Exhibit B

RESOLUTION

WHEREAS, the Board of Directors (Board) of The National Hemophilia Foundation (NHF) has been asked to consider the implications of the attempt to certify the case of Gannon v. Cutter Laboratories, No. C 85 20078 in the United States District Court for the Northern District of California, as a class action;

WHEREAS, NHF's Board finds that such a class action would constitute an invasion of privacy of those who would prefer not to publicize their health status, risk disclosure (public or private) of other risk factors, or otherwise risk the potential (albeit irrational) stigmatization which might be necessary to participate or to opt out of any class action;

WHEREAS, NHF's Board finds that the plaintiff in the Gannon case may not adequately represent all members of any class of those with hemophilia because there may be wholly different interests of those who have died of AIDS in contrast to those who have been exposed to HTLV-III/LAV but will continue to rely upon and use the same clotting factor which the suit claims to be "defective";

WHEREAS, NHF's Board finds that a class action might necessarily need many health care practitioners (including hospitals, treatment centers, and physicians) joined as additional parties, which would result in the creation of an adversary relationship between those with hemophilia and the health care practitioners upon whom they continue to rely;

WHEREAS, NHF's Board finds that the decision to bring a lawsuit is a peculiarly individual one with many financial, socioeconomic, psychological, and legal implications such that individual legal counsel is vital to achieve the best interests of any potential litigant and to help any person with hemophilia evaluate the complex advantages and disadvantages of a lawsuit;

WHEREAS, NHF's Board finds that any attempt to use any public media to locate potential class members would have serious adverse effects on all those with hemophilia which could far exceed the benefits of any potential award in a class action;

WHEREAS, for all the above reasons and for the other reasons referred to in the discussions of NHF's Board,

NOW BE IT, RESOLVED this 31st day of October, 1985, that:

1. It would not be in the best interests of persons with hemophilia for the case of Gannon v. Cutter Laboratories to proceed as a class action.

2. It would not be in the best interests of persons with hemophilia to compile or even to attempt to compile a list of persons with hemophilia who have AIDS or may otherwise have been exposed to HTLV-III/LAV or be infected by it.

3. The President and Executive Director (or either of them) are hereby directed and authorized to communicate this resolution to the Court and counsel by such means as they may deem appropriate.

The Haemophilia Society

P.O. Box 9
16 Trinity Street
London SE1 1DE
Telephone: 01-407 1010

DGW/CAM

14th January 1986

Mr A P Brownstein
Executive Director
The National Hemophilia Foundation
The Soho Building
110 Green Street
Rm. 406
New York
NY 10012

Dear Alan,

Thank you for your letter dated 6th January 1986 - you will note that it came to me considerably quicker than my letter to Charles Carman!

I am grateful to you for this information which will be most useful in killing a rising tide in opinion in the U.K!

May I too take this opportunity to send our warmest best wishes to you for 1986.

Yours sincerely,

GRO-C

David G Watters
Co-ordinator

THE NATIONAL
HEMOPHILIA FOUNDATION

COPY TO AJT KC CK DR

January 6, 1986

David G. Watters, Co-ordinator
The Haemophilia Society
P. O. Box 9
16 Trinity Street
London SE 1 1DE
England

Dear David:

It took a month and a half for your October 11 correspondence to reach Mr. Carman! At Mr. Carman's request, I am providing you with a reply (see attached).

The National Hemophilia Foundation is not initiating any legal action with respect to the blood products manufactured for people with hemophilia. All manufacturers providing Factor VIII to the U.S. market are supplying heat treated product only. Is this not so in the United Kingdom? It might be of interest to you to review the attached resolution passed by The NHF Board of Directors on October 31, 1985. Indeed, this entire matter is very complex.

My best wishes to you, David, for a happy and healthy new year.

Sincerely,

GRO-C

Alan P. Brownstein
Executive Director

APB:bjl

Attach.

cc: Charles J. Carman
Peter H. Levine, MD
Donald S. Goldman

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Alan, ← TAPE

Please attach a copy of the Board Resolution regarding the recommendation against a "Class Action" Suit. Forward to David Watters

DGW/CAM

985

Mr C Carman
The National
1288 West Arn
Stow
Ohio 44224
USA

Dear Mr Carman,

We are, at the moment, investigating the possibility of taking legal action against someone! in relation to AIDS in haemophilia. While it is perhaps the case that our best course of action would be against those persons supplied non-heat treated concentrates after heat treated concentrates became available, and HTLV-III sero conversion and development of AIDS had subsequently occurred, we are also interested in pursueing a case against our own National Blood Transfusion Service.

It would be very helpful to us if we could know of any actions being taken by the National Hemophilia Foundation in the United States, or indeed by individuals.

I look forward to hearing from you in the near future.

With our warmest best wishes,

Yours sincerely,

GRO-C

David G Watters
Co-ordinator

David,
I am asking Alan Brownstein, our Executive Director, to send you a copy of a recent Resolution passed by our Board of Directors regarding legal action regarding AIDS
Best Wishes,