

McKeags,

GROMr Robert Daily, Post Office Ltd., Security Room, Glasgow
Mail Centre, 20 Turner Road, Glasgow, G21 1AA.The Crown Court
at NewcastlePlea and Case Management
Hearing

Case No D1 T20090890

Date of trial W/C 17/8/09

Fixed ☐Warned ☒

Advocates Questionnaire

Parties must complete this form.

This form is to be used at all Crown Court Centres, without
local variation.There is an electronic version of the form which contains answer
boxes that expand. The form is at:<http://www.hmcourts-service.gov.uk/HMCSCourtFinder>

1

Date of PCMH

22nd June 09.

PTI URN

Judge

Rec Freedman.

Estimated length of trial

2 days +

2

Parties' details

Parties name	Age	Remand status	CTL expires	Advocate at PCMH	Trial advocate (if known)
P Royal Mail				P. Caulfield	P. Caulfield
D1 Peter Holmes		C ☐ B ☐		K. Ounsu	C. Knox

3

Contact details

3

Parties

P	Office	Name	Phone
		Email	
	Advocate	Name	Phone
		Email	
D1	Solicitor	Name D. Jackson	Phone [REDACTED]
		Email	
	Advocate	Name C. Knox	Phone [REDACTED]
		Email	

3.2

Case progression officers

P

Name	Phone
Email	

D1

Name	Phone
Email	

D. Judman

Court

Name	Phone
Email	

4

Which orders made at the magistrates' court have not been complied with?

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5

D1 Has the defendant been advised that he or she will receive credit for a guilty plea?

☐ No ☒ Yes

6

D1 Has the defendant been warned that the case may proceed in his or her absence?

☐ No ☒ Yes

7

What plea(s) is/are the defendant(s) offering?

D1

<i>False accounting</i>

8

Should the case be referred to the Resident Judge for a trial judge to be allocated?

☐ No ☐ Yes

9

Give details of any issues relating to the fitness to plead or to stand trial.

D1

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10

10.1 Has the prosecution made statutory disclosure?

P

<i>no - missing exhibits 2, 4, 6 8 + 9.</i>
<i>missing indic</i>

D1

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10.2

Has a defence statement been served?

no - awaiting exhibits + info.

D1

10.3 Does it comply with the statutory requirements?

P

10.4 If not clear from the defence statement, what are the real issues?

D1

10.5

D1 Has/will the defence made/make an application in writing under section 8 of the Criminal Procedure and Investigations Act 1996?

☐ No ☐ Yes

11 What further evidence is to be served by the prosecution?
By when is it reasonably practicable to serve this?

P

12

12.1 Give details of any expert evidence likely to be relied upon, including why it is required and by when it is reasonably practicable to serve this.

P

D1

Forensic acct-

12.2 Is a note of agreement/disagreement required?

13

13.1

D1 Has the defence completed the Witness List (see 36)?

☐ No ☒ Yes

13.2 Is any witness summons necessary?

13.3

D1 Is a timetable for the calling of witnesses required (see 30)?

☐ No ☐ Yes

14

14.1

D1 Is a certificate for a litigator sought?

☐ No ☐ Yes

14.2 If Yes, why and for how long?

D1

For 15 to 35, answer the relevant questions only

15 Admissions, schedules etc.

What matters can usefully be admitted or put into schedules, diagrams, visual aids etc.?

16 Case summary

P Is it proposed to serve a case summary or note of opening?

☐ No ☐ Yes

17 Special measures

17.1 Give details of any special measures application to be made.

17.2

Can any order be made now?

☐ No ☐ Yes

17.3 What other arrangements are needed for any young/vulnerable/intimidated witness?

18 Young defendants

Are any arrangements needed for any young defendant?

D1

19 Reporting restrictions

State type and grounds of any reporting restriction sought.

P

D1

20 Third party material

20.1 What third party material is sought, from whom, and why?

P

D1

20.2 If the material can be obtained without a court order, by whom and by when?

P

D1

20.3 Should any person adversely affected by an order be notified?

21 Defendant's interview(s)

21.1 Is there an issue in relation to the accuracy of the transcript/admissibility of the defendant's interview?

D1

21.2 What proposals are made for any editing required?

D1

21.3 What proposals are made to summarise the interview(s)?

D1

22 Video Evidence

22.1 Is there video evidence of any young/vulnerable/intimidated witness yet to be served?

22.2 Has each video been transcribed?

22.3 Is there an issue in relation to the accuracy/admissibility/quality of any video or transcript?

23 ** Witness interview(s)

23.1 Are there any videos/audio tapes of witness interviews which, if they meet the disclosure test, are yet to be disclosed as unused material?

23.2 If so, is any application made for that video/audio tape to be transcribed and, if so, why?

24 CCTV evidence

- 24.1 Are there any outstanding issues in relation to service disclosure of CCTV footage?
If the material is in the possession of a third party, complete 20 instead.

- 24.2 Is an edited version to be served/used?

25 Electronic equipment

- 25.1 Give details of any special equipment (e.g. CCTV, live link, audio recordings, DVD) required in the trial courtroom.

P

D1

- 25.2 Is the evidence in its present form compatible with the equipment in court?

2 Cross-examination on sexual history

If an application has not already been made, does the defence intend to make an application under section 41 of the Youth Justice and Criminal Evidence Act 1999 to cross-examine a witness about his or her sexual history?

D1

27 Bad character

Are any directions necessary in relation to bad character applications?
Are there any further applications?

P

D1

28

Hearsay

Are any directions necessary in relation to hearsay applications?
Are there to be any further applications?

P

D1

29

Admissibility and legal issues

What points on admissibility/other legal issues are to be taken?
Is it necessary for any to be resolved before trial?

P

D1

30

Timetable of trial

Are there matters which need to be determined on the day of trial, which
may affect the timetable of trial?
If so, when will (1) the jury and (2) the witnesses be required?

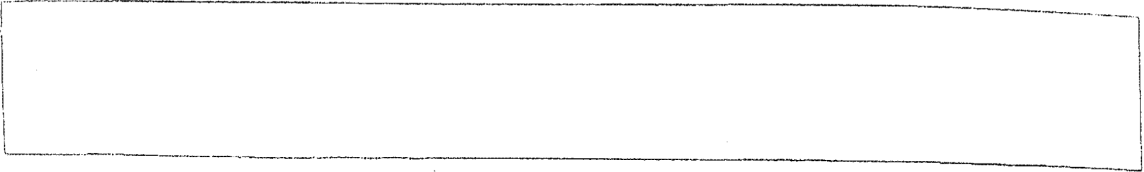
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31

Public interest immunity

Is any 'on notice' public interest immunity application to be made?

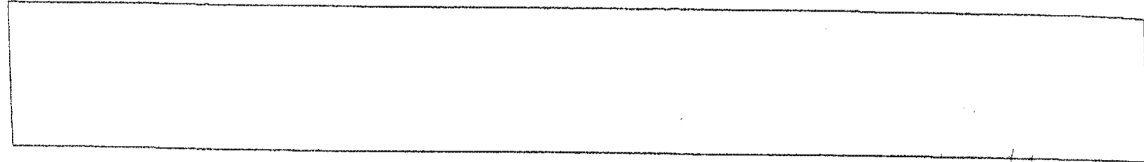
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32 Jury bundle

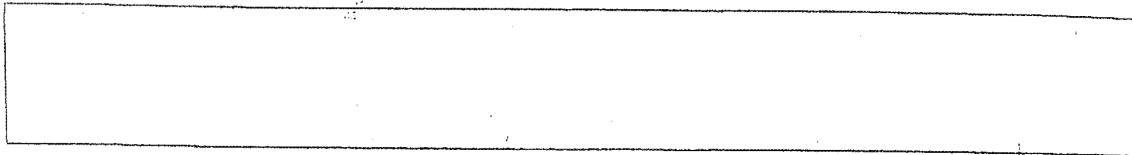
What proposals do the prosecution make for a jury bundle?

P



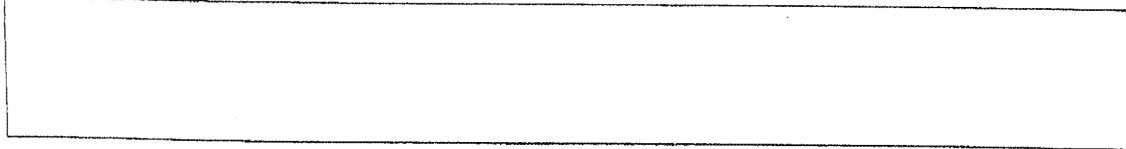
33 Concurrent family proceedings

Give details of any concurrent family proceedings.



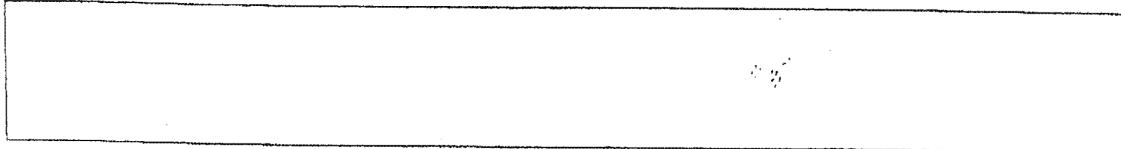
34 Other special arrangements

Give details of any special arrangements (e.g., interpreter, intermediary, wheelchair access, hearing loop system) needed for anyone attending the trial.



35 Linked criminal proceedings

Are there other criminal proceedings against the defendant or otherwise linked?



36

The defence should indicate here which prosecution witnesses are required to give evidence at trial. The attendance of any witness is subject to the judge's direction.

Type of witness:
Provide specific details of the
type of witness. For example:
eye witness, police officer,
firearms expert, continuity

[illegible]