

OPUS2

Manchester Arena Inquiry

Day 14

October 1, 2020

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1 Thursday, 1 October 2020
 2 (9.30 am)
 3 SIR JOHN SAUNDERS: Mr de la Poer.
 4 MR DE LA POER: Good morning, sir. As Mr Greaney indicated
 5 at the conclusion of proceedings yesterday, this morning
 6 we will start and complete chapter 6 of the oral
 7 evidence hearings. This chapter will serve to introduce
 8 some core documents and establish further important
 9 timings in relation to the coming evidence related to
 10 security at the arena, which will be heard in chapter 7
 11 and which will commence on Monday of next week.
 12 As all who have been following the hearings prior to
 13 the start of the oral evidence hearings closely will
 14 know, chapter 6, as with other chapters, is subject to a
 15 restriction order by reason of an order you made
 16 following a hearing on 23 July of this year. The terms
 17 of the restriction order, as it applies to this and
 18 other chapters, are published on the website together
 19 with that ruling, which is dated 31 July.
 20 The practical effect of the restriction order
 21 is that if it becomes apparent that operationally
 22 sensitive material has been inadvertently referred to,
 23 I shall ask for the feed to be cut whilst this is
 24 investigated. This will result in no broadcast outside
 25 this hearing room.

1

1 SIR JOHN SAUNDERS: Thank you.
 2 MR DE LA POER: Finally, by way of introduction to this
 3 morning's session, I should indicate that I will be
 4 assisted in the presentation of this material by
 5 Detective Chief Inspector Pickering of Greater
 6 Manchester Police, to whom I now turn.
 7 DETECTIVE CHIEF INSPECTOR SAM PICKERING (affirmed)
 8 Questions from MR de la POER
 9 SIR JOHN SAUNDERS: Mr Pickering, stand or sit to give your
 10 evidence, whichever you're more comfortable with.
 11 A. I'll sit, thank you.
 12 MR DE LA POER: Please could you state your full name.
 13 A. My full name is Samuel Jeffrey Pickering.
 14 Q. Is it correct, chief inspector, that you became a police
 15 officer in 1994, that you joined the Greater Manchester
 16 Police Major Incident Team in 2005, and in 2013 you
 17 joined what was then known as the North-west
 18 Counter-terrorism Unit?
 19 A. That's correct, yes.
 20 Q. Detective chief inspector, you have given in these
 21 proceedings a witness statement dated 31 July 2020?
 22 A. I have.
 23 Q. And that witness statement was provided at the request
 24 of the inquiry legal team, is that correct?
 25 A. It was, yes.

2

1 Q. We'll just identify that now, please, for the record.
 2 It doesn't need to be brought up on screen, but its
 3 reference is {INQ034710/1}; is that correct?
 4 A. That's correct.
 5 Q. At the conclusion of that statement, did you sign it,
 6 attesting that the contents were true to the best of
 7 your knowledge and belief?
 8 A. I did.
 9 Q. And do you stand by that attestation?
 10 A. Indeed.
 11 Q. As I said a few moments ago, detective chief inspector,
 12 the purpose of you giving evidence today is to assist
 13 the inquiry to introduce materials which will be
 14 relevant to the next chapter, that is to say chapter 7.
 15 It will fall into three broad categories.
 16 The first, maps and photographs of the arena and
 17 Victoria Railway Station.
 18 The second, hostile reconnaissance and the final
 19 visit to the arena by Salman Abedi.
 20 And the third, movement of significant chapter 7
 21 witnesses.
 22 So we will now begin, please, with the first of
 23 those three categories, namely maps and photographs.
 24 There are four to look at under the heading of maps.
 25 The first, please, Mr Lopez, if you could bring it up on

3

1 screen, is {INQ033900/1}.
 2 Detective chief inspector, could you just describe
 3 to us what this document is to start with, as it was
 4 created, I think, by members of your team?
 5 A. It was, yes. It's a map of Manchester Arena and it also
 6 shows the surrounding area and indicates where the
 7 buildings are in a yellow colour and various streets and
 8 buildings are indicated, so it indicates where
 9 Manchester Arena is, where the City Room is within that
 10 complex, and where it is in relation to
 11 Victoria Station, and some of the surrounding streets
 12 are labelled on the map too, for example, Trinity Way,
 13 Hunts Bank and Victoria Station Approach.
 14 Q. I think what we'll do here is to identify together those
 15 streets as this is a useful map to do so. Before we do
 16 so, is this right that it is in its current layout is
 17 orientated north/south?
 18 A. It is, yes.
 19 Q. I think we're going to see in some other maps that they
 20 are orientated differently and that's because they are
 21 not orientated as this one is?
 22 A. Yes.
 23 Q. So if we begin in the top left-hand corner, do we see
 24 coming in from that top left-hand corner, running
 25 horizontally, Trinity Way?

4

1 A. We do, yes.
 2 Q. And if you continue along that, please, with your
 3 cursor, Mr Lopez, we can see a sign there,
 4 "Trinity Way", by a red circle.
 5 A. Mm-hm.
 6 Q. Trinity Way provides an access to the arena complex,
 7 doesn't it?
 8 A. It does, yes.
 9 Q. And I think that access is in approximately the vicinity
 10 of that red dot, is that so?
 11 A. It's close to that area, yes.
 12 Q. And that access we have already heard referred to by
 13 Mr Greaney as being the Trinity Way link tunnel?
 14 A. Yes.
 15 Q. And in due course we'll have a look at some photographs
 16 of that. That's the first road that we can identify.
 17 The second is almost precisely in the centre of this map
 18 and it is labelled "Hunts Bank".
 19 Hunts Bank provides access to the arena complex via
 20 a broad span of steps; is that right?
 21 A. It does, yes, and those are indicated on the map too.
 22 Q. Mr Lopez is indicating those.
 23 At right angles to Hunts Bank, as we can see to the
 24 east, is Victoria Station Approach.
 25 A. Yes, that's right.

5

1 Q. And again, Mr Lopez, thank you for indicating that.
 2 That provides three access points to the Victoria
 3 Railway Station concourse; is that correct?
 4 A. Yes, it does.
 5 Q. Including one access point which is of particular
 6 significance to this inquiry, namely the war memorial
 7 access?
 8 A. That's correct.
 9 Q. And we'll turn in a moment to identify that more
 10 closely.
 11 Can we please bring up the next of our plans, namely
 12 {CPS000160/1}. The first point to make here is, as
 13 we've already adverted to, detective chief inspector,
 14 we can see that in the top right-hand corner the
 15 north/south indication is given?
 16 A. Yes, that's right. So it's at a different angle to the
 17 other map, purely to fit all of the information on to
 18 one page that could be shown.
 19 Q. We can see emanating from the right-hand side of the
 20 map, towards the top, a series of parallel blue lines.
 21 What do they indicate please?
 22 A. Those are the Metrolink tramlines.
 23 Q. And so if we follow that Metrolink tramline into the
 24 railway station, please -- Mr Lopez, you're indicating
 25 that with your cursor -- we'll reach a point just above

6

1 the words "Victoria Station". Is that the access point
 2 from the tram stop within the station complex on to the
 3 railway concourse?
 4 A. Yes, it is.
 5 Q. From the words "Victoria Station", the white area that
 6 we can see to the left of that, is that the area
 7 commonly referred to as the station concourse?
 8 A. It is, yes.
 9 Q. We can see those three access points from
 10 Victoria Station Approach. If you can indicate the
 11 left-hand one of those, Mr Lopez. Thank you very much
 12 indeed. That is the war memorial entrance, isn't it?
 13 A. It is.
 14 Q. Then from that entrance, above it and slightly to the
 15 right, there is a purple square; can you tell us what
 16 that is?
 17 A. That's the bottom of the stairs that lead up to the
 18 footbridge, which in turn leads to the City Room.
 19 Q. And then following that footbridge, which elbows round
 20 to the left, do we arrive in the City Room?
 21 A. We do indeed, yes.
 22 Q. Mr Lopez is kindly indicating that there. We'll look at
 23 the City Room in closer detail in a moment. Beneath the
 24 word "room" do we see marked in purple a line of doors?
 25 A. We do. Those are doors there along that whole line.

7

1 Q. And do those doors provide access to the arena
 2 concourse?
 3 A. They do.
 4 Q. Thank you. Mr Lopez, the third of our four maps,
 5 please, {INQ033841/1}. If you can zoom that in for us,
 6 please, Mr Lopez.
 7 Our principal focus isn't going to be on the
 8 City Room, which is just off-centre. This is a plan
 9 that Mr Greaney showed during his opening of the oral
 10 evidence hearings. The particular focus, please, is --
 11 above the words "City Room", do we see marked two sets
 12 of steps?
 13 A. We do, yes.
 14 Q. The set of steps above the word "city", do they lead to
 15 the mezzanine area?
 16 A. They do.
 17 Q. And if Mr Lopez indicates that beyond that mezzanine
 18 area, we see the words "JD Williams"?
 19 A. That's right, yes.
 20 Q. So that everybody can distinguish between the two sides
 21 of the mezzanine area so that we have a common way of
 22 referring to it, might we refer to that as the
 23 JD Williams side of the mezzanine?
 24 A. Yes.
 25 Q. Then above the word "room" of "City Room", is there

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1 another flight of steps up on to that mezzanine area?
 2 A. There are some more steps there, yes.
 3 Q. Do the two access points connect, so in other words you
 4 could access the whole mezzanine from either flight ?
 5 A. Yes, you can.
 6 Q. And was there, on that side, a McDonald's fast-food
 7 restaurant?
 8 A. Yes, there was one there previously .
 9 Q. Might we refer to this as the McDonald's side of the
 10 mezzanine --
 11 A. Yes, we may.
 12 Q. -- albeit at the time we're concerned with there wasn't
 13 in fact an operating restaurant there?
 14 Between those two flights of stairs, there is,
 15 I believe, an emergency exit; is that right?
 16 A. That's correct, yes.
 17 Q. That emergency exit is concealed behind a series of
 18 doors?
 19 A. That's correct .
 20 Q. The final item to identify here, please. If we go back
 21 to the word "City Room" and go 10 o'clock from the C of
 22 "City Room", do we see that the room narrows to
 23 a passageway and there is a flight of steps marked in
 24 yellow?
 25 A. Yes, it does, that's correct .

1 Q. And is that an area which is sometimes referred to as
 2 the Fifty Pence entrance?
 3 A. Yes, that's referred to as the Fifty Pence entrance and
 4 staircase .
 5 Q. Again, an important location as we shall come to see --
 6 SIR JOHN SAUNDERS: I missed that. I'm really sorry, can
 7 you just tell me again where the Fifty Pence entrance
 8 is?
 9 MR DE LA POER: Not at all, sir.
 10 If we go from the C of "City Room" at approximately
 11 10 o'clock, the City Room narrows to a passageway, and
 12 above the passageway, marked in yellow, is a flight of
 13 stairs which lead down. And from there I think we can
 14 identify this, as we're in that vicinity, just to the
 15 left is a tunnel marked in yellow. Is that the
 16 Trinity Way link tunnel which merges out on to
 17 Trinity Way?
 18 A. Yes.
 19 SIR JOHN SAUNDERS: Before we leave this plan, is it worth
 20 pointing out where the lift is? I'm not sure we're
 21 going to see the lift. Is it just over the word
 22 "station"?
 23 MR DE LA POER: Absolutely, thank you very much indeed.
 24 Let's go back to the words "Victoria Station Concourse".
 25 Thank you very much indeed.

1 Above the word "Victoria", detective chief
 2 inspector, can you confirm we see the flight of steps?
 3 A. Yes, the flight of steps is shown as a grid on this
 4 particular map.
 5 Q. And then to the right of those, above the word
 6 "station", do we see the lift indicated, which provides
 7 access to that same raised footbridge?
 8 A. Yes, it does. It allows people to go up or down from
 9 the concourse, up or down to the walkway.
 10 Q. The next matter to refer to, which we won't bring up on
 11 screen, but we'll give the reference for is
 12 {INQ033842R/1}, the R indicating that the document
 13 contains operationally sensitive material.
 14 Can you confirm that that particular plan shows the
 15 location of CCTV cameras relevant to Salman Abedi's
 16 movements?
 17 A. Yes, it does.
 18 Q. And in due course it may be necessary to look at that,
 19 in restricted session, but we won't look at that today.
 20 The final plan to consider is the plan of the
 21 City Room. Before it's brought up, can I just give this
 22 warning to anybody who may be watching. Can you
 23 confirm, please, that there are a series of concentric
 24 rings shown on this plan?
 25 A. There are, yes.

1 Q. And those concentric rings indicate a distance from the
 2 point of detonation within the City Room?
 3 A. They do.
 4 Q. I'll pause for a moment, should anybody not wish to look
 5 at that, they can switch off their feed or step away.
 6 I anticipate that we will spend no more than a minute or
 7 so considering this plan.
 8 (Pause)
 9 We have identified already the concentric rings, and
 10 this gives us a very zoomed-in view of the City Room;
 11 is that correct?
 12 A. It does.
 13 Q. So if we just pick out some of the features, we can
 14 start on the left-hand wall as it appears on this plan
 15 of the City Room, which Mr Lopez can indicate is
 16 a variation of doors by the words "Manchester Arena
 17 Concourse".
 18 A. Yes, those are the doors that lead from the City Room
 19 into that concourse area.
 20 Q. And then if we work in a clockwise direction around the
 21 outer perimeter of the City Room, we can see from those
 22 doors what is effectively a broken wall, as it appears
 23 on here. It's at the top edge of the City Room from the
 24 concourse doors -- if you keep going up with the cursor,
 25 Mr Lopez -- to the left is that the box office area?

1 A. The box office area, yes.
 2 Q. Just again continuing in a clockwise direction from
 3 there, we can see that point at which it narrows,
 4 leading to a down flight of stairs, the Fifty Pence
 5 staircase?
 6 A. Yes, that's that area.
 7 Q. Thank you very much indeed. Again, following the
 8 perimeter of the floor of the City Room -- if you can
 9 now continue downwards with your cursor, Mr Lopez --
 10 we will get to the flight of steps leading up to the
 11 JD Williams side of the mezzanine?
 12 A. Yes, that's the JD Williams stairs.
 13 Q. And continuing slightly down and in a clockwise
 14 direction do we see, between the two flights of stairs,
 15 indicated with the up arrow -- just above where you're
 16 marking now, Mr Lopez, if you move your cursor up from
 17 that point -- that's the area of the emergency exit?
 18 A. That's the emergency exit, yes.
 19 Q. Which we will see is between the two staircases and
 20 then -- just below that, Mr Lopez -- an up arrow leading
 21 to the staircase, leading to the McDonald's side of the
 22 mezzanine?
 23 A. That's correct.
 24 Q. And to complete the picture, if we then move down to the
 25 bottom right-hand corner, do we see the entrance doors

1 from the raised footbridge?
 2 A. That's correct, yes.
 3 Q. I'm going to turn now from plans and maps to consider
 4 some photographs together. We'll do this in three
 5 parts. Firstly, we will consider photographs of the
 6 arena area itself. The first of these, Mr Lopez, is at
 7 {INQ025597/13}.
 8 What do we see here, please?
 9 A. That's a picture of the doors that lead from the
 10 concourse, which is where the picture was taken through
 11 to the City Room, which is on the far side of those
 12 doors.
 13 Q. Thank you. Next, {INQ025597/27}. What do these
 14 indicate?
 15 A. These are the doors at the Trinity Way exit, also known,
 16 I believe, as the Trinity Roller.
 17 Q. So this is an exit from the arena concourse down
 18 a flight of stairs into Trinity Way?
 19 A. It is, yes.
 20 Q. Then at {INQ025597/10}, please.
 21 A. These are the doors that lead from the arena complex
 22 down to the Hunts Bank and you can just, in the distance
 23 behind the doors, see the start of the railings that are
 24 at the top of the steps.
 25 Q. Thank you. And I think we're going to see those steps

1 in the next photograph at {INQ025597/8}, please.
 2 Is that effectively a reverse angle looking in the
 3 opposite direction to the previous photograph up the
 4 stairs which would lead to those doors that we have just
 5 seen?
 6 A. Indeed, yes.
 7 Q. And then at {INQ025597/22}, please.
 8 A. This is a picture of the Trinity Way link tunnel near to
 9 the Trinity Way end.
 10 Q. So that's at the end of the tunnel which emerges on to
 11 the public highway?
 12 A. Yes.
 13 Q. And then {INQ025597/21}, please.
 14 A. This is that same tunnel but pointing in the opposite
 15 direction towards the City Room.
 16 Q. We can see a half flight of steps and a ramp leading up
 17 there. A person proceeding in that direction, would
 18 they find themselves on a route that could take them up
 19 the Fifty Pence staircase?
 20 A. Indeed they would, yes.
 21 Q. And finally, a different INQ reference, {INQ033897/1},
 22 please.
 23 Helpfully, we've got some annotations on this. If
 24 you can talk us through those from the left-hand side
 25 moving round in a clockwise direction.

1 A. This is at the junction between a number of areas here,
 2 so on the left-hand side you have doors that lead to
 3 Victoria Train Station. Moving along to the right, the
 4 green doors there, a set of double green doors that lead
 5 up to the City Room and up to that staircase, the 50p
 6 staircase we referred to previously. The next label
 7 points in the direction of the Trinity Way link tunnel.
 8 Q. If I pause you there. We can see just above that arrow
 9 some railings. Are those the half staircase that
 10 I described earlier that we saw in the preceding shot?
 11 A. That's the very same.
 12 Q. And then, finally.
 13 A. Finally, close to the camera on the right there, are the
 14 doors to the NCP car park that adjoins the arena from
 15 the station.
 16 Q. Thank you very much indeed.
 17 Next we are going to look at a small number of
 18 photographs of the railway station itself. Before you
 19 bring those up, Mr Lopez, can I please just indicate
 20 that marked upon them in text are areas where people
 21 were treated. It is no greater indication than that.
 22 They were prepared to assist us with chapter 10, but
 23 they'll serve our purpose now. So I just give that
 24 warning in the event that people were not expecting to
 25 see that. But as I say, it is no more than text

1 indicating that people in general terms were treated in
2 particular areas.

3 Mr Lopez, if you could please bring up
4 {INQ033899/1}. I think we've moved straight to
5 {INQ033899/11}.

6 Can I just indicate this, with all due respect,
7 detective chief inspector, I have been asked to ask you
8 to speak up very slightly to help with the
9 transcription. I have no doubt everybody in the room
10 can hear you.

11 We are looking at {INQ033899/11}. As I stated,
12 there is a text marking which we can disregard for
13 present purposes as we're just familiarising ourselves
14 with this. Is this a photograph looking down Station
15 Approach in the direction of that left-hand turn on to
16 Hunts Bank?

17 A. It is, yes.

18 Q. If we look at {INQ033899/9}, please, Mr Lopez. Is this
19 a reverse angle of that photograph, so looking now
20 in the opposite direction with Hunts Bank to the
21 photographer's right?

22 A. It is, yes.

23 Q. And I think we can see there that the entrance to the
24 railway station and the war memorial are marked in text?

25 A. Yes, that's right. So that's the closest entrance to

17

1 the photographer there.

2 Q. Thank you. {INQ033899/6} will bring us inside. Is that
3 effectively looking back out to the area the
4 photographer was standing in?

5 A. Yes, that's the war memorial entrance from the opposite
6 side.

7 Q. {INQ033899/5}, please. Again, we're now swinging the
8 photograph round from the preceding one and we can see
9 part of the station concourse area with that white
10 tiling.

11 A. That's correct, yes.

12 Q. {INQ033899/4}, please. This is set back at a slightly
13 different angle and I think we can now see in this
14 photograph why it is known as the war memorial entrance.

15 A. Indeed, the war memorial is visible in this photograph
16 and the doors that we've been looking at are at the top
17 left of this photograph.

18 Q. And again the railway station concourse is in that white
19 tiling?

20 A. It is.

21 Q. {INQ033899/7}, please. This view has swung slightly to
22 the left, is that right, from the previous photograph?

23 A. That's correct, yes.

24 Q. It shows the ticket offices?

25 A. It does.

18

1 Q. And in the top left-hand corner, I think it shows
2 a second entrance exit which leads on to Station
3 Approach?

4 A. It does, yes.

5 Q. {INQ033899/2}, please. We're here looking down the
6 station concourse. Is access to the trains to the left
7 of the photograph?

8 A. It is, yes.

9 Q. And do we see in the top centre the staircase which
10 leads up on to the raised footbridge?

11 A. We do, yes, and just beyond that is the lifts that have
12 been mentioned previously as well.

13 Q. Thank you. {INQ033899/3}, please. This is looking back
14 to where that previous image was taken from. There's
15 a public house there and a Starbucks; is that right?

16 A. Yes, there is.

17 Q. And access to the trains to the right of the photograph?

18 A. That's correct.

19 Q. Finally, please, {INQ033899/8}. This is at the other
20 end of the station concourse; is that correct?

21 A. Correct.

22 Q. We can see a half flight of stairs marked by those hand
23 railings which leads down to the trams?

24 A. It does.

25 Q. The lift appears just off centre towards the top?

19

1 A. It does, with the red light next to it.

2 Q. And completing the picture, the staircase in relation to
3 that lift can be seen towards the top left of the shot?

4 A. That's correct.

5 Q. Thank you.

6 The third and final area of photographs is to look
7 at the footbridge and the City Room itself. As we're
8 going to look at some images of the City Room, can
9 I just make clear what it is that we're going to show.
10 We are not going to show any images of the City Room
11 taken on or around the 22nd. They will not in any way
12 be graphic, but nonetheless I do give a warning that
13 we are going to look at some photographs of the
14 City Room itself. So if anybody wants to make the
15 necessary arrangements, they can do so.

16 The first INQ to consider, please, is {INQ033898/3}.
17 Page 3, first. Do we see this as a view of the raised
18 footbridge?

19 A. That's correct, yes, and the view is towards the
20 City Room doors.

21 Q. So if a person had ascended that staircase, they would
22 be walking away from the camera in the direction of the
23 City Room?

24 A. That's correct.

25 Q. {INQ033898/2}, please. I think this is the reverse

20

1 angle?
 2 A. Yes. This is a view from the opposite angle and at the
 3 top right of the shot you can just about make out the
 4 area where the stairs and the lift --
 5 Q. So we see that elbow, as I've described it, in the
 6 footbridge, which on this view tends off to the right?
 7 A. Yes.
 8 Q. And that would lead one to the staircase down to the
 9 concourse?
 10 A. That's correct.
 11 Q. Finally, please, {INQ033898/1}, which is our first image
 12 of the City Room. Again, just to identify some features
 13 in this for us, please. At the top of the shot we see
 14 marked the exit doors, do they lead on to the
 15 footbridge?
 16 A. They do.
 17 Q. If we then move to the extreme left of the shot, do we
 18 see a flight of stairs in the centre?
 19 A. We do, yes.
 20 Q. Do they lead to the JD Williams side of the mezzanine?
 21 A. Yes, the closer stairs, the ones you can see clearly on
 22 the left-hand side, are the ones that lead to the JD
 23 area of the mezzanine, yes.
 24 Q. And we can see an overhang with railings in the top left
 25 hand corner. Beneath that overhang, can one access the

21

1 emergency exit?
 2 A. Yes, that's the emergency exit.
 3 Q. And then beyond that, we can just see the end of the
 4 railings which mark the staircase up to the McDonald's
 5 side of the mezzanine?
 6 A. That's correct, yes.
 7 Q. So that everybody can orientate other features, in the
 8 bottom left-hand corner, is that the way to the Fifty
 9 Pence staircase?
 10 A. Indeed it is, yes.
 11 Q. And to the extreme right of the shot, if one moved out
 12 of shot, would one come to the doors to the arena
 13 concourse?
 14 A. Indeed you would, yes.
 15 SIR JOHN SAUNDERS: Just so I can be clear, the emergency
 16 exit doors, the stairs there do go up, not down?
 17 A. No, they go down, sir.
 18 MR DE LA POER: They go down. The emergency exit is
 19 a descent.
 20 SIR JOHN SAUNDERS: I thought at some time we might have
 21 said they went up. But they do go down, which makes
 22 more sense. It's probably me misunderstanding it.
 23 A. If I can point out, the mezzanine is above them, so if
 24 they went up, they would lead up to the mezzanine as the
 25 other stairs do, so they lead down to the escape route,

22

1 if you like.
 2 MR DE LA POER: We're just going to consider some other
 3 photographs of the City Room to complete the picture.
 4 {INQ016169/1}.
 5 (Inaudible: distorted) left-hand side of shot,
 6 detective chief inspector, through those doors on to the
 7 raised footbridge?
 8 A. That's where those doors lead, yes.
 9 Q. And again we can now see that in relation to the arena
 10 concourse doors, which are on the right-hand side of the
 11 shot, white with small windows and a blue trim at the
 12 bottom.
 13 A. That's correct, yes.
 14 Q. Next, {INQ016170/1}.
 15 The photographer has swung round now to make the
 16 focus of the shot on the left-hand side the arena
 17 concourse doors; is that correct?
 18 A. That's correct, yes.
 19 Q. And on the right-hand side, we see the box office
 20 windows?
 21 A. Indeed we do, yes.
 22 Q. And I think, as it's been mentioned before, the bright
 23 white area at the top of the shot is the glass ceiling
 24 roof; is that right?
 25 A. Indeed it is, yes.

23

1 Q. Next, please, Mr Lopez, {INQ033846/1}.
 2 The decor was different, but those yellow doors are
 3 the arena concourse doors; is that correct?
 4 A. Yes, these are the same doors.
 5 Q. And what this photograph shows, different to others, is
 6 it's taken from up on the mezzanine area; is that
 7 correct?
 8 A. Yes.
 9 Q. And this is on the JD Williams side of the mezzanine?
 10 A. I think it is, yes, although the presence of the people
 11 in that area may mean it's a bit further back, but it's
 12 certainly taken from the mezzanine area.
 13 Q. Thank you.
 14 The penultimate of our photographs, please,
 15 Mr Lopez, {INQ033848/1}.
 16 We saw that commentary with the railings with those
 17 people in the last one. Is this a photograph taken from
 18 approximately where those people were, overlooking
 19 a queue of people for the arena, those doors being
 20 approximately in the centre?
 21 A. That's correct, yes.
 22 SIR JOHN SAUNDERS: Mr de la Poer, can we check at some
 23 stage on the previous one that the photograph was taken
 24 from the JD Williams side and not from the McDonald's
 25 side?

24

1 MR DE LA POER: The area above the emergency exit is raised
 2 and that wasn't visible in the foreground of that
 3 photograph. So I think it will have been taken from the
 4 top of the flight of stairs which is why you can see the
 5 mezzanine, but of course we will check that, sir.
 6 Finally, please, {INQ016173/1}. This, detective
 7 chief inspector, I think is the view from the McDonald's
 8 side.
 9 A. That's correct.
 10 Q. So we can see on the right-hand side of the photograph
 11 the flight of steps up to the JD Williams side of the
 12 mezzanine.
 13 A. That's correct.
 14 Q. This is not all of the photographs that the inquiry has
 15 collected. Can you confirm that, please? There are
 16 others exhibited to your statement, but for present
 17 purposes we will leave our topic 1 and please move to
 18 the second of our topics, which we can deal with
 19 relatively briefly, which I have entitled, "Hostile
 20 reconnaissance and the final visit by Salman Abedi".
 21 As I've said, we can deal with this fairly shortly
 22 because Mr Greaney opened much of this evidence,
 23 including playing footage. I just want to identify for
 24 the record the references to the documents you have
 25 produced before looking at a very small amount of moving

25

1 footage.
 2 Firstly, can you confirm that under {INQ020158/1},
 3 we have the compilation made by your team of the
 4 movement of Salman Abedi on 18 May?
 5 A. That's correct, yes.
 6 Q. And that, for people's reference, at 20:50 to 23:10 on
 7 the counter time, that will show him at the arena?
 8 A. Yes, it will.
 9 Q. Next, {INQ031278/1}, I think that provides us with
 10 further footage of Salman Abedi and that his movements
 11 at the arena appear at counter time 01:12 to 08:34.
 12 A. That's correct, yes.
 13 Q. And then, just by way of example of the further work
 14 your team has done and the resources that we have
 15 available to refer to if required, Mr Lopez, can
 16 I please ask you to bring up {INQ031275/35}?
 17 So as indicated, detective chief inspector, this is
 18 in fact page 35 of a much larger document, isn't it?
 19 A. It is, yes.
 20 Q. This document under that reference number is a series of
 21 stills taken from the moving footage for 18 May?
 22 A. That's correct, yes.
 23 Q. And we can see in the bottom still Salman Abedi at the
 24 arena in that red box?
 25 A. We can.

26

1 Q. We don't need to look at the detail of that, but that is
 2 available should anyone wish to refer to it. We are
 3 going to move on, please, to simply indicate but not
 4 show {INQ020157/1}.
 5 This, can you confirm, please, shows a compilation
 6 of Salman Abedi captured on CCTV on 21 May?
 7 A. It does, yes.
 8 Q. And at counter time 17:05 to 22:45, it captures him
 9 at the arena on this day?
 10 A. Yes, it does.
 11 Q. We refer to that commonly as hostile reconnaissance,
 12 don't we?
 13 A. We do.
 14 Q. There is an equivalent booklet of stills for that day at
 15 {INQ020163/1}; is that correct?
 16 A. That's correct, yes.
 17 Q. And now we're going to turn, please -- and I'm going to
 18 give a warning as I do this -- to just 2 minutes of
 19 moving footage from 22 May. I make clear that there is
 20 going to be no moving footage after 22:31. But we will
 21 see Salman Abedi moving in this image, so I give that
 22 warning in case anybody wants to make arrangements.
 23 I would estimate that we will have completed this within
 24 the next 3 or so minutes.
 25 {INQ020156/1}. Again, Mr Greaney has played much of

27

1 this, so we are going to just be highly selective in
 2 what we play now. Firstly, Mr Lopez, can I ask you to
 3 take us to counter time 21:38, and if you could bring
 4 that up and pause it. Thank you very much indeed.
 5 Let's just orientate ourselves, please. Can you
 6 confirm, firstly, that this moving footage that we're
 10:07:09 7 going to see is at approximately 18:35:44?
 7 A. That's correct, yes.
 8 Q. So this is on Salman Abedi's first visit on 22nd and
 9 we can see he doesn't have his rucksack and he's
 10 depicted in shot slightly to the left of that lamp post;
 11 is that correct?
 12 A. That's correct.
 13 Q. And what we are going to see, so that everybody knows
 14 what we're looking for, is Salman Abedi approaching
 15 ShowSec operative Robert Atkinson at the top of the
 16 staircase that leads down from the raised footbridge to
 17 the station concourse.
 18 A. That's correct, yes.
 19 Q. And we are going to see that at the end of that
 20 interaction Mr Atkinson and Salman Abedi will be joined
 21 by Kyle Lawler, who will approach moving up the
 22 staircase.
 23 A. That's correct, yes.
 24 Q. So if we could please now, Mr Lopez, play through from

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1 21:38 through to 22:27 -- and I think our focus in the
 2 first camera image will be at the top right-hand of the
 3 shot and we'll be looking for Mr Atkinson with that
 4 yellow T-shirt and black trousers .
 5 (Video played to the inquiry)
 6 We see Mr Atkinson there at the top of the flight of
 7 stairs , is that correct ?
 8 A. That's correct , yes .
 9 Q. We see Salman Abedi approaching him and standing in
 10 close proximity ?
 11 A. Yes, we can .
 12 Q. And in a moment, I think we're going to see Mr Lawler's
 13 head coming up the stairs as he ascends them .
 14 A. Yes .
 15 Q. That's Kyle Lawler there ?
 16 A. It is .
 17 Q. I think we're going to change camera shot. Do we see
 18 Mr Lawler's feet there in the bottom left-hand corner ?
 19 A. We do .
 20 Q. And then Salman Abedi a couple of seconds after
 21 Mr Lawler has joined them .
 22 We can stop it there .
 23 For a couple of seconds after Mr Lawler has joined
 24 Mr Atkinson and Salman Abedi, Salman Abedi descends that
 25 staircase towards the station concourse ?

29

1 A. He does, yes .
 2 Q. The second of the four sequences of moving footage we'll
 3 look at today. Counter time 41:20, please, if you can
 4 bring that up for us, Mr Lopez. Again, we'll just get
 5 our bearings if we may. We see Salman Abedi, the figure
 6 in black, this time with a rucksack on his back .
 7 A. We do, yes .
 8 Q. The approximate time of this is 20.50.49; is that
 9 correct ?
 10 A. That's correct , yes .
 11 Q. He has just emerged from the lift which is on the bottom
 12 left-hand corner of the shot ?
 13 A. It is .
 14 Q. And he's going to walk now in the direction of the
 15 footbridge and towards the City Room and what we're
 16 going to see in this very short sequence, only
 17 16 seconds, is that he will walk past those who are
 18 stationed on the footbridge at that time,
 19 Robert Atkinson and Kyle Lawler ?
 20 A. That's correct , yes .
 21 Q. Thank you very much .
 22 Mr Lopez, play that through, please .
 23 (Video played to the inquiry)
 24 Pause it there, thank you very much. In the top
 25 left there, is that Kyle Lawler and Robert Atkinson ?

30

1 A. Yes, it is .
 2 Q. We see the distinctive yellow of their tops. And if you
 3 can identify Salman Abedi and where is he in relation to
 4 the two of them ?
 5 A. He's on the opposite side and so he is the right-most
 6 figure on the bridge .
 7 Q. And he has emerged from that narrow area that leads to
 8 the lift , is that right ?
 9 A. He has, yes .
 10 Q. And we can see the top of the flight of stairs down,
 11 which Mr Lawler and Mr Atkinson are standing at the head
 12 of ?
 13 A. We can .
 14 Q. Thank you .
 15 Next we're going to see an image in the City Room .
 16 If you could take us, please, Mr Lopez, to counter time
 17 41:54. We're going to watch just 36 seconds of this
 18 footage .
 19 (Video played to the inquiry)
 20 Again, just identifying what we can see here, we can
 21 see that there is an open door leading to the footbridge
 22 area and silhouetted in that door, is that Salman Abedi ?
 23 A. It is , yes .
 24 Q. So if you can indicate that for us, please, Mr Lopez if
 25 that's possible? And the time now is 20.51, so this is

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1 the continuation, the progression he's made having
 2 walked past Kyle Lawler and Robert Atkinson as we have
 3 just seen ?
 4 A. That's correct , yes .
 5 Q. Is what we're going to see that he's going to turn to
 6 his right, moving left as we look at it, and ascend the
 7 staircase to the McDonald's side of the mezzanine ?
 8 A. He does .
 9 Q. And there is a figure wearing a yellow top there .
 10 Can you confirm that that is Mohammed Agha, the ShowSec
 11 operative ?
 12 A. Yes, it is Mohammed Agha .
 13 Q. And he is standing underneath that overhang of the area
 14 which leads to the emergency exit and that down flight
 15 of stairs ?
 16 A. That's correct , yes .
 17 Q. This footage, which we'll play through to 42:30, will
 18 also include an edit where 20 minutes have elapsed and
 19 at the conclusion of this sequence we'll see
 20 Salman Abedi descend those stairs after that 20-minute
 21 period ?
 22 A. Yes, that's what we see .
 23 Q. And that will be at approximately 21.10.22. So
 24 Mr Lopez, if you can play this for us, please .
 25 (Video played to the inquiry)

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1 We see Mohammed Agha has turned to his left and
 2 moved in the general direction of that flight of stairs .
 3 A. He does.
 4 Q. There we see the text telling us that 19 minutes or so
 5 have elapsed. Mohammed Agha is now in place. And,
 6 having spent 19 or so minutes on that mezzanine area,
 7 Salman Abedi leaves.
 8 A. He does.
 9 Q. Thank you very much indeed, Mr Lopez.
 10 The fourth and final sequence of footage, please, is
 11 counter time 47:37. It's 23 minutes later, as we shall
 12 see. So it's now just after 9.30. This is the final
 13 time that Salman Abedi enters the City Room; is that
 14 correct?
 15 A. That's correct, yes.
 16 Q. And we are going to see him in this 13-second sequence
 17 walking almost an identical path to the one we've just
 18 seen him walk; is that right?
 19 A. Yes.
 20 Q. He is going to walk up that flight of stairs to the
 21 McDonald's side of the mezzanine, and we have in yellow
 22 there, in approximately the same position as he was
 23 previously, Mohammed Agha?
 24 A. We do.
 25 Q. Thank you very much indeed. Could we play that, please?

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1 (Video played to the inquiry)
 2 Thank you. We can leave it there and we know that
 3 he does not emerge again until 10.30, when he descends
 4 that same flight of stairs .
 5 A. That's correct, yes.
 6 Q. Thank you very much indeed. We just have a very small
 7 number of documents to complete this section, please.
 8 The first is simply to refer to. Do we have
 9 a booklet of stills for 22 May produced by your team
 10 under {INQ020160/1}?
 11 A. Yes.
 12 Q. Has your team also produced -- Mr Lopez, you can display
 13 this, please -- a CCTV sequence of events under
 14 {INQ033892/1}?
 15 A. Yes, we have.
 16 Q. We don't need to look at the detail of it, but it's
 17 available to people to refer to if they wish. It's
 18 a spreadsheet providing times and descriptions, which
 19 can be a helpful navigation tool and I'm sure it was for
 20 your investigation .
 21 A. Indeed it was.
 22 Q. Thank you. To complete section 2 for today,
 23 {INQ033893/1}. We saw these with Mr Greaney. Are these
 24 annotated maps showing the hostile reconnaissance routes
 25 on the various days that we've just been speaking about?

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1 A. Yes, they are.
 2 Q. They track Salman Abedi's movements, and I'm sure
 3 everybody will have them very much in mind from
 4 Mr Greaney's opening.
 5 A. Yes, they do.
 6 Q. We're going to move to the third and final section of
 7 this chapter 6 evidence and your assistance at this
 8 stage, which is entitled "Movements of significant
 9 chapter 7 witnesses". The purpose of this section will
 10 be to establish key moments in the timeline. It will
 11 not be exhaustive and it will not look at all of the
 12 sequence of events that you provide for such key
 13 individuals .
 14 We are going to look at three. Can you confirm
 15 we're firstly going to look at the sequence that
 16 you have compiled for Mohammed Agha?
 17 A. That's correct, yes.
 18 Q. Then we will look at some for Kyle Lawler?
 19 A. Indeed.
 20 Q. And then finally, we will look at some for the BTP
 21 officers who were on duty in the station that night?
 22 A. Yes, that's right .
 23 Q. So we will begin by looking at the stills related to
 24 Mohammed Agha.
 25 As people will be becoming increasingly familiar

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1 with now, I give a warning at this stage that we are
 2 going to be looking at more stills of the arena, but
 3 I stress that we will not be looking at any still after
 4 22.31, and steps have been taken to ensure, I think you
 5 can confirm, that none of the 22 who died will appear in
 6 these stills .
 7 A. Yes, that's right .
 8 Q. Firstly, Mohammed Agha, {INQ032038/2}, please.
 9 If you can zoom us in a little bit, then we can just
 10 introduce this. We've seen them before, but taking it
 11 very briefly, the column on the left indicates the time,
 12 is that correct?
 13 A. That's correct, yes.
 14 Q. We see two times, the one in bold is the corrected
 15 actual time, is that right?
 16 A. Yes, it is .
 17 Q. Thank you. And the time in brackets is simply an
 18 indication of what time the recording system had it and
 19 effectively a calibration process has taken place?
 20 A. That's correct, yes.
 21 Q. And I think you can confirm that in relation to some of
 22 the cameras within the Victoria Concourse, that there is
 23 at the moment some small doubt about the precise time
 24 and that there may be up to a 10-second or so error on
 25 those, which is being investigated?

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1 A. Yes, that's a possibility , yes.
 2 Q. And we're in the process of identifying that, but
 3 anything within the arena concourse and the City Room
 4 will be accurate and you're satisfied with that?
 5 A. To the best of our knowledge and ability , yes.
 6 Q. Thank you.
 7 The second column gives us the camera number. We
 8 don't need to dwell on that, although I day say it was
 9 very useful to your team in compiling this . We then
 10 have a summary and then we have the still in question .
 11 A. We do.
 12 Q. And again, the final two columns are largely for the
 13 benefit of your investigation and the criminal process?
 14 A. That's correct , yes.
 15 Q. So here we have 17.31.19, and can you tell us what
 16 we can see here?
 17 A. That's a view of the City Room doors and that's from
 18 within the concourse area of the arena and it shows
 19 a group of people predominantly in yellow clothing ,
 20 ShowSec security staff , talking to each other.
 21 Q. Thank you. Amongst those is Mohammed Agha?
 22 A. Indeed.
 23 Q. Can you confirm then, and we don't need to track all of
 24 this , that at 17.47.21 Mohammed Agha takes up that
 25 position that we've seen in the City Room between the

1 two sets of stairs up to the mezzanine level and he
 2 remains there from that time at just before 5.50 for
 3 approximately 3 hours, leaving only once for a short
 4 comfort break, and during that 3-hour period speaking to
 5 Kyle Lawler twice?
 6 A. Yes, that's the case, yes.
 7 Q. So we don't need to look at stills of all of that.
 8 We can move forward in our timeline to still 23, which
 9 will be increasingly familiar to us all .
 10 We have seen that in terms of its moving footage, we
 11 don't need to dwell on it , but there we have a still
 12 that shows that, at 20.51.35, Salman Abedi begins to
 13 walk across the floor of the City Room towards that
 14 staircase .
 15 A. That's correct , yes.
 16 Q. And then still 24, please. Do we see what was captured
 17 more clearly in the moving footage that Mohammed Agha
 18 has turned to his left in the direction of Salman Abedi
 19 or his general vicinity ?
 20 A. Yes, he does.
 21 Q. And then we know that Salman Abedi disappears off camera
 22 on to that mezzanine level for 19 or so minutes, during
 23 which time Mohammed Agha remains in situ?
 24 A. That's correct , yes.
 25 Q. Still 25, please, will capture the moment he leaves,

1 time stamped at 21.10.22.
 2 A. That's correct .
 3 Q. We've seen that on the footage. Can you confirm,
 4 please, detective chief inspector, that within about
 5 30 seconds of that image and Salman Abedi leaving the
 6 City Room, Mohammed Agha is replaced for a period of
 7 about 13 minutes by a colleague?
 8 A. He is, yes.
 9 Q. He walks into the arena concourse whilst his colleague
 10 takes up station by those emergency doors?
 11 A. That's correct , yes.
 12 Q. But he then returns after that 13-minute period to the
 13 position he was in, such that when we bring up still 34,
 14 timed at 21.33.08, we can see that he is back in
 15 position . That's {INQ033776/34}, please. Thank you
 16 very much indeed. Again we've seen this on CCTV.
 17 Then at still 35, and we need to be careful here,
 18 the CCTV is the best evidence of this , but is it the
 19 case that Mohammed Agha appears to turn to his left at
 20 this point?
 21 A. Yes, he appears to.
 22 Q. And to his left at that point is Salman Abedi about to
 23 ascend the staircase ?
 24 A. Indeed, yes.
 25 Q. We're going to get two alternative camera views which

1 we've not yet had which will show the mezzanine and,
 2 more particularly , will show that Salman Abedi at that
 3 time is not visible in what can be seen.
 4 {INQ033776/36} timed at 21.43.03. This is a view
 5 across the City Room with Mohammed Agha in situ there
 6 marked in the yellow box. Is that correct ?
 7 A. That's correct , yes.
 8 Q. And to the best ability of you and your colleagues
 9 investigating this , is it the case that Salman Abedi was
 10 not able to be distinguished as apparent on that area of
 11 the mezzanine?
 12 A. No, he's not visible in this shot.
 13 Q. That's timed at 21.43.30. Then moving forward about
 14 5 minutes to {INQ033776/37}, please, Mr Lopez. At
 15 21.48.35, we've got a view of the JD Williams flight of
 16 stairs and this time Mohammed Agha on the right of the
 17 shot?
 18 A. That's correct , yes.
 19 Q. And again, we have a partial view of some of the
 20 mezzanine and again is it right that Salman Abedi was
 21 not visible so far as your officers could tell ?
 22 A. That's correct , yes.
 23 Q. {INQ033776/38}. Do we see Mohammed Agha at
 24 approximately 9.55 speaking to BTP officers
 25 Constable Bullough and Community Support

1 Officer Renshaw?
 2 A. Yes, we do.
 3 Q. I'll give a warning now that we are about to look at
 4 footage after 10 pm of the City Room, but it comes with
 5 the same explanation as I've previously given, namely
 6 that it will not go past 22.31.
 7 {INQ033776/40}, please. At 22.14.49, and the
 8 witness is indicated as Witness A, do we see that he
 9 comes to speak to Mohammed Agha having descended the
 10 JD Williams side of the mezzanine?
 11 A. That's correct, we do.
 12 Q. If we note the time, 22.14.49, and at still 41, please,
 13 the next still, do we see that he's turned to complete
 14 that interaction, and this is timed at 22.15.34?
 15 A. That's correct, yes.
 16 Q. So the interaction, and it'll be for the witnesses to
 17 speak as to what took place, was for between 30 and
 18 45 seconds?
 19 A. That's correct.
 20 Q. Still 42 shows us the same time but a different view.
 21 Does it identify that at that time within the City Room
 22 there were other ShowSec operatives?
 23 A. Indeed it does.
 24 Q. This is precisely the same time as Witness A in that
 25 previous shot, it's just an alternative view towards the

1 doors, and we'll have a good idea about where those
 2 doors are in relation to Mohammed Agha at that time.
 3 A. Correct, yes.
 4 Q. Still 44, please, at 22.23.15. This is approximately 7
 5 to 8 minutes after the interaction with Witness A. Do
 6 we see Mohammed Agha interacting with Kyle Lawler?
 7 A. Yes, we do. Those are shown within the yellow rectangle
 8 on this shot.
 9 Q. And Mr Atkinson, who had spent some of that evening with
 10 Kyle Lawler, is also in shot but not shoulder to
 11 shoulder with those two?
 12 A. No, he's seen to their right, or to the right of this
 13 shot, within an orange rectangle, perhaps walking
 14 towards them.
 15 Q. Do we see that in our next shot, which is
 16 {INQ033776/45}, please, and is 14 seconds later, that
 17 14 seconds on from that interaction between
 18 Mohammed Agha and Kyle Lawler, Kyle Lawler has moved to
 19 the foot of the mezzanine level stairs?
 20 A. He has, yes.
 21 Q. And he's looking in the direction of the staircase or
 22 mezzanine?
 23 A. That's right, and he's surrounded by a white rectangle
 24 in this shot.
 25 Q. Thank you.

1 We are going to come back to Mr Lawler, but our
 2 focus for present purposes is on Mr Agha. Can you
 3 confirm Mr Lawler leaves the City Room for a short time,
 4 or certainly goes to the vicinity of the doors, returns
 5 to speak to Mohammed Agha, they then both speak to some
 6 unknown members of the public for a short time on two
 7 occasions?
 8 A. That's true, yes.
 9 Q. If we move now to still 52, please, we can see that that
 10 interaction has concluded, those members of the public
 11 are marked in that green box.
 12 A. They are, yes.
 13 Q. And they then walk in the direction of the Fifty Pence
 14 staircase?
 15 A. They do.
 16 Q. And Mohammed Agha has returned to his post and
 17 Kyle Lawler leaves the City Room?
 18 A. That's correct, yes.
 19 Q. But in our next still at {INQ033776/54}, about
 20 30 seconds later, does Kyle Lawler come back and speak
 21 to Mohammed Agha again?
 22 A. That's correct, yes. They're shown within the yellow
 23 rectangle on this picture.
 24 Q. Then at {INQ033776/55}, 22.25.19, we see the two of them
 25 separating with Mohammed Agha returning to his post?

1 A. Yes, he does.
 2 Q. And Kyle Lawler going out on to the raised footbridge?
 3 A. That's correct, yes.
 4 Q. And we know, don't we, that Mohammed Agha remains
 5 in that position such that he is there at 22.30.32 when
 6 Salman Abedi descends the staircase on the McDonald's
 7 side?
 8 A. He does, yes.
 9 Q. Thank you.
 10 We are going to now turn to the second of our three
 11 sequence of events in this, the final section for you.
 12 It's {INQ033776/1}. More images of very much the same
 13 nature and quality that we have just seen, so I give
 14 that indication but repeat that no images after 22.31
 15 will be shown. We can deal with these in fairly short
 16 order.
 17 We've moved straight to {INQ033776/14} and we'll
 18 explain why, please, detective chief inspector. We know
 19 that he is in that huddle at 17.31 that we saw when
 20 we were looking at Mohammed Agha; is that right?
 21 A. At 18.31, but yes.
 22 Q. And that he is then paired with Robert Atkinson, with
 23 whom he can be seen walking through the City Room on to
 24 the raised footbridge at about the time that
 25 Mohammed Agha takes up station?

1 A. That's correct , yes.
 2 Q. And that he then takes up positions variously at the
 3 bottom, on the half landing, and the top of that
 4 staircase which leads down to the concourse?
 5 A. Yes, he does.
 6 Q. So we are going to take up at 18.31, where he is walking
 7 back up the staircase . So in that bottom image we can
 8 see at 18.33.55 that Kyle Lawler is standing at the top
 9 of the staircase at the time that Salman Abedi, on his
 10 first visit that night, ascends the staircase and walks
 11 past him?
 12 A. Yes, that's right .
 13 Q. We then move to {INQ033776/16}, please, we're 2 minutes
 14 on in our timeline . Is this the interaction that we'd
 15 seen on the moving images a few moments ago where
 16 Salman Abedi stops to interact with Robert Atkinson?
 17 A. Yes, and this is the conclusion of that interaction .
 18 You can see that Salman Abedi is beginning to descend
 19 that staircase .
 20 Q. Thank you. We can deal in summary form with some of his
 21 movements now. Is Kyle Lawler subsequently seen to move
 22 about the station concourse and raised walkway, and that
 23 he also enters the City Room twice and speaks to
 24 Mohammed Agha?
 25 A. That's right , yes.

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1 Q. So we can move forward to, again, something which
 2 we have seen in moving form, {INQ033776/25}, please. In
 3 the top image we see that's Salman Abedi on the right
 4 in the red circle , walking towards the City Room?
 5 A. Yes, it is .
 6 Q. The time is 20.50, and in the centre of that shot
 7 we have Mr Atkinson and Mr Lawler?
 8 A. We do, yes.
 9 Q. Is this right that about 15 minutes later , Mr Atkinson
 10 and Mr Lawler leave the raised walkway, they walk
 11 through the City Room, walk around the arena area, they
 12 spend about an hour on the arena concourse side of the
 13 City Room, and Kyle Lawler is on the arena side of the
 14 doors between the arena and the City Room at the time of
 15 the interaction between Mr Agha and Witness A?
 16 A. That's correct , yes.
 17 Q. So we'll pick it up after that. We're now going to look
 18 at some images which are of the City Room after
 19 10 o'clock . {INQ033776/34}, please. What do we see
 20 taking place here?
 21 A. You can see Kyle Lawler walking out of the arena into
 22 the City Room where he is speaking to a member of the
 23 ShowSec security team and then walks back through the
 24 doors into the arena concourse.
 25 Q. So at this time, this is after Mohammed Agha has spoken

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1 to Witness A?
 2 A. Yes.
 3 Q. At this time, whilst that interaction is taking place
 4 involving Kyle Lawler, is Mohammed Agha out of shot to
 5 the left ?
 6 A. Yes, he is .
 7 Q. Thank you. {INQ033776/35}, please, 22.22.56.
 8 Mr Lawler re-entered the City Room following his
 9 exit after that conversation?
 10 A. Yes, he comes back in and, as indicated on the screen
 11 there, Robert Atkinson is walking just behind him.
 12 Q. Does he walk across the City Room in the direction of
 13 the raised footbridge?
 14 A. He does.
 15 Q. I think we know now, as we look at the next still , that
 16 he is intercepted by Mohammed Agha?
 17 A. He is .
 18 Q. A few seconds later -- still 36, please -- Mr Agha steps
 19 out and speaks to Mr Lawler?
 20 A. Indeed, yes.
 21 Q. And then we've seen the next still already, but it's
 22 an important one or it may be. {INQ033776/37}. We have
 23 Mr Lawler looking in the direction of the staircase or
 24 mezzanine following that conversation with
 25 Mohammed Agha.

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1 A. That's right . So Mr Lawler's shown in the yellow
 2 rectangle .
 3 Q. Then 22.23.31, which is at {INQ033776/38}. Do we see
 4 that having done that, he walks in the direction of the
 5 raised footbridge?
 6 A. Yes, he does.
 7 SIR JOHN SAUNDERS: Just stopping there for a moment, in the
 8 last one and in this one, does he appear to have a radio
 9 to his ear or is it not possible to see properly?
 10 A. If we could go back one slide , that might be the best
 11 one to indicate . All I could say from this is that he
 12 has his left arm raised and is holding something to his
 13 face. It could be a mobile phone or a radio .
 14 SIR JOHN SAUNDERS: Okay, thank you. It's perhaps worth
 15 looking at at this stage.
 16 MR DE LA POER: Yes, thank you, sir, that's a very helpful
 17 intervention .
 18 So we were on slide 38 which is the next one, which
 19 is timed at 22.23.31. We see that following what we've
 20 just looked at, Kyle Lawler walks in the direction of
 21 the raised footbridge .
 22 If we then move forward 18 seconds to
 23 {INQ033776/39}, he's standing in the vicinity of the
 24 doors on to the footbridge .
 25 A. That's correct , yes.

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1 Q. And then at {INQ033776/40}, having been in that position
 2 for about 10 or so seconds, he then comes back into the
 3 City Room and interacts with Mohammed Agha?
 4 A. That's right, yes, so they both walk into the area
 5 that's in this shot within the yellow rectangle.
 6 Q. They meet halfway effectively?
 7 A. Indeed.
 8 Q. And then very shortly after that interaction, less than
 9 10 seconds, do we see that they are both approached by
 10 unknown members of the public?
 11 A. Yes, that's correct.
 12 Q. So we'll look at that at {INQ033776/41}, please,
 13 Mr Lopez.
 14 Effectively, somebody intervenes in their
 15 conversation to speak to them about something?
 16 A. That would appear to be the case, yes.
 17 Q. Then 5 seconds after that, {INQ033776/42}, do we see
 18 a second member of the public approach them?
 19 A. Yes, correct.
 20 Q. And then at {INQ033776/43}, 22.24.22, two more members
 21 of the public approach them?
 22 A. Indeed they do, yes.
 23 Q. In case people are wondering who those people are, is it
 24 known who those people are?
 25 A. I don't believe we (overspeaking).

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1 Q. -- and their relevance to what was to happen has not
 2 been suggested by any information that you have?
 3 A. No.
 4 Q. So it's just members of the public in the City Room
 5 speaking to ShowSec operatives at that time around
 6 22.24.
 7 Then if we move forward to still 44, please,
 8 22.24.32, we see those, as we've seen before, those two
 9 members of the public walk in the direction of the Fifty
 10 Pence entrance?
 11 A. They do, yes.
 12 Q. And Mr Lawler, marked in the yellow box, then walks
 13 towards the doors to the raised footbridge?
 14 A. He does, yes.
 15 Q. At still 45, do we see him by the City Room doors?
 16 A. We do, again within a yellow rectangle.
 17 Q. Then at 46, he returns to the City Room to speak to
 18 Mr Agha, who again travels a distance across the
 19 City Room to meet him?
 20 A. Yes. Correct, yes.
 21 Q. Then Kyle Lawler leaves the City Room for the final time
 22 before the detonation at 22.25.19?
 23 A. He does, yes.
 24 Q. He's captured there in still 47. Then in our next
 25 still, I think we'll see him walking down the footbridge

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1 with his right arm extended.
 2 A. Yes. That's him again on that top shot with his arm
 3 extended in the yellow rectangle.
 4 Q. So in the top shot, he's walking away from the City Room
 5 with that right arm extended, and then we have a reverse
 6 angle of him, is this right, in the bottom shot?
 7 A. That's correct, yes, a few seconds later.
 8 Q. Then at still 49, the final still to look at for
 9 Mr Lawler, do we see him rejoining Robert Atkinson and
 10 taking up station at the top of the staircase on the
 11 raised footbridge down to the station concourse?
 12 A. That's correct, yes.
 13 SIR JOHN SAUNDERS: Could we just go back one? I'm really
 14 sorry.
 15 MR DE LA POER: Of course, yes.
 16 Would you like us to zoom in on that bottom shot,
 17 sir?
 18 SIR JOHN SAUNDERS: Yes. It points out what is written
 19 there about there being a radio earpiece and
 20 a microphone.
 21 MR DE LA POER: Quite so, sir. So that's left ear, I think.
 22 SIR JOHN SAUNDERS: Thank you.
 23 MR DE LA POER: Thank you, sir.
 24 We've looked at 49, so we don't need to bring that
 25 back up again, but is this right: that Kyle Lawler,

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1 having taken up station with Mr Atkinson at just after
 2 22.26, is in that position at the top of the staircase?
 3 He is approached by three members of the public who had
 4 previously been in the City Room, they speak to
 5 Mr Atkinson and Mr Lawler, and he is in that position on
 6 the footbridge at the time of the explosion?
 7 A. That's correct, yes.
 8 Q. Thank you very much indeed. We will now move to the
 9 third and final sequence of this, the third and final
 10 section. This will deal with the movements of the
 11 British Transport Police staff. Mr Lopez,
 12 {INQ031678/1}.
 13 We'll start with {INQ031678/3}, thank you very much.
 14 Could you crop in for us a little? Thank you.
 15 The officers are not depicted in this still, but
 16 what this still does show us is that at 18.03 a very
 17 substantial body of people have gathered in the
 18 City Room; is that right?
 19 A. That's correct, yes.
 20 Q. And in the main, they appear to be loosely lined up,
 21 entering the arena concourse?
 22 A. Yes, and they've formed queues in line with each of the
 23 doors that lead to that concourse.
 24 SIR JOHN SAUNDERS: If anyone can't answer this, then fair
 25 enough, but what time was the concert due to start?

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1 A. A lot later than this , wasn't it? I believe it was
 2 around 8 o'clock.
 3 SIR JOHN SAUNDERS: We'll check up on that.
 4 MR DE LA POER: We'll find that out for you, sir .
 5 So that is people preparing to ingress into the
 6 arena. If we then move forward 20 minutes in time to
 7 still 4, we will see -- and this is a fish-eye, but
 8 through the diligence of your staff you've managed to
 9 identify them -- we can see that in the view above the
 10 staircase to the raised footbridge , in that red circle ,
 11 PC Bullough and PCSO Renshaw are identified as having
 12 entered the railway station?
 13 A. That's correct , they're shown in a red circle in this
 14 image.
 15 Q. So that's 20 minutes after the shot we've just seen but
 16 within 2 minutes of this shot at {INQ031678/7} they have
 17 both made their way to the City Room; is that correct ?
 18 A. That's correct , yes.
 19 Q. So they are in the City Room at 18.25.56?
 20 A. That's correct .
 21 Q. About 4 minutes after PC Bullough and PCSO Renshaw have
 22 arrived in the City Room, do we see PCSO Brown and
 23 PCSO Morrey entered the Victoria Railway Station?
 24 A. Yes, we do.
 25 Q. That's {INQ031678/8}, please, Mr Lopez.

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1 Just help orientate us with this shot. Is this
 2 a camera on the raised footbridge?
 3 A. It is, yes.
 4 Q. Effectively where that elbow or that turn occurs?
 5 A. Yes.
 6 Q. And is that, again through the diligence of your staff ,
 7 a shot right in that far distance of them entering the
 8 station concourse?
 9 A. Yes, it is .
 10 Q. So it's not indicating that they're on the footbridge ,
 11 in fact they are just in the very far distance of the
 12 shot?
 13 A. They're in the very far distance of that extreme
 14 concourse area .
 15 Q. Thank you.
 16 Is this right , that they initially remain on the
 17 station concourse, in other words they don't ascend the
 18 staircase on to the raised footbridge?
 19 A. Yes, they do.
 20 Q. So we will move forward to 15, which is 18.36. This
 21 shows us PC Bullough and PCSO Renshaw. What do they do
 22 at this point?
 23 A. At this point they walk up the stairs up to the
 24 McDonald's side of the mezzanine level in the City Room.
 25 Q. So that's 18.36.06. And then next still , please ,

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1 {INQ031678/16}, 2 minutes on, so 2 minutes later do they
 2 then come down again?
 3 A. That's correct . They come down the same stairs and then
 4 remain in the City Room in the same position they were
 5 previously .
 6 Q. Ten minutes on from that -- still 22, please -- do they
 7 go back up the stairs to the McDonald as side of the
 8 mezzanine?
 9 A. Yes, repeating their previous movements they use the
 10 same stairs to go back up to the mezzanine.
 11 Q. Then 17 seconds after that, our next still , and
 12 could you crop into this , please , for us, Mr Lopez,
 13 {INQ031678/23}. If you can crop right into that image
 14 as far as you can go. I think that will be adequate for
 15 our purposes.
 16 Do we see there that they are leaning on the
 17 railings or certainly pressed close to the railings of
 18 that McDonald's side of the mezzanine, looking out over
 19 the people who are in the City Room?
 20 A. Yes. They appear to be in a position whereby they can
 21 see most of the City Room from that area, yes.
 22 Q. Thank you very much indeed.
 23 Still 25 is some 14 minutes later . Can you confirm
 24 that in that intervening 14 minutes or so, PC Bullough
 25 and PCSO Renshaw have remained in position on the

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1 mezzanine?
 2 A. Yes, indeed they do.
 3 Q. But at this point what we're turning to consider is
 4 PCSO Morrey and PCSO Brown entering the City Room via
 5 the Fifty Pence staircase ?
 6 A. They do and they can be seen just at the top of the
 7 stairs on this shot within the yellow rectangle .
 8 Q. Because this isn't an image that we have seen before
 9 let's just get our bearings. There's a staircase which
 10 they have just walked up which is towards the left of
 11 the shot behind them?
 12 A. That's correct , yes.
 13 Q. That's the Fifty Pence staircase . We can see they're
 14 in that narrow area where the City Room becomes almost
 15 like a corridor ?
 16 A. It does.
 17 Q. And immediately in front of them, so right in the centre
 18 top of the shot, is that the mezzanine that we can see
 19 with the bottom of people's feet (overspeaking) --
 20 A. Yes -- sorry , I'm interrupting you. Yes, that's the
 21 JD Williams side of the mezzanine.
 22 Q. Thank you. If we look at what happens in the next
 23 still , which is 15 seconds later , at {INQ031678/26}.
 24 We can see that they have come out, that is to say
 25 PCSO Morrey and PCSO Brown have come out, into the

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1 City Room, and do they then come up that JD Williams
 2 side?
 3 A. Yes, they do. So those two officers go up those first
 4 set of stairs as indicated by the yellow arrow.
 5 Q. And PC Bullough and PCSO Renshaw?
 6 A. They're in the same shot and they remain, as you said
 7 earlier, in the position they were in before, just to
 8 the right of the stairs that lead to the McDonald's side
 9 of the mezzanine indicated by the red rectangle in this
 10 shot.
 11 Q. Thank you. {INQ031678/27}, please. I hope here we will
 12 be able to have a better sense of that mezzanine area.
 13 PCSOs Morrey and Brown have walked up the staircase
 14 which is on the left-hand side of the shot; is that
 15 right?
 16 A. That's correct, yes.
 17 Q. They have then walked around that railed area which
 18 overhangs the emergency exit?
 19 A. Yes, they've walked around the back of that, yes.
 20 Q. And that enables them to connect up with their two
 21 British Transport Police colleagues who were in that
 22 position by the railings?
 23 A. That's correct, yes.
 24 Q. Do they remain in that position, the four of them, for
 25 about 9 minutes?

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1 A. Yes, they do.
 2 Q. And at the conclusion of that 9-minute period, do
 3 PCSO Brown and PCSO Morrey leave the City Room?
 4 A. Yes, then they're deployed down towards the railway
 5 station concourse.
 6 Q. Leaving PC Bullough and PCSO Renshaw still in that same
 7 position on the McDonald's side of the mezzanine?
 8 A. That's correct.
 9 Q. Do they remain there until our next still, which is at
 10 {INQ031678/32}, timed at 19.20?
 11 A. Yes.
 12 Q. So if we summarise what we've just seen in relation to
 13 PC Bullough and PCSO Renshaw, were they in that position
 14 or around it just for just short of an hour in the
 15 City Room?
 16 A. Yes, they were.
 17 Q. And did they spend just over half of that nearly 1-hour
 18 period in that area of the mezzanine?
 19 A. Yes, they did.
 20 Q. Perhaps I can just interrupt this, sir, for a moment
 21 just to give you an answer to your question, as I have
 22 just been given it.
 23 The concert started at 19.35 and was scheduled to
 24 finish at 22.30. The doors opened at 6 o'clock.
 25 SIR JOHN SAUNDERS: Thank you.

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1 MR DE LA POER: And I think the main act --
 2 SIR JOHN SAUNDERS: Very clever of you to look it up while
 3 still adducing the evidence.
 4 MR DE LA POER: Quite so. Well, you'll have seen that I had
 5 a little help.
 6 Detective chief inspector, can we return then to our
 7 narrative of the movements of the British Transport
 8 Police officers. We've just seen that PC Bullough and
 9 PCSO Renshaw have come down the stairs from the
 10 mezzanine and are about to leave via the raised
 11 footbridge. Do they do so and join PCSOs Morrey and
 12 Brown at the war memorial entrance?
 13 A. Yes, that's what they do.
 14 Q. We'll then move forward to still 36, 19.27.30. This was
 15 referred to by Mr Greaney in his opening, but we'll look
 16 at it in a little more detail now and the basis for what
 17 has been said.
 18 Here we are looking at Station Approach.
 19 A. Yes, we are, but Station Approach with Hunts Bank on the
 20 other side.
 21 Q. Thank you. Captured in the red box, is that PC Bullough
 22 and PCSO Renshaw?
 23 A. Yes, very small but they're in that red box.
 24 Q. Do they get into a police vehicle and drive away from
 25 the area of the railway station?

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1 A. Yes, they do.
 2 Q. That's timed at 19.27.30. In their absence, we can
 3 summarise between ourselves, can you confirm that the
 4 closed circuit television captured PCSOs Morrey and
 5 Brown patrolling through the station complex and shortly
 6 before 20.00, PCSO Brown escorts a member of the public
 7 into the City Room in the vicinity of the arena entrance
 8 doors, he then walks around the City Room with that
 9 member of the public, before apparently showing them the
 10 Fifty Pence staircase, during which time PCSO Morrey
 11 patrols the station concourse before finally taking up
 12 position at the war memorial entrance?
 13 A. Yes, that's correct.
 14 Q. That covers what is approximately a 40-minute period and
 15 brings us to still 59, please, Mr Lopez.
 16 20.09.14, if you can just crop in on that a little
 17 for us. We've described PCSO Morrey finally taking up
 18 station by the war memorial entrance towards the
 19 conclusion of that 40-minute period. Do we there see
 20 PCSO Renshaw and PC Bullough returning? They don't have
 21 any headgear on and they are both carrying white bags or
 22 certainly white objects?
 23 A. Yes, that's correct and is shown within the red
 24 rectangle.
 25 Q. Thank you very much indeed.

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1 Do they both, that is to say PC Bullough and
 2 PCSO Renshaw, walk through the station concourse and are
 3 then neither of them identified again in this sequence
 4 of events for the next 45 minutes?
 5 A. That's correct, yes.
 6 Q. That deals with them.
 7 Let's return to PCSO Brown who we had left in the
 8 City Room in our description. Still 62, please, at
 9 20.10. So that's very shortly after the still we've
 10 just looked at. Do we see PCSO Brown, who has been in
 11 the City Room during this period, speaking to
 12 Mohammed Agha?
 13 A. Yes, we do and they're shown within the yellow rectangle
 14 on this shot.
 15 Q. Again, we can deal with this in summary form. Can you
 16 confirm that PCSO Brown then leaves the City Room after
 17 this conversation, rejoins PCSO Morrey at the war
 18 memorial entrance within 2 minutes of it, and then, at
 19 20.28.14, they set off on patrol, which takes them out
 20 of the station via the war memorial entrance, around to
 21 Trinity Way, re-entering via the Trinity Way link
 22 tunnel, and back up into the City Room via the Fifty
 23 Pence staircase?
 24 A. Yes, that summarises their movements, yes.
 25 Q. We pick it up again at still 74, please, which is about

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1 10 minutes or so after they set off on that patrol.
 2 There they are, PCSO Brown and Morrey entering the
 3 City Room?
 4 A. That's them, yes, in the same position as before. It's
 5 the same camera angle as we've seen previously.
 6 Q. Thank you.
 7 Again, dealing with it by way of summary, do they
 8 then walk across the City Room, leave via the raised
 9 footbridge doors, and return to the war memorial
 10 entrance, getting there about 15 minutes after they'd
 11 set off?
 12 A. That's correct, yes.
 13 Q. If we just pause for a moment, we're going to deal with
 14 something that my learned friend Mr Gibbs QC referred to
 15 yesterday -- or indeed I think it may in fact have been
 16 the day before.
 17 Salman Abedi during this period, he was in the
 18 station complex wearing his very substantial rucksack
 19 and, as we saw in footage when Mr Greaney opened it, he
 20 positioned himself for a period of time in the station
 21 concourse toilets, didn't he?
 22 A. Yes, he did.
 23 Q. He did so at 20.36.27, and in fact he's timed as leaving
 24 the toilets at 20.48.30.
 25 A. Yes, that's correct.

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1 Q. Mr Gibbs referred to this. Let us look, please, at
 2 still 83, which is 59 seconds after this same camera
 3 recorded Salman Abedi leaving. Do we see that
 4 PCSOs Brown and Morrey enter the toilets on that station
 5 concourse?
 6 A. Yes, we do.
 7 Q. So, as it has been described by Mr Gibbs, is it fair to
 8 say that the two missed each other by substantially less
 9 than a minute?
 10 A. That seems to be the case, yes.
 11 Q. Do PCSOs Brown and Morrey remain in the toilet area for
 12 a couple of minutes before returning to their position
 13 on the war memorial entrance?
 14 A. Yes, they do.
 15 Q. And then we get the next sighting, this time just of
 16 PC Bullough on her own, at 20.54.19, when she can be
 17 seen on Hunts Bank walking in the direction of the war
 18 memorial entrance. She enters the station via that
 19 entrance and walks past her colleagues PCSOs Morrey and
 20 Brown?
 21 A. That's correct, yes.
 22 Q. So this is approximately 45 minutes after she's last
 23 captured in this document and is she then not captured
 24 again in this document for another 35 minutes?
 25 A. Yes, that's right.

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1 Q. As she walks past her colleagues, do they effectively
 2 fall in a short distance behind her and follow her
 3 direction of travel?
 4 A. Yes, that's right.
 5 Q. So that's at 20.54, just before 9 o'clock?
 6 A. Yes.
 7 Q. And again, dealing with it by way of summary, are
 8 PCSOs Morrey and Brown not captured within the document
 9 prepared by your team until just over half an hour --
 10 until 22.27.23?
 11 A. Yes, that's right.
 12 Q. So that's a period of approximately an hour and a half,
 13 in fact, isn't it?
 14 A. Yes, it is.
 15 Q. In relation to PCSOs Morrey and Brown, is it during the
 16 periods 9.15 to 9.35 that Salman Abedi walks from the
 17 Metro stop for the final time to the City Room?
 18 A. Yes, it is.
 19 Q. Let's pick this up about 5 minutes or so after that
 20 period. Still 100, please, 21.37.50.
 21 Immediately prior to this, are PC Bullough and
 22 PCSO Renshaw captured returning to their vehicle, which
 23 was parked on Station Approach and retrieving their
 24 headgear?
 25 A. That's correct, yes.

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1 Q. So we can see here that at 21.37 they've positioned
2 themselves at the war memorial entrance?
3 A. They have, yes, shown here in the red rectangle.
4 Q. Thank you.
5 Do they briefly leave the station in the direction
6 of Hunts Bank before walking back into the concourse and
7 up to the City Room?
8 A. Yes, they do.
9 Q. Let's look at that, please, at still 107, 21.47.48.
10 That's the two of them entering the City Room at just
11 after 9.45?
12 A. Yes, that's correct.
13 Q. Again, dealing with it by way of summary, do they then
14 speak to ShowSec staff, including Mohammed Agha, and to
15 a member of the public before leaving at 21.59?
16 A. Yes, that's what they do.
17 Q. And having left the City Room at just before 10.00, do
18 they take up position by the war memorial entrance,
19 following which PC Bullough leaves the station in the
20 direction of Hunts Bank with PCSO Renshaw remaining on
21 the station concourse?
22 A. Yes, that's right.
23 Q. But by 22.13.07, are they both back together in the
24 vicinity of the war memorial entrance?
25 A. Yes, they are.

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1 Q. And is that where they remain, or close by, until the
2 explosion?
3 A. They do, yes.
4 Q. And are they rejoined in that position at 22.29.08 by
5 PCSOs Morrey and Brown?
6 A. Yes, they are.
7 Q. So we have one more still to look at. It is timed after
8 22.31, but it shows the station concourse only and does
9 not contain more than images of the police officers in
10 question. Still 142, please.
11 It's fair to say, isn't it, that this is one of the
12 cameras in relation to which there is a very minor
13 degree of doubt about the precise timing?
14 A. Yes, I believe so.
15 Q. So although it's timed at 22.31.09, that's to be
16 confirmed, and so this may be immediately before or
17 after the explosion?
18 A. I don't believe it's after, but there's room for
19 manoeuvre, I think, yes.
20 Q. In any event, it shows a time highly proximate to the
21 detonation and it shows those four officers, namely
22 PCSOs Morrey, Brown and Renshaw together with
23 PC Bullough in that position by the war memorial
24 entrance?
25 A. That's correct, yes.

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1 SIR JOHN SAUNDERS: And we have already seen other stills
2 which show them running towards the explosion after it
3 happens.
4 MR DE LA POER: Quite so, sir. That immediately follows
5 this still, in fact, and will be something that we will
6 consider in considerable detail when we come to
7 chapter 9 and following.
8 Sir, I have no further questions for the detective
9 chief inspector. I'll look behind me, but we had not
10 received any prior notification in accordance with the
11 Rule 10 procedure that there were any questions arising
12 from chapter 6.
13 I will pause for a moment and just check that we're
14 not receiving ... I'm told that there are none.
15 MR COOPER: Sir, we have no questions at this stage.
16 SIR JOHN SAUNDERS: Thank you.
17 MR DE LA POER: I make absolutely clear two things. Firstly
18 that Detective Chief Inspector Pickering will return to
19 assist us on a number of future occasions, and secondly,
20 that the material that we've looked at in overview today
21 will be looked at with the witnesses when they come to
22 be called.
23 SIR JOHN SAUNDERS: Okay. Perhaps I can just ask two
24 things.
25 Mr Pickering, having spent quite a considerable time

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1 of my professional life looking at CCTV footage on which
2 you can see absolutely nothing, this does seem to be
3 remarkably good quality CCTV or is that an enhancement
4 process or is it very good?
5 A. In my limited experience of CCTV, sir, I would agree
6 with you. It is very good quality in that the images
7 aren't as pixelated as perhaps other footage we are both
8 used to is.
9 SIR JOHN SAUNDERS: Have you actually seen it on the
10 monitors which they actually had in the control room as
11 well?
12 A. I haven't seen that personally, sir, but I believe it's
13 as good as it can be in the circumstances. We've done
14 the best we can.
15 SIR JOHN SAUNDERS: The second thing is: it's taken us very
16 little time to go through that but it will have taken
17 your officers hours and hours and hours of going through
18 CCTV in order to get what we have seen.
19 A. I would put it at months and years, sir.
20 SIR JOHN SAUNDERS: We are all very grateful. It must be
21 very painstaking indeed, so thank you to all of them for
22 doing that.
23 A. I'll pass that on, sir.
24 MR DE LA POER: I see that it's 11 o'clock. I have been
25 told by Mr Greaney that 11.30 would be a very convenient

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1 time to start the directions hearing that we're to have
 2 this morning.
 3 SIR JOHN SAUNDERS: Thank you.
 4 11.30 then, thank you very much.
 5 (11.00 am)
 6 (A short break)
 7 (11.30 am)
 8 (The inquiry went into a closed session)
 9 (2.47 pm)
 10 (The inquiry adjourned until Monday, 5 October 2020
 11 at a time to be determined)
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