

HIV/HAEMOPHILIA LITIGATION

OFFICE MEETING 20 NOVEMBER - ACTION NOTE

Item 2 - Discovery of documents

- i. Supplementary lists to be prepared by EHF1A and MCA by Christmas.
- ii. MCA to draw up comparison between MCA and EHF1A served lists.

Item 3 - Arrangements for central storage/access to documents

EHF1A to provide 2 copy sets of discovery and PII documents to SOLB3 for storage/access in room 515A New Court at the end of this week/beginning of next.

Item 4 - Selection of lead cases

- i. Mr Powell to ask T Sol to obtain a full set of hospital and GP notes and revised ISCs for lead cases together with HA's defences and further and better particulars.
- ii. Dr Rejman to send to Dr Rotblat:
full statement of claim for lead cases - these items also to go to Ms Bendall.
- iii. Dr Rejman to locate & send to Dr Rotblat details of the Manchester case - with supposed development of inhibitor after use of porcine VIII.
- iv. Dr Rejman to copy current ISC on 'Armour' case from Cambridge.

Item 5 - Expert witness reports.

Dr Rejman who is in the lead on this item informed the meeting of outstanding work. The following action points were raised in addition.

- i. Mr Gutowski to check when Dr Mayne was on CSM.
- ii. Dr Rejman to copy Dr Mannucci's report to Dr Rotblat and Ms Bendall.
- iii. EHF1A to chase up T Sol for reply on epidemiology expert witness.
- iv. Dr Rejman to circulate advance information on meetings of expert witnesses with Counsel.

- v. Mr Powell to ask T Sol for list of HA's and CBLA's expert witnesses.

Item 6 - Witnesses to fact

Mr Powell will be interviewing witnesses as to fact, and work on this item is to start shortly. Mr Powell agreed to circulate a list of witnesses as to fact he intends to approach, with their whereabouts. EHF1A, MEDISP and MCA to give advance notice to witnesses.

Item 7 - Schedules to defence document

- i. Mr Powell to speak with Counsel on any further work to be done.
- ii. Ms Bendall to send official request to MCA for list of heat treatment methods used by manufacturers, asked for by Counsel.

Item 8 - Letter from Davies, Arnold, Cooper dated 6/11/90

- i. Mr Powell to respond to Treasury Solicitor,
- ii. it was agreed that there would need to be an in house meeting before a formal written response is made.
- iii. Dr Rejman to draft comments on Appendix to DAC letter and circulate for comments.

Item 9 - Pannone Napier letter of 7/09/90

No specific action on this item.

Litigation costs - DH/LA and CSM defence

After discussion on item 2.4 of the Pannone Napier letter - Tests and Back Testing, it was agreed that Mr Powell would look at the more general question of costs for continuing business/new work in the light of decision to transfer costs from Treasury Solicitor to the Central Defendants next year.

Item 10 - Plaintiffs response to request for further and better particulars

- i. EHF1A to check whether T Sol has had any response on the request from LA & CSM for further and better particulars.

- ii. The response to the Department's request for further and better particulars to be circulated by EHF1A, and any comments to be sent to Mr Canavan by 4 December. [T Sol has now asked Dr Rejman for a response asap, so comments are requested asap.]

Item 11 - DH & NW Thames: Responsibility for BPL

Mr Powell to pursue with RHA solicitors, and advise in the light of documents submitted. EHF1A to advise Finance Division of the issue.

Item 12 - Discovery of plaintiffs/HA/CBLA documents

Mr Powell to ask T Sol for the definitive lists of plaintiffs/HA/CBLA documents. J Canavan and Dr Rejman to check through these lists to ascertain which are likely to be useful and to help solicitors to decide which documents should be requested from the other parties.

Item 13 - Any Other Business

Counsel has advised that expert witnesses should look at the discovery and give an expert opinion. It was agreed that the best approach would be for experts to see a defined part of the discovery relevant to the area of expertise.