women's Hospital NNU." $\,$

So not related to a parent of a baby on this indictment but why would you be looking at whoever that was?

- A. Again, it's just curiosity.
- 8. Going over the page, please, thank you. If we go to the top of the page, we've got, at 23.33 on 10 June 2015, the top entry is for [Mother of Babies A and B]. This is later on the day after [Baby B]'s episode. Why would you be looking at [Mother of Babies A and B]?

 A. Again, she's on my mind.
- Q. One minute later, "Other mother of child from COCH". So another mother of a child from the Countess of Chester neonatal unit, nothing to do with this indictment. A. Yes.
- Q. What's happened there just 2 minutes later? Why are you looking at someone else like that?

 A Again it's just general curiosity, flicking through
- A. Again it's just general curiosity, flicking through a lot of different names at different times.
- Q. If we skip forwards, not all entries are here for June, but just to look forwards from there, 14 June, a couple of lines down, we've got at 10.20, a mother of a child from Liverpool Women's Hospital. At 15.52, (Mother of Baby C], and at 15.52, also (Father of Baby C] who are also [Baby C]'s parents. Why would you be looking for them?
- A. Again, it's just general curiosity.
- Q. Is it unusual for you to look for people who have crossed your mind for whatever reason?
- A. No, I do it frequently. It's just normal behaviour for me.

Ο.

For you?

A. Yes.

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

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

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

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

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

MR JUSTICE GOSS: All right.

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

MR JUSTICE GOSS: Yes. I can understand that. Anyway, I don't want to interrupt you. It was becoming very apparent and I just wondered if it was other mother 1, other mother 2, other mother 3 or something from Liverpool Women's or whether it's other mother 1, 1, 1, again. That's what I'm trying to distinguish.

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

MR JUSTICE GOSS: All right, there we are.

MR MYERS: If we look towards the end of that day, Ms Letby, we've got searches, after a number of social searches, later in the evening for [Mother of Babies A and B], [Mother of Baby D] and [Father of Baby D], [Mother and Father of Baby D] being parents of [Baby D]. Any particular reason why you'd be looking for them at that point?

A. No. Again, it's just a pattern of behaviour. They're on my mind. I'm just searching for lots of different

people.

Q. In the case of [Mother and Father of Baby D], those searches come within a couple of days of [Baby D] dying. Is that in any way relevant to why they were on your mind at that point?

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

8. We can see the total number of searches for June: there are 113, of which these are part.

A. Yes.

Q. July, 70 searches. Do you see that? We can move on to August 2015. On 6 August, a number of searches, a reference at 12.31 to "mother of a child from Liverpool Women's Hospital"; can you see that?

A. Yes.

Q. Then "Team AL" at 12.427 What's Team AL? We don't need the name necessarily but could you explain what "#teamal" was?

A. Um...

I'm not sure at the minute.

- Q. Right. Was the unit ever involved in activities to raise funds for anything?
 A. Yes.
- Q. What sort of things would funds be raised for from the unit?
- A. So for equipment for the unit or predominantly to save for the new build, so the unit was recently rebuilt.
- Q. In terms of Team AL, does that help you with what that relates to?
- A. Yeah, I think that's a fundraising page.
- Q. And AL the initials of a child, I should say, to assist you. $\label{eq:child_problem}$

A. Yes.

- & (Mother of Babies E and F] on 6 August 2015 at 19.58. Do you know why you were looking at [Mother of Babies E and F) or searching for [Mother of Babies E and F) on that occasion? A. No.
- Q. or a couple of weeks later if we come some lines down, can you say why you were looking there?

 A. No, just that she's on my mind.
- Q. [Mother of Babies E and F1, of course, the mother of [Baby E] and [Baby F].

A. Yes.

&

[Baby F] died on 4 August 2015. That's just to help us with that date.

July 2015. Just go over the page, please. The total number of searches. 175.

MR JUSTICE GOSS: For August.

MR MYERS: I apologise. 175 for August 2015.

MR JUSTICE GOSS: If we could just go back. Where it says for 6 August, 22.25, "Work colleague". Is that a work colleague who's not been named in this case?

MR MYERS: Yes.

MR JUSTICE GOSS: So it's preserving the anonymity of another work colleague.

MR MYERS: Yes, someone who hasn't yet been named.

MR JUSTICE GOSS: I thought it was, but just to clarify that.

MR MYERS: August 2015, two searches out of the 175 relating to a parent of a child on this indictment and they're both for [Mother of Babies E and F]?

A. Yes.

MR MYERS: My Lord, there are several more pages just to review in this. Although I'm trying to go through it as expeditiously as possible.

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

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

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

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

(In the absence of the jury)

MR JUSTICE GOSS: As before, please, could members of the public leave the courtroom? (Pause)

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

(12.59 pm)

(The short adjournment)
(2.00 pm)

MR JUSTICE GOSS: Mr Myers, Mr Johnson, in future we'll have slightly longer lunch breaks for logistical reasons and timings so there can be a proper break for Ms Letby.

MR MYERS: Thank you.

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

MR MYERS: We're grateful, my Lord, thank you. (In the presence of the jury)

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

A. Yes.

- Q. All right. If we go just to the lower part of the entries we've got 21 September 2015. We can see 01.13, Minna Lappalainen, her name is there. And then also, searches for Ms Lappalainen at 06.58, 14.15 and 21.12. Ms Lappalainen was a friend of yours, wasn't she? A. Yes.
- Q. And a good friend of yours? A. Yes, a close friend.
- Q. And we're looking at your use of Facebook in all of this. Why is it you're searching for her on those occasions, if you can remember? Why would you be searching for her on Facebook?

 A. She's just somebody that's on my mind. She was a big part of my life.
- Q. And so when it's on your mind then, you go to Facebook and take a look?
 A. Yes.
- Q. Just below the 21.12, Minna Lappalainen entry, there's one for 22.30 and it says "AB appeal"; can you see that? A. Yes.
- Q. Do you remember what that relates to? I'm not asking for the identity of the person involved, but what did that relate to?
- A. That was a fundraising page for a child that I had met on the children's ward during my training.
- Q. All right. Then we've got, soon after that at 22.33, a few minutes after that, a search for [Mother of Baby G], who was [Baby G]'s mother.

 A. Yes.
- Q. Any particular reason why you looked for [Baby G]'s mum ?
- A. No.

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

A. Yes.

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

A. No.

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

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

A. Yes.

- Q. Any particular reason you can think of now why you're doing those searches like that then?
- A. No, it's just a normal pattern of behaviour. That's what I would do.
- Q. And this is just one section on one day, isn't it? A. Yes.
- & We can see that with Minna Lappalainen, for instance, there are repeat searches there, aren't there?

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

A. Yes.

Q. Similarly, so we can be quite clear, with regard to parents of children who are not on this indictment, where we've got anonymised entries, can you confirm a number of those are repeat searches, aren't they -- A. They are, yes.

а

- -- for the same people, some of them? Were any of the parents, I am not talking about the ones on the indictment, any of the parents ever friends of yours or did you have friends --
- A. Yes, some. Yes.
- Q. So some of them (inaudible: coughing) were friends; is that correct?
- A. Yes.
- 2. Not all but some?
- A. No.
- Q. October 2015, if we just go to the total number of searches there, if we go over the page, please, to page 4. The total searches for October is 173. A. Yes.
- 8. I'm going to move down, we can see it includes some searches for parents for babies on this indictment. If we go down to November 2015, please. I'm going to go to

the central part of that table. The lower half of the schedule, please, Mr Murphy.

In fact, could we increase before then, please?
A little bit higher than that. Thank you.
If we just look at that, the second entry down,
16.19 on 5 November 2015, from 16.19 through to 17.22,
about 10 rows or so below, there's a series of searches,
aren't there, in quite quick succession?
A. Yes.

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

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

 A. No. That would be my normal pattern of behaviour.

 I just they come into my mind, I quickly search and then I just move on to the next thing.
- Q. Looking at this section that's open before us there, if we look at 21.40, in fact, 21.20, we've got Ailsa Simpson on 5 November. Can you see that?

 A. Yes.
- Q. She's a work colleague, we know. She's given evidence in this case. 21.40, work colleague. 21.42, work colleague. 21.43.

Then three of the parents related to children on this indictment at 23.40, 23.41 and 23.44. Certainly for the first two of those searches of a minute or several minutes. Do you see that?

- A. Yes.
- 2. Again in terms of spending a minute or just a couple of minutes on somebody when you're searching, is that unusual or is it what you do?
- A. No, that would be normal for me.
- Q. Can we go over the page, please. Just noting at the top the total number of searches in fact for November is 277. Five of those relate to parents of children on this indictment.

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

Move to January, please, Mr Murphy. Look at the total number of searches for January, 199. We have in this schedule searches in effect bookending the searches of parents relating to children on this indictment; you understand that, don't you, Ms Letby?

A. Yes.

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

- A. Yes.
- Q. Generally speaking, would the pattern of your searches be constant across the month?
- A. Yes.
- Q. Can we just go down to February 2016, please. We can see a total of 178 searches recorded for February 2016; do you see that?
- A. Yes.
- Q. Only one in fact relating to a parent of a child on this indictment, for [Mother of Baby G] on 12 February 2016; do you see that?
- A. Yes.
- Q. That comes at the end of a series of searches which, if we go up, starts with Ailsa Simpson at 23.14 on 12 February: can you see that?
- A. Yes.
- Q. Then there's a series of searches over the course of several minutes --
- A. Yes.
- Q.
- -- ending with social at 23.19?
- A. Yes.
- Q. The searches, are they linked in any way to things -- in this case, anything that you have done to cause harm to $[Baby\ G]$?
- A. No, not at all.
- Q. Because you understand that's the suggestion that's being made from the sequence of events and the searches and then with the prosecution. You understand that, don't you?
- A. Yes.
- & That you're looking at these because it's babies that you have hurt in some way and it's connected with that. Is that what these searches are about?
- A. It's not, no.
- Q. If we scroll forwards, please, to have a look at March and April. Look at both of those: 211 searches in March, 168 in April.

None relating to parents of children on this indictment.

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

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

- Q. One minute before the [Mother of Baby I] search, "other mother of child from the neonatal unit". And then a search for "father of child from the neonatal unit" a minute afterwards. Why are you searching for the people that we see here?
- A. They're just people that have crossed my mind at that time.
- Q. Is there any sinister reason why you're looking at [Mother of Baby I]?
- A. No, it's just general curiosity, the same as the reason as I'm looking at a lot of people.
- Q. Was it your habit to go and look at the parents of babies on this indictment if you'd gone and hurt them or done something to them?
 A. No.
- Q. June 2016, 233 searches. But none relating to the parents of children on this indictment. A. No.
- Q. So would you describe yourself, as far as you can tell, as a pretty regular user of Facebook searches over the period we're looking at?
- A. Yes, very much so, yes.
- Q. Did you live on your own for most of the time? A. Yes.
- Q. We see some of the searches are in the late evening, aren't they?
 A. Yes.
- Q. Is it unusual for you to go on to Facebook and look at people or make searches when you're on your own and you've got time on your hands?
- A. No, I was always on my phone.
- Q. All right. Thank you for helping us with that. I'm going to move to a different area now to do with your house and items that were found from it.
- I'd like you to help us next with where you were living and when over the period that you were working at the Countess of Chester. So I'm actually going to go back to 2012. When you had first qualified and started working there, where were you living?
- A. So I lived on site in the hospital grounds in staff accommodation.
- 2. Actually on the grounds of the Countess of Chester? A. Yes.
- Q. I'm going to ask you to keep your voice up if you would, please. Is there a name for that accommodation, the premises? What was it called, the place you lived at?
 A. Ash House.
- Q. And that's a hospital accommodation, is it?

- A. It is, yes, for staff.
- Q. Did there come a time when you moved out of there and began to live somewhere else? A. Yes.
- Q. Again, casting your mind back, so take your time to think through the timings, but when did you move out of Ash House?
- A. Around June 2015, around that time.
- Q. Was there a time you moved out before then and stayed with somebody in between two dates?
 A. Yes.
- Q. All right. You first went to Ash House in 2012? A. Yes.
- Q. Did you move out to live with somebody at a date after that?
- A. Not to live with somebody, but I did move premises, yes.
- Q. Where did you move to?
- A. I moved to a flat in town.
- Q. Did anyone else live there?
- A. No.
- Q. When was that?
- A. I think that was 2015.
- Q. Right. Did you ever live with any of your colleagues from the unit?
- A. No.
- Q. Did you ever move back into Ash House?
- A Yes
- Q. When did you move back into Ash House?
- A. Towards the end of 2015.
- Q. All right. I'm going to see if I can help you with something. I'm going to ask if we could put up a page of your 2015 diary. It's t exhibit page J355, please, Mr Murphy. This is the 2015 diary. We have heard there were two diaries when the police came to your house that were seized: one for 2015, one for 2016.

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

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

A. Yes.

& Does that help you with dates when you moved back to Ash House after you'd moved out?
A. Yes.

- Q. When did you move back?
- A. So that would be on that date, 1 June.
- Q. Right. So you'd started off living at Ash House, then

you moved out at some point to a flat elsewhere, and then you moved back in on 1 June 2015; is that right? A. I think so, yeah.

Q. All right.

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

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

A. About 6 months.

- Q. So maybe you moved out of Ash House -- then that would be some time in the middle of 2014 --
- A. I could be -- I'm not 100% --
- Q. -- or late 2014?
- A. sure with dates.
- Q. Then you moved back in on 2015, June. If you just look across from there, can you say it says "Jen's hen party, York" for 5 June?

 A. That was Jennifer Jones-Key, who was a nursery nurse on the unit. That was her hen weekend which I went to.
- Q. Right. So that was about the end of the week after you'd moved back to Ash House?
- A. That's right.
- 8. We know that when the police arrested you the first time you were living at an address at 41 Westbourne Road in Chester?
- A. That's right.
- Q. Do you remember when it was that you moved to that address approximately?
- A. It was around April 2016.
- Q. Is that a house that you bought?
- A. It was, yes.
- Q. I'm going to ask if we could just to put up an image from the prosecution images at page 16, please. This is again with the diary just to help with dates, Ms Letby. It's page 16. Again, images we have had from the prosecution.

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

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

- A. That's right.
- Q. So where were you moving to then?
- A. That was when I moved into the property in Westbourne Road.
- Q. And that's the --
- A. The house that I bought.
- Q. And that's where you were living at the time of the arrest, is it, the first arrest -- A. It is, yes.
- Q. -- which took place in July 2018.

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

 This is from you to [Nurse E] on Friday,
 8 April. Just a couple of days, 2 or 3 days after the entry in the diary and you're saying:
 "Unpacking. Stuff everywhere lol. May do extra shift over weekend."

 It may be obvious to us now, but what's that relating to?
- A. That's relating to me having moved into the house and I'm unpacking.
- Q. Could we go forwards to tile 57, please. It's Sophie Ellis to you on Friday 8 April saying: "How's the house, pal?"

And 58, please, Mr Murphy. You reply:
"Hi. It feels a bit weird having a whole house but
it's good thanks, although stuff everywhere as moved in
properly on Tuesday and been at work Wednesday, Thursday
and today. Doing tomorrow as an extra so I'll see you
tomorrow night. Won't be such an early start for you
now back in Chester."

And then you said:

"Did I hear your grandparents are coming to see you?"

If we keep in mind 9 April is a date associated with $[Baby\ M]$.

A. Yes.

- Q. In fact what was going in your life at that time?
 A. So I was in the process of moving house whilst working a number of shifts.
- Q. How big a thing was that on your mind?
 A. Um... Well, as anybody knows, when you move house it's a lot to take on, isn't it? So I was very occupied with sorting the house out.
- Q. Yes. I'd like to look at some images of the house. Are you all right with that? I would like to put up D26,

please. These are images taken by the police at the time of the first arrest or around that point. Again, just to help us with picturing this, what are we looking at on page 1 of D26?

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

- Q. That's 41 Westbourne Road, is it?
- A. Yes.
- Q. Thank you. Are you all right looking at these?
- A. It's just quite difficult.
- Q. All right then. Can we just go to photo 2? So we know, what area is that?
- A. That's the back garden.
- Q. And photo 3, please. Likewise?
- A. Yes.
- Q. Just towards the left of the photo where we can see the French windows, is that the back of your house?
 A. It is, yes.
- Q. Photo 4, please. And photo 5. All right. The eagle-eyed may notice that that green bin moved around in the course of those photos. Do you know how that happened, the moving of the green bin?
- A. No, that wasn't done by me.
- 8. No. Were you there when the police were taking these photos?
- A. No.
- Q. And photo 6, please. We'll see it's moved back somewhere else in fact. All right. Photo 7, please, Mr Murphy. Again we've seen a similar photo before. Where is this? A. That's the garage.
- Q. Could we see photo 8 as well, please. That's just the same garage from a different angle?
 A. Yes.
- Q. All that stuff in there, is it all yours?
 A. Some of it. The tools at the back wall that we're seeing there belong to my dad. He would help me out with general maintenance around the property.
- Q. Did he help you when you moved in with things? A. He did, yes.
- Q. So his tools are there?
- A. Yes.
- Q. Do you recall what's in the bags that are hanging up or do you not recall?
- A. I don't recall.

- Q. Did you store stuff in the garage?
- A. I did, yes.
- Q. Let's go inside then. Photo 9, please, Mr Murphy. What are we looking at here?
- A. That's the downstairs, the living room and dining area.
- Q. The French windows at the end, are they the ones we could see looking in from the garden?
 A. Yes.
- Q. Photo 10, please. We've moved forwards in the living room here; is that right?
 A. Yes.
- Q. And we can see on the left-hand side there's a door, you can just see it looks narrow here, a doorway on the left-hand side of that picture.
- A. Yes, that's the doorway to the kitchen.
- Q. All right. What about the stairs on the right of the -- in the middle of the picture. Where do they go?
- A. They lead to the upstairs of the property.
- Q. Can we go to photo 11, please. Is that looking into the kitchen?
- A. Yes.
- Q. And the back. Photo 12, please. Is this where you were living up to the time of your arrest?
 A. Yes.
- Q. Can we look at photo 13, please. Obviously we're being careful with privacy and identities. Can you help us with what it is we have on photo 13?
- A. This is a noticeboard that I had up in my kitchen, which contains various photographs and letters and just things that are important to me.
- Q. And this is -- this would have been in situ like this, in position, at the time that the police came and arrested you on 8 July 2018?
- A. Yes, that's right.
- Q. I'm in the going to ask you for the names of the people whose faces have been blanked out, not the name, but who's the person in the top left-hand corner?
- A. That's my cousin and godson.
- & Your cousin and godson. And then we're just going to go round clockwise. It says:
- "Number 1 godmother. Awarded to Lucy Letby." That's from the godson?
- A. That was something he had drawn for me.
- Q. Going across the top on the right-hand side there's something that says, "Auntie Lucy, thank you". Do you recall what that is?
- A. Yes. So those are another two of my godchildren and it

was a thank-you note for some gifts that they'd had at Christmas.

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

 A. That's another cousin of mine.
- Q. Another one of your cousins. Can we scroll down the picture, Mr Murphy.

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

- A. That's my mum and dad.
- Q. Was it actually something from the Telegraph or is it a kind of novelty card that's been --
- A. No, it's just a novelty card from the Hay Festival, which is just a festival they'd gone to.
- Q. Scroll back up to where we were. Just above the dolphin figure, who or what is that a photograph of?
- A. That's a picture of myself and two nurses on the unit.
- Q. Right. That's you back in 2016?
- A. Yes.
- 2. Is that the coloured scrubs that you wear when you're a band 5?
- A. It is, yes.

Q.

Thank you.

Can we go next, please, to photograph 14? So if we walked past this in your house where you were living at the time, where is this?

- A. As you go up the stairs, it's the landing area.
- Q. So landing on the stairway?
- A. Yes.
- Q. And the left -- who's in the photograph on the left? Again I'm not asking for names.
- A. They're the two cousins that I've talked about, so --
- Q. Is that you with them?
- A. It is, yes.
- Q. And over on the right-hand side again blanked out?
 A. They're the two godchildren that I mentioned in the previous images.
- Q. Let's go upstairs then, please, to photograph 15. Thank you. Which room is that one?
- A. That's my bedroom.
- Q. Actually, we can compare this, we can nip out of these if possible and look at the prosecution images number 2.

We can see what's where. If it's possible to look at prosecution image number 2, which is the photo of this room, but shortly after the point of arrest. So this is where you'd been sleeping -- I'll deal with this as quickly as I can, Ms Letby. This is where you'd been sleeping at the time of the arrest, isn't it, and this is your room after you'd been arrested; is that right?

A. Yes. That was how they left it.

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

 A. Yes.
- Q. We can see the radio on the left-hand side on the cupboards and the books on the right-hand side. Then if we go back then, please, to the photographs we were looking at at page 15, please, Mr Murphy, just with those orientation points, we can see again the pink -- the two pink tops, can't we?

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

 A. Yes.
- Q. That'd be your dad probably.
- A. Yes.
- Q. Maybe that's the room afterwards. Can we go finally on these to page 16. First of all, which room is this cabinet in?
- A. That's in the downstairs living area.
- Q. So back to the downstairs. I would like you to explain to us what the files are for that we can see. So if we look at the thickest one with the kind of light blue cover to it on the right-hand side, do you want to use the cursor just so we can be in no doubt what we're talking about, please. If it's working.

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

MR MYERS: Thank you, my Lord. What did you keep in that?

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

- Q. What about the thin blue wallet above that, that was that?
- A. That's a folder that had the medical records of my two cats that I had at the time.
- Q. What were the names of the cats? We're going to come to

- it, aren't we? They appear on some of the notes, don't they?
- A. Tigger and Smudge.
- Q. All right. And then just going across from there, the bright pink wallet, what did you keep in that?
- A. I think that was just more general documents. I think it might have had some study day details in and things.
- Q. Is it unusual to have study day details from courses you've been on or training you've had?
- A. No, I've kept everything through the whole of my training. I've never thrown anything away.
- Q. Keeping things $\mbox{--}$ is keeping things unusual for you? A. No.
- Q. We're going to have a look at some of the items in the prosecution images we've looked at. I wonder, just to start with, could we look at prosecution -- we've finished with those photographs, Mr Murphy. Could we look at prosecution images page 15. We understand that the diary, the 2016 diary that we've looked at, part of, has come out of that middle -- the top drawer of that middle chest of drawers?
- A. That's right, yes.
- & Is that where you kept that?
- A. Yes.
- Q. If we next look at page 18 of the prosecution images, please, Mr Murphy. So prosecution images page 18. Thank you. There's no issue as to this. This has been moved now for the purpose of being photographed by the police, hasn't it?
- A. Yes, it's now downstairs on the dining table.
- Q. So that's been moved for a photograph. The pieces of paper or the sheets of paper tucked behind the 2016 diary cover, are those bits of paper that you kept in that diary?
- A. Yes.
- Q. The green note we've looked at, was that in the diary as well?
- A. Yes.
- Q. What about the item that says Smudge behind it, what's
- A. That is my vaccination record for one of cats. That would have been in the blue folder that I mentioned in the unit in the kitchen -- in the dining room, sorry.
- All right.
- A. Yeah, that was placed there.
- Q. Let's go through some of the items as we saw them when the prosecution were showing us these. I would like to go first to page 6 of those images, Mr Murphy.

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

A. It's pink.

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

 A. So the pink bag is what I used daily for going to work and then the smaller bag was for more casual use, just socially.
- Q. Pink bag for work, smaller bag casual use socially. There are a couple or several notes that were taken from these which we're going to come to. That's the significance or potential significance of these. But is this where you kept them in your bedroom as a rule? A. Yes.
- Q. We know that you had been -- sorry, had you been anywhere in particular shortly before you were arrested? A. Yes, I'd just been on a family holiday with my parents and we'd just come back the day before.
- Q. The notes that come from these bags, we've actually got set out at page 7 of the prosecution images. I wonder if we could just put that up next. I think it was unclear precisely which bag the note or notes had come from. Do you recall which bag in particular any or all of these notes came from, Ms Letby?

 A. No, I couldn't say.
- Q. But you accept they come from one or other of those bags? A. Yes.
- Q. Both pieces of paper have writing on either side. We're not going to look at all of this but we are going to look at some of it if you're all right with that. The notes -- we asked you about notes earlier. Why did you write notes down in the kind of style that we see here?

 A. That's something I've done my whole life. I just -- I write things down.
- Q. Did you write down things that you could say to other people?
- A. No. It was my way of processing my thoughts and emotions that I wouldn't say to anybody else.
- Q. Was it written in any kind of structured way?
 A. No, it's very much what would come into my head. It could be very -- just random and sporadically written.
- Q. We are going to have a look at some of what's on the yellow piece of paper and some of what's on the larger piece of paper, not everything, but it's there for you to be questioned about if there's anything I don't cover.

With the yellow piece of paper I'm going to ask if we can go to page 9 of the prosecution images first because that's an enlarged bit of the yellow piece of paper.

Out of interest, when you look at this can you look at it and automatically see all the things that are written on it and read it easily?

A. No.

- Q. So is it difficult for you to make -- A. It is, yes.
- Q. -- to read through? Well, we can look at some of the detail on this one. What does it say right at the top, can you help us? The very first joined up letters.
 A. "Love was all we needed."
- Q. "Love was all we needed." Where have you got that expression from, if you don't mind me asking?

 A. It's the lyrics in a song that was obviously just on my mind at that time.
- Q. By?
- A. Craig David.
- 2. Right, "Love is all we needed". Were you saying that to anyone in particular -- ${\tt A.\ No.}$
- Q. -- in the note?
- A. No, these weren't for anybody to read, they were just an outlet for me.
- &. It says under that "[Babies O, P and R]". That's the name of the (Babies O, P and R) triplets, isn't it?
 A. Yes.
- Q. Is there any reason why their names appear there?
- A. I'm thinking of them at this time.
- Q. I asked you earlier about the impact of deaths of babies on the unit. Is that something that would have an impact on you?
- A. Yes.
- Q. Across from there it says "[Dr A]". What does it say under that?
- A. "My best friend."
- Q. Is that a reference to $[Dr\ A]$ at the time that was written?
- A. I believe so, yes.
- Q. Does that relate to how you felt about him?
- A. Yes, he was he was a trusted friend at that time, yes.
- Q. To the left of that, I'm going to hazard a guess.
- Is that "Love is all we needed" again?
- A. Yes.

- Q. We're going to see expressions like that -- it keeps appearing in the note, doesn't it?
- A. Yes.
- 8. Why does it keep appearing in the note? If it's possible to say, and if you can't, say so, but is it possible to say why?
- A. I think that's just how I often write. It's very, very repetitive, very random, just things that are in my mind will just come out on paper. There's no sort of structure, it's just... A release of some sort.
- Q. When it says under that, under "Love is all we impact on you?
- A. Yes.
- 2. Across from there it says "[Dr A]". What does it say under that?
- A. "My best friend."
- Q. Is that a reference to $[Dr\ A]$ at the time that was written?
- A. I believe so, yes.
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- A. Yes, he was -- he was a trusted friend at that time, yes.
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 A. Yes.
- & Why does it keep appearing in the note? If it's possible to say, and if you can't, say so, but is it possible to say why?
- A. I think that's just how I often write. It's very, very repetitive, very random, just things that are in my mind will just come out on paper. There's no sort of structure, it's just... A release of some sort.
- Q. When it says under that, under "Love is all we needed" --

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

MR MYERS: "Love was all we needed." A. Oh yeah, sorry.

MR JUSTICE GOSS: Well, that's what you said it was originally, and then you changed --

MR MYERS: I think I'm confusing it with another song lyric, my Lord, but, yes, "Love was all we needed".

MR JUSTICE GOSS: By the Beatles.

MR MYERS: "I can't do this any more" under that. Is that what it says? I don't want to get the words wrong. A. Yes.

- Q. What are you meaning or what can't you do?
- A. My life at that time.
- Q. Right. What does it say under "I can't do this anymore"?
- A. I think it's further lyrics, "But time let us down".
- Q. "Time let us down"?
- A. Yes.
- Q. Does that follow on in the lyrics from "Love was all we needed"?
- A. Yes.

Ο.

"Love was all we needed but time let us down." Who's Catherine de Berger?

- A. So that was a lady I was receiving support from, from occupational health when I was redeployed.
- Q. The name Tigger, who is that referring to?
- A. That's one of my cats.
- Q. The other was Smudge, wasn't it? Can you see it looks like there's the word "today"?
- A. Yes.
- Q. Does that say "Today is your birthday"?
- A. Yes.
- Q. Who are you writing that about, can you help us? Who are you thinking of?
- A. So [Baby P] and [Baby 01.
- Q. "Today is your birthday but you [is that] aren't here"?
- A. Yes.
- Q. It says, "And I am so sorry..."?
- A. "So sorry for that."
- Q. Why are you saying that you're sorry for that? What is it that's making you sorry?
 (Pause)
- A. I think this was on their anniversary and I was thinking of them and $% \left(1\right) =\left(1\right) +\left(1\right) =\left(1\right) +\left(1\right) +\left(1\right) =\left(1\right) +\left(1\right) +\left($
- Q. And then under that, it's difficult to -- what's the bolder writing, is it TT or something? What does that say?
- A. Where, sorry?
- Q. Under "aren't here" and "I am so sorry for that", if you carry on going from left to right, there's slightly darker ink. It might be tiny or Timmy or something.
- A. It might be Timmy in relation to a dog that I used to --

- Q. All right.
- A. I think, yeah, that's Timmy.
- Q. But under Timmy, it carries on with "I'm sorry that", can you see that?
- A. Yes.
- Q. And can you help us with what it says after that? "I am sorry that", what?
- A. "Sorry that you couldn't have a chance of life. You should have."
- Q. Carry on, Ms Letby, you should have?
- A. Um... "And for the pain that your..."
- Q. Is that parents?
- A. I can't see parents on there.
- Q. Can we scroll down? I apologise.
- A. "... parents must experience every day."
- &. All right. This is something you're writing to yourself, isn't it?
- A. Yes.
- Q. Yes. And what do you say -- under the scribbled words, the letters, probably following on from the sense of what we've just been reading. After "every day", what do you follow that with? "We [something].'
- A. "We tried our best and it wasn't enough."
- Q. Right. So when you said "We tried our best there", what are you talking about?
- A. Us as a team.
- 2. And who are you writing this to?
- A. To no one, to myself.
- Q. Right. "It wasn't enough." How were you feeling about the fact that if, as this says, you tried your best and it wasn't enough?
- A. I was distraught, really.
- Q. Do you recall whether this was written at a time after you'd found that you were being blamed for deaths?
- A. Yes, it was, yes.
- Q. How did you feel, being blamed for deaths, when what you're writing here is that you tried your best? A. Just devastated.
- Q. Under there, where it says "We tried our best and it wasn't enough", there's the words, it looks like, "I can't do it any more"; is that right?
- Q. What does that mean, "I can't do it any more"?
- A. Life.

- Q. What do you continue writing under that, following on from what you'd written above that?
- A. "I don't know if many people will think of you today or any day, but I do. 1 will always remember because you should be."
- Q. Right. Pause there. Is this what was on your mind?
- A. Very much so, yeah.
- &. Could you read through to the end of that, please?
- A. "I can't do this any more. I want someone to help me but they can't, so what is the point in asking? Hate my life."
- Q. Right. Is it you that's written "help" in the middle of that?
- A. Yes.
- Q. Why have you written "help"?
- A. Because I just wanted someone to help me and at that point nobody could help me.
- Q. Can we go over to page 10, which is the other side of this note. The prosecution images, page 10. If we carry on reading this, Ms Letby. It says: "Please help me, please help me, help me." Why were you saying that? Sorry to ask again. A. Because that's what I wanted: I just wanted somebody to help me.
- Q. You'd been involved with a grievance procedure; is that correct?
- A. Yes.
- Q. You'd been taken off the unit; yes? You hadn't asked to be taken off, had you?
- A. No.
- Q. We've been over this. And you'd found that people were saying things that held you responsible for deaths on the unit?
- A. Yes.
- Q. How hard had you tried to look after the children on that unit who you cared for?
- A. I only ever did my best.
- Q. What did it feel like to be accused or to have the finger pointed at you for the things that it was being pointed at you for?
- A. I don't think you can really put it into words. It -- it was just devastating and it changed my whole life.
- Q. I'm not going to go through all of this, it is here, but I would like to ask you something, if we scroll down the page. In capitals down at the bottom we can see the word "bastards". Can you see that?

 A. Yeah.

- Q. We've seen lots of messages from you, Ms Letby, and we've seen lots in the notes. Some people swear with complete abandon and other people don't. Quite a personal thing, swearing. We've not seen you swearing in text messages, have we?
- A. No, that's not language I would use, no.
- Q. Why are you using that language in this note that you're writing for yourself?
- A. Because that's how I felt about some people. And I suppose I could use that word because it was private for me.
- Q. Was it directed at any people in particular? Who, do you think, looking back?
- A. Ravi Jayaram and Steve Brearey.
- Q. Why did you say that about them?
- A. Because of the things they'd been saying about me.
- Q. Right. Let's move, please, if we could to page 13, which is the white piece of paper from the bags with lots of items written on it. It's prosecution image, page 13.

I'm not going to read every line of this with you, but this contains a lot of names over it, doesn't it? A. Yes, it does, yes.

- Q. At the top underneath -- thank you. Just underneath the triangle where it's torn, what's the first name that appears up there?
- A. That's my name and signature.
- Q. Then underneath that, what does it say?
- A. "Please help me."
- Q. What or who is Whiskey?
- A. Whiskey was a dog, my dog that I had when I was a child.
- Q. Was Whiskey still alive at the time you were writing this?
- A. (Inaudible: coughing).
- Q. So why were you thinking of Whiskey?
- A. Because he was an important part of my life.
- Q. And then underneath that, is that: "Love was all we needed but time let us down"? A. Yes.

Q.

"Please help me."

Just looking at that we can see names like [Dr A], Karen Rees, Berger, and various other names you might be able to pick out. Why are you writing names over and over again on this piece of paper?

A. Because they're important people to me and they were just on my mind at that time. I would just write about people that were important to me. At that time I had

- a very limited support network, so these people were very important to me.
- &. Can we scroll down to see the remaining part of that note, please. Thanks, Mr Murphy.

We've got the names Tigger and Smudge, that's your cats, isn't it, and your name written out repeatedly; is that right? [Dr A].

A. Yes.

- Q. We can see in fact, just towards the left-hand side near the bottom it says "Rees", and we have seen Karen Rees a little bit higher up.
 A. Yes.
- Q. We have heard her name before and it's also on this page higher. Who was Karen Rees?
- A. Karen Rees was the director of nursing at the Countess of Chester, and she was my main support during this time when I was redeployed.
- Q. Let's go over the page, please, to the back of this piece of paper, which is page 14 in the prosecution images.

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

- A. Because it may well have been done at different times.
- Q. Have you drawn the pink love heart that we can see on the right-hand side?
- A. Yes.
- &. And have you drawn and made all the other marks on there?
- A. Yes.
- Q. We've seen a lot about how you were feeling and you've used the word "hate". We can see, to the top left, it has the word "love" in a rectangle. Why have you written that, if you can remember?
- A. I'm assuming it's the love for the people that were important to me.
- Q. Right. We can take that down, there's nothing else I want to ask you about that at the moment, but it's there and we can look at it if we need to, or others can.

I'm going to ask you about the diary next, please, Ms Letby. Is it unusual for you to keep a diary?
A. No, I've always kept a diary.

- Q. The diaries that cover this period are diaries for 2015 and 2016. In general at this time of your life what did you use your diary for?
- A. For everything, really. I would document my work shifts, any social activities, birthdays, appointments. Everything, really, went into my diary.
- Q. The bits of paper that we've seen that were tucked into the diary. That's not the one we looked at there, they

came from the handbags, but we'll see paper from the diary and that note came from the diary. How did they end up in the diary or why did they end up in the diary?

A. So I put them in the diary. So at some point I've been writing them and they have gone into the diary.

& In the 2016 diary that we looked at in particular, reference was made to some of the babies in this case.

A. Yes.

- Q. So why would you make reference to one of the babies in this case, or any baby, in your diary?
- A. I would sometimes write down significant events that had happened or something that had stood out in terms of something unusual or a training opportunity on the unit.
- Q. Right. Let's have a look at page 16, if we could, in the prosecution images. This is the one that's included in the presentation that we have here and it deals with the period 4 April through to 10 April 2016. That's a period that covers the time of the event or events we're looking at with [Babies L and M). Do you follow that, Ms Letby?

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

 A. Yes.
- 8. Bookending this, I'm going to ask Mr Murphy if we could go to page 412 from the exhibits. We'll need to flip that round.
- So this starts on 29 February. That's the date there. 2016. Just going through this, where it says Tuesday and then, is that St David's Day, is there something faintly that you've written in next to that, ID or something?
- A. I think that's a long day.
- Q. LD?
- A. Yes.
- Q. Long day. Why would you have written that in?
 A. So sometimes I would write in requests that I had made for shifts to work, so it may have been that that's originally what I thought I was going to be working and it's changed.
- Q. Then for Wednesday the 2nd it's got salsa. That might be obvious, I won't keep asking you why whenever we see salsa, but just for this first time why have you written salsa in there?
- A. I would write down when salsa classes or there are parties that we go to, so I'd just write down when it was happening.
- & That's something you enjoyed doing?

- A. Yes.
- Q. Was it something you did regularly?
- A. Yes.
- 2. Did you have friends there?
- A. Yes.
- Q. The N under salsa, what does that stand for?
- A. Night shift.
- Q. Then the following day, Thursday the 3rd, we've got N; can you see that?
- A. Yes.
- Q. I'm not going to read out all the names that we see when we see them, but there's a name beginning with a K there.
- A. Yes.
- Q. Can you see that? Thank you, Mr Murphy.
- A. Yes.
- Q. Who does that relate to? What kind of person is that?
- A. That's a patient on the unit.
- Q. Why is that in the diary?
- A. Because something unusual, significant, has happened or I've done something related to training that I've documented.
- Q. And why would you put it in? Because attention has been pointed to where you put names in, some names, so why would you put the name in if it was something unusual or some training --
- A. Just for my own reflection and development, really, tracking things that I'd done in my career.
- Q. And then on the Friday we see the same name next to ${\tt N}\mbox{.}$
- A. Yes.
- O. Is that the same reason?
- A. Yes.
- Q. Then could we go across to the Saturday, please, on the other side. It's got N. What does that stand for? Is that nights?
- A. That's night shift.
- Q. And another night shift?
- A. Yes.
- Q. There's four on the Sunday, so that's four night shifts in a row, is it?
- A. Yes.
- Q. And the names there, not names of anybody on or connected to this indictment?
- A. No.

- Q. Why would you have written those down?
- A. For the same reasons as I've said: something's happened that was significant or something I wanted to document that I'd learnt from on that day.
- Q. When you say something's happened, so there's no misunderstanding, are you suggesting there's something sinister when you say something's happened?
- A. No, I mean something that stands out, so something that maybe I could use as reflection going forwards, a skill that I might have used for the first time, or... More things like that, for me to reflect on babies that I've cared for with different needs.
- Q. Under "notes" it's got some asterisks and it says in pink ink "Skin patch test". If you can remember, what would that relate to, skin patch test?
- A. I'm not -- probably, I think it might be a hairdresser's thing.
- Q. Go over the page, please, 413. Tuesday, 8 March. It says "Stretton Fox at 12.00".
 A. Yes.
- Q. What does that refer to?
- A. The Stretton Fox is a pub that a few of the girls used to meet up for lunch. That's just a reference to that. I met some people for lunch there.
- Q. When you're not working?
- A. Yes.
- Q. What does it say under that, "something email"? It may not say email.
- A. "Forms arrived."
- &. Do you know what the forms are relating to? What was going on in your life at this point?
- A. Maybe in relation to the house purchase.
- Q. Because we know you move into the new house round about the 5th or 6 April, don't you?
- A. Yes.
- Q. And this is now about a month before March?
- A. Yes.
- Q. So salsa and hair and beauty works, is that an appointment on the Wednesday?
- A. Yes.
- Q. And then we've got Ellie G, who would that be?
- A. I went to see Ellie Goulding in concert and stayed at the $30\ \mathrm{James}\ \mathrm{St}\ \mathrm{Hotel}$.
- 2. Is there any fixed pattern to what colour ink you happen to use for which entry when you're keeping your diary?
- A. I tended to use blue for work-related things, but otherwise no.

- Q. Thank you. So "AL" across the top of this week in blue, what would that stand for?
- A. That's in reference to that I'm on leave from work, so I'm on holiday, annual leave.
- Q. Right. If we just look at the Sunday, the 13th, it says:

"Mum and dad, house, 11.00."

What does that relate to?

- A. I would think that's mum and dad coming to view my house with me.
- Q. Are you all right if we just carry on for a few more of these perhaps until we get to the end of this sequence?
 A. Yes.
- Q. If we pop over the page then, page 414. We can see under Monday, 4 March, it's written in, "Paid full amount". Paid full amount for what, we might be able to guess, but could you tell us?
- A. I think that's for the house.
- 8. And then exchange the following day?
- A. Yes.
- Q. How big a thing in your life was it, the buying of this house?
- A. Oh, it was huge, a huge milestone.

Q.

And were you working nights on the Tuesday, Wednesday, Thursday?

A. Yes.

Ο.

"Keys 17.30", down at the bottom. Is that for the new house?

- A. The time I collected the keys, yes.
- 8. Just look across the page, please. Salsa Buckley and then a word I'm not too sure about.
- A. Bachata. It's a form of salsa.
- Q. Is that something that was happening on the Saturday night, the salsa?
- A. That's a reference to salsa that has taken place in Buckley and I have ticked it, which means that I've gone, I think.
- Q. Seeing your mum and dad the next day?
- A. Yes.
- Q. I'm going to move to the next page, please. On the Monday what are the notes referring to, "Greencroft and washing machine".
- A. I'm not sure about Greencroft, but washing machine is obviously having a washing machine delivered to the house.
- Q. Right. Down at the bottom of the page, what does "Gloucester Keys" refer to on 25 April -- march.

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

Q.

Somewhere you went?

- A. Yes.
- Q. Across the page "Zizzi 18.30"?
- A. Again, I'm in Hereford at this point meeting with friends from school.
- 8. Let's move to the next page, please. Thank you. It says under Tuesday the 29th, is that -- does it say "bed"?
- A. Yes. So I've had my bed delivered on that day.
- Q. All right. And "[Nurse E] PM", who's that a reference to? A. [Nurse E).
- Q. The entries in blue for Thursday at LD, is that long day?
- A. Yes.
- Q. And the Friday, the 1st, the N?
- A. Yes, so that's nights.
- Q. Looking across the page, nights also on Saturday and Sunday?
- A. Yes.
- Q. So is that in effect four duties in a row?
- A. Yes.
- & If we go, please, to the next page, which is the page we started at with the prosecution image. We're familiar with this now. Tuesday, 5 April. You can confirm for us, is that you moving out of the hospital accommodation?
- A. It is, yes.
- Q. And you moved into 41 Westbourne Road around this time?
- A. That's right.
- 2. A long day on the 6th with salsa and then it says LD and then there's a name on Thursday the 7th; can you see that?
- A. Yes.
- 8. Is that a baby you cared for?
- A. Yes.
- &. Why is that name in here?
- A. Again, something has stood out with that baby.
- Q. That's just something you did, is it, that?
- A. Yes, it's just for my own reflection.
- Q. And the 8th, we can see "LD twins". Then also across the page, if we look at both of these:

"LD. Extra. Twins resus."

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

- A. Yes.
- 2. Is that who that refers to?
- A. Yes, it is, yes.

- & Can we go to the next page, please. Just a handful more pages, Ms Letby, and then we're done going through this and we'll have a break. Is that all right? The 12th, Amie, [Nurse E], Laura. Can you help us with that?
- A. They're friends that came round to the house at that time.
- Q. Is that Amie from work?
- A. No.
- Q. Is it [Nurse E) from work?
- A. (Nurse E] is from work, the other two aren't.
- Q. If we look down at the Wednesday where it says "Minna 14.00", that refers to Minna Lappalainen?
 A. Yes.
- Q. Then the other duties are marked in on this page, aren't they, on both sides of the page, LD, N?
- A. Yes, I crossed through the nights because my shifts have changed at that point so I was initially doing nights on the 13th and 14th, but obviously got changed to long days.
- Q. All right. We're going to move through the next ones a bit more rapidly. Page 419, please, which is the next page in the diary. Again appointments and your social life in pink or red, aren't they?

 A. Yes.
- Q. And does blue tend to refer, we can see, to work commitments?
- A. Yes, blue tended to be work-related, yes.
- Q. Go to page 420, please. Again social engagements in pink: is that right?
 A. Yes.
- Q. Including on the 26th, Tuesday, lunch with Jen at Tatton Park: is that right?
- A. Yes.
- 8. Salsa in Mold on the Saturday?
- A. Yes.
- Q. Just under the notes where it says various items and "council", is that items you have to pay?
- A. Yes, that's reminders for me to pay my car tax and council tax and Tesco credit card bill.
- Q. If we go to 421, please. There's one more after that. And 422.
- Just looking at this one, which is just at the start of May, can you see under Wednesday, is that LD? A. Yes.
- Q. And then is that a name written under that?
- A. Two names.

- Q. Are those names -- who do those names belong to?
 A. They relate to children that I was caring for at that time.
- Q. Not children on this indictment? \overline{A} No.
- Q. And are those the same names that appear on Thursday the 12th as well?
- A. No, so on the Thursday the one name is a student that I was mentoring and the other one is a baby.
- Q. Right. So as to the babies that appear, the two on the 11th and the one on the 12th, again why did you put make a note of their names?
- A. So for my own reflection, I've done something with those babies perhaps for the first time OI... yeah.
- Q. If we just look across on the 14th, on the top of the opposite side, again there's two names there.
 A. That's the same. One of the names is with reference to
- A. That's the same. One of the names is with reference to a student and the other one is a patient.
- Q. And why would you make a reference to the student in here?
- A. I would document whenever I worked with a student because you have to keep records of who you've mentored and when. That's just part of my career development.

MR MYERS: Thank you for going through those with us, Ms Letby.

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

MR JUSTICE GOSS: Certainly. Yes, we'll have a 15-minute break now, members of the jury. (In the absence of the jury)

MR JUSTICE GOSS: Yes, general public, please leave. (3.10 pm)
(A short break)
(3.23 pm)

MR MYERS: Just before the jury return, we're endeavouring to sit for about an hour, take a 15-minute break and then sit for a further hour and in the normal course of events that means we would finish round about 4.15. I ran on a little bit there because I wanted to get to the end of the diary entries. May I pick a time around 4.157 That is around the time scale we were working with rather than running for an hour from now because that --

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

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

 $\ensuremath{\mathsf{MR}}$ JUSTICE GOSS: Just what's a convenient and natural break.

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