

OPUS2

Manchester Arena Inquiry

Day 162

October 14, 2021

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1 Thursday, 14 October 2021
 2 (9.30 am)
 3 (The inquiry sat in a restricted session)
 4 (12.38 pm)
 5 (A short break)
 6 (12.39 pm)
 7 OPEN SESSION
 8 Submissions re Self–incrimination
 9 Submissions by Mr Greaney
 10 MR GREANEY: We are now in open session.
 11 On 22 July of this year, Mr Suter, the solicitor to
 12 the inquiry, served on Abdalraouf Abdallah a notice
 13 pursuant to Section 21 of the Inquiries Act (2005),
 14 requiring him to attend the oral evidence hearing of
 15 this inquiry next Wednesday, 20 October.
 16 That is because Mr Abdallah has evidence of a high
 17 degree of potential relevance to give in relation to the
 18 radicalisation of Salman Abedi and the planning and
 19 preparation for the arena attack.
 20 As is publicly known, he is serving a sentence for
 21 terrorism offences and was in contact with Salman Abedi,
 22 both in person and electronically, from 2014. Moreover,
 23 he is regarded by Dr Matthew Wilkinson, the inquiry’s
 24 instructed expert on radicalisation, as responsible for,
 25 as he puts it, grooming Salman Abedi into the violent

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1 Islamist extremist world view.
 2 By a letter dated 18 August of this year, the legal
 3 representatives for Abdalraouf Abdallah applied for the
 4 notice to which I have referred to be revoked, pursuant
 5 to Sections 21(4) and 22 of the Act on the basis that
 6 it would be unreasonable, so they argued, in all the
 7 circumstances to require or compel Mr Abdallah to comply
 8 with the notice.
 9 In summary, it was argued on his behalf that to
 10 compel his attendance would (a) infringe Mr Abdallah’s
 11 Convention rights under Articles 2, 3 and 8 and, (b),
 12 violate his privilege against self–incrimination.
 13 Sir, pursuant to a restriction order you have made,
 14 we have just concluded a restricted session in order to
 15 consider the objection of Mr Abdallah based upon his
 16 Convention rights.
 17 Before we turn to deal with his argument (b), the
 18 argument based upon privilege against
 19 self–incrimination, may we indicate, please, the core
 20 elements of what has happened and what can therefore be
 21 reported in relation to the restricted hearing early
 22 today, which was attended by Mr Gardham on behalf of the
 23 media.
 24 What can be reported in relation to the restricted
 25 hearing is as follows:

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1 (1). Abdalraouf Abdallah has post–traumatic stress
 2 disorder and has self–harmed on multiple occasions in
 3 prison, including recently.
 4 (2). He has advanced various motivations for having
 5 done so.
 6 (3). His lawyers have argued that the Section 21
 7 notice should be revoked, in part because, based upon
 8 that history of self–harm, his Convention rights in
 9 Articles 2, 3 and 8 would be infringed.
 10 (4). Counsel to the inquiry and the lawyers
 11 representing the bereaved families have opposed that
 12 argument presented on behalf of Abdalraouf Abdallah.
 13 (5). The arguments that have been presented on all
 14 sides can be reported subject to one matter of which the
 15 media is aware.
 16 (6). Evidence was given by Dr John Kent and
 17 Dr Richard Latham, consultant forensic psychiatrists.
 18 Their evidence about the mental health of
 19 Abdalraouf Abdallah can be reported and we underline the
 20 word "mental" in the phrase mental health.
 21 (7). Any matters which are in the public domain
 22 may, of course, also be reported.
 23 Sir, we hope that that is a fair and reasonable
 24 summary of what has happened so far today. We’ll turn
 25 next to deal briefly with objection (b), that is to say

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1 the objection based upon the privilege against
 2 self–incrimination.
 3 As we, sir, explained to you earlier, submissions
 4 have been made as follows on that issue, and indeed on
 5 the issues more generally, by the inquiry legal team by
 6 written submissions dated 8 October, by the bereaved
 7 families as follows, the Slater & Gordon families by
 8 submissions dated 10 October, by the BJC, Hudgells and
 9 Hogan Lovells families dated 12 October, and by the
 10 Addleshaw Goddard families dated 11 October. To
 11 complete the picture, written submissions were made most
 12 recently on behalf of Abdalraouf Abdallah, dated
 13 13 October.
 14 Sir, our submissions on the objection based upon the
 15 privilege against self–incrimination are set out at
 16 paragraphs 42 to 48 of our written submissions. The
 17 point that we would make is a very simple and
 18 straightforward one and, we suggest, irresistible.
 19 It is that the privilege against self–incrimination may
 20 provide Abdalraouf Abdallah with a basis for objecting
 21 to specific questions once he is here or joining us to
 22 give evidence by a video link, but there is no authority
 23 for the proposition that it provides a free–standing
 24 basis for him refusing to come in order to raise that
 25 privilege.

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1 So sir, the point is, we would submit, as simple as
 2 that: there is nothing in this objection and unless
 3 we can help any further at this stage by way of
 4 developing that, we will ask Mr Weatherby whether he has
 5 anything to add.
 6 SIR JOHN SAUNDERS: Mr Weatherby.
 7 Submissions by MR WEATHERBY
 8 MR WEATHERBY: Thank you. Very much in summary, we've set
 9 out our submissions very much in accordance with CTI's
 10 submissions on this point in the written submissions,
 11 but just so that everyone can understand where the
 12 families are coming from, I just want to put five brief
 13 bullet points.
 14 The first is that there is an imperative for the
 15 inquiry to fully investigate in accordance with the
 16 terms of reference and therefore if the inquiry
 17 determines that a witness has relevant evidence to give,
 18 everything should be done to obtain that evidence,
 19 subject to very narrow exceptions.
 20 Secondly, the same point but from the families'
 21 perspective. The families' Article 2 rights to have
 22 relevant questions put and answered is a further
 23 imperative, subject only to countervailing rights that
 24 may attach to the witness.
 25 The third point is that the privilege may be one of

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1 those countervailing rights that only applies in
 2 relatively narrowly defined circumstances.
 3 The fourth point is that the privilege does not
 4 prevent the questions being put.
 5 The fifth point is that the privilege, even where it
 6 applies on a particular question, does not prevent the
 7 question being answered, and I think probably in
 8 everybody's court experience very, very often witnesses
 9 who could assert the privilege, for good reason choose
 10 not to and answer the question.
 11 Sir, I hope that is sufficiently brief, but
 12 comprehensive. Those are our submissions.
 13 SIR JOHN SAUNDERS: Thank you.
 14 MR GREANEY: Thank you, Mr Weatherby.
 15 Next, Mr Atkinson, please.
 16 MR ATKINSON: Sir, nothing to add to what Mr Weatherby has
 17 just said. Thank you very much.
 18 SIR JOHN SAUNDERS: Thank you.
 19 MR GREANEY: Mr Di Francesco, do you have anything that you
 20 wish to say on this issue?
 21 Submissions by MR DI FRANCESCO
 22 MR DI FRANCESCO: Very brief submissions, thank you,
 23 Mr Greaney.
 24 Sir, as you can see in our written submissions, we
 25 completely agree with what is being said by counsel to

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1 the inquiry and it is self-evident that the privilege
 2 against self-incrimination applies to any witness in
 3 these proceedings and we say nothing to undermine the
 4 position in respect of Mr Abdallah and his rights.
 5 In respect of what's been submitted by his legal
 6 representatives, I have two short points to address
 7 what's been said. The first is that -- and it relates
 8 to paragraph 48 of Mr Menon's document, his first set of
 9 submissions in July.
 10 SIR JOHN SAUNDERS: Okay, I've got that, thank you.
 11 MR DI FRANCESCO: What I respectfully submit is that
 12 Mr Abdallah's subjective belief, whether that belief is
 13 genuinely held or not, that the police and the security
 14 services, and I quote, "will find some way or another to
 15 treat his answers as incriminating" is not a basis for
 16 asserting privilege.
 17 What matters is the objective reality of the
 18 consequences of his answers, which he says, via
 19 Mr Menon, will certainly not be incriminating. I invite
 20 that consideration to be borne in mind in due course,
 21 should Mr Abdallah be required to give evidence to the
 22 inquiry, and in the moment, should he exercise any
 23 privilege before you, sir, the degree of latitude he's
 24 given.
 25 SIR JOHN SAUNDERS: Could you just give me the paragraph

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1 number again? I'm aware of this being in Mr Menon's
 2 submissions, I can't find it in the first submissions at
 3 the moment.
 4 MR DI FRANCESCO: Just bear with me, sir.
 5 SIR JOHN SAUNDERS: I thought you gave me a paragraph 48 and
 6 I can't actually find a paragraph 48.
 7 MR DI FRANCESCO: That's right, paragraph 48, which is at
 8 page 17 of the bundle. It's page 11 of Mr Menon's
 9 submissions dated 24 July.
 10 MR GREANEY: Internal page 11 of the submissions, page 17 of
 11 your bundle.
 12 SIR JOHN SAUNDERS: Thank you.
 13 MR DI FRANCESCO: I hope that's what I said.
 14 SIR JOHN SAUNDERS: You're quite right, I'm really sorry.
 15 I can now find it. I did remember it, but I'm afraid
 16 I couldn't find it when you mentioned it. Thank you
 17 very much. I have indeed made a note saying it needs to
 18 be objective.
 19 MR DI FRANCESCO: The second submission relates to
 20 paragraph 49 of that same document, sub-paragraph (d).
 21 It's a very simple point, which is questions posed
 22 by counsel to the inquiry, or any other CP, those
 23 questions cannot be incriminating, they don't risk the
 24 risk of self-incrimination or make it more real. What
 25 matters, and the only thing that can possibly matter in

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1 the circumstances, is the substance of Mr Abdallah's
 2 answers, which, it is said by his legal representative,
 3 will certainly not be incriminating. I only felt it
 4 necessary to make that point in light of the submissions
 5 contained within Mr Menon's document.
 6 SIR JOHN SAUNDERS: Right. As you've raised this point, you
 7 can help me with this matter. Mr Menon will elaborate
 8 on this in a moment, but at the moment what he said
 9 is that in the light of the questions that he's been
 10 asked repeatedly by counter-terrorism police and by the
 11 inquiry, he has been advised by his lawyers not to
 12 answer the questions.
 13 If we were dealing with a criminal trial or being
 14 interviewed by the police, then the simple statement,
 15 "I'm not answering any questions on the advice of my
 16 lawyers", would be sufficient. As I understand this
 17 situation, we are in a rather different situation
 18 in that the mere fact that someone says, "I'm not
 19 prepared to answer the questions, I exercise my right
 20 not to incriminate myself", is not enough and I am
 21 obliged to investigate whether in fact answering the
 22 questions would be incriminatory.
 23 So would it be sufficient for Mr Abdallah, if he
 24 were to be here and to be answering questions, to simply
 25 say, "I refuse to answer questions on the basis they may

1 incriminate me on the advice of my lawyers"? And
 2 of course we can't investigate, except insofar as
 3 Mr Menon has volunteered it, what advice is given by the
 4 lawyers.
 5 MR DI FRANCESCO: The answer to your question, sir, is no,
 6 it wouldn't be sufficient. It's a matter for Mr Menon,
 7 the advice he gives his client, but given the relevant
 8 tests in this particular instance, his advice should be
 9 premised on the answers that his client gives rather
 10 than the questions that are posed by counsel to the
 11 inquiry or other CPs.
 12 SIR JOHN SAUNDERS: Okay, thank you very much.
 13 MR DI FRANCESCO: I'll say no more. I assume the point is
 14 made.
 15 Those are my submissions.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MR GREANEY: Thank you, Mr Di Francesco.
 18 Finally, Mr Menon, please.
 19 Submissions by MR MENON
 20 MR MENON: Thank you.
 21 Clearly, this issue, sir, will only arise if you
 22 have ruled that compelling Mr Abdallah's attendance
 23 at the inquiry would not be incompatible with his
 24 Convention rights. I will be very brief because we
 25 accept the proposition that the privilege against

1 self-incrimination applies to a witness's answers and
 2 not to the questions asked. That is trite law and we
 3 agree.
 4 But we repeat what we've been saying consistently:
 5 Mr Abdallah will not be answering questions on legal
 6 advice. So the spectacle, which will inevitably arise
 7 if he's compelled to attend either in person or by CVP,
 8 which will involve him having to sit through hours of
 9 questions, will, (1), serve no useful purpose, (2), will
 10 merely dehumanise and humiliate him, and (3) will
 11 frustrate everyone else present who's wanting him to
 12 answer the questions. So, we ask rhetorically, what is
 13 gained by going through that process?
 14 So far as the privilege itself is concerned, I raise
 15 this point again because it arose earlier during the
 16 evidence of Dr Kent during the exchange that you and
 17 I had, sir, namely that it would be erroneous to
 18 interpret the privilege against self-incrimination as
 19 exclusively — what I've called a shield behind which
 20 a guilty person can hide.
 21 This is a fundamental right in our democratic
 22 society to protect us all, guilty and innocent. It's
 23 a basic liberty of the subject and effectively amounts
 24 to this: if there is a real and appreciable risk that an
 25 answer that Mr Abdallah were to give may be used against

1 him in criminal proceedings, he's entitled to refuse to
 2 answer that question and he should be given great
 3 latitude, as the authorities make clear, because the
 4 privilege extends not only to the questions that might
 5 directly or indirectly incriminate him but also to
 6 questions that might lead to a line of enquiry which
 7 might form a significant step in the chain of evidence
 8 required for a prosecution.
 9 That's a complicated and nuanced question upon which
 10 he is going to require legal advice, quite literally on
 11 a question-by-question basis. As things presently
 12 stand, if you dismiss the human rights arguments, the
 13 plan is that Mr Abdallah will be compelled to attend the
 14 inquiry, either in person or by CVP, in six days' time.
 15 To insist on that timetable, in all the circumstances,
 16 would be grossly unfair.
 17 We have had virtually no disclosure at all of the
 18 material in the possession of the inquiry that has led
 19 Mr Greaney to make the assertion that Mr Abdallah is
 20 most likely to give highly relevant evidence to the
 21 terms of reference that you are considering. We have
 22 nothing. And the notion that we are — with the
 23 exception, I should say, of the excerpts of
 24 Matthew Wilkinson's statement that we received for the
 25 very first time yesterday.

1 How are we supposed to — assuming that we get all
 2 this material today, if you rule effectively that he's
 3 compelled to give evidence, how on earth are we supposed
 4 to be ready by 20 October?
 5 First, we need to digest all the material ourselves.
 6 Secondly, we need to take instructions on the material
 7 from Mr Abdallah, and then consider those instructions
 8 carefully and then advise him.
 9 If it's being suggested, for example, that the
 10 blanket approach that we're currently taking is wrong
 11 and that we should be looking at this on
 12 a question-by-question or on a topic-by-topic basis, how
 13 are we supposed to be able to do that by the 20th?
 14 On top of the fact that we can't be ready, I'm
 15 in the middle of a criminal trial, I'm going to be
 16 calling my client on the 20th. I can't be there.
 17 Ms Maragh is out of the jurisdiction and my instructing
 18 solicitor will be in the middle of a Parole Board
 19 hearing in another case next week, so none of the three
 20 of us are available to assist in any event next week on
 21 this.
 22 SIR JOHN SAUNDERS: I'm really sorry, if I make the decision
 23 to require him to come, if it's then fair to do so or
 24 you need further time in which to do that, is, I think,
 25 a separate issue, if you don't mind. I will (inaudible:

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1 distorted) that and I will allow that to be asked but
 2 can we just go back a step because I am interested in
 3 this.
 4 Really, it's the question I asked Mr Di Francesco:
 5 bearing in mind that it is part of the process which
 6 I have to follow, which is to examine the basis on which
 7 the privilege of self-incrimination is being put
 8 forward, would it be sufficient for Mr Abdallah to say,
 9 "Well, my lawyers have advised me not to"?
 10 MR MENON: Once he's in the witness box and being
 11 questioned, he can either, in response to every
 12 question, say, "I am exercising my right to silence",
 13 or, "I'm invoking my right to self-incrimination on
 14 legal advice", or he can just sit there and say
 15 absolutely nothing.
 16 There's nothing, with all due respect, sir, you can
 17 do other than to consider a prosecution pursuant to
 18 section 35(1) of the Inquiries Act 2005 for failing,
 19 without reasonable excuse, to give evidence. That's the
 20 remedy you have.
 21 SIR JOHN SAUNDERS: I do understand that. I just want to
 22 know along the line, it seems to me that on the face of
 23 it, just to say, "My lawyers (inaudible: distorted)",
 24 without saying how it would incriminate him,
 25 particularly in view of what you have said, which I come

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1 back to and which has been repeated by counsel for the
 2 families: it's already been said he actually had nothing
 3 to do with it, he has nothing — he can't incriminate
 4 himself in it because he was nothing to do with it and
 5 is entirely innocent.
 6 MR MENON: Sir, I'll explain how I'm approaching this: my
 7 client is a suspect in respect of a crime of mass
 8 murder. If I was a solicitor and I was representing him
 9 in the police station, where he is being asked questions
 10 as a suspect, one would never in those circumstances, in
 11 my respectful submission, take a piecemeal approach to
 12 this. It would be insane to effectively say to a client
 13 in a police station who's being investigated in respect
 14 of mass murder, "Let's consider each question one by one
 15 and decide what you're going to do about it".
 16 (Overspeaking) and you exercise it.
 17 SIR JOHN SAUNDERS: Forgive me, it occurred to me that your
 18 solicitor and you are actually approaching this as if
 19 he's in the police station answering questions. There,
 20 of course, he has the right to silence subject to the
 21 caution.
 22 This is a different situation. This is the right
 23 anyone has enduring any hearing to say, "I refuse to
 24 answer questions on the basis I may incriminate myself".
 25 That is different.

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1 MR MENON: It is legally a different situation because one
 2 would be invoking the privilege against
 3 self-incrimination as opposed to the right to silence,
 4 I agree. But from a pragmatic point of view, as
 5 a defence lawyer seeking to protect his client's
 6 interests, there is absolutely no difference, absolutely
 7 no difference, because — and that's the way we approach
 8 it, rightly or wrongly. You may disagree with me about
 9 it, sir, but that is my approach.
 10 My job is to ensure that my client's interests are
 11 protected and that he is not wrongly prosecuted for an
 12 act of mass murder and that is what (overspeaking) —
 13 SIR JOHN SAUNDERS: Once the suspicion is raised, you would
 14 advise your client to answer no questions irrespective
 15 of whether there is any danger of the answer
 16 incriminating him?
 17 MR MENON: At the moment, yes. If we get to the stage where
 18 we are properly given disclosure — and at the moment
 19 we have nothing other than, as I said, those few pages
 20 from Wilkinson's report — we will reflect on the matter
 21 and consider the position. But as things presently
 22 stand, given we have had no disclosure and the process,
 23 in our submission, is wholly unfair, yes, we will take
 24 a blanket approach to the matter. But obviously, if the
 25 situation and the circumstances were to change we will

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1 reflect and advise.
 2 SIR JOHN SAUNDERS: Okay. I interrupted your submissions,
 3 I'm sorry.
 4 MR MENON: I was effectively finished, sir. To go back to
 5 the point you raised earlier, the remedy for the inquiry
 6 is section 35(1). If at the end of the day the position
 7 remains as it currently is, that we are advising
 8 a blanket approach to this matter, that is the
 9 resolution of the matter. Nobody can force Mr Abdallah
 10 to answer questions. I think that is probably --
 11 obviously it's blindingly obvious in the circumstances,
 12 but it perhaps bears repeating: that is precisely why we
 13 say that dragging him, either physically or
 14 metaphorically, to a CVP room at Wakefield Prison to
 15 simply have questions hurled at him in this way will
 16 serve no useful purpose. But I'm now returning to an
 17 old point and I'll end it there.
 18 Those of our submissions in relation to the
 19 privilege of self-incrimination.
 20 SIR JOHN SAUNDERS: Mr Greaney.
 21 Further submissions by MR GREANEY
 22 MR GREANEY: We have three short points to make which
 23 we would prefer to make before lunch.
 24 The first point is that no principled basis on the
 25 basis of the privilege against self-incrimination has

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1 been advanced as an objection to the Section 21 notice
 2 and that is because there is no basis in that privilege
 3 for doing so.
 4 Secondly, the proposal that Mr Abdallah should be
 5 encouraged to adopt a "blanket approach" to every
 6 question that he is asked when he does come to give
 7 evidence is, we suggest, not proper. And to give the
 8 very clearest example, it is very difficult, if not
 9 impossible, to see how Mr Abdallah could properly be
 10 advised to not answer questions where he had answered
 11 those questions during the course of his criminal trial.
 12 Just to put some flesh on that, over the course of
 13 3 days of evidence during the course of the criminal
 14 trial, Mr Abdallah accepted a number of matters,
 15 including an interest in guns, taking part in the Libyan
 16 uprising in 2011, joining the Tripoli Brigade, fighting
 17 and being injured, and having contact with terrorists.
 18 And knowing Mr Menon well, we know how seriously he
 19 takes his professional obligations, and for our part we
 20 cannot see how it would be proper to advise Mr Abdallah
 21 that he should refuse on grounds of privilege against
 22 self-incrimination that he should refuse to answer
 23 questions on matters such as that.
 24 Thirdly, in terms of the issue of, as we might
 25 describe it, general fairness, we entirely agree with

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1 the observation that you made that there are two
 2 different issues here. Issue 1 is whether there is any
 3 basis in any privilege against self-incrimination that
 4 Mr Abdallah may have for revoking the Section 21 notice.
 5 The second issue is, if the notice is not revoked so
 6 that he will be required to give evidence, is it fair to
 7 require him to give evidence next Wednesday and on the
 8 basis of the disclosure that he has been given to date?
 9 Two issues seem to be raised. First of all, the
 10 non-availability of his counsel and solicitor. Sir, we
 11 know that you'll have to grapple with that issue if
 12 it is advanced as a serious basis for Mr Abdallah not to
 13 give evidence next Wednesday. But just to give you and
 14 indeed Mr Abdallah and his team some fair warning of
 15 a point that will be taken against that proposition, on
 16 22 July of this year, so several months ago now,
 17 Mr Abdallah was informed by the Section 21 notice that
 18 he would be required to give evidence next Wednesday, so
 19 he and his team have had ample opportunity to ensure
 20 that proper arrangements were in place either by way of
 21 instructing alternative lawyers or seeking accommodation
 22 in whatever commitments they currently have.
 23 Secondly, so far as disclosure is concerned, bearing
 24 in mind that this hearing was coming up, the Rule 10
 25 process that we engage in relation to every witness has

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1 not been fully engaged yet but an abbreviated process
 2 will be undertaken which ensures that Mr Abdallah has
 3 what he is entitled to before he gives his evidence.
 4 Sir, that may well be ground that we will need to go
 5 over again next week. The issue for the moment is
 6 whether you have been satisfied that there is any
 7 principled basis for revoking the Section 21 notice.
 8 Our resounding answer to that question is that no such
 9 basis has been advanced and the Section 21 notice must
 10 therefore stand.
 11 Those are our submissions unless we can assist
 12 further.
 13 SIR JOHN SAUNDERS: Right. I am going to invite Mr Menon to
 14 come back on the question of the adjournment and whether
 15 the information he's had -- because I don't particularly
 16 want to have another hearing. Mr Menon, do you want to
 17 come back on any of that?
 18 MR MENON: Do you mean, sir, about the fact that we've been
 19 on notice since July about this?
 20 SIR JOHN SAUNDERS: Yes.
 21 Further submissions by MR MENON
 22 MR MENON: Well, the trial that I'm currently defending in
 23 was supposed to take place before the lockdown and was
 24 re-fixed for the current date long before July of this
 25 year. Yes, of course, alternative arrangements could

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1 have been made, but as I'm sure you appreciate, I have
 2 been representing Mr Abdallah for a long time and
 3 changing counsel in respect of these matters was hardly
 4 ideal in the circumstances and I don't think any
 5 consideration was given for it.
 6 SIR JOHN SAUNDERS: Have you given any forewarning to the
 7 inquiry of your non-availability on the date selected
 8 for him to give evidence?
 9 MR MENON: No, because we are confident in the strength of
 10 our submissions and hopeful and remain hopeful that
 11 you will agree to set aside this notice. We've worked
 12 on the basis that these issues are not predetermined.
 13 SIR JOHN SAUNDERS: Of course they're not predetermined, but
 14 for you to assume that you are going to succeed is
 15 perhaps bold.
 16 MR MENON: No, I certainly wouldn't presume to succeed.
 17 Please don't misunderstand, sir. That is the last thing
 18 that's on my mind. But that is the position that we are
 19 in. The timetable — we only received the bundle for
 20 today's hearing yesterday, so we're working as fast as
 21 we can, but the position of the inquiry has been
 22 throughout, "We'll give you the papers you need as and
 23 when we think it's appropriate to give them to you".
 24 When we asked, for example, for Matthew Wilkinson's
 25 report, months and months ago we asked for it, when we

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1 first realised that he had been instructed by the
 2 inquiry and there was an indication given as to what he
 3 was saying, we were told categorically, "You can't have
 4 it". And again yesterday we asked for it and then we
 5 got the 10 or 15 pages of it that touch on Mr Abdallah
 6 directly.
 7 So the inquiry could have given us the papers if it
 8 wished to months ago and has chosen not to give them to
 9 us. So how are we supposed to be ready? If even I was
 10 available next week, how am I supposed to get on top of
 11 the relevant material and advise a client who is in
 12 Wakefield Prison so that we'll be ready on 20 October?
 13 Even if all those logistical problems had been sorted
 14 out, I'm anticipating I'm going to need weeks, if not
 15 months, to go over this material and take instructions
 16 for it. We have nothing.
 17 SIR JOHN SAUNDERS: Thank you.
 18 Mr Greaney.
 19 Further submissions by MR GREANEY
 20 MR GREANEY: Sir, as you know, the Rule 10 process involves
 21 witnesses generally having material 7 days before they
 22 give evidence and every witness who has hitherto give
 23 evidence has managed to achieve giving evidence within
 24 that period, not within weeks or months.
 25 Secondly, I'm sorry that Mr Menon didn't receive his

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1 bundle for today's hearing until yesterday evening. In
 2 fact, nor did I or anyone else. The explanation for
 3 that is that we were unable to produce the bundle until
 4 we received Mr Menon's submissions, which we received
 5 very late yesterday afternoon.
 6 Sir, I don't want to get involved in point scoring.
 7 We are entirely satisfied that, as we have achieved
 8 in relation to all witnesses hitherto, we will achieve
 9 fairness for Mr Abdallah.
 10 SIR JOHN SAUNDERS: Right. Thank you.
 11 Is there anything else for today?
 12 MR GREANEY: No, sir. That will conclude the proceedings
 13 for today. Mr Gardham has appeared.
 14 MR GARDHAM: I do apologise. For the sake of clarity,
 15 I just wanted to make sure that we are permitted to
 16 report the very brief exchange between the chairman and
 17 Mr Menon on this subject in closed. It doesn't seem to
 18 me controversial but it may be that somebody wants to
 19 quote from it in reporting.
 20 MR GREANEY: Sir, for our part we agree that we did stray
 21 into this open area during the course of the restricted
 22 hearing and the media ought to be permitted to report
 23 that exchange subject to the one matter that is the
 24 subject, for the time being at any rate, of the
 25 restriction order and I know Mr Gardham will understand

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1 what I'm talking about.
 2 SIR JOHN SAUNDERS: Mr Gardham, unless we have any further
 3 submissions about this, I agree as well. It's my fault
 4 for straying into things which should properly have been
 5 in open, so it's my fault that that occurred. But yes,
 6 you can therefore report it, unless Mr Menon wants to
 7 come back on that at all.
 8 MR GARDHAM: I'm grateful, thank you.
 9 MR MENON: No, thank you.
 10 SIR JOHN SAUNDERS: Thank you, Mr Menon.
 11 MR GREANEY: So sir, we will next sit on, I believe, Tuesday
 12 of next week at 9.30. That is not because your team are
 13 not engaged in work connected with the inquiry, we are
 14 certainly on Friday of this week and Monday, but we will
 15 next sit in public next Tuesday at 9.30, please.
 16 SIR JOHN SAUNDERS: Thank you. I will obviously complete
 17 a judgment on this matter as soon as I can. It's
 18 obviously urgently needed, so I will do my best to do it
 19 as quickly as I can.
 20 MR GREANEY: Thank you very much indeed, sir.
 21 SIR JOHN SAUNDERS: Thank you to everybody for their
 22 submissions. That's the end of the hearing.
 23 (1.15 pm)
 24 (The inquiry adjourned until 9.30 am
 25 on Tuesday, 19 October 2021)

24

1 I N D E X

2

3 (The inquiry sat in a restricted1

4 session)

5

6 OPEN SESSION1

7

8 Submissions re Self–incrimination1

9 Submissions by Mr Greaney1

10 Submissions by MR WEATHERBY5

11 Submissions by MR DI FRANCESCO6

12 Submissions by MR MENON10

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