

IN THE WILTSHIRE AND SWINDON CORONER'S COURT

BEFORE THE RIGHT HONOURABLE BARONESS HALLETT DBE

IN THE MATTER OF THE INQUEST TOUCHING THE DEATH OF DAWN STURGESS

**SUBMISSIONS ON BEHALF OF
THE STURGESS FAMILY AND CHARLIE ROWLEY
FOR PRE-INQUEST REVIEW ON 17 DECEMBER 2021**

Introduction

1. These submissions are made on behalf of the family of Dawn Sturgess and her partner Charlie Rowley (“the family”).
2. The family welcome the Home Secretary’s decision to establish a public inquiry, and that the decision was made within the timescale envisaged at the last PIR.

Core participants

3. For the avoidance of doubt, the members of Dawns’ family who were designated as IPs (that is, Stephen Stanley Sturgess (Ms Sturgess’ father), Caroline Sturgess (Ms Sturgess’ mother), Aidan Hope and Ewan Hope (Ms Sturgess’ sons) and GS (Ms Sturgess’ daughter)) would wish to be designated as CPs. Charlie Rowley also would wish to be designated as a CP. Birnberg Peirce will be appointed to act on behalf of all of them for the purpose of the Inquiry, and we will invite the Chair to designate Birnberg Peirce as their recognised legal representative, pursuant to rule 6. However, it is likely to be necessary for Charlie Rowley to have different counsel. Thank you for the warning that applications for legal expenses will be requested with a short turnaround at the first preliminary hearing.
4. We will be happy to give further undertakings to the inquiry, as required.

Further procedural matters and next PIR

5. In light of an observation at §7 of CTI’s submissions, we should emphasise that while the family wish the inquiry hearings to be held as soon as is practicable (for the reasons

given previously), that should not be at the expense of a full and thorough investigation, which is paramount. The family are pleased that a start date for the inquiry hearings has been identified, in February 2023. That is getting on for 5 years after Dawn died, which is a very long time for the family to have to wait to learn how she died, and a very long time for the wider public to learn about matters which are of acute concern. The family impress upon the government bodies and police the need to ensure disclosure is prioritised and made to the Chair's legal team as soon as it can be.

6. The family is grateful for the update in CTI's submissions at §22-35. We welcome the request by CTI for an overarching corporate statement from a senior police officer (at §24). Once disclosure is further advanced, we look forward to an opportunity to make submissions about whether further inquiries should be made, further material sought, statements from witnesses including expert witnesses obtained, and which witnesses should be called or read at the inquiry hearings. We agree with CTI at §31 that it is unnecessary to consider the Terms of Reference at this point. We look forward to an opportunity to make submissions about restriction orders at the appropriate point, and about rule 12 of the Inquiry Rules 2006.

Michael Mansfield QC
Henrietta Hill QC
Adam Straw QC
10 December 2021