

[MOTHER OF BABIES E & F] (sworn)
Examination-in-chief by MR JOHNSON

MR JOHNSON: Thank you. It's quite a big room and you have quite a soft voice, so if you wouldn't mind, please, it's a slightly artificial exercise, but the questions, generally speaking, come from this direction. If you could try to give your answers to the jury. And it may help you if you look at the jury when you speak, if you don't mind. Thank you.

So imagining that you're shouting at your kids, can you tell the jury what your name is, please?

A. [Mother of Babies E & F].

Q. Thank you.

[Mother of Babies E & F], on 29 July 2015 did you give birth to identical twin sons, [Baby E] and [Baby F]?

A. Yes.

Q. Was that at the Countess of Chester Hospital?

A. Yes.

Q. As a matter of fact, and I'm not asking you to tell us your address, but did you live in that general area?

A. No.

Q. Where had you expected to be giving birth?

A. The Liverpool Women's Hospital.

Q. But for capacity reasons, were you taken to Chester?

A. Yes.

Q. Can you remember now how far your pregnancy was advanced when you gave birth on 29 July?

A. 29 weeks and 5 days.

Q. When you gave birth, what was the impression that you had of the state of health of your twin sons?

A. I thought they were in good condition for the gestation.

Q. Was [Baby E] born first?

A. Yes.

Q. And followed, about a minute later, by [Baby F]?

A. Yes.

Q. How long was it before you had physical contact with your boys after giving birth?

A. I got to go to the neonatal unit at around 11.20 in the evening, after having them just before 6 o'clock in the evening.

Q. Were you able, given your condition and their condition, to spend a lot of time with them at that stage?

A. No. Just a few minutes.

Q. So that was 29 July, which was a Wednesday. Did you stay in hospital yourself for quite a period of time

after they, the lads, had been born?

A. Yes.

Q. The following day, Thursday, 30 July, were you able to visit the boys?

A. Yes.

Q. And how far away from the neonatal unit were you being accommodated?

A. I was upstairs in the post-natal ward. I'm unsure of how far away that is, but it was in a lift.

Q. Yes. Perhaps in time, how long, generally speaking, would it take you to get from the post-natal ward down or along or up to the neonatal ward?

A. I had had a section, so it took me probably a little bit longer than what it would probably take normally, so probably about 5, 10 minutes.

Q. Okay.

Were you able to cuddle your boys on 30 July?

A. [Baby E].

Q. [Baby E]. Was there any reason why you were able to cuddle [Baby E] and not cuddle [Baby F]?

A. [Baby E] wasn't on his CPAP, so he didn't have all the wires that [Baby F] did.

Q. Okay.

Now, 30 July, which was the Thursday, so the lads' first full day, so to speak. Had you made a decision about how you wanted your sons to be fed?

A. Yes,

Q. And what was your decision, please?

A. I wanted them to have my breast milk.

Q. What steps had you decided to take in order for them to get what you wanted them to get in terms of their feed? Were you providing breast milk yourself?

A. Yes

Q. And were you helped by the nurses to express that so that it could be provided to them?

A. Yes.

Q. Whilst that regime was establishing itself, had you agreed for them to have donor milk?

A. Yes.

Q. But in due course, did you manage to establish a regime whereby you were able to provide your own milk for the lads?

A. Yes. That was very important to me.

Q. On 31 July, which was the Friday, did you produce milk for your sons and drop it off at the neonatal unit?

A. Yes.

Q. As you were thinking then, how did providing your milk for your sons feature in a list of important things for you to do?

A. It was the only thing I could do for them at that point. I had to do it. It was non-negotiable for me.

Q. Yes. Were you getting help and support from the nursing staff to achieve what it was you were seeking to achieve?

A. Yes.

Q. So taking those 2 days then, that is Thursday the 30th and Friday, 31 July, in general terms how were the lads progressing?

A. Really well.

Q. As it appeared to you, on just those 2 days, who was doing the better of [Baby E] and [Baby F]?

A. Sorry?

Q. Which of the lads was doing better at that stage?

A. Oh, [Baby E].

Q. By Saturday, 1 August, how were the boys progressing?

A. Really well.

Q. You were a distance from home in Chester?

A. Yes.

Q. Were you keen to get back home or closer to home at least?

A. Absolutely.

Q. What were you waiting for so far as getting back towards home was concerned?

A. Transport to be able to take both boys, so rather than being able to transport one baby, we needed two ambulances to take them and for those to be available for neonatal babies.

Q. As you understood it, was there any -- other than physically getting two ambulances with the required facilities to carry out the transfer, so far as the health of the lads was concerned, did you understand that there was anything blocking them moving other than just getting the transport?

A. No. We were informed by staff on the unit that -- we actually asked if we would like to move closer to home, to our local hospital, so at that point I was under the impression that both my boys were well enough to travel.

Q. Had you had any -- by 1 August, which was the Sunday, sorry, the Saturday, I beg your pardon, had you had skin-to-skin contact with them?

A. Yes

Q. And how were your sons managing in terms of the

skin-to-skin contact?

A. They were managing fine. We were never informed that there was anything to say that they weren't managing fine.

Q. So that's 1 August, the Saturday. Moving on to 2 August, the Sunday, were you still waiting for transport?

A. Yes.

Q. Were the boys always in their incubators on the Sunday or were they coming out of the incubators?

A. Um. From memory, I think -- well, yeah, they were out of the incubators. Yes, they were out of the incubators, both of them.

Q. Just concentrating on [Baby E] first for a second, how was he breathing out of the incubator?

A. Beautifully.

Q. And [Baby F]?

A. Great.

MR JUSTICE GOSS: Sorry, you dropped your voice there.

A. Sorry. Great.

MR JOHNSON: Was there -- do you remember an occasion when you were told that there was a potential issue over the production of insulin, the blood sugars, of the boys?

A. I don't remember a specific conversation, but I do recall that being mentioned, that neonatal babies struggle to maintain levels of insulin, that was totally normal.

Q. 3 August. How were the boys doing by Monday, 3 August?

A. Great. They were doing really well. [Baby F] had come off his CPAP and gone on to Optiflow and we were absolutely thrilled that both boys were doing so well and, yeah, we couldn't have asked for any more than that. They were both progressing.

Q. What about [Baby E]? How was he doing on Monday the 3rd during the day?

A. [Baby E] was always thriving.

Q. You've already told us that you were an inpatient yourself at the Countess. Was your husband staying over or was he commuting to and from the hospital?

A. No, he was commuting to and from the hospital.

Q. And without giving away too much detail, geographically was your home at the time in effect on the other side of Liverpool from Chester?

A. Over an hour.

Q. Over an hour away, okay.

Did there come a stage on Monday when your husband, [Father of Babies E & F], went home?

A. Yes.

Q. Did he have any -- as far as you were concerned, had he gone home for a specific reason, to do anything in anticipation of anything?

A. Yes, he'd gone home to prepare the house because he'd been there for a while I was in hospital and he was going home to tidy up and get prepared for me coming home because we believed that that was imminent, that the boys were getting transferred to a local hospital, which would mean I would be sleeping at home.

Q. Can you remember approximately the time of the day on Monday the 3rd when your husband [Father of Babies E & F] left the hospital to go home?

A. Yes, it was about 5 o'clock.

Q. Is that in the afternoon?

A. In the afternoon.

Q. Can you remember what you were doing when [Father of Babies E & F] left you in hospital?

A. I was having skin-to-skin with [Baby E].

Q. Can you remember the time when your direct contact with [Baby E] ended on Monday, 3 August?

A. So you mean that skin-to-skin contact?

Q. Yes. What time did that finish?

A. About 6.30-ish.

Q. Did you do anything else for your son before you left him in the care of the nursing staff?

A. Yes. I changed his nappy and done all his -- what they call cares, so that was cleaning him, cleaning under his neck, cleaning his eyes and things like that.

Q. What sort of state were you in by this stage, by the 3rd? Did you feel you'd fully recovered or were you still tired?

A. I was still sensitive and sore and fragile, but I was just over the moon, I was absolutely over the moon. My two boys were perfect.

Q. And were you still managing to provide milk for them to be fed?

A. Yes.

Q. So you left the lads in the neonatal unit and where did you go from the neonatal unit?

A. I went up to the post-natal ward.

Q. What did you need to do when you got to the post-natal ward?

A. Express milk and have something to eat.

Q. Can you remember roughly what time it was that you carried out those two tasks?

A. It would have been between 7 and about 8.30. I can't give an exact

Q. No. I don't think anyone would expect you to be exact, but that's the time as you remember it.

Now having expressed the milk for your sons, and having had your own food, what did you decide to do?

A. What I did every time: every time I expressed milk I took it straight down to the neonatal unit, even if it was in the night. So every 2 to 3 hours I would express and I would take it to the unit.

Q. What time was it when you arrived at the unit with the milk?

A. A touch before 9 o'clock.

Q. I just want to deal with the layout in the unit, all right? I think you drew a plan for the police. Do you remember drawing that plan? By your facial expression, you don't look too impressed with your own plan.

A. It wasn't my finest hour.

Q. I'm sure we all understand. I wonder whether we could see the plan on the screen, please.

This is one of the plans. I'm not going to comment on how good, bad or indifferent it is, but for the sake of the record it's J2424.

Is that all written by you?

A. The bit down the side.

Q. So the bit down the right-hand side is written by you?

A. No, it's not written by me. And this (indicating), that isn't written by me.

Q. So are those the bits that aren't written by you?

A. (Inaudible)

Q. And the bit along the top, "high dependency children"?

A. Mm-hm.

Q. Do you know whose writing that is?

A. I think that's my family liaison (inaudible), I'm unsure.

Q. You're just going to have to keep your voice up a bit.

A. I think that's the family liaison's writing.

Q. So the police officer that was speaking to you?

A. Yes.

Q. Okay. Were you describing what --

A. I struggled.

Q. Okay.

A. I'm not very visual with things like that, so I can see it in my own mind, but I couldn't put it on --

I physically couldn't put it on to the paper and he was just telling me to do my best and then he added some of

the writing in.

Q. Okay. As you were describing it?

A. As I described it, at my request.

Q. Okay. So you were directing what was written and where it was written?

A. Yes.

Q. Okay, I understand.

Well, we can see just at the top where it says "high dependency children", there is what looks like a pretty much a square box and within the square box are two rectangular boxes. One has the name [Baby E] and the other has [Baby F] against it. If we enlarge that a bit more, please, Mr Murphy.

MR JUSTICE GOSS: I think what it says is, turning sideways, "room 1" and then two rectangles, one having [Baby F] against it and one having [Baby E] against it. Is that right?

MR JOHNSON: Yes.

Is that how you remembered it?

A. Yes.

Q. Okay. So the lads were together in a room. The room, as you remember it, was room number 1; is that right?

A. Yes.

Q. Were they both in incubators --

A. They were.

Q. -- on 3 August? Can you remember now whether there were any other children in the room, any other babies in the room?

A. I don't think there was, but I can't remember.

Q. Okay. Let's go back to that night then, please. If we could just remove that from the screen. Thank you. You had gone down with the purpose of delivering the milk for the boys. Did you go into room number 1?

A. Yes.

Q. Other than your children, was anyone else in room number 1?

A. Yes.

Q. Who else was in room number 1?

A. Lucy Letby.

Q. Right. Were any other adults in the room?

A. No.

Q. What could you see or hear when you walked into the room?

A. I could hear my son crying and it was like nothing I'd heard before. I walked over to the incubator to see

he had blood coming out of his mouth and I panicked.
I was panicking because I felt like there was something wrong.

Q. Okay. I just want to get a bit more detail from you, all right? We all realise it's very difficult for you to give this detail, but, first of all, which of your sons are you talking about?

A. [Baby E].

Q. Was Lucy Letby near [Baby E] when you walked in?

A. No, she was -- in between [Baby E]'s incubator, there was a workstation and she was at the workstation at the side of -- yes, she was at the workstation.

Q. Okay. I'll just try and help you with what I'll show you, if Mr Murphy can help me, is a video of the room. Are you all right watching that?

A. (Witness nods).

Q. There are no children in the room, okay? I don't know whether Mr Murphy, you could help by locating the video for me. This is the shakier of the videos, if I can put it that way.

If you need to watch this more than once, [Mother of Babies E & F], you tell us, all right?

A. Okay.

(Video played to the court)

Q. Can we just stop it there, please.

What we've just seen there, [Mother of Babies E & F], is two separate entrances into the same room. The room is partially divided by a wall, which is the wall we can see to the right of the screen at the moment, which is between the two doors. Okay?

We can see the positions of four incubators within the room. Looking at the video, can you remember which of those incubators your sons were in?

A. Yes.

Q. Which of the incubators?

A. The ones immediately

Q. On the other side from the wall we're looking at now?

A. Yes.

Q. So the view one gets when the camera operator goes through the first door, those two incubators, one on the right and one straight ahead, in effect. So those two?

A. Yes.

Q. Thank you, Mr Murphy. So that's, just for the record, at 01:09 on that video.

The workstation that you were speaking of where Lucy Letby was, where is that -- is that shown on the video?

A. It was round -- she was round here (indicating).

Q. So you're indicating to the right-hand side of the screen as we're looking at that still there?

A. Yes.

Q. Okay. Was Lucy Letby sitting or standing?

A. No, standing.

Q. She was standing. And just to help us, which of the two incubators was which of your lads in?

A. [Baby E] and [Baby F].

Q. [Baby E] in the one to the right as we're looking at the picture and [Baby F] up towards the left of the picture.

Okay.

Did you come through the door that the camera operator is standing in as we look at that still?

Rather than nodding your head, would you mind --

A. Sorry, yes.

Q. Lots of witnesses do it, all right, just nod, but if you wouldn't mind verbalising the answer. Thank you.

Just describe again for us what you could hear, please, [Mother of Babies E & F].

A. Crying, like

Q. What sort of a cry?

A. It was a sound that shouldn't have come from a tiny baby. I can't explain what that sound was. It was It was horrendous. More of a scream than a cry.

Q. And how long before you walked into the room could you hear that; can you remember?

A. I could hear it in the little corridor.

Q. When you say the little corridor, is that the corridor --

A. The main corridor.

&. The corridor within the unit itself? Did you come through the door that we can see the picture of on the screen?

A. Yes.

MR JUSTICE GOSS: We can't actually see the door. Through that door where the cameraman is?

MR JOHNSON: Yes. There's the door. Thank you, Mr Murphy.

MR JUSTICE GOSS: Is that what you mean, [Mother of Babies E & F]?

A. Yes.

MR JUSTICE GOSS: So as we know from the corridor, that's the right-hand door if you're in the corridor.

MR JOHNSON: Yes, thank you, my Lord.

And just to be entirely clear, what was Lucy Letby doing as you walked in, hearing what you could hear?

A. She was busy doing something, but she wasn't near

[Baby E].

Q. What did you do?

A. I immediately went to [Baby E] and because when the boys were born, we were told to use a containment technique, which is putting your hand on the baby's head and on the tummy to make them feel like they're still in your tummy.

Q. Yes.

A. So I tried doing that. That's meant to make them feel calm and comforted. I tried doing that and it didn't work.

Q. So did [Baby E] continue to make the same noise?

A. Yes.

Q. Doing your best, how long did he continue to make that noise?

A. He was still making that when I left.

Q. Let's just try and define the period that you were there from arriving to leaving and then we'll fill in what happened during that time. Approximately how long were you in the unit in that room with your lads?

A. About 10 minutes.

Q. Right. When you did this containment technique with [Baby E] with your hands, was there anything unusual that you could see on or about [Baby E]?

A. Yes, there was blood on his face, round his mouth.

Q. Can you remember now, were you asked by the police to draw on a pre-drawn picture of a baby's face --

A. Yes.

Q. -- to indicate where the blood was?

A. Yes.

Q. If we could go to that, please, Mr Murphy. It's page 27 of the bundle I gave you.

This, my Lord, for the record is CLG/9, which is J2434.

Is this the diagram that you annotated, [Mother of Babies E & F]?

A. Yes.

Q. I'm sure it's perfectly obvious to everybody, but can you just describe the alteration that you have made to the plan?

A. Round the mouth.

Q. So describing it in a rather inelegant way, it's almost like a goatee beard?

A. Yes.

MR JUSTICE GOSS: Sorry, for the sake of clarity -- it's difficult to see -- was it above the top lip?

A. Not really. A little bit, but not as much as on the

bottom.

MR JUSTICE GOSS: That's better, yes, thank you, Mr Murphy.

MR JOHNSON: So you've shaded in, almost like a pencil moustache -- that's the way it looks -- and below the bottom lip and just above the point of the chin, that area between, you have put shading; is that right?

A. Yes.

Q. Okay. What you saw was blood; is that right?

A. Yes.

Q. Did you ask Lucy Letby about what it was you could see?

A. Yes.

Q. What did you say to her?

A. I asked why he was bleeding and what was wrong.

Q. Did she give you a response?

A. Yes

Q. What did she say?

A. She said the feed tube from the back of his throat will have been rubbing and that will have caused the blood.

Q. Did you accept that explanation?

A. Yes.

Q. Were you concerned about the explanation?

A. Yes.

Q. Did Lucy Letby say anything else to you?

A. She told me to go back to the ward.

Q. Did you do what you were told by her?

A. Yes.

Q. Why did you do what you were told by her?

A. Because she was in authority and she knew better than me and I trusted her completely.

Q. Did she say what she would do about the problem?

A. She said the registrar was on his way and if there was a problem, someone would ring up to the post-natal ward.

Q. And did you accept that explanation?

A. Yes.

Q. Did you return to the post-natal ward?

A. Yes

Q. Did you do anything when you got back to the post-natal ward?

A. I rung my husband.

Q. Any particular reason why you rang your husband?

A. I knew there was something very wrong. I was

frightened. I didn't take my phone downstairs and I needed to speak to him, I needed to tell him.

Q. Okay. Let's deal with -- did there come a stage much later in the process when you were trying to put together the sequence of events?

A. Yes.

&. And when you were doing that, did you remember going back to the -- do you remember what you have just told us, that you went back to the post-natal ward and you made this telephone call?

A. Yes.

Q. All right. Did you get a printed version of your telephone records?

A. I did.

Q. And did you identify from the telephone records the call that you made when you returned to the post-natal ward?

A. I did.

Q. With the help of Mr Murphy again, please, it's page 8 of the documents -- this, for the jury's information, will appear in the sequence of events as well when we go through the sequence. It's J2431.

This is an edited version of your phone records, [Mother of Babies E & F], okay? So we're not telling the world at large what people's telephone numbers are or were at the time. Is that your writing on the telephone record?

A. Yes.

Q. I can read it perfectly well, but just for the sake of the record, is there a number 1 at the top, which has been partially obscured by the way the document has been copied?

A. Yes.

Q. And have you written on it:

"When I called [Father of Babies E & F] to tell him there was something wrong"?

A. Yes.

Q. Okay. Is there then a number 1 to the right of that manuscript?

A. Yes

Q. Then an asterisk, a star?

A. Yes.

Q. What's the time of the call to [Father of Babies E & F] to tell him there was something wrong?

A. 21.11.

Q. So if we highlight that. Can we see that that was a call that lasted 4 minutes and 25 seconds?

A. Yes.

Q. And that number ending, is it 5808 or 5800?

A. 5800.

Q. 5800 was [Father of Babies E & F]'s number at the time?

A. Yes.

Q. Did you speak to your husband about your concerns?

A. I did.

Q. Having spoken to him, did you remain on the post-natal ward?

A. Yes.

Q. When did you next return to the neonatal ward?

A. It was later on that evening, it would have been

Q. It may be fairer to you if you just tell us in summary form what was going on the next time you went to the neonatal ward. What was happening in the neonatal ward?

A. I was sat in the corridor, actually inside the neonatal unit, and I was watching a team of people around [Baby E]'s incubator, working on him.

Q. So this was [Baby E] being resuscitated the next time you went? Okay. We have a time for that, all right? So I won't ask you about that. But I just want to make sure we've filled in the time between you going back to the post-natal ward and you going down when [Baby E] was being resuscitated.

A. Okay.

Q. So just trying to put yourself back into that time for us, please, [Mother of Babies E & F], in that intervening time what were you doing?

A. Panicking. I'd had conversations with the midwife, who had come to administer medication to me. A lot of that time was panicking and waiting and waiting because I was following the rules. I was told that if there was a problem, I'd be told to go.

Q. Who had told you what the rules were so far as this period of time was concerned?

A. Well, the rules were: go back upstairs and if there's a problem I'll call you. And that was Lucy Letby on the neonatal unit and I followed those rules.

Q. Yes. Can you remember how you were called back to the unit, who was responsible for calling you back? How did you get a message?

A. The midwife came and spoke to me and asked me to call my husband and she spoke to him on the phone.

Q. Okay. Can we see that call on this telephone record, [Mother of Babies E & F]?

A. Yes.

Q. What time is it shown as on the telephone record?

A. 22.52.

Q. So that's number 2: is that right?

A. Yes.

Q. You have written:

"Midwife rung [Father of Babies E & F] to tell him to come into the hospital after neonatal rung the maternity ward."

A. Yes.

Q. Is that right?

A. Yes

Q. Is there any reason why it was the midwife who spoke to [Father of Babies E & F] rather than you speaking to [Father of Babies E & F]?

A. I have no idea. I'm presuming because I wasn't I was very upset and I... I knew there was something wrong and I'd known from leaving him, but I left.

Q. Okay.

A. Sorry.

Q. No, no, don't be sorry. It's quite all right. I don't want to make things unnecessarily difficult for you, all right, because there are many doctors and medical professionals who can give us the details about what happened with [Baby E] when he was being resuscitated. But does it come to this, that you were taken back down to the neonatal unit later on?

A. Yes

Q. To use your words, or an approximation of your words, the medical team were working on [Baby E]?

A. Yes.

Q. And ultimately, their best efforts were unsuccessful?

A. Yes

Q. We'll leave it at that with you because others are in a less sensitive position than you to explain what happened there.

But I just want to deal with what happened afterwards, please, once [Baby E] had passed away.

A. Okay.

Q. Did you have any contact with Lucy Letby at that stage?

A. Yes.

Q. Can you tell us what happened in relation to that contact with Lucy Letby after the death of [Baby E]?

A. I was asked if I would like to bath [Baby E] and at that moment I didn't feel I was able to. I was I was just broken and I couldn't. So Lucy Letby bathed him in front of me in the neonatal unit. After he was bathed, he was placed in a white gown and I just remember being thankful because we had no clothes for him because he was so little.

(Pause)

And he was given back to us and then went in his incubator. And that's where he stayed.

Q. Did one of the doctors have a conversation with you and your husband about the issue of a post-mortem examination of [Baby E]?

A. Yes. We were asked about a post-mortem and I think my husband asked some questions and I think those questions were along the lines of: what will a post-mortem tell us? And she told us that it wouldn't tell us very much and it wouldn't be able to tell us any more than what she was telling us of how he died. She spoke about it would delay it would
It would delay our
transfer back home, it would mean if we got transferred back home, we would be leaving [Baby E], and we just wanted to take him home.

Q. Did there come a stage when you were given anything by Lucy Letby?

A. Yes, we were given a memory box, which totally surprised me because at that moment I hadn't even thought -- well, I
It was just all his things, footprints, there was a little memory card with pictures on, a lock of his hair, a candle, a teddy, and I just -- I was just so over, overcome with emotion that this had been provided for me because I had no other memories apart from that.

Q. Did you ever get a -- you have told us about a teddy for [Baby E]. Did you ever get another teddy?

A. Yes, we got a matching one for [Baby F], actually those teddies were swapped over, so [Baby E] got [Baby F]'s teddy and [Baby F] got [Baby E]'s teddy.

Q. In relation to [Baby F] and his teddy, did you ever get anything else from Lucy Letby?

A. There was a picture, not long
I think it was a few
days after. I'm struggling to recall the actual date.

Q. Don't worry about the precise date, but approximately was this whilst [Baby F] was still in the Countess of Chester Hospital?

A. [Baby F] was in the Countess of Chester Hospital and we had been to visit [Baby E] at the chapel of rest. Until his funeral, we made the journey home every day until it was his funeral, and when we come back one day there was a picture, she'd presented me with a picture of [Baby F] holding his -- we called it his [Baby E] bear, and she said, "I got this picture, he rolled over and hugged his [Baby E] bear and I thought it was so amazing, so I took a picture for you".

Q. So she was suggesting to you that [Baby F] had rolled over and cuddled the bear?

A. Yes.

Q. Did there come a time when you sent a card to the staff on the neonatal unit?

A. Yes

Q. Was that done through one of these Internet companies where you can, in effect, build your own card?

A. Yes.

Q. And I think Moonpig is one.

A. Yes.

Q. I'm sure other card services are available. Is it that sort of a card that we're talking about?

A. Yes,

Q. Did that card on its front have a picture of your boys?

A. Just

Q. Just [Baby F]?

A. Yes.

Q. And within it, did it express your -- you, your husband [Father of Babies E & F] and [Baby F]'s -- thanks to the staff on the neonatal unit?

A. Yes.

Q. I want to ask you one other point, please, [Mother of Babies E & F]. On the question of your son [Baby F]. Has he ever had any -- how old is he now?

A. Seven.

Q. Has he ever had any unusual bleeding issues in the 7 years that you've had him?

A. No.

MR JOHNSON: Thank you, [Mother of Babies E & F].
My Lord, those are all the questions I have at this stage.

Cross-examination by MR MYERS

MR MYERS: [Mother of Babies E & F], if at any point you need to stop, as his Lordship says, you must say so. Can I say before I ask my questions, everybody will understand what an awful experience you have had and your husband. I have to ask you questions about it, but I really want to emphasise, nothing I say is meant to be insensitive. I'll be as quick as I can be. I make it plain that whatever I'm asking and whatever happened, nobody suggests that you haven't done everything you could do. You said about you'd left him and whatever, but you did all that you could do, so nothing I say is meant to suggest anything other than that. All right?

There will be some things that I ask that you may disagree with and if that happens, could I ask you to say that you disagree or you don't accept what I say and then I can put those things to you and you can make that plain and then we can move on to the next thing.

A. Okay

Q. Is that all right?

A. Yes.

Q. All right.

Just for a little background for us, was this, so we can follow, your first babies, this was the first time you'd been in hospital as a new mum?

A. Yes.

Q. I'm going to ask you to keep your voice up if you could, please.

So had you spent much time -- I don't want to ask any personal details, but had you spent much time in hospitals before this in any capacity with babies, anything like that?

A. No.

Q. When you came to help the police with this, you made -- the first statement you made was in July 2017. You made a few other ones afterwards, but July 2017. Did you make some notes shortly after that just to help your memory?

A. Yes.

Q. So you'd be able to tell the police?

A. Yes.

Q. Were those notes also notes that you made in July 2017 or in 2017?

A. Yes.

Q. Again, so you were thinking back to things that had happened back in June and August 2015?

A. Yes.

MR JUSTICE GOSS: End of July and August?

MR MYERS: Yes.

MR JUSTICE GOSS: I think you misspoke, you said June and August.

MR MYERS: I apologise.

MR JUSTICE GOSS: The end of July and beginning of August. So almost exactly 2 years.

MR MYERS: Yes.

I'm going to go through some of the details and some of the timings. I'll ask you generally now, you can agree or disagree, but do you think it's possible that any of the timings you've got could be not accurate, the timings you have given us?

A. In respect of what timings?

Q. When you say for instance you went down at 9 o'clock or

about 9 o'clock, is that a timing you're quite clear about?

A. Yes

Q. Or is that approximate?

A. Yes.

Q. We'll go through it and have a look. What happened that night, perhaps we can agree about this, must have been very intense and very upsetting.

A. Yes.

Q. And so what I'd like to look at is whether there's any areas where any of the detail that you've got could at all be mixed with any other detail or any other timing as we go along. That's what I'm looking at.

A. Okay.

Q. You will tell me if you disagree.

A. Okay.

Q. So that you know where I'm coming from with the questions and so that everybody knows, so you know what lies behind them, can I suggest to you that there were three times you went down that evening. I'm going to suggest it and then we'll go over it and you tell me if this is right or wrong. Is that okay?

A. Yes.

Q. I am doing to so you know where I am coming from because I don't want it to suddenly come as a surprise what I'm suggesting.

I'm going to suggest to you that you'd gone down round about 8 o'clock, which is the handover time on the unit --

A. Right.

Q. -- and you were doing cares, certainly with [Baby E], round about then. Let me suggest this and we'll go over it.

Then I'm going to suggest that actually it's nearer to 10 o'clock than 9 o'clock that you went down with the breast milk.

And then you went back again when [Baby E] was being resuscitated round about 11 o'clock. So I know you have said you went down at 9 and then you went back later, and what I'm asking you to consider is whether you'd gone down at 8 and then 10 and then later.

A. No, that's not the case.

Q. You disagree with that?

A. Absolutely.

Q. I'm suggesting that, you disagree with it.

A. Yes, okay.

Q. I'll come back to some more detail, but I'm going to go through the things now that you've been talking about.

A. Okay.

Q. Let's just go through what you describe when you say you went down at 9 o'clock. I'm going to ask you about that next.

You told us there were two things about [Baby E] at that time or two in particular. One was how upset he was. That's one of them, isn't it? And the other was that there was blood coming out of his mouth; is that right?

A. (Witness nods).

Q. You're nodding, it's tempting to nod.

A. I'm sorry, yes.

Q. About the upset first of all, let me ask you about the crying. When you went down, [Mother of Babies E 6 F], to the unit that evening, there were other staff, other nurses, in the unit, weren't there?

A. I would imagine so, but I didn't come into contact with anybody.

Q. You've described it as "very loud" and you said "horrendous screaming and crying".

A. Yes. Mm-hm.

Q. On your account, at no time did any other nurse come into the nursery, did she or he?

A. No, not that I'm aware of.

Q. I'm not going to disagree that [Baby E] was upset when you went down. What I'm looking at is just how upset he was, right? And what I'm going to suggest to you is that he wasn't as upset to the degree that you describe. It wasn't as bad as that. Because you said it was horrendous.

A. It was horrendous.

Q. I'm respectfully disagreeing and saying he was upset, but it wasn't as horrendous as you're saying. In your mind you say it was horrendous.

A. Okay.

Q. I'm going to ask you a little bit about the blood. I'll be as quick as I can with this. You said to start with that there was blood coming out of his mouth and you drew a picture, didn't you? Did the blood go anywhere else apart from on his chin?

A. It was on his -- a little bit.

Q. A little bit on the lip?

A. And underneath.

Q. Just so we can be quite clear, you're not describing something where there is blood coming out and it's going on his clothes or over the bedding or anything like that?

A. No.

Q. It's that you could see certainly what looked like blood, you would say it was blood, but you could see it round about his chin in that area like we saw on that picture?

A. Yes.

MR JUSTICE GOSS: You say on clothes. Perhaps we could have some evidence of what clothing --

A. He wasn't wearing any clothing.

MR MYERS: But on your clothes, for instance, because you contained him, didn't you?

A. I had my hand on the top of his head and on his stomach.

Q. But to be quite clear, and this is the point I am asking and I think you agree, you're not describing it coming out and going over things like that --

A. No.

Q. -- or on the bedding or anything like that?

A. No.

Q. One of the descriptions that you gave to the police later, [Mother of Babies E & F], was this, and just see if you agree, you said:

"It was around his bottom chin and the bottom lip [like on the picture you've drawn]. It wasn't thick, it's difficult to explain what it was like, it was like a dribble pattern on his skin. It wasn't completely fresh."

Does that sort of describe what it was that you saw?

A. (Witness nods). Yes.

Q. All right. I know you said it's blood and that's how you say -- that's what you say you saw. I'll ask in case it makes any difference: is it possible that what you saw was some sort of dark liquid with flecks of blood in it around his chin?

A. It was blood.

Q. That's right, you say it was blood. All right. I'm suggesting if you did see anything like that at that time it might have been what's called a dark asperate with flecks of material in it, but you say it was blood.

A. It was blood.

Q. All right. And it struck you as not completely fresh?

A. No.

Q. Again, just going through some of the details that you have given us, [Mother of Babies E & F], you mentioned that after you'd been downstairs, you went upstairs and you saw -- did you see -- was it the midwife?

A. A midwife come in.

Q. Is that the midwife who had been looking after you generally?

A. That evening, yes. There was different midwives on.
There was a lot of different midwives.

Q. Had you seen this one before?

A. No, it was the first time I'd come into contact with this one.

Q. Did you speak to her about what had happened?

A. Yes, I was distraught.

Q. I'm not going to suggest you weren't anxious and you weren't upset.

A. Mm-hm.

Q. I am going to suggest, and you can disagree with it if you want to, [Mother of Babies E & F], that actually at this time you were worried, but it was much later in the evening that you became distraught.

A. Yes, okay.

Q. Do you agree or disagree with that?

A. I disagree. I was

Q. You say you were distraught here?

A. Yes, I knew there was something very wrong.

Q. All right. I'm just showing where the differences are, but trying to get on with it quickly so we don't spend too long with it.

Was the midwife called Susan?

A. Yes.

Q. Susan Brooks?

A. I don't know her last name.

Q. We'll see sooner or later, I imagine, a note from Susan Brooks, who describes how she had been told by you that, it must be [Baby E], had deteriorated slightly.

A. Okay.

Q. This is the note. We'll come to the note later in the evidence.

A. Okay.

Q. I'm going to suggest that at that point we have that because you weren't saying at that point that you were -- something was very wrong, you might have said you were anxious but you weren't actually saying anything was very wrong.

A. I said that to my husband on the phone, I told him there was something very wrong.

Q. Right. I'm going to suggest you didn't say that to the midwife even though you were talking with her, did you?

A. I can't remember that full conversation, but I was very upset.

Q. Right. All right. I've explained where I'm coming from

and you're making it clear where you come from, so I'll move on with the next detail.

With your husband, we know there was a phone call at 21.11. We've seen that on the records. Then there was a later call, wasn't there, at about 22.42?

A. Yes.

Q. Again, not disputing you were anxious about things that were taking place at the very least. You say you were more than anxious, you say you were very worried?

A. Yes.

Q. I'm not going to dispute that you mentioned that you had seen what you thought was blood on [Baby E]. I'm not disputing that. But did you speak to your husband -- when you spoke to him later, at 22.52, did you tell him then as well, or at all, that there was a lot of blood coming from [Baby E] at that time?

A. I don't remember a conversation with [Father of Babies E & F] at that point. It was Sue, the nurse, who was having a conversation with [Father of Babies E & F].

Q. You checked your phone records some time after the night that this all happened, didn't you?

A. Yes.

Q. There was an issue with the hospital, wasn't there, about timings --

A. Yes,

Q. -- incidentally and you'd wanted just to have a look at the timings, hadn't you?

A. Yes.

Q. Again, I'm just asking and I give you the opportunity to respond to this, whether actually at the phone call at 9.11, whilst you were anxious, you weren't as worried as you were later on, when you'd been called down for the resuscitation. Is it possible that, looking back, you've kind of transferred some of the very big worry you had later to that phone call at 9.11? Is that possible, do you think?

A. No, it's not possible.

Q. I suggest it is, but you disagree with me about that.

A. Yes, I disagree.

Q. That's why I'm doing it this way so we can make it quite clear. All right.

Can I go through then some suggestions I'm going to make to you about what happened. Exactly the same: you're absolutely free to agree or disagree as you like, [Mother of Babies E & F].

A. Okay.

Q. I've asked you whether you went down to do cares at 8 o'clock and you say that --

A. No.

Q. You didn't, all right. I've suggested to you that the time you did go down with the breast milk is later than 9, it might even be as late as 10, but you disagree with that.

A. I disagree.

Q. All right. I suggest to you that there was no time that Ms Letby said the tube was irritating [Baby E]. That isn't something that she said.

A. I disagree.

Q. Okay. Can I ask you something else, if you could help with this. At the time you were down there, the time that you're saying is 9 o'clock or just after, around that time, do you recall one of the doctors being present, a gentleman, David Harkness?

A. I don't.

Q. Right. I don't want you to be at any disadvantage with this. When you say you don't, do you mean you don't and he wasn't there or you don't and he might be there but you just cannot remember that detail?

A. I didn't see anybody else on that occasion when I went down to the unit.

Q. I understand what you have said. Let me just ask a little more detail about that, whether this helps. Do you recall a conversation where you were there with Ms Letby and a male doctor and talking about some medication that would be given to [Baby E]? This is before you went down at the time of resuscitation. This is the earlier one. Do you recall that?

A. No. The only person in that room was Lucy Letby. There was only me and her there.

Q. And that's the only person you say you saw?

A. That's the only person I had a conversation with.

Q. So if I'm suggesting there was a doctor who was around at that time, that's something you actually disagree with?

A. I disagree with that.

Q. That's why I wanted to be clear. I didn't want to leave it that you might be saying that you couldn't remember in fairness to you, [Mother of Babies E & F].

A. Okay. I disagree.

Q. All right. I'm suggesting there was --

A. Okay.

Q. -- on behalf of Ms Letby.

MR JUSTICE GOSS : It was a conversation in which you were involved and Lucy Letby and Dr Harkness. That's what is being suggested about some medication for [Baby E].

A. I disagree with that.

MR MYERS: I wanted to be quite clear about that.

MR JUSTICE GOSS: Well, exactly. You're saying you can't remember anything like that happening, it didn't happen?

A. No, I was actually told that the registrar would be down and she had made that call.

MR MYERS: But at no time do you say the registrar did actually put in an appearance at that point?

A. Not at all.

Q. So we disagree about that bit?

A. I disagree, yes,

Q. Moving forwards now, and in fact after what happened at 11 o'clock, you went downstairs, didn't you, at the time that they were trying to give help to [Baby E] when he was very ill; is that correct?

A. Yes.

Q. I'm not going to ask you any details at all but can I just ask you this, [Mother of Babies E & F]: could you see what was happening in the room at that time?

A. I could see people stood around the incubator. I could see through a window.

Q. And could you see blood then, do you mind me asking?

A. There was people stood round him, I couldn't see anything.

Q. Are you aware, you may not be, but I'll just ask, that they have a set procedure on that unit for how nurses are meant to help families when a bereavement has taken place. Are you aware of that now?

A. I don't know about that specific hospital, but I do know that other hospitals do have procedures in place.

Q. All right. Are you aware now that sometimes they have procedures like taking handprints or footprints and making memory boxes? Is that something you know now?

A. I know now, yes.

Q. And Ms Letby took care of [Baby E] after he died, didn't she?

A. Yes.

Q. And you have described some of the things that she did. And she was the nurse who had been with [Baby E] beforehand, as far as you understand, is that correct, [Mother of Babies E & F]?

A. (Witness nods).

Q. We've nearly finished, just one final area. It's always helpful just to pause. This is something different, this is about what you told us about the post-mortem, the discussion about the post-mortem.

So the jury can follow who it was with, because you talked about "she". There was a female doctor, wasn't

there, who you had the discussion with?

A. Yes.

Q. In fact we're going to find the doctor's name is [Dr C]. You may or may not remember.

A. Not at all.

Q. But that's the doctor. When you and your husband eventually decided that you wouldn't have a post-mortem, was that largely because she had explained in a way why there was little point in having a post-mortem?

A. Yes.

Q. So in a way, she had directed you in that decision, hadn't she, swayed you?

A. I felt so, yes.

MR MYERS: All right. [Mother of Babies E & F], thank you for answering my questions.

Re-examination by MR JOHNSON

MR JOHNSON: Just two clarification issues, [Mother of Babies E & F], okay?

You described the blood that you saw on [Baby E]'s --around [Baby E]'s mouth as being "not completely fresh",

I think were your words. What was it about its appearance that drove you to that conclusion?

A. It was stained and it was... (Pause). It wasn't dripping, it was smudged. It's really hard to explain, isn't it? It didn't look completely dry, but it didn't look like it was

Q. Was there anything about the colour that --

A. It was darker.

Q. Darker?

A. It wasn't Yeah.

Q. I think most people know that very fresh blood is the colour of his Lordship's gown.

A. Yes. It wasn't like that.

Q. Dark blood is a much darker colour. Where was it on the spectrum as you remember?

A. Um

Darker, but it was

Like I said, it wasn't

It's really hard to explain. It was darker, it wasn't bright red, it was

Yeah, it was darker than that.

I don't know how else to explain it.

Q. No, no, it's all right.

A. It was all there (indicating).

MR JUSTICE GOSS: For the benefit of the record, you're again indicating below the bottom lip to the top of the chin area.

A. Yes.

MR JOHNSON: As part of the questioning about the timing of the phone call, it was suggested to you that there had been an incident over timing. Do you remember?

A. Yes.

Q. What was the incident over timing?

A. The incident over timing was a report had come from the Countess of Chester and the time difference was very -- it seemed to be out by an hour of my recollection of things. My recollection of things -- I know what time it was and in that moment I thought I know that I literally had come back upstairs because I didn't take my phone with me and I spoke to my husband. I know that I did that. That's when I contacted the telephone company to get things right in my mind as well because I knew and I couldn't understand why the hospital would be so far out with that.

Q. So what, it was being suggested to you that something had happened an hour later than you remembered it happening?

A. Yes, and I knew that that wasn't the case.

Q. By reference to the telephone call?

A. But I knew it in my mind and then I got some evidence for myself.

MR JOHNSON: Okay. Does your Lordship have any questions?

MR JUSTICE GOSS: I don't. Thank you very much. That completes your evidence. You're free to go. We're going to have our break now and the next witness is your husband.

[FATHER OF BABIES E & F] (affirmed)
Examination-in-chief by MR JOHNSON

MR JOHNSON: Would you like to take a seat. You have a nice loud voice and can you keep it up, please, and tell the jury your full name?

A. My full name is [Father of Babies E & F].

Q. [Father of Babies E & F], are you married to [Mother of Babies E & F]?

A. Correct.

Q. And were your twin boys, [Baby E] and [Baby F1], born on Wednesday, 29 July 2015?

A. Yes.

Q. Given the issues in the case, [Father of Babies E & F], I'm only going to ask you about one thing and that is a telephone call that you received from your wife or telephone calls. But just to set the scene for that, what was your perception of the progress of your twin boys between their birth on 29 July and [Baby E]'s tragic death on the

night of the 3rd to 4 August?

A. My perception before the phone call?

Q. Before the phone call, yes.

A. I was very happy. There didn't seem to be any issues. Yes, my perception of their health was good.

Q. This may sound like a ridiculous question, but do you remember 3 August 2015, the events of that day?

A. I remember looking at the statement I've submitted and that's accurate, the bits that I can remember.

Q. Okay. Did there come a stage on 3 August when you had gone home?

A. Yes.

Q. And that evening, did you receive a telephone call from your wife?

A. Yes.

Q. Can you remember what time the call was?

A. Looking at my statement, and we corroborated it with phone records, I want to say 21.50, but I would need that in front of me to --

Q. All right. Let's put up the phone records if we can, please, again.

Is your number the one ending 5800?

A. That's correct, yes.

Q. What we have that day, starting at the top, are a couple of calls made earlier in the day. Can you see right at the top, 8.16, for example?

A. Yes, I can see that, yes.

Q. We can see one at 18.31, 3 minutes and 34 seconds.

A. Yes.

Q. We can see a further one at 19.36?

A. Yes.

Q. Fourteen minutes and 1 second. And we see then a pair of calls at 21.11 and 22.52; all right?

A. Yes

Q. Do you remember either/or both of the calls?

A. I remember both calls. The first of those two calls was my wife calling me. She was upset, very worried about [Baby E] because she seen bleeding from his mouth. Then I remember the conversation was, well, what have the doctors and nurses said, and she said, they said there's nothing to worry about, go back up. I said, [Mother of Babies E & F], that's what they've said, I'm sure you're panicking over nothing because they know what they're doing. Then the second phone call was -- sorry.

Q. No, you saw me coming. That was the question I was about to ask you.

A. The second phone call was [Mother of Babies E & F] and the midwife who was looking after her, because [Mother of Babies E & F] was still on the ward, she'd had a C-section, and the midwife was telling me, you know, don't panic, but you need to get here right away, [Baby E]'s not doing very well, don't drive, get somebody to drive you. That was the second phone call.

MR JOHNSON: Thank you, [Father of Babies E & F]. Would you wait there?

There may be some more questions for you.

Cross-examination by MR MYERS

MR MYERS: Only really one, [Father of Babies E & F]. It won't take very long. You told us about the two calls, 21.11 and 22.52.

A. Yes.

Q. Might it be possible that the reference to bleeding was at 22.52 rather than 21.11 or are you clear?

A. Absolutely not.

Q. All right.

A. Yes. Absolutely not.

MR MYERS: That's all I wanted to check. Thank you.

MR JOHNSON: Does your Lordship have any questions?

MR JUSTICE GOSS: No, I don't. That was short, your evidence. Just by way of explanation, because your wife has given evidence, that ground didn't need to be gone over again.

A. I understand.

MR JUSTICE GOSS: Although you obviously said a lot more in your statement about these events, that's all that you needed to be asked about.

A. That's fine.

MR JUSTICE GOSS: Thank you very much indeed for coming and giving your evidence. That's it and you're free to go or stay, exactly as you wish. All right?

A. Okay, thank you.

MR JUSTICE GOSS: Thank you very much.

(The witness withdrew)