

OPUS 2

INTERNATIONAL

Inquests arising from the deaths in the Westminster Terror Attack of 22 March
2017

Day 17.2

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1 Thursday, 4 October 2018

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3 Chief Coroner's opening to the jury

4 THE CHIEF CORONER: Ladies and gentlemen, you have all been

5 sworn in as the jury for this Inquest. My name is

6 Mark Lucraft, I am the Chief Coroner of England and

7 Wales and the coroner for this Inquest.

8 This, as you know, is an inquest into the death of

9 Khalid Masood. He died on 22 March 2017. This Inquest

10 concerns a death as a result of the actions of police

11 officers, close protection officers, in New Palace Yard

12 in the Palace of Westminster. As a result, under our

13 law, where an inquest takes place into such a death, it

14 must be conducted by a coroner sitting with a jury.

15 The role of the coroner is to investigate violent or

16 unexplained death. In England and Wales, the office of

17 coroner has existed for almost a thousand years.

18 Evidence of the office dates back to the reign of

19 Richard I in 1194 but it might have earlier origins.

20 The role of coroner has developed and changed over

21 the centuries. Initially the office was closely

22 connected to revenue—collecting on behalf of the

23 monarch. As time went on, it focused on the

24 investigation of the cause of death. There are

25 approximately 120 full-time coroners and 300 part-time

1

1 coroners in post today, each an independent judicial

2 officer overseeing investigations into deaths reported

3 to them.

4 In 2017, there were some 533,118 deaths registered

5 in England and Wales. Of those, some 229,700 were

6 reported to a coroner. 31,519 inquests were opened in

7 2017, and so one can see that some investigation by

8 a coroner resolves the vast majority of issues around

9 death without the need for an inquest at all. Of the

10 31,519 inquests that were opened, many will have taken

11 a day or less to resolve. There are approximately 500

12 inquests each year that take place, as here, with

13 a coroner and a jury.

14 I'm just going to give you a brief summary of the

15 case. On 22 March 2017 at 2.40 pm, Khalid Masood drove

16 a car across Westminster Bridge. His vehicle mounted

17 the pavement and struck a number of pedestrians. Four

18 people sustained fatal injuries: Kurt Cochran,

19 Leslie Rhodes, Aysha Frade and Andreea Cristea.

20 29 others suffered serious injuries but survived.

21 Others suffered less serious injuries. The vehicle went

22 on to crash into railings at the perimeter of the

23 Palace of Westminster.

24 Masood then left the vehicle, he ran through the

25 Carriage Gates vehicle entrance to the

2

1 Palace of Westminster at the New Palace Yard area. He

2 attacked PC Keith Palmer with knives, causing fatal

3 injuries. Masood was then confronted by plain-clothed

4 armed officers and was shot.

5 The period from when Masood drove his vehicle onto

6 the bridge to the time he was shot was just 82 seconds.

7 There has been an inquest into the deaths of

8 Kurt Cochran, Leslie Rhodes, Aysha Frade,

9 Andreea Cristea and PC Keith Palmer. That inquest

10 concluded yesterday. This is now a separate inquest

11 into the death of Khalid Masood. The focus of this

12 Inquest will be the events in New Palace Yard and the

13 circumstances that presented themselves there to the

14 armed close protection officers.

15 I have the assistance of Mr Jonathan Hough QC and

16 Mr Aaron Moss, who are leading and junior counsel to

17 this Inquest. They are assisted by Ms Sian Jones and

18 Ms Natasha Davis, who are the solicitors to this

19 Inquest. There are no parties to the Inquest, but there

20 are interested persons: people and organisations who

21 have the right to play a part, including by questioning

22 witnesses.

23 The family of Khalid Masood are interested persons,

24 but I understand that their lawyers are unlikely to be

25 present during this hearing. Mr Hugo Keith QC and

3

1 Mr Matthew Butt represent the Metropolitan Police.

2 Ms Samantha Leek QC and Mr Neil Sheldon represent the

3 Secretary of State for the Home Department.

4 Mr Matthew Hill represents the London Ambulance Service.

5 Mr Sebastian Naughton represents Barts Health NHS Trust.

6 The Independent Office for Police Conduct is an

7 interested person but is not represented in this hearing

8 by lawyers.

9 The purpose of the Inquest. An inquest hears

10 evidence so that you, the jury, can make findings of

11 fact and come to a conclusion about the death. Formerly

12 a conclusion was known as a verdict. Now we use the

13 word "conclusion" to distinguish the inquest process

14 from a criminal trial. Nobody is on trial here. An

15 inquest does not decide matters of criminal liability of

16 individuals or civil liability. There is no question of

17 attributing blame. The Inquest is simply a way of

18 establishing facts about the death of Khalid Masood.

19 I stress this last point as this Inquest is taking

20 place in court number 1 at the Central Criminal Court,

21 or the Old Bailey, as it is more commonly known.

22 Despite the setting, this is not a criminal trial. That

23 said, I am grateful to the Recorder of London, Nicholas

24 Hilliard QC, and the Corporation of the City of London

25 for allowing the use of this court and a number of

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1 adjoining rooms for the Inquest to be held here.
 2 Your role in this Inquest is to answer four main
 3 questions: who was the deceased, when did he come by his
 4 death, where did he die, and how did he come by his
 5 death?

6 The last question, how did he come by his death, is
 7 the most significant one in this, as in most, inquests.
 8 In this Inquest, it means by what means and in what
 9 circumstances did he come by his death.

10 You are also required to record particulars for
 11 registering the death, such as the date and place of
 12 birth and occupation. You are not allowed to express
 13 an opinion on any other matters. Your determination may
 14 not appear to determine any question of criminal
 15 liability of a named person or any question of civil
 16 liability.

17 In due course, you will be asked to complete and
 18 sign a document called a Record of Inquest, setting out
 19 your findings and a conclusion about the death. That
 20 will include the medical cause of death and your other
 21 findings about how Khalid Masood came by his death.
 22 I will give you further directions about those matters
 23 towards the end of the Inquest, including what options
 24 are open to you and how to record your conclusions.

25 A few words about the procedure. Soon we will

1 embark on hearing the evidence in this Inquest, all of
 2 which will be recorded. Counsel to the Inquest will
 3 take each witness through their evidence. Interested
 4 persons may ask questions through their counsel. I may
 5 ask questions from time to time. After that, you may
 6 ask questions to clarify matters, if you wish. Here
 7 I expect that all the relevant questions will be put by
 8 counsel, but if you do have a question you would like
 9 asked, then please write it down and pass it to me.
 10 I have a duty to exclude any question that is not
 11 relevant to the purpose and the scope of this Inquest.

12 It is possible that some evidence will be read to
 13 you, without the witness having to come into court. If
 14 that happens, it will likely be because nobody has
 15 required their attendance and their evidence is not in
 16 dispute.

17 At the end of the evidence I will sum the case up to
 18 you: I will give you written directions on the law
 19 indicating what conclusions you may consider, and
 20 factual findings are required to support them. I will
 21 also summarise the evidence that's been presented to
 22 you, reminding you of the key parts of it. Some of you
 23 may wish to make your own brief notes during the
 24 evidence. At the end of my summing-up I will then
 25 invite you to retire and to consider your findings and

1 conclusions.

2 Some rules for jury service. First, do not talk to
 3 anyone outside your number about this case. When you
 4 get home tonight, friends and family who know you have
 5 started service as a juror on an inquest will want to
 6 know all about it: perfectly natural. It is very
 7 important that you do not discuss anything about the
 8 Inquest with anyone. The reason is simply this: that if
 9 you have friends or family like some of mine, they'll be
 10 only too happy to give you the benefit of their opinion,
 11 unencumbered by any knowledge of the evidence. That may
 12 affect you, even subconsciously, and that would be
 13 unfair.

14 You do not decide the issues in this Inquest with
 15 your other jurors and your mum or your best friend; you
 16 decide those issues with your other jurors alone. If
 17 families or friends ask, simply tell them it is a rule
 18 to ensure fairness and you are not, by law, permitted to
 19 discuss it during the Inquest.

20 Of course, when the Inquest is over and you've
 21 delivered your findings and conclusion, you may discuss
 22 your experiences, but not the deliberations, with family
 23 and friends, but not until then.

24 During the case, if you happen to travel to court
 25 with a fellow juror, or you happen to bump into one

1 another away from court, please do not discuss the
 2 evidence you have heard. Any discussions you have about
 3 this case should be whilst you are in the privacy of
 4 your jury room.

5 One or two words about press coverage. There has
 6 been extensive reporting of the incident behind this
 7 Inquest. It is highly likely that there will be
 8 reporting of this Inquest in the press, I've already
 9 told you, there are members of the press sitting in the
 10 dock. The press are entitled to publish reports of
 11 legal proceedings that are held in public. There are
 12 rules governing those reports. It is very likely that
 13 you may see or hear some of those reports.

14 However good the press reports are, they are
 15 unlikely to report all of the evidence as is given in
 16 court. Each of you has taken an oath or affirmation to
 17 listen to this Inquest and try the issues on the
 18 evidence, and it's on the evidence that you will hear in
 19 court that you will make your decisions.

20 To ensure fairness, can I ask each of you make sure
 21 that your focus is on what is said in court in your
 22 presence. Do not make any of your own investigations.
 23 Do not be tempted to make any of your own investigations
 24 into the background of this case. You and I are
 25 fortunate as we have experienced and competent advocates

1 to put all the relevant evidence before you and rehearse
2 all the relevant issues for you to consider. Sit back
3 and let them do the hard work in presenting the evidence
4 before you.

5 Why is this rule so important? Well, because our
6 whole system relies on open justice. All those in this
7 courtroom and the public are entitled to know and hear
8 all the evidence on which you have reached your
9 decisions. It's that question of fairness again. If
10 you were to introduce into your jury room the fruits of
11 your own investigations, be they on the internet,
12 Facebook or Twitter, then they would not have been
13 tested in open court for all to see and hear. We all
14 know how wonderful the internet is and how useful search
15 engines such as Google can be. We also know how
16 unreliable they can sometimes be. Seemingly
17 authoritative pages on the internet can turn out to be
18 completely false. So the simple rule is: do not make
19 your own investigations. Of course, this does not mean
20 you cannot use the internet for your personal affairs.
21 It simply means do not use it to investigate this
22 Inquest.

23 You will have heard on the news of jurors who have
24 ignored directions like these and have been sent to
25 prison. You may also know that Parliament has enacted

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1 specific offences of juror misconduct. These include
2 the offences of a juror researching a case, sharing that
3 research with jurors, or engaging in other prohibited
4 conduct. The last thing I want is that one of the
5 jurors who is on this Inquest should commit any offence
6 in connection with their jury service, and that's why
7 I've given you these instructions and will remind you
8 from time to time during the Inquest about these very
9 important rules.

10 You all have a joint responsibility as jurors to see
11 what goes on in your retiring room is in accordance with
12 the directions that you are given.

13 Approaches to you. Very rarely something may
14 happen, either outside your jury room, someone who is
15 not on your jury may try to speak to you about this
16 case, or something happens in the jury room itself which
17 causes you a real concern. If any of you should have
18 such a concern, would you please inform me about it at
19 once, discreetly through a written note via the court
20 clerk or the usher. Please do not leave it until the
21 Inquest is over, because it might then be impossible to
22 put matters right.

23 We are hearing this Inquest together. I am the
24 judge of the law and you are the judges of the facts.
25 When matters of law arise, I will deal with those in

10

1 your absence. As I've indicated, at the end of the
2 evidence I will give you directions on the law and
3 provide you with a summary of the evidence that's been
4 given in court.

5 Finally, please keep an open mind. The evidence
6 will be presented to you over the coming days. Do not
7 jump to conclusions. The time to come to any
8 conclusions is once you've heard all of the evidence,
9 the summing-up, and you are in the privacy of your jury
10 room.

11 One or two words, then, about the order of the
12 evidence. We're about to start hearing the evidence.
13 In broad terms it's going to be called in the following
14 order. Firstly, the senior investigating officer of the
15 investigation into the events on 22 March. He'll give
16 evidence to provide you with a background of the
17 inquiry. He will cover the events on the bridge and
18 those in New Palace Yard. We will see video footage of
19 the events. Some of it will inevitably be graphic.
20 However, it is right you should understand the
21 background to the scene which took place in the
22 Palace of Westminster.

23 After that, we will hear from a number of bystanders
24 who saw events unfolding in the Palace of Westminster.
25 We will hear from a firearms officer to provide evidence

11

1 relevant to the actions of the close protection officers
2 involved in the confrontation with Khalid Masood. The
3 close protection officers themselves will give evidence.
4 I have ruled that they should give evidence anonymously,
5 and we will refer to them by pseudonyms. Nobody has
6 taken issue with that ruling. The reason, in short, is
7 that their job requires them not to be publicly
8 identified. Their ability to do that job would be
9 compromised, and overall, it would be unfair if their
10 identities were published.

11 We will then hear from people involved in the
12 medical care provided to Khalid Masood after he had been
13 shot. We will also hear from a pathologist who carried
14 out a post mortem examination on him. There will also
15 be evidence from the deputy senior investigator in the
16 police investigation to summarise the life and
17 background of Khalid Masood, as well as the planning and
18 preparation that he undertook leading up to
19 22 March 2017.

20 At present we expect the evidence will continue
21 until about Monday, 15 October. I will then give you
22 final directions and ask you to consider your
23 conclusions.

24 Can I just say one or two things about hours of
25 sitting and the seats where you are currently sitting.

12

1 It's likely that we will start each day at 10 o'clock,
2 sitting no later than 4.30 in the afternoon. There will
3 be a mid-morning and a mid-afternoon break of
4 15 minutes. I have sat in those seats: they're not the
5 most comfortable, you don't have a lot of elbow room, so
6 that's why we will take those breaks. We will take
7 a lunch break between 1.00 and 2.00. We will not be
8 sitting next Monday afternoon, so next Monday,
9 8 October, at 1 o'clock the rest of the day is yours,
10 and we will not be sitting at all on Tuesday, 9 October,
11 so I won't require your attendance here on Tuesday next
12 week at all, or Monday after 1 o'clock. If there are
13 other changes of times, I will let you know as we go on.

14 I've said that's not the most comfortable place to
15 sit, we will take regular comfort breaks, but can I just
16 make this one plea: don't sit there in agony. If you
17 want a comfort break and it is going to be a long time
18 before we will be taking one, please just let me know
19 because the important thing, as I say, is you've got to
20 be able to focus on the evidence that's being presented
21 before you.

22 The temperature in this courtroom is pretty good,
23 but on days it can be Arctic and on other days, Saharan.
24 Again, we will try and regulate the heat, but if some of
25 you feel uncomfortable, either because it is too warm or

13

1 too cold, I can't promise to be able to accommodate
2 everyone, because we would all like different
3 temperatures, but please, again, let me know, because as
4 I say, it is important you are able to focus and listen
5 to the evidence.

6 Mr Hough.

7 MR HOUGH: Sir, the first witness is

8 Detective Superintendent John Crossley.

9 DS JOHN CROSSLEY (Sworn)

10 Examination by MR HOUGH QC

11 MR HOUGH: Would you please give your full name and rank for
12 the court?

13 A. Certainly. John Crossley, detective superintendent
14 attached to SO15, which is the counter terrorism command
15 with the Metropolitan Police.

16 Q. Mr Crossley, as I think you understand, I'm asking
17 questions on behalf of the Coroner as counsel to the
18 Inquest.

19 A. Yes, sir.

20 Q. Is it right that you were and are the senior
21 investigating officer of Operation Classific, the
22 investigation into the Westminster Terror Attack
23 of March last year?

24 A. That's correct, sir, yes.

25 Q. You understand, I think, that you are giving evidence at

14

1 this stage to summarise the events of the attack with
2 the assistance of some visual aids to provide background
3 for the inquiry the jury have to carry out?

4 A. Yes, sir.

5 Q. You've prepared a report for that purpose, which
6 I understand you have with you, and which you may refer
7 to as you wish.

8 A. Thank you.

9 Q. I will refer to that from time to time.

10 Just to be clear, the evidence you're about to give,
11 you understand also, is similar to the evidence you gave
12 at the start of the Inquests for the victims of the
13 attack?

14 A. Yes.

15 Q. And, as such, it will include at times some distressing
16 images and footage.

17 A. Yes.

18 Q. May we begin with your investigation, which you address
19 at the start of your report. There you describe the
20 different investigative strands of the
21 Operation Classific investigation. Could you please
22 explain them for the court?

23 A. Yes, obviously following the attack on 22 March it was
24 a very chaotic scene initially and we needed to get some
25 strands put in place to progress the investigation.

15

1 They were split into three different strands, and they
2 were as follows: firstly, there was the investigation
3 into the ongoing threat to national security posed by
4 persons linked to Masood. This aspect of the
5 investigation sought to identify individuals who may be
6 linked to him, or may have been involved with Masood in
7 the attack, or may be planning further attacks within
8 the UK. This element was led by
9 Detective Superintendent Pete Holdcroft.

10 The initial response and the investigation into the
11 attack in Westminster that led to the deaths of four
12 members of the public and the police officer, and the
13 shooting of Khalid Masood, I led this part of the
14 investigation. And other aspects of this were led by
15 Detective Chief Inspector Dan Brown.

16 Then there was a final investigation strand which
17 was to seek to establish why Khalid Masood committed the
18 attack and that strand was led by Detective Chief
19 Inspector Brown.

20 Q. I think you're aware we'll be hearing from Mr Brown
21 later about the background, planning and preparation of
22 Khalid Masood?

23 A. That's correct, sir, yes.

24 Q. May we begin, then, with the basic facts of the attack.
25 Was the attacker identified on the day of the attack as

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1 Khalid Masood, a 52-year-old man?
 2 A. That's correct, sir, he was.
 3 Q. And was the vehicle used in the attack also identified
 4 very clearly as a grey Hyundai Tucson?
 5 A. Yes, sir.
 6 Q. That was a 4x4 vehicle, I think?
 7 A. Yes, that's correct.
 8 Q. To understand the scene of the attack, may we please
 9 look on screen at a plan prepared by the Computer Aided
 10 Modelling Bureau of the police, {DC7960/52} is the
 11 reference.
 12 Members of the jury, it should come up on your
 13 screens if the screens are all working properly.
 14 THE CHIEF CORONER: Are all your screens working? Very
 15 good.
 16 MR HOUGH: Now, just to orientate ourselves, Mr Crossley, is
 17 it right to say that the River Thames in the area we're
 18 concerned with runs north-south?
 19 A. That's correct, yes.
 20 Q. And to the west of this plan, the left-hand side,
 21 I think is what most of us would call the north bank of
 22 the Thames; yes?
 23 A. Yes, that's correct.
 24 Q. With the Palace of Westminster and its estate at the
 25 bottom left-hand side of the plan?

17

1 A. Yes, that's correct.
 2 Q. And to the east or right of the plan is what most
 3 Londoners would call the south bank of the Thames, where
 4 St Thomas' Hospital is at the bottom right of the plan?
 5 A. Yes, that's correct.
 6 Q. Now, is it right to say that in the attack, the vehicle
 7 was driven over the bridge from the south bank side to
 8 the north bank side, so from right to left on the plan?
 9 A. That's correct, yes.
 10 Q. In the course of the attack, did Khalid Masood, driving
 11 his vehicle, mount the kerb multiple times, striking
 12 pedestrians?
 13 A. Yes, that's correct, sir.
 14 Q. Can you identify the four pedestrians who were struck on
 15 the bridge who died as a result?
 16 A. Yes, going from right to left, you'll see the first pink
 17 box there, which was Kurt Cochran. He was the first
 18 victim that was struck by the vehicle. It then
 19 continued along the footway, striking Leslie Rhodes who
 20 is shown there in the red. It then came off the
 21 pavement and back onto the roadway for a short distance
 22 before coming back onto the pavement where it struck
 23 Aysha Frade, and she's marked there in the green box.
 24 It then continued along the pavement and struck
 25 Andreea Cristea, flinging her into the water, and then

18

1 it continued along. As it did and it came towards the
 2 Houses of Parliament and then swerved back onto the
 3 pavement and around, before coming back, crashing into
 4 the wall of the Houses of Parliament.
 5 Q. Mr Crossley, in addition to those who were killed, were
 6 a large number of other people struck by the vehicle?
 7 A. Yes, there were. As it went along the pavement it
 8 struck a number of people and 29 others were seriously
 9 injured.
 10 Q. So 29 seriously injured; others, I think, injured less
 11 seriously as well?
 12 A. Yes.
 13 Q. After the vehicle had crashed into the wall at the
 14 perimeter of the Palace of Westminster, did the attacker
 15 then leave the vehicle and continue on foot?
 16 A. That's correct, sir, he left the vehicle armed with two
 17 knives and made his way towards Parliament Square.
 18 Q. May we look at a different plan in order to see his
 19 movements? {DC7960/53} is the reference. Now, using
 20 this plan, can you describe, Mr Crossley, the attacker,
 21 Khalid Masood's movements after he had got out of the
 22 vehicle which had crashed and which we see at the top of
 23 the page in the middle?
 24 A. Yes, certainly. As he got out of the vehicle he began
 25 to make his way and then started running around the

19

1 corner as it's shown there on the red line, and he made
 2 his way around towards the entrance of the
 3 Houses of Parliament to New Palace Yard where the blue
 4 box is that's shown on that map. So he made his way
 5 around that red line to that entrance there.
 6 Q. Pausing there, did he then approach a large set of metal
 7 gates called Carriage Gates, and the north set of those
 8 gates, which are vehicle entry gates?
 9 A. That's correct, yes.
 10 Q. Were there police officers stationed at those gates?
 11 A. Yes, there were a number of police officers there and,
 12 as he approached them, he began to attack Keith Palmer.
 13 Q. And Keith Palmer, I think, was one of those officers?
 14 A. That's correct, sir, yes.
 15 Q. As PC Palmer came forward and was attacked, what did the
 16 attacker do and what happened to PC Palmer as a result?
 17 A. During that struggle where he was attacking PC Palmer,
 18 PC Palmer was driven backwards and, as you can see it on
 19 the map there, he followed the blue line back and he was
 20 pursued by Khalid Masood, and while Keith Palmer was on
 21 the floor, Khalid Masood continued his attack.
 22 Q. Did a time come when the attack stopped and Keith Palmer
 23 was able to move away from the attacker?
 24 A. Yes, while he was on the floor he was attacking him with
 25 two knives, and some of PC Palmer's colleagues went back

20

1 towards him to assist him. That seemed to distract
 2 Khalid Masood and Keith Palmer was able to get up.
 3 PC Palmer then ran in the direction of the second blue
 4 line, around the edge of that green, the grass area
 5 there, and he was pursued by Khalid Masood.
 6 Q. What then happened with the attacker's progress?
 7 A. As they went forward, you can see there the other blue
 8 box where Keith Palmer, PC Palmer fell, and you have two
 9 black boxes there marked with "Khalid Masood". As he
 10 ran round there, he was confronted by two close
 11 protection officers.
 12 Q. Two close protection officers, those being, I think,
 13 plain-clothes police officers armed with pistols?
 14 A. That's correct, sir, yes.
 15 Q. And what happened then?
 16 A. As he approached them, the officers were going towards
 17 him and he continued to go towards them and they shouted
 18 a warning at him. He continued to walk towards them, or
 19 was going towards them and, having been warned to stop,
 20 they fired at Khalid Masood.
 21 Q. And what happened as a result of their shots fired?
 22 A. Khalid Masood was struck and he fell to the floor and he
 23 was then attended to by medical personnel almost
 24 immediately.
 25 Q. We'll look at all of this in much more detail as we go

21

1 through your evidence, but just some details, please,
 2 about the timings of the attack. Are you able to tell
 3 us at what time, based on CCTV and other evidence,
 4 Khalid Masood drove onto the bridge and started his
 5 attack there?
 6 A. Khalid Masood drove onto the bridge and it was at
 7 14.40.08 that he first mounted the pavement where he
 8 struck Kurt Cochran.
 9 Q. At what time was Khalid Masood shot and collapsed?
 10 A. Khalid Masood was shot at 14.41.30.
 11 Q. So can we work out the difference between those times
 12 tells us that the events of the attack lasted
 13 82 seconds?
 14 A. That's correct, sir, yes.
 15 Q. May we now briefly look at each stage of the attack in
 16 a little more detail, looking at what happened to each
 17 of those who died on the bridge, and may we start with
 18 the first phase of the attack by looking at a plan
 19 {DC7960/49}.
 20 Do we see here the events of the first stage of the
 21 attack on the bridge, including information about the
 22 first person who was fatally injured?
 23 A. That's correct, sir. The vehicle began to drive along
 24 the bridge and just before, as I've said, just before
 25 that time you can see the vehicle, the blue line

22

1 obviously showing the route of the vehicle, and he made
 2 a direct path onto the pavement, and then we can see
 3 Kurt Cochran shown there in the pink box.
 4 Q. What happened to Mr Cochran as the vehicle approached
 5 and then struck him?
 6 A. Kurt Cochran was with his wife, Melissa Cochran, and as
 7 the vehicle mounted the pavement, on CCTV you can see
 8 that Mr Cochran could see the vehicle coming towards him
 9 and he pushed his wife, Melissa, out of the way. Kurt
 10 was struck and he was thrown over the balustrade and he
 11 felt onto the embankment below.
 12 Q. At this point in its travel were your colleagues in the
 13 vehicle reconstruction part of the police able to
 14 estimate its speed?
 15 A. Yes, they were. They put the speed at between 32 and
 16 36 miles an hour as he mounted the pavement and struck
 17 Kurt.
 18 Q. Is it right he got up to that speed over a short
 19 distance?
 20 A. That's correct, sir.
 21 Q. May we look now at some still images from CCTV footage
 22 and photographs to illustrate this part of the attack?
 23 Some of these are distressing images, and may we begin
 24 {DC5259/4}. Do we see here at the top of the page
 25 a still image from a CCTV camera mounted on the south

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1 side of the bridge, mounted at, I think, the Marriott
 2 Hotel archway looking towards the area where Mr Cochran
 3 was and focusing upon the vehicle being driven by
 4 Khalid Masood?
 5 A. That's correct. The top slide, as you can see, the
 6 vehicle is now slanted and is pointing towards the
 7 pathway, and if you look immediately to the right of the
 8 vehicle, so the two figures on the far right of the
 9 image, you see Kurt Cochran and Melissa Cochran there,
 10 Melissa in all black with a black hat on, and Kurt
 11 immediately to her left, so the far right figure.
 12 Q. What do we see in the bottom photograph?
 13 A. We obviously see at the time that the vehicle has now
 14 gone onto the path and we can see Kurt has now got his
 15 hand on Melissa's back and is pushing her out of the
 16 way.
 17 Q. Then the next page, please. Can you help us with the
 18 events shown in the next two photographs which are,
 19 I think, still images immediately in sequence after the
 20 last two?
 21 A. As we can see that both Kurt and Melissa Cochran have
 22 been struck. Melissa is flying through the air towards
 23 those postcard stands there that were on the edge of the
 24 steps as it goes down towards the embankment, and Kurt
 25 is now in the air going towards the balustrade.

24

1 In the bottom shot we can just see Kurt's legs are
 2 now in the air and he's on the edge of the balustrade
 3 before he was flung over.
 4 Q. And is it right to say that as a result of his fall over
 5 that balustrade, Kurt Cochran sustained fatal injuries?
 6 A. He did, yes, sir.
 7 Q. May we now move to the next phase of the attack on the
 8 bridge, and for this purpose look at a plan {DC7960/50}.
 9 Does this plan show how the vehicle moved after it had
 10 struck Mr Cochran, who is labelled with a purple flag at
 11 the far right of the plan?
 12 A. Yes, that's correct. It stayed on the pavement and it
 13 drove up about 22 metres where Leslie Rhodes was walking
 14 on the pavement and it struck Leslie Rhodes from behind.
 15 Q. Is it right to say that Mr Rhodes was one of a group of
 16 people who were struck in that area?
 17 A. That's correct, yes. There was a number of people
 18 around him and Leslie Rhodes had his back to the
 19 vehicle.
 20 Q. After striking Mr Rhodes, how did the vehicle continue
 21 to move?
 22 A. The vehicle stayed on the path for a very short period
 23 and Leslie Rhodes was dragged underneath the vehicle and
 24 the vehicle drove back onto the pavement. It seemed to
 25 be avoiding a temporary road sign that was on the path

1 and Leslie was dragged underneath the car as it went
 2 back onto the road.
 3 Q. So it appeared, is this right, that Masood had driven
 4 his vehicle off the pavement only to avoid a temporary
 5 sign we see marked on the plan?
 6 A. That's correct.
 7 Q. May we again look at some still images to capture this
 8 part of the attack. The first page, {DC5259/8}. Are we
 9 looking in the first, higher image, at a still from the
 10 same camera as before, now showing the Hyundai Tucson
 11 further along the pavement from the place where we had
 12 seen it in the previous shots?
 13 A. That's correct, and the person stood immediately in
 14 front of the vehicle there is Leslie Rhodes.
 15 Q. Do we see over that and the subsequent image the vehicle
 16 striking him and other pedestrians on that stretch of
 17 the pavement?
 18 A. That's correct. You can see Leslie Rhodes is now on top
 19 of the vehicle almost with his legs in the air, and just
 20 on the very right-hand edge of that image you can just
 21 see the very edge of the yellow temporary traffic -- the
 22 sign that was on the pavement that he swerved to avoid.
 23 Q. May we move to the next page, please {DC5259/9}. Can we
 24 see in the upper image the vehicle has dragged
 25 Leslie Rhodes along the road after its return to the

1 roadway as you described?
 2 A. That's correct, yes. Leslie is now underneath the
 3 vehicle.
 4 Q. We can take those off the screen now.
 5 Is it right to say that as a result of the vehicle
 6 striking him and dragging him along, Mr Rhodes too
 7 sustained fatal and, indeed, unsurvivable injuries?
 8 A. That's correct, sir, yes.
 9 Q. May we now consider the next part of the vehicle's
 10 passage across the bridge and look at a plan at
 11 {DC7960/50} again. Now, I think on this plan flagged
 12 towards the right is where Leslie Rhodes was struck on
 13 the pavement.
 14 A. That's correct.
 15 Q. And then slightly to the left of that, around the middle
 16 of the plan, we see Leslie Rhodes marked in the position
 17 where he came to rest?
 18 A. Yes, that's correct.
 19 Q. Then can you describe the movement of the vehicle from
 20 that point on?
 21 A. Having gone back onto the road, Leslie was dragged
 22 underneath it and then the car then swerved back onto
 23 the pavement, as you can see there on the path of the
 24 blue line and the path of the vehicle, and as it's gone
 25 onto the pavement, it's then struck Aysha Frade. Aysha

1 was walking from the direction of what we've referred to
 2 as the south bank, so she would have been walking
 3 towards the Houses of Parliament, the
 4 Palace of Westminster.
 5 Q. I think Mrs Frade was on her telephone at the time and
 6 was struck from behind without warning?
 7 A. That's correct, yes. She was then knocked into
 8 the roadway, and you can see the two green areas, the
 9 first one where she was struck, and then she was flung
 10 into the roadway, and that's just over 17 metres,
 11 17.4 metres further on, and she landed in the roadway.
 12 Q. Is it right to say that there were other pedestrians in
 13 that area who were also struck and some other additional
 14 pedestrians who had to jump out of the way?
 15 A. That's correct, sir, yes.
 16 Q. Did your colleagues arrive at an estimated speed of the
 17 vehicle over this part of its journey?
 18 A. Yes, the speed at that part of the journey, sir, was
 19 31 to 42 miles an hour.
 20 Q. May we look at some further images of the passage of the
 21 vehicle over this period. {DC5259/13} is the first page
 22 showing those. Now, just to see what these images show,
 23 are we looking in both of these images on the page at
 24 CCTV stills taken from a camera mounted on the nearside
 25 of a bus travelling from the south bank towards the

1 north bank of the Thames?
 2 A. That's correct, sir, yes.
 3 Q. And the camera, I think, is looking backwards, so
 4 looking towards the south bank?
 5 A. Yes, that's correct.
 6 Q. And we see St Thomas' Hospital over there towards the
 7 top of the screen over on the right?
 8 A. Yes, that's correct. So what we've got there as well,
 9 so looking at that with St Thomas' Hospital, we can
 10 clearly see Mrs Frade marked in the middle there and you
 11 can see just at the very edge of the bus at the back the
 12 vehicle is just coming into view there. Mrs Frade is
 13 walking forwards on her phone, we can see she's got
 14 a carrier bag over one arm and she has a backpack on on
 15 the other -- on her back as she's walking along.
 16 On the second still at the bottom we can see that
 17 the car has mounted the pavement and is just striking
 18 Mrs Frade at that point.
 19 Q. Then the next page, please {DC5259/14}. Do these images
 20 taken from the same camera's perspective show the next
 21 stages in the vehicle's journey?
 22 A. Yes, we can see that Mrs Frade has been flung into
 23 the roadway there and at the very top left we can see
 24 her bag has come off and that has been flung up into the
 25 air, her shoes have been knocked off and she's been

1 struck and she's now falling into the roadway and
 2 there's other pedestrians directly in front of the car
 3 now.
 4 Q. In the lower image do we see the vehicle striking
 5 further pedestrians, throwing them into the air?
 6 A. That's correct, yes.
 7 Q. Do we see that Mrs Frade has been thrown under the rear
 8 wheels of the bus?
 9 A. Yes, that's correct.
 10 Q. And do we see if we look in the bottom image towards the
 11 bottom right that the Hyundai vehicle has by this stage
 12 sustained very substantial front-end damage?
 13 A. Yes, that's correct.
 14 Q. The next page, please, page 15 {DC5259/15}, is the upper
 15 image taken from the same camera showing the next point
 16 in the chronology?
 17 A. Yes, that's right. Mrs Frade has now been flung onto
 18 the roadway and underneath the bus and she's sustained
 19 serious injuries and died almost instantaneously. The
 20 lower image is obviously where she came to rest and has
 21 been covered up.
 22 Q. You can take that off the screen now. So that was the
 23 next stage of the vehicle's movement, during which
 24 another pedestrian was fatally injured?
 25 A. That's correct, sir.

1 THE CHIEF CORONER: Mr Hough, would that be a convenient
 2 point for us to break for lunch?
 3 MR HOUGH: It would, indeed.
 4 Members of the jury, we're going to break now and
 5 sit again at 2 o'clock. When we break my usher is going
 6 to give you all a colour document. Can I just --
 7 I'm not going to read through it to you. It's
 8 a document which I suggest you read in your own time.
 9 Please take it away from court today with you and keep
 10 it with you.
 11 It sets out many of the dos and don'ts, do you
 12 remember those things I said at the beginning: don't do
 13 this and don't do that. It has it here in sort of good,
 14 easy form. One of the reasons that we give these to
 15 people to take away is you remember my comment about
 16 friends and family might say: well, that all sounds very
 17 interesting. This repeats that warning of not
 18 discussing with them, and you can show it to them and
 19 say: well, the Coroner has given me this, it tells me
 20 that I can't discuss it with you, because the natural
 21 human reaction is people want to know what it is that
 22 you are doing. So just, if you have a difficult member
 23 of the family who wants to do that, just show it to them
 24 and say: the Coroner has given me this. It also has
 25 various other things on there for you, so you will have

1 one of those each to keep during your time as a juror.
 2 We will break there, members of the jury, and we
 3 will sit again, please, at 2.05, thank you.
 4 I will rise.
 5 (1.00 pm)
 6 (The Luncheon Adjournment)
 7 (2.12 pm)
 8 (In the absence of the jury)
 9 THE CHIEF CORONER: Mr Hough, one of our jurors is having
 10 a problem with the monitor and has simply asked to
 11 change places with the person they are sitting next to,
 12 so I have said that's absolutely fine.
 13 (In the presence of the jury)
 14 THE CHIEF CORONER: Welcome back, members of the jury.
 15 I know the monitors are quite close to where you are
 16 sitting, and certainly occasionally they do flicker.
 17 You will notice that when we put images on, we try and
 18 put them on for the limited amount of time we need to,
 19 but if any of you need to move, then please do feel free
 20 to do so.
 21 MR HOUGH: Mr Crossley, we had reached a point in the path
 22 of the vehicle across the bridge where it had struck
 23 Aysha Frade and a number of other pedestrians, and we're
 24 going to move to another stage in its journey, and we
 25 were about to look at the plan again, or another plan,

1 {DC7960/51}, please. We're now looking at a plan
 2 focusing on the west side of the bridge. Are you able
 3 to describe using this plan, the next part of its
 4 journey?
 5 A. Yes, sir. As the vehicle struck Aysha Frade it moved on
 6 and, as you can see the path there, it was swerving on
 7 towards the road but still remaining upon the pavement
 8 and it struck Andreea Cristea, who was walking on the
 9 bridge from the Houses of Parliament over towards
 10 St Thomas' Hospital. So she was walking into the path
 11 of the vehicle, she was walking in the direction facing
 12 towards it.
 13 Q. She was, I believe, not alone on the pavement with other
 14 pedestrians who were also struck?
 15 A. That's correct. She was over here on holiday and she
 16 was with her boyfriend and she was struck and flung into
 17 the water.
 18 Q. May we look at some photographs of the sequence of
 19 events, {DC5259/17}, first of all. Do we see, first of
 20 all, a photograph on this page showing circled where
 21 Ms Cristea was?
 22 A. That's correct, you can see just on the edge of that
 23 circle there the vehicle.
 24 Q. Then the next page, please {DC5259/18}. If we look at
 25 the bottom of the page, do we see an image taken from

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1 a CCTV camera mounted on St Thomas' Hospital with a long
 2 view of the bridge looking towards the north bank of the
 3 Thames?
 4 A. That's correct, yes.
 5 Q. And circled, do we see Ms Cristea falling, having been
 6 propelled over the balustrade of the bridge?
 7 A. That's correct, yes.
 8 Q. And then next page, please. {DC5259/19}, the sign
 9 circled again of her falling into the water?
 10 A. That's correct, yes.
 11 Q. Is it right to say that in that area, the height of her
 12 fall would have been 12.5 metres?
 13 A. Yes.
 14 Q. Was Ms Cristea then carried by the current for some
 15 distance?
 16 A. Yes, she was carried by the current for approximately
 17 100 metres.
 18 Q. After that, just to briefly complete the story so far as
 19 she is concerned, what happened to her?
 20 A. A pleasure cruiser, somebody identified it from the
 21 bridge, was shouting at a pleasure cruise. They went
 22 out and tried to recover her and a London Fire Brigade
 23 boat was there and she was recovered from the water.
 24 Q. How long had she been in the water?
 25 A. She was in the water for slightly over five minutes.

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1 Q. May we now move to the next stage in the vehicle's
 2 movement over the bridge and look at, first, a plan
 3 {DC7960/51}. This is the plan we were looking at a few
 4 moments ago. You have described the movement of the
 5 vehicle as it approached and then struck
 6 Andreea Cristea, who is marked with a yellow flag. Can
 7 you describe the movement of the vehicle from there
 8 using this plan?
 9 A. As we can see with the path of the vehicle following the
 10 blue line, the vehicle went back onto the roadway into
 11 the bus lane there, and it has then driven back onto the
 12 pavement just by the steps. It was only on the pavement
 13 for a very short distance and manoeuvred round traffic
 14 signals and then went back onto the road.
 15 Q. Is it right to say when the vehicle mounted the pavement
 16 again, just above the embankment on the west side, on
 17 the left side of the plan, it appeared to be driving at
 18 another group of people?
 19 A. That's correct, yes.
 20 Q. And then for the next phase of the journey {DC7960/52},
 21 please.
 22 THE CHIEF CORONER: Just before we leave that plan,
 23 Mr Hough, officer, perhaps you can just help us with
 24 this: we can see it is on the road, but I think in fact
 25 it is a cycle lane, isn't it?

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1 A. Sorry, that's correct, yes, it is, my apologies, it is
 2 a cycle lane, yes, sir.
 3 THE CHIEF CORONER: So it is distinct from the pavement or
 4 the bus lane but it's a designated cycle lane that we
 5 see?
 6 A. Yes.
 7 MR HOUGH: Then {DC7960/52}, looking, and perhaps we can
 8 zero-in on the left-hand side to focus on the next part
 9 of the vehicle's movement. Again, can you help us with
 10 what happens after the vehicle has gone back onto the
 11 pavement just above the embankment?
 12 A. So as it's driven back onto the pavement, it manoeuvres
 13 round a traffic signal and then it goes back onto
 14 the road because there are some hostile vehicle barriers
 15 there, some barriers forcing traffic back out, so it
 16 goes back onto the main road, it goes around there and
 17 then it drives into the wall of the
 18 Palace of Westminster.
 19 Q. So is it right to say that the vehicle was essentially
 20 forced back into the road to go around the barriers
 21 which protect the base of the Elizabeth Tower of the
 22 Houses of Parliament?
 23 A. That's correct.
 24 Q. Then may we look at some photographs, please
 25 {DC5259/25}. Now, looking at the upper photograph, is

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1 this a photograph from a camera mounted on the perimeter
 2 of the Palace of Westminster estate looking towards
 3 Parliament Square?
 4 A. Yes, that's correct.
 5 Q. Do we see just visible at the bottom right of the
 6 picture the vehicle barrier you've described, and which
 7 we'll see again in footage?
 8 A. Yes, that's correct.
 9 Q. And do we see there that the vehicle has driven onto the
 10 pavement again and crashed into the wall of the Palace?
 11 A. That's right, and as it drove on there there was a group
 12 of pedestrians by the wall as he drove into the wall.
 13 Q. Is it right to say that further pedestrians were struck
 14 and injured at that stage?
 15 A. That's correct, yes.
 16 Q. If we look at the lower image, do we see there
 17 a photograph taken from the building opposite Portcullis
 18 House, above ground level, looking down at the vehicle
 19 where it had collided with one of the pillars forming
 20 part of the perimeter?
 21 A. Yes, that's correct.
 22 Q. Then {DC5259/26}, we see there on the upper image
 23 a focused shot of the vehicle after it had come into
 24 collision with the pillar?
 25 A. Yes.

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1 Q. And then at the bottom do we see a shot of the vehicle
 2 from ground level showing the extent of the damage to
 3 the front of it?
 4 A. That's correct, sir.
 5 Q. Then to continue with the description, may we look again
 6 at a plan we looked at this morning, {DC7960/53}. Now,
 7 you have already described that, having crashed the
 8 vehicle into the pillar, Khalid Masood got out of the
 9 vehicle?
 10 A. Yes, that's correct. He then followed the route which
 11 is shown there, and he began running around towards the
 12 entrance to the Palace of Westminster.
 13 Q. Just pausing there, what were any people in that area
 14 doing over that period?
 15 A. As he got out of the vehicle, he was armed with two
 16 knives and people began running from him and they were
 17 running round the corner into Parliament Square.
 18 Q. You have already told us that he then followed the path
 19 marked in red on this plan around the perimeter of the
 20 parliamentary estate?
 21 A. Yes.
 22 Q. That he entered the estate at the Carriage Gates
 23 entrance, the north vehicle gates, and attacked the
 24 officer there?
 25 A. That's correct, sir, yes.

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1 Q. You have already described what happened inside, so
 2 I'm not going to ask you those questions again, but may
 3 we look, please, at some still photographs to examine
 4 the events in a little more detail.
 5 First of all, {DC5259/28}. If we look at the upper
 6 image I think we're here looking at a still taken from
 7 CCTV footage from a camera at the north-west corner, so
 8 the corner where Masood had run around, but looking back
 9 into New Palace Yard?
 10 A. That's correct, sir, yes.
 11 Q. On the right of the image, are we looking at a security
 12 hut positioned at the gates?
 13 A. That's correct, yes.
 14 Q. Then using this image, can you describe how Masood
 15 entered and what happened with the police officers as
 16 a result?
 17 A. As Masood came in towards the gate, PC Palmer stepped
 18 forward and a struggle ensued at the gate and Masood was
 19 attacking him there. That's forced PC Palmer back in
 20 and the shot you're seeing there, so the gates as you're
 21 looking at that picture, the upper picture, the gates
 22 where he had come through are just slightly out of shot
 23 immediately to the right.
 24 PC Palmer, as we can see in the hi-vis jacket there,
 25 has been forced backwards and he collapses by that black

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1 wall there just slightly over towards the left of where
 2 he is now.
 3 THE CHIEF CORONER: I'm just going to ask if the operator
 4 might just put a cursor, because there are a number of
 5 black walls, Superintendent Crossley, so if we make sure
 6 we're all looking at the right one. It's the upper of
 7 the two images. Thank you.
 8 A. Yes.
 9 THE CHIEF CORONER: So the officer we see stumbling with the
 10 hi-vis jacket, that's Police Constable Palmer?
 11 A. That's correct.
 12 THE CHIEF CORONER: And the black low wall is the one where
 13 the cursor is just at the top?
 14 A. That's correct, sir, yes.
 15 MR HOUGH: And that's a low wall I think that surrounds a
 16 central grassed area within New Palace Yard?
 17 A. Yes, that's correct.
 18 Q. If we move the cursor slightly to the right, do we see
 19 Masood entering, forcing PC Palmer back?
 20 A. That's correct.
 21 Q. And looking at the lower image, is this an image taken
 22 from the building opposite Portcullis House, looking
 23 down at the same area but in more detail?
 24 A. Yes. A much clearer image and we can obviously see --
 25 what we're seeing there is that low wall, as described

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1 up above where the cursor was, and we can see the legs
 2 of PC Palmer there in the air and Khalid Masood going
 3 towards him with a knife in each hand.
 4 Q. Knives pointing downwards?
 5 A. Yes.
 6 Q. And then next page, please, {DC5259/29}, looking at the
 7 upper image here, can you use this to describe what
 8 happened next after Masood had approached PC Palmer
 9 against the wall?
 10 A. So whilst PC Palmer was on the floor, Masood was
 11 attacking him with the knives and stabbing him.
 12 PC Palmer's colleagues went back towards him and this
 13 distracted Masood and allowed PC Palmer to get up.
 14 In the top image we can see the hi-vis jackets
 15 moving away from the camera and PC Palmer with his
 16 colleagues then began to retreat away from Masood
 17 towards that car which you can see there.
 18 Q. That's another image taken from the camera at the
 19 north-west corner looking into New Palace Yard at ground
 20 level. Do we see in the lower half of the page a still
 21 image taken from a camera mounted above ground level on
 22 the Palace of Westminster looking down towards the
 23 gates?
 24 A. That's correct. What we're seeing in there is -- you
 25 can see the police officers in the high visibility

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1 jackets. They've retreated around there and PC Palmer
 2 ran in where Masood is now, he'd run around that side of
 3 the vehicle, and Khalid Masood is chasing the officers
 4 at that point.
 5 Q. So the gates, I think, into which Masood had come are at
 6 the top right corner of the lower photograph; is that
 7 right?
 8 A. That's correct.
 9 Q. We see first the officers and then Masood running past
 10 a vehicle, but is it right that that's a vehicle that
 11 was leaving the parliamentary estate?
 12 A. That's correct.
 13 Q. Is it right that vehicle was going through a channel for
 14 vehicles which had a vehicle barrier that would rise and
 15 fall?
 16 A. That's correct, sir, yes.
 17 Q. Is it right that the barrier had risen because the
 18 vehicle was leaving?
 19 A. Yes, that's correct.
 20 Q. And it was that barrier rising which allowed first of
 21 all the officers to escape through that route and then
 22 Masood to pursue them through that route?
 23 A. That's correct.
 24 Q. Then if we can look at the next page, {DC5259/30}, do we
 25 see in the upper image a photograph of Masood running

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1 through that route, having just passed the vehicle that
 2 was leaving the estate?
 3 A. That's correct, and we can see the knife in his hand
 4 there as he runs through.
 5 Q. We can take that off the screen now.
 6 After Masood had run through that channel, what
 7 happened?
 8 A. As Masood ran through there, the officers are retreating
 9 and the close protection officers, which we mentioned
 10 earlier, are making their way quickly towards that area
 11 and so they're going into the direction of Masood, and
 12 Masood is going towards them armed with the two knives.
 13 The close protection officers shouted a warning, we
 14 know that from a number of witnesses in the area, and
 15 Masood continued to go towards them. Having shouted the
 16 warning, one of the officers fired at Masood and fired
 17 three shots, stopping Masood.
 18 Q. We can bring up on screen {DC5259/32}. Looking at the
 19 image in the centre of this page, are we seeing another
 20 still from the CCTV camera mounted high up on the
 21 Palace of Westminster?
 22 A. That's correct.
 23 Q. Do we see once again at the top right of the image, the
 24 vehicle entry gates and exit gates to New Palace Yard?
 25 A. Yes, sir.

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1 Q. And do we see that Masood, having come through that
 2 channel for vehicles leaving the Palace, has been
 3 confronted and shot by one of the close protection
 4 officers?
 5 A. That's correct, yes.
 6 Q. We can see the close protection officer, I think, just
 7 to the immediate right of the photograph?
 8 A. That's correct, yes.
 9 Q. And to his left, a police officer in a hi-vis jacket, is
 10 that Police Constable Carlisle --
 11 A. That's correct, sir, yes.
 12 Q. -- from who we will be hearing?
 13 At this point in the footage Masood has collapsed as
 14 a result of being shot?
 15 A. Yes, that's correct, sir.
 16 Q. Meanwhile, where had PC Palmer gone?
 17 A. PC Palmer is -- has gone past this area and he's just
 18 out of shot and he's now collapsed just out of shot to
 19 the right and slightly beyond where the plain-clothes
 20 officer is.
 21 Q. We can take that image off the screen. In a word or
 22 two, what happened to PC Palmer as a result of the
 23 attack Masood had launched on him?
 24 A. Colleagues went to work on PC Palmer immediately, giving
 25 first aid, and as was seen there on one of the images,

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1 a lot of first aid was given, but sadly he died at the
 2 scene.
 3 Q. What happened to Masood as a result of him being shot?
 4 A. Having been shot, officers immediately went to work with
 5 first aid on him, trying to preserve his life .
 6 Paramedics were called and a number of paramedics and
 7 the air ambulance arrived and he was worked on and he
 8 was taken to hospital .
 9 Q. And at hospital?
 10 A. He was taken to St Mary's Hospital where he died at the
 11 hospital .
 12 Q. May we now move to a presentation tool which has been
 13 prepared by your colleagues in the Computer Aided
 14 Modelling Bureau. The reference is AV0077.
 15 Pause there. Now, I think what we're about to see
 16 is an animation based on a 3D laser scan survey of
 17 Westminster Bridge and the New Palace Yard area; is that
 18 right?
 19 A. Yes, sir .
 20 Q. That survey was carried out by your colleagues on
 21 various dates?
 22 A. Yes, sir .
 23 Q. A few points to note about the animation: is it right
 24 this will show the rough route taken by the Hyundai
 25 across the bridge and the positions of those who were

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1 fatally injured?
 2 A. Yes, sir .
 3 Q. The vehicle route and victim positions are based on the
 4 expert opinions of the collision reconstruction experts
 5 in the police?
 6 A. Yes, sir .
 7 Q. The vehicles which we see or we shall see on the bridge
 8 are those which were there at the time of the survey, so
 9 many fewer than were there at the time of the attack?
 10 A. Yes, that's correct .
 11 Q. But your colleagues making this presentation have
 12 removed emergency service vehicles from the images, so
 13 we won't see them?
 14 A. Yes, that's correct .
 15 Q. I think we'll also see as we look at this animation blue
 16 markers highlighting CCTV cameras from which some
 17 important footage has been taken that we will see?
 18 A. Yes .
 19 Q. And that the scene will be shown in black and white
 20 because of poor light conditions at some stages of the
 21 survey exercise?
 22 A. Yes, that's correct .
 23 Q. We'll play on, please.
 24 (Video played in court)
 25 Pause here, please. We're now, I think, at

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1 bird's-eye view level, looking down at the Thames with
 2 north to the bottom of the page, Palace of Westminster
 3 on the right and St Thomas' Hospital on the left ; is
 4 that right?
 5 A. That's correct, yes .
 6 Q. Viewed from this perspective, is it right that the
 7 vehicle travels from the left of the screen to the right
 8 over the bridge?
 9 A. Yes, that's correct .
 10 Q. We'll then zoom down to street level , and play on,
 11 please .
 12 So the red line is showing the route taken by
 13 Masood's vehicle?
 14 A. Yes, that's correct, it's parked in the bus lane there
 15 and then pulled off .
 16 Q. Pause there. We're now seeing, is this right , a camera
 17 marked out which is on the side of the road where the
 18 vehicle was driven, from which we'll see quite a lot of
 19 images and footage; is that right?
 20 A. Yes, that's correct .
 21 Q. And an example of that footage showing the vehicle just
 22 starting on its journey across the bridge?
 23 A. Yes .
 24 Q. Play on, please. And marked out, the other camera from
 25 the Marriott archway?

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1 A. Yes .
 2 Q. Pause here, please. Are we now looking at the first
 3 position where the vehicle has mounted the kerb and, as
 4 you've described, is striking Mr Cochran?
 5 A. Yes, that's correct .
 6 Q. Play on, please. Showing where he falls .
 7 Then pause .
 8 Is the animation now showing the vehicle continuing
 9 along the pavement striking Mr Rhodes, among other
 10 pedestrians?
 11 A. Yes, that's correct , and then veering back onto
 12 the road .
 13 Q. As you've told us, that was to avoid a temporary traffic
 14 sign?
 15 A. Yes .
 16 Q. Play on, please .
 17 Pause there .
 18 Are we now seeing the animation is showing us the
 19 vehicle moving back onto the pavement, striking first
 20 Aysha Frade and then a number of other pedestrians?
 21 A. Yes, that's correct .
 22 Q. And then just ahead and over to the right , the bus under
 23 which she very sadly fell ?
 24 A. Yes .
 25 Q. Play on, please .

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1 Pause there.
 2 We're now looking, I think, at the part of the
 3 bridge slightly further towards the north bank side,
 4 looked at from side—on to the position where
 5 Andreea Cristea, amongst other pedestrians, was struck
 6 and she was thrown into the water?
 7 A. Yes, that's correct.
 8 Q. Play on, please.
 9 Pause there.
 10 Are we now looking at the part of the journey where
 11 the vehicle mounts the pavement once again, driven into
 12 a further group of pedestrians just near a pedestrian
 13 crossing?
 14 A. Yes, that's correct.
 15 Q. And just over the embankment and the north bank?
 16 A. Yes.
 17 Q. And then we'll see in a moment as we play on, the
 18 vehicle veers around the distinctively curved vehicle
 19 barriers through the cycle lane?
 20 A. Yes, that's correct.
 21 Q. Play on, please. Passing the vehicle barriers.
 22 Pause there.
 23 We're seeing, I think, marked out a camera which is
 24 pointing towards the river from the
 25 Palace of Westminster, and do we see to the left of the

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1 inset image, the vehicle barriers which the vehicle went
 2 around?
 3 A. Yes, that's correct.
 4 Q. Play on, please.
 5 Pause there.
 6 We are now seeing marked out another camera from
 7 which we will see quite a bit of footage, pointing
 8 towards the Parliament Square direction, and circled the
 9 vehicle passing the barriers?
 10 A. Yes, that's correct.
 11 Q. Play on, please.
 12 And pause.
 13 Are we seeing now the final part of the vehicle's
 14 route as it mounts the pavement for a final time and
 15 collides with the pillar on the perimeter of the Palace?
 16 A. Yes, that's correct, sir.
 17 Q. Play on, please.
 18 Pause, please.
 19 We're now looking, I think, down at the north—west
 20 corner of the parliamentary estate, seeing Masood's
 21 route on foot plotted out as you plotted it out on the
 22 plan we looked at earlier?
 23 A. Yes, that's correct.
 24 Q. Do we see to the right—hand side the vehicle gates where
 25 PC Palmer was attacked?

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1 A. Yes, that's correct, sir.
 2 Q. Play on, please.
 3 Pause there, please.
 4 Is this right, looking down at New Palace Yard, that
 5 it's — in form, it's roughly a square or a rectangular
 6 area with a grassed area in the centre.
 7 A. Yes.
 8 Q. The grassed area is bounded by vehicle tracks and
 9 vehicle ramps up and down from an underground car park?
 10 A. Yes, that's right, sir.
 11 Q. Do we see on the left—hand side of the image, the route
 12 that vehicles would take entering the
 13 Palace of Westminster?
 14 A. Yes, that's correct.
 15 Q. And on the right—hand side, the area where they would
 16 leave?
 17 A. Yes, that's correct.
 18 Q. Are we seeing marked out at the left—hand side in blue,
 19 a CCTV camera looking into the square?
 20 A. Yes.
 21 Q. And inset, an image on the right which shows us
 22 an example of footage from that camera?
 23 A. That's correct, yes.
 24 Q. As we saw before, is that a camera from which we see
 25 a fair amount of the available imagery of Masood

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1 entering the Palace and attacking PC Palmer?
 2 A. Yes.
 3 Q. Play on, please.
 4 Pause there.
 5 You marked out in your plan earlier and described in
 6 your evidence PC Palmer first of all being attacked by
 7 the gates and then driven back against a low wall; is
 8 that what these yellow arrows are showing now?
 9 A. Yes, that's showing the route that he took back and then
 10 collapsed by the wall as indicated there in the yellow.
 11 Q. Play on, please.
 12 Pause there.
 13 Are we now looking at, marked in blue on the right,
 14 a camera mounted on the Palace looking down towards the
 15 entrance and exit gates?
 16 A. Yes, that's right.
 17 Q. And on the left inset, an image which is an example of
 18 images taken from that camera?
 19 A. That's correct.
 20 Q. Is it right to say that that is a camera which will show
 21 us a fair amount of the imagery of Masood being
 22 confronted and shot?
 23 A. Yes, that's correct.
 24 Q. Play on, please.
 25 Pause there. Now, you marked out on your plan

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1 earlier where Masood was confronted and shot. I think
 2 that's being arrowed in yellow to the left of the shot.
 3 A. Yes, and what you're seeing there is the debris that was
 4 left where the medical treatment was done for
 5 Khalid Masood.
 6 Q. Over to the right, an area where, as you say,
 7 Keith Palmer collapsed and received medical help?
 8 A. Yes.
 9 Q. Play on, please.
 10 Pause again.
 11 We're now seeing marked out, I think, a camera
 12 mounted very high up on the facade of the Palace, again
 13 looking down at the gates and Parliament Square beyond?
 14 A. Yes, that's correct.
 15 Q. Circled, the area of the gates at the point in time that
 16 Masood is entering?
 17 A. Yes.
 18 Q. And we'll see some footage from this camera of that
 19 stage in the events; is that right?
 20 A. That's correct, sir.
 21 Q. Play on, please.
 22 Pause there.
 23 You showed us earlier in your report and described
 24 to us a photograph taken from an unusual ground level
 25 angle at the point where vehicles would leave the

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1 square. Is that marked out in blue at the top of the
 2 page where that camera is?
 3 A. Yes, that's correct.
 4 Q. And then inset, the image from that camera showing
 5 Masood running through with the knife in his hand?
 6 A. Yes, that's right, sir.
 7 Q. Play on, please.
 8 THE CHIEF CORONER: Just before we move on, one of the
 9 points -- I think earlier we heard the barrier went up.
 10 In fact, the barrier goes down, doesn't it, to allow the
 11 vehicles out?
 12 A. The barrier goes down, yes.
 13 THE CHIEF CORONER: It goes down into the ground so it's
 14 flat.
 15 A. So there is the ramp that goes down there, but there is
 16 a barrier there, I believe, which raises --
 17 THE CHIEF CORONER: The barrier goes up and the ramp goes
 18 down?
 19 A. Yes.
 20 THE CHIEF CORONER: Thank you.
 21 MR HOUGH: Play on, please. Pause there.
 22 Are we seeing here all the relevant CCTV cameras
 23 marked giving us an idea of quite how many cameras you
 24 could take imagery from in that area?
 25 A. Yes, that's correct.

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1 Q. Play on, please.
 2 Pause there.
 3 We're now, I think, looking at, marked out, a camera
 4 high up on a building at the corner of Parliament Square
 5 and Parliament Street?
 6 A. Yes.
 7 Q. Looking towards the base of Elizabeth Tower and the
 8 vehicle barriers that you pointed out earlier?
 9 A. Yes, that's correct.
 10 Q. And we see a sample shot from that camera?
 11 A. Yes.
 12 Q. Play on, please.
 13 Pause there.
 14 Here marked out a camera at the south side of
 15 Parliament Street, the junction with Parliament Square.
 16 A. Yes, correct, sir.
 17 Q. Again, looking to the north-west corner of the
 18 parliamentary estate?
 19 A. Yes.
 20 Q. And I think on this camera, you picked up footage of
 21 Masood running around the perimeter before he entered
 22 the Palace?
 23 A. Yes, that's correct, sir.
 24 Q. We see, in fact, him circled as he ran around; is that
 25 right?

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1 A. Yes, that's correct.
 2 Q. Play on, please.
 3 Pause there.
 4 Finally, I think, a camera mounted also at
 5 an elevated level looking down towards the bridge and
 6 with the vehicle circled just before it went round the
 7 vehicle barriers.
 8 A. Yes, that's correct, sir.
 9 Q. Play on, please.
 10 Pause there.
 11 We're now seeing marked out the camera on
 12 St Thomas' Hospital with the long view of the bridge; is
 13 that right?
 14 A. Yes, that's right.
 15 Q. Play on, please.
 16 Finally marking out where the various victims who
 17 were fatally injured were?
 18 A. Yes, that's correct.
 19 Q. That, I think, is the end of that animation.
 20 A. Yes.
 21 Q. Now, we now move to a timeline video. Is it right to
 22 say that your team prepared a timeline video which is
 23 a compilation of CCTV and other imagery showing the key
 24 events of Masood's preparations and the attack?
 25 A. Yes, that's correct.

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1 Q. We're going to view the part concerned with his
2 preparations later in the hearing, I think you
3 understand, with your colleague Mr Brown.
4 A. Yes.
5 Q. But at this stage we'll be viewing the section concerned
6 with the attack, again, asking your assistance as we go
7 along.
8 Is it right to say, Mr Crossley, that the footage
9 and images come from a range of sources, including CCTV
10 cameras mounted on those various buildings that we've
11 looked at?
12 A. Yes, that's right.
13 Q. CCTV cameras also mounted on buses going over the
14 bridge?
15 A. Yes.
16 Q. And, as such, footage is from a number of different
17 perspectives and ranges of distance?
18 A. Yes, that's correct.
19 Q. We'll see in the compilation, I think, the videos from
20 which a number of the stills we've looked at were taken?
21 A. Yes.
22 Q. And if we can start the compilation, please, Oli, at the
23 chapter entitled "Attack car".
24 (Video played in court)
25 Pause here.

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1 Are we now looking at the camera mounted high up at
2 the south bank of the Thames, looking across the
3 Palace of Westminster on the left, Portcullis House on
4 the right?
5 A. Yes, that's correct.
6 Q. And are we seeing just passing the 159 bus, the Hyundai
7 car driven by Masood?
8 A. That's correct, yes.
9 Q. In a moment when we play on will we see that vehicle
10 mount the pavement, striking the first victims, Mr and
11 Mrs Cochran?
12 A. Yes, that's correct. They're just to the left of that
13 lamppost there.
14 Q. Play on, please.
15 Pause there.
16 So over the last second or two did we see the
17 vehicle mount the kerb, striking first of all Mr and
18 Mrs Cochran and then a further group of pedestrians,
19 including Mr Rhodes?
20 A. That's correct, and he's then obviously swerved on, as
21 we discussed earlier, with the yellow traffic sign on
22 the pavement there, he swerved out to avoid that.
23 THE CHIEF CORONER: Perhaps the operator might just put the
24 cursor on that yellow sign, just so we ... thank you.
25 MR HOUGH: May we play on, please. We see the vehicle carry

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1 on further along the bridge striking further
2 pedestrians.
3 A. Yes, that's correct.
4 Q. Pause here, please. We are now, I think, looking at the
5 footage from the CCTV camera on the Marriott Hotel
6 archway on the south bank of the Thames looking towards
7 the bridge?
8 A. Yes, that's correct.
9 Q. Will we see the vehicle come into view from the
10 left-hand side of the screen?
11 A. Yes.
12 Q. Moving past the bus and striking the pedestrians, this
13 time from a different viewpoint?
14 A. Yes, that's correct.
15 Q. Play on, please.
16 Pause again.
17 We're now, I think, looking at footage from the
18 camera mounted on the nearside of the route 53 bus,
19 which is travelling from the south bank side in the
20 direction of the north bank side.
21 A. Yes.
22 Q. Because the camera is pointing backwards, it's looking
23 towards the south bank side with St Thomas' Hospital on
24 the right.
25 A. Yes.

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1 Q. Will we see when the footage starts the vehicle having
2 left the pavement to avoid the vehicle sign, rejoining
3 the pavement and striking further pedestrians?
4 A. Yes, that's correct.
5 Q. Play on, please.
6 Aysha Frade being struck and further pedestrians.
7 Pause there.
8 I think we've just seen the bus passing over
9 Aysha Frade where she was thrown under its wheels by the
10 car?
11 A. Yes, that's correct.
12 Q. Play on, please. Pause again.
13 I think we're now looking from a camera mounted
14 inside the same bus. In the middle of the bus, the
15 mid-section, looking towards the exit doors and so
16 towards the pavement on which Mrs Frade is walking and
17 on which the car will be driven?
18 A. Yes, that's right.
19 Q. Play on, please.
20 Pause there.
21 We're just seeing Mrs Frade through the right-hand
22 window, the right-hand door window?
23 A. Yes.
24 Q. And shortly, we'll see the vehicle come past.
25 Play on, please.

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1 And pause, please.
 2 We're now, I think, looking at footage from a CCTV
 3 camera mounted on the front of the same bus, the
 4 route 53.
 5 A. Yes, that's correct.
 6 Q. We'll see Aysha Frade on the pavement to the left as the
 7 bus passes her and before she's struck, and then a few
 8 moments later we'll see the Hyundai pass on the
 9 pavement?
 10 A. Yes, that's correct.
 11 Q. Play on, please.
 12 Pause here.
 13 Are we now looking at footage from the front of the
 14 route 12 bus?
 15 A. Yes.
 16 Q. The bus which was immediately in front of the route 53?
 17 A. That's correct, yes.
 18 Q. So also looking towards the Palace of Westminster side
 19 of the bridge.
 20 A. Yes.
 21 Q. And on the left, the pavement relatively full of
 22 pedestrians?
 23 A. Yes, that's correct.
 24 Q. Among them, Andreea Cristea?
 25 A. Yes.

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1 Q. When we play on in a moment, will we see the vehicle
 2 strike those pedestrians as it goes past on the
 3 pavement?
 4 A. Yes, that's correct.
 5 Q. And I think it's possible to see, but very faintly,
 6 a figure -- the figure of Andreea Cristea thrown over
 7 the balustrade?
 8 A. Yes, that's correct.
 9 Q. Play on, please.
 10 Pause, please.
 11 Are we now looking at footage from the camera
 12 mounted on St Thomas' Hospital with the long view
 13 towards the bridge?
 14 A. Yes, that's correct.
 15 Q. If we look carefully will we see in a moment when we
 16 play on, the Hyundai pass across the bridge from right
 17 to left, striking pedestrians, and in the middle
 18 section, a figure falling and striking the water?
 19 A. Yes, that's correct.
 20 Q. Play on, please.
 21 And that, we know, is Andreea Cristea?
 22 A. Yes.
 23 Q. Pause here.
 24 I think we're now looking at footage from a CCTV
 25 camera on Bridge Street on the side of the

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1 Palace of Westminster. We're going to see the vehicle
 2 come towards us, having struck all those pedestrians on
 3 the bridge, and veering around the vehicle barriers we
 4 see on the left-hand side of the screen; is that right?
 5 A. Yes, that's correct, and you'll be able to see there's
 6 already substantial damage to the car because of what's
 7 happened.
 8 Q. And quite a number of pedestrians effectively protected
 9 by those vehicle barriers?
 10 A. Yes.
 11 Q. Play on, please.
 12 Pause, please.
 13 This is a sequence of footage, I think, from
 14 a camera mounted at a high level at the junction of
 15 Parliament Street with Parliament Square, looking down
 16 towards the bridge.
 17 A. Yes.
 18 Q. We'll see, I think, in a moment, the Hyundai coming
 19 towards us, pass the curve of the vehicle barrier,
 20 strike a number of pedestrians as it collides with the
 21 railings?
 22 A. Yes, that's correct.
 23 Q. Play on, please.
 24 Pause here.
 25 I think we'll get a better image on this one of the

63

1 vehicle colliding with the side of the Palace. Is this
 2 footage from a camera pointing towards Parliament Square
 3 with the vehicle passing those vehicle barriers on the
 4 right of screen?
 5 A. Yes.
 6 Q. And in a moment when we play on, will we see the vehicle
 7 having passed the barriers, swerve to the left, striking
 8 pedestrians in view of this footage?
 9 A. Yes, that's correct.
 10 Q. Play on, please.
 11 Pause here, please.
 12 We're now, I think, looking at footage from another
 13 CCTV camera at the junction of Parliament Street with
 14 Parliament Square, again, looking towards the bridge
 15 with the Palace of Westminster on the right; yes?
 16 A. Yes.
 17 Q. The vehicle has just come into shot beyond the
 18 distinctive curve of the vehicle barriers?
 19 A. Yes.
 20 Q. And we'll see, I think, the Hyundai come towards us past
 21 that barrier, once again, collide with the railings?
 22 A. Yes, that's correct.
 23 Q. And then after I think about five or six seconds, we'll
 24 see the door open and Masood leaving the vehicle by the
 25 driver's door?

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1 A. Yes, that's correct.
 2 Q. Play on, please.
 3 Pause there.
 4 Now, the vehicle has just crashed and rebounded. If
 5 we focus on the vehicle itself, so just to the right of
 6 the red bus, we'll see the period of time before Masood
 7 opens his door and leaves the vehicle.
 8 Play on, please.
 9 He has opened the door, seems to stagger slightly
 10 before running on; is that right?
 11 A. Yes, that's correct.
 12 Q. Pause here, please.
 13 We're now, I think, looking at a CCTV camera with
 14 a high-level view of the north-west corner of
 15 New Palace Yard. When we play on, will we see Masood,
 16 who has left the vehicle, running from the left of the
 17 screen around the perimeter?
 18 A. Yes, that's correct. He's now armed with two knives,
 19 from witness accounts.
 20 Q. We'll see the speed of his movement and he'll be circled
 21 to identify him.
 22 A. Yes.
 23 Q. We'll also see, I think, a wave of pedestrians passing
 24 the front entrances of New Palace Yard and Masood moving
 25 through them as various people will describe when they

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1 give their evidence?
 2 A. Yes, that's correct.
 3 Q. Play on, please.
 4 So he is circled there.
 5 And pause there.
 6 Now, we'll see him in a moment, rather less clearly,
 7 moving into New Palace Yard as his attack on PC Palmer
 8 continues.
 9 A. Yes.
 10 Q. Play on, please.
 11 Pause there.
 12 Can we see just faintly by that curved low wall
 13 around the grassed area, Masood has forced PC Palmer
 14 back against the wall?
 15 A. Yes, that's correct.
 16 Q. And if we look up the screen towards the vehicle, do we
 17 see there the channel through which the vehicle has come
 18 and through which first the officers and then Masood
 19 will go?
 20 A. Yes, that's right.
 21 Q. Play on, please.
 22 Pause there.
 23 Have we just seen one of the officer's colleagues,
 24 PC Carlisle, moving towards Masood, distracting him and
 25 then both he and PC Palmer running away?

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1 A. That's correct, you have PC Palmer on the left, Carlisle
 2 on the right there, and Masood is chasing after them.
 3 Q. Play on, please.
 4 Pause there.
 5 The officers have, I think, run either side of the
 6 car, further into New Palace Yard. Masood has just
 7 passed the car.
 8 A. That's correct.
 9 Q. Play on, please.
 10 And pause there.
 11 Masood, is this right, has just reached the furthest
 12 point that he will reach and is just being confronted by
 13 one of the close protection officers in view?
 14 A. Yes, that's right.
 15 Q. Play on, please. We can just see Masood collapse there?
 16 A. Yes.
 17 Q. Then play on.
 18 Pause there.
 19 Now, we're now, I think, looking at footage from
 20 a camera mounted on the Palace of Westminster at a high
 21 level looking down towards the gates, with
 22 Parliament Square and beyond, slightly to the left of
 23 shot.
 24 A. That's correct.
 25 Q. Now, when we play on in a moment, will we see first of

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1 all the police officers in the high-visibility jackets
 2 moving away from the gates --
 3 A. Yes.
 4 Q. -- to see what's happened with the vehicle crashed into
 5 the perimeter?
 6 A. Yes, that's correct.
 7 Q. And then as people run past, those officers moving back
 8 towards the gates?
 9 A. Yes.
 10 Q. And do we see, just to complete our understanding, the
 11 vehicle, the car that is leaving the Palace, just coming
 12 into view at the bottom of the screen?
 13 A. Yes.
 14 Q. Play on, please.
 15 Pause there.
 16 Have we just seen Masood forcing his way in, driving
 17 PC Palmer back against the low wall which we can see in
 18 the middle of the shot?
 19 A. Yes.
 20 Q. And I think in a moment we'll see from this perspective
 21 PC Carlisle moving over towards Masood, distracting him
 22 and then both he and PC Palmer moving away?
 23 A. Yes.
 24 Q. Play on, please.
 25 Pause there.

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1 Have we just seen Masood running past the vehicle
 2 through that channel that's been left open by the
 3 barriers rising and falling?
 4 A. Yes.
 5 Q. And we'll see Masood go further in before being
 6 confronted.
 7 A. Correct, yes.
 8 Q. Play on, please. Once again, can we pause at the start
 9 of this footage.
 10 We're now, I think, seeing some footage from the
 11 camera at the corner of New Palace Yard looking in, the
 12 camera from which we saw some stills earlier on?
 13 A. Yes, that's right.
 14 Q. The gates over to the far right of shot?
 15 A. Yes.
 16 Q. The security hut within shot on the right-hand side?
 17 A. Yes.
 18 Q. And the low wall over further to the left?
 19 A. Yes.
 20 Q. Is this right: this is the clearest moving imagery
 21 showing the attack?
 22 A. Yes, it is.
 23 Q. Play on, please.
 24 Pause there.
 25 Did we see in the last few seconds the attack taking

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1 place and an idea of the ferocity of that attack?
 2 A. Yes.
 3 Q. Then we're just seeing the officers getting away from
 4 Masood and him following.
 5 A. Yes.
 6 Q. And we'll get from this an idea of the speed and type of
 7 his movement as he follows them; is that right?
 8 A. Yes.
 9 Q. Play on, please.
 10 May we pause at the start of this clip.
 11 Are we now looking at footage from the ground level
 12 camera that looks across that channel where the vehicle
 13 we saw was leaving the estate?
 14 A. Yes, that's correct.
 15 Q. And in answer to the learned Coroner's point, will we
 16 see the barrier in the middle of the shot rising, just
 17 as the vehicle barriers below it have fallen, so the two
 18 different forms of protection removed to allow the
 19 vehicle to leave?
 20 A. Yes.
 21 Q. And will we see in a moment a number of figures running
 22 through, police officers first of all, and then finally
 23 Masood running from left to right with the knife clearly
 24 visible in his right hand?
 25 A. Yes.

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1 Q. Play on, please.
 2 May we pause at the start of this clip.
 3 I think we're now looking at footage from a camera
 4 within New Palace Yard pointing from the central area
 5 towards the Palace of Westminster itself?
 6 A. Yes.
 7 Q. We'll first of all, I think, see people running away
 8 from Masood, from right to left across the screen?
 9 A. Yes.
 10 Q. And then I think we'll see figures come into view from
 11 the left, which are the armed close protection officers
 12 who were involved in the confrontation with Masood?
 13 A. That's correct.
 14 Q. When we see them, is this right, their figures will be
 15 obscured to an extent because their identities need to
 16 be protected?
 17 A. Yes.
 18 Q. But their mouths and their weapon hands will be visible?
 19 A. Yes.
 20 Q. I'm going to play on in a second and we'll then see the
 21 footage again a moment after that in slow motion.
 22 Pause here.
 23 So we're now, I think, about to see slow motion
 24 footage of the last part of that last section; is this
 25 right?

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1 A. Yes.
 2 Q. Some of the unarmed officers moving from the right, but
 3 just coming into the shot on the left, one of the close
 4 protection officers with his firearm visible in his
 5 right hand?
 6 A. Yes.
 7 Q. And his mouth open?
 8 A. Yes.
 9 Q. We'll see his movement and the movement of his colleague
 10 forward and back during the course of the confrontation?
 11 A. Yes.
 12 Q. Play on, please.
 13 Pause there.
 14 So do we see that the two close protection officers
 15 were roughly parallel with each other, looking towards
 16 Masood?
 17 A. Yes.
 18 Q. I think the police officer in the high-visibility jacket
 19 who is just beyond them whom we saw is PC Carlisle
 20 again?
 21 A. That's correct.
 22 Q. We see in both cases their weapon hands and the firearms
 23 in their hands?
 24 A. Yes.
 25 Q. And we'll see even more clearly with the left-hand of

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1 the two officers, his mouth opening and closing?
 2 A. Yes.
 3 Q. Just before we play this, can you help us with this: has
 4 any effort been made to ascertain what, if anything,
 5 they were saying?
 6 A. Yes, on getting this footage we got a lip-reading expert
 7 to go over this to see if she could identify the words
 8 that were being said. She has identified two words that
 9 were being said, but she can only confirm that one of
 10 the words, the first word, is "Stand".
 11 Q. The word "Stand", being said or shouted?
 12 A. Yes.
 13 Q. Play on, please.
 14 Pause there for a moment. This, I think, is the
 15 final clip we'll see, footage from a camera on the
 16 Palace facade looking towards Carriage Gates with
 17 a particular focus on the area where Masood is to be
 18 confronted and shot?
 19 A. Yes.
 20 Q. We'll see, I think, in this footage, the best overview
 21 footage of that confrontation, including the officers
 22 involved?
 23 A. Yes.
 24 Q. And the first thing we'll see is the vehicle that was
 25 leaving the Palace, one of whose occupants we'll hear

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1 from, just leaving as the barrier rises?
 2 A. Yes.
 3 Q. Play on, please.
 4 Masood entering again.
 5 Then pause there.
 6 We're seeing Masood just coming past on what is,
 7 from our perspective, the right-hand side offside of the
 8 car?
 9 A. Yes.
 10 Q. And then as he comes through that channel, we'll see him
 11 confronted?
 12 A. Yes.
 13 Q. Play on, please.
 14 Pause there.
 15 Do we see the point Masood has reached when he is
 16 confronted with one of the close protection officers
 17 visible on the right-hand side of the screen; yes?
 18 A. Yes.
 19 Q. PC Carlisle to the left with a good view of both officer
 20 and Masood?
 21 A. Yes.
 22 Q. And just as we see this, we'll see Masood's movement as
 23 the officer has confronted him.
 24 A. Yes.
 25 Q. Play on, please.

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1 That, I think, is the extent of the compilation.
 2 A. Yes.
 3 Q. Finally, Mr Crossley, may I ask you some questions about
 4 the scale and conclusions of your investigation, and
 5 I'm looking now at the last page of your report.
 6 Are you able to give us an impression of the scale
 7 of your team's investigation into the Westminster Terror
 8 Attack?
 9 A. Yes, as you can imagine, it was a very large-scale
 10 investigation, many officers deployed, in total over
 11 1,300 police officers across the country were deployed.
 12 12 people were arrested. We searched 15 premises and 11
 13 vehicles. To date, we've seized over 4,400 exhibits,
 14 we've taken over 2,400 statements, and there's over
 15 5,380 people registered as being involved in the
 16 incident.
 17 Just in terms of digital data, we've seized
 18 somewhere in the region of 15 terabytes of data with
 19 860,000 files that have needed assessing. Just on one
 20 strand alone of the investigation, the CCTV, to view all
 21 the footage that was seized took a team of eight
 22 officers six days a week, four months to view, and
 23 an estimated viewing time of over 6,000 officer hours
 24 just to get the CCTV, to get all the evidence for this
 25 inquiry.

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1 Q. So when we saw that compilation, that's a tiny fraction
 2 of a huge amount of CCTV that you and your team went
 3 through in order to provide the best available footage
 4 of the events?
 5 A. That's correct, sir, yes.
 6 Q. Now, we'll consider a little later the investigation
 7 into Masood's background, his planning and his
 8 preparation for the attack, but you have indicated that
 9 it was part of your investigation to discover if others
 10 were involved at any stage, along with Masood?
 11 A. That's correct, sir, and with all of those
 12 investigations, with all the arrests, all the searches
 13 and everything we have looked through, I'm absolutely
 14 convinced there was nobody else involved in this: Masood
 15 acted alone.
 16 MR HOUGH: Thank you very much, Mr Crossley. There may be
 17 further questions from other lawyers or from the learned
 18 Coroner.
 19 THE CHIEF CORONER: Mr Keith, the jury may remember why you
 20 are here, but it may be sensible for you just to
 21 introduce yourself and Mr Butt.
 22 Examination by MR KEITH QC
 23 MR KEITH: Yes, indeed.
 24 Detective superintendent, you know that I am
 25 Hugo Keith and I am one of the two barristers who appear

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1 in this inquiry into the death of Masood on behalf of
 2 the Metropolitan Police Service, of which you are, of
 3 course, part.
 4 A. Yes.
 5 Q. I just want to ask you, if I may, please, some more
 6 questions about the material we've seen and the CCTV.
 7 Your officers investigated the terrible events of
 8 22 March, in effect, on the direction of
 9 His Honour Judge Lucreft QC, the Chief Coroner, because
 10 your team of officers essentially acted to investigate
 11 all the relevant parts of the events on that day?
 12 A. That's correct, sir, yes.
 13 Q. So as part of that onerous obligation, you and your
 14 Metropolitan Police colleagues scoured through thousands
 15 of hours of CCTV, photographs and other material?
 16 A. Yes, correct, sir.
 17 Q. And in relation to the CCTV in New Palace Yard, did the
 18 majority, or all of the CCTV, have timers on it so that
 19 when you played the CCTV, or you take a still from the
 20 CCTV, you could see precisely to the second at what time
 21 the events on the CCTV occurred?
 22 A. That's correct, sir, yes.
 23 Q. Were all the CCTV cameras linked to the same timer or
 24 clock, so that if we look from one CCTV still to
 25 another, even if from a different place, we don't lose

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1 thread of the time?
 2 A. That's correct, within New Palace Yard, yes.
 3 Q. Right. So we can look at the CCTV and stills from it,
 4 and see how much time passed or elapsed between each
 5 part of these terrible events?
 6 A. Yes.
 7 Q. Can we then just look, please, for a moment at some of
 8 these stills to get an idea of the speed at which they
 9 occurred and how fast it took for some parts of these
 10 events to take place.
 11 The first one, please. Could we have up {AV0071/2}.
 12 Is this a still from a camera which we can see is timed
 13 at the bottom left-hand corner, 14.41.09?
 14 A. That's correct.
 15 Q. We're now becoming familiar with Carriage Gates in the
 16 middle.
 17 A. Yes.
 18 Q. Do we see there the unarmed officers, including
 19 PC Palmer, in their hi-vis jackets by the north vehicle
 20 gate?
 21 A. Yes, that's correct.
 22 Q. You have seen this material and you've read, of course,
 23 many, many statements relating to the events on that day
 24 and you've heard, of course, the witnesses give evidence
 25 in the prior Inquests. Those officers standing there,

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1 we can see, very close to the gate. Is this the moment
 2 at which Masood enters through Carriage Gates?
 3 A. That's correct, yes.
 4 Q. So the time, 14.41.09.
 5 Could we have {AV0071/3}, please. 14.41.13 is the
 6 time at the bottom, so we've moved forward only four
 7 seconds, and at this time, {AV0071/3}, this CCTV still,
 8 shows that PC Palmer has stumbled to the ground just in
 9 front of the low barrier, does it not?
 10 A. Yes.
 11 Q. And Masood is almost upon him?
 12 A. Yes.
 13 Q. So Masood came through the gate very fast, and he is
 14 almost upon PC Palmer within four seconds of so doing?
 15 A. Yes.
 16 Q. {AV0073/7}, please. The officer, who we can see in the
 17 bottom left-hand corner, is, we know from evidence that
 18 you heard last week, PC Glaze, who was one of the
 19 unarmed officers at the gate but not wearing, in fact,
 20 a hi-vis jacket?
 21 A. Yes.
 22 Q. And he is on his radio?
 23 A. Yes.
 24 Q. And are you aware from the evidence that we heard that
 25 PC Glaze was able to make a radio call concerning what

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1 he feared had taken place, namely an explosive device or
 2 explosive noise on Bridge Street on the side of
 3 Parliament Square?
 4 A. Yes.
 5 Q. {AV0073/9}, this still is timed from the bottom
 6 left-hand corner, 14.41.16, and it shows part of that
 7 terrible footage of PC Palmer being hacked at by Masood
 8 against the low barrier. So 14.41.16, within seven
 9 seconds of Masood coming in through the gate, he had
 10 already ferociously attacked PC Palmer with his two
 11 knives down on the ground?
 12 A. Yes.
 13 Q. {AV0071/4}, 19 seconds is the timer on the bottom
 14 left-hand corner, so now we are talking only ten seconds
 15 after Masood has come in. PC Carlisle, extremely
 16 bravely, is trying to come across to PC Palmer's
 17 assistance, either to tackle Masood or to provide help
 18 to PC Palmer, and the attack is ending?
 19 A. Yes.
 20 Q. {AV0073/11}. The timer on the bottom left-hand corner
 21 shows 14.41.21. The unarmed police officers start to
 22 run towards the members' entrance and the exit point
 23 from the Cromwell Green search area, away from Masood.
 24 A. Yes.
 25 Q. Who at this point has stopped his second and main attack

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1 on PC Palmer, who has managed to get up and tried to run
2 away?
3 A. Yes.
4 Q. {AV0073/14}. The timer now is 14.41.24, so still only
5 15 or so seconds after Masood has entered
6 Carriage Gates. PC Carlisle in the hi-vis jacket is
7 moving away to the right, and we can see a foot on the
8 left.
9 A. Yes.
10 Q. {AV0073/15}, two officers running away from Masood.
11 There's an officer on the right --
12 A. Yes.
13 Q. -- you may see, Detective Superintendent, a red mark on
14 the right shoulder of that officer?
15 A. Yes.
16 Q. Is that officer likely, therefore, to have been
17 PC Palmer running from that terrible attack and showing
18 signs of some of his wounds on his right shoulder?
19 A. That's correct, it is, yes.
20 Q. And the officer on the left is PC Carlisle, having drawn
21 his baton to try to deal with the ferocious attacker
22 holding, in fact, two knives?
23 A. That's correct.
24 Q. {AV0073/16}, 14.41.26. Masood has run after those
25 officers and is making his way round the left-hand side,

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1 as we look at it, the driver's side of the car, towards
2 the officers?
3 A. That's correct.
4 Q. {AV0072/5}. The same time, 14.41.26, from a different
5 angle you can see Masood -- this is the same clip that
6 Mr Hough showed you a few moments ago -- Masood coming
7 round on the driver's side of the car, the black figure
8 there, the hi-vis officers in front of him, including
9 PC Palmer.
10 A. Yes.
11 Q. {AV0072/6}, 1 second later, 27 seconds in the bottom
12 left-hand corner, so now around about 18 seconds after
13 the entire event has started, Masood has come forward
14 and he is now standing over the ramp underneath the
15 barrier, the ground barrier, which had been lowered to
16 allow the car to pass?
17 A. Yes.
18 Q. {AV0073/17}, we can see there two officers. The officer
19 without the hi-vis on the left, PC Glaze, and the
20 officer on the right, either PC Marsh or PC Palmer, we
21 can't see the right shoulder of the right-hand officer,
22 so we can't see whether there is blood on the shoulder
23 indicating it is PC Palmer, so it could be him or
24 Mr Marsh, but in the middle, we see the close protection
25 officer coming up and going in the opposite direction?

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1 A. Yes.
2 Q. {AV0073/18}, timed at 14.41.27, so the same time but
3 from a different angle, we see that officer, the close
4 protection officer, with his mouth open, coming towards,
5 or rather going one way while Masood goes the other?
6 A. That's correct.
7 Q. So it would seem, as you said earlier, we know from
8 witnesses who gave evidence in the earlier Inquests,
9 that they heard shouts from the close protection
10 officers before the firing, but this still appears to
11 show that close protection officer, SA74, with his mouth
12 opened and therefore, it would seem to indicate saying
13 or shouting something?
14 A. Yes.
15 Q. {AV0073/19}, again, 27 seconds past 41 minutes, so
16 18 seconds or so after the incident has started, we can
17 see Masood in the middle of the picture at the top,
18 running towards the officers who were fleeing from him,
19 and straight towards the close protection officer?
20 A. Yes.
21 Q. And one still further on, please, {AV0073/20}, 1 second
22 later, Masood has gone over the ground barrier and we
23 can see him in the top right-hand corner with his
24 knives.
25 A. Yes.

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1 Q. Next, please {AV0072/7}, at 27 seconds past 41 minutes,
2 we can see from a different angle, Masood having now
3 gone over the in-ground barrier is heading straight
4 towards the close protection officer who we can see on
5 the right-hand side.
6 A. Yes.
7 Q. {AV0072/8}, 1 second further on, so 19 seconds after the
8 start, Masood has moved forward. So he continues to
9 move straight forward, without deviating in direction,
10 and straight at the close protection officer?
11 A. Yes, that's correct.
12 Q. {AV0072/9}, one second later, he has gone further
13 forward, hasn't he?
14 A. Yes.
15 Q. And we know from the CCTV that Mr Hough showed us that
16 he's running, he doesn't change direction, he doesn't
17 slow down, he carries on going even though the close
18 protection officer is standing right in front of him.
19 A. Yes.
20 Q. {AV0072/10}, 19 seconds after Masood has entered through
21 Carriage Gates, we see here the shot --
22 A. Yes.
23 Q. -- or a shot from SA74, the close protection officer.
24 If we look very carefully at this,
25 Detective Superintendent, can we see what looks like

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1 a point or a dot of light , or in fact the discharge of
 2 a shot, or something halfway between the close
 3 protection officer and Masood?
 4 A. Yes.
 5 THE CHIEF CORONER: Just to the left of that traffic cone?
 6 MR KEITH: Yes, just to the left of the traffic cone.
 7 So this time, 14.41.29, is just 19 seconds after
 8 Masood has entered.
 9 THE CHIEF CORONER: Mr Keith, I'm just going to pause
 10 a moment just to see whether the jury would like a short
 11 break. I notice we've been sitting for a while. The
 12 gentleman closest to me; would you like a short break
 13 sir, or are you all right?
 14 A short break.
 15 Mr Keith, we'll just take a short break there.
 16 I appreciate you may not have very much to go, but this
 17 is quite important on the timing so we'll just break
 18 there.
 19 MR KEITH: No, no, I think that is an ideal moment.
 20 THE CHIEF CORONER: Members of the jury, we'll just take a
 21 short break.
 22 (In the absence of the jury)
 23 My ever-alert usher spotted and I think was just
 24 concerned as to whether concentration might have lapsed.
 25 MR HOUGH: Yes. Mr Keith has a very mellifluous voice.

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1 THE CHIEF CORONER: Yes.
 2 MR KEITH: We had noticed, in fact, but my will to try to
 3 will the position along failed.
 4 THE CHIEF CORONER: Yes. I don't suspect, Mr Keith, you've
 5 got many more questions to go, so I'm sorry that it's
 6 rather sort of interrupted your flow, but it seemed to
 7 me that you might just want to go back over the last
 8 couple of stills just to make sure that --
 9 MR KEITH: I raised my voice in an attempt but, as I say, it
 10 didn't work.
 11 THE CHIEF CORONER: I shall rise.
 12 (3.43 pm)
 13 (A short break)
 14 (4.00 pm)
 15 THE CHIEF CORONER: Mr Keith, I'll say this just as he's
 16 going through the door, but Bob has had a word with all
 17 the jury and just said if they need a break at any time,
 18 just to let us know, rather than singling out one.
 19 MR KEITH: Indeed.
 20 THE CHIEF CORONER: Just to make it clear to all.
 21 MR KEITH: Quite so.
 22 (In the presence of the jury)
 23 THE CHIEF CORONER: Mr Keith, in my note, you had been
 24 taking us through the various stills and we had been
 25 watching the times, so just to recap, we know at

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1 14.41.09 is when we know the first entry through the
 2 gate, and in your sequence, you had taken us through
 3 14.27 and the different angles where we see Masood has
 4 run after the officers, passing the car. We see him on
 5 the ramp, or the barrier that goes down, the ramp
 6 barrier that goes down, and at 14.41.27, again, the same
 7 timing, is when we see one of the close protection
 8 officers going towards Mr Masood with his mouth open on
 9 the still, as we see it, and the gun pointing forwards.
 10 Then a second later, he is over the ground barrier --
 11 Masood, that is -- with his knives out, and then he's
 12 still moving forward and we had just got, I think, to
 13 14.41.29.
 14 MR KEITH: Sir, you have it exactly.
 15 THE CHIEF CORONER: So in the sequence you have taken us
 16 through, effectively 20 seconds after the first entry
 17 through the barrier, or the gates, rather, I should say,
 18 at New Palace Yard.
 19 MR KEITH: Yes. Indeed.
 20 So perhaps, Detective Superintendent, we could just
 21 pick up the thread again at {AV0072/8}, which is
 22 14.41.28 in the afternoon. There we can see the close
 23 protection officer. We can't see, of course, whether
 24 he's moving from the still because it's a still.
 25 A. Yes.

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1 Q. But he is directly in front of, on the still, Masood as
 2 he comes towards him.
 3 A. That's correct.
 4 THE CHIEF CORONER: Just, Mr Keith, at the point we were
 5 just on, we can see there the traffic cone just by that
 6 black low wall, which we're going to see in the next
 7 one, which is where you were asking us to look at
 8 something or asking the officer to look at a particular
 9 point on the screen to see if he could help us with what
 10 that might be.
 11 MR KEITH: That is the same traffic cone, exactly.
 12 So the next still I would like you to see, please,
 13 Detective Superintendent, is {AV0072/9}. The time on
 14 this one in the bottom left-hand corner is 29, so we've
 15 moved one second further on.
 16 A. Yes.
 17 Q. This isn't the one, sir, in fact, with the mark on it.
 18 I think that's the one -- it may be the one to come.
 19 But we can see there that Masood has moved further
 20 forward because he is now adjacent to the traffic cone.
 21 The close protection officer is still there. And the
 22 next still, which is timed at the same time, 14.41.29,
 23 is {AV0072/10}. The time at the bottom is 14.41.29, as
 24 we can see, and then just by the left of the traffic
 25 cone as we look at this still, we can see a white mark.

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1 Masood, if anything, has moved forward slightly from the
2 traffic cone, but this is the moment, I would suggest,
3 of at least one shot, because we can't say whether that
4 is the first, the second or the third shot, but it would
5 appear to indicate a shot?
6 A. It was, and it was this timing, yes.
7 THE CHIEF CORONER: Perhaps we could ask the operator just
8 to put the cursor on it. I'm sure we can all see it.
9 There we go, we have the image blown up as well,
10 Mr Keith.
11 MR KEITH: Thank you to the operator.
12 So there we have it, Detective Superintendent. The
13 series of stills shows, then, firstly the speed with
14 which Masood entered through Carriage Gates, ferociously
15 hacked PC Palmer to death, and then moved straight
16 towards the other unarmed officers who were fleeing from
17 him and straight towards the close protection officer
18 coming in the opposite direction?
19 A. Yes, that's correct, sir.
20 Q. He did not change direction, did he?
21 A. No.
22 Q. He did not slow down?
23 A. No.
24 Q. And from the earlier still, we can see that one of those
25 officers at least on the still had his mouth open and

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1 appeared to be saying or shouting something at him?
2 A. That's correct, sir, yes.
3 Q. But he carried on regardless?
4 A. Yes, and there are a number of witnesses that hear that.
5 Q. Could you confirm that a number of the witnesses who
6 gave evidence in the earlier Inquests were left in no
7 doubt whatsoever but that Masood's intention was to kill
8 a police officer?
9 A. Yes, that's correct, sir.
10 MR KEITH: Thank you.
11 THE CHIEF CORONER: Thank you very much.
12 MR HOUGH: Sir, none of the lawyers has any more questions
13 of Mr Crossley at this point; do you have any questions?
14 THE CHIEF CORONER: I don't. I anticipate the officer may
15 be around, so if something were to arise I'm sure he
16 would be able to assist us, but at the moment I don't,
17 Mr Hough.
18 I know in relation to timetabling, we don't have any
19 other witnesses here today.
20 MR HOUGH: No.
21 THE CHIEF CORONER: And we've got a number of witnesses
22 timetabled to be here tomorrow.
23 MR HOUGH: Five.
24 THE CHIEF CORONER: Five. So, members of the jury, we will
25 break there and we will resume again, please, tomorrow

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1 morning at 10 o'clock.
2 Can I just remind you of the warnings I gave about
3 not doing research, not doing your own inquiries. As
4 I say, if you've got a question that you feel needs to
5 be asked and it doesn't appear to be asked, please don't
6 go and make the research yourself, that's really why the
7 paper is there, to make a note and send it to me.
8 Thank you very much for your attendance today.
9 I look forward to seeing you all for 10 o'clock tomorrow
10 morning.
11 My usher will be looking out for you, first thing in
12 the morning. I know living in London there can
13 sometimes be delays on transport, there can be all sorts
14 of other issues. Can I just make sure that we all make
15 good arrangements to be here in good time. Should any
16 of you hit a problem for whatever reason, can I simply
17 ask that you just ring and let us know so at least we
18 know you are on your way, the train has broken down or
19 whatever it might be, just so that we know what's
20 happening. Thank you very much.
21 The train strike. Yes, it may affect some of us, it
22 may not affect any of us, but if there is a train strike
23 and it might affect your line, you might just need to
24 allow a little bit more time to get here, but I look
25 forward to seeing you all for tomorrow morning at

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1 10 o'clock. Thank you.
2 I'll rise.
3 (4.09 pm)
4 (The court adjourned until 10.00 am on
5 Friday, 5 October 2018)
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