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By DX and Email

Date: 4 March 2015

Without Prejudice save as to Costs

Dear Sirs

Our clients: The Incorporated Trustees of the Macfarlane Trust ("the MFT"), Roger Evans & Jan Barlow

Your clients: The Haemophilia Society ("tHS") and Liz Carroll

We refer to your letter and enclosure dated 27 February 2015. Our clients are content that your clients are prepared to apologise and withdraw the false allegations which have had a seriously damaging effect on them. Your clients will only be too aware of the damage they have caused which has included a call for an urgent inquiry made to the Under Secretary of State for Public Health by a number of the MPs who were sent a copy of the letter of 10 February 2015 ("the Letter"). That call for an inquiry is entirely premised on the basis of your clients' false allegations.

Therefore, and in order to draw this matter to a swift conclusion our clients have asked us to respond as follows:

1. We enclose an amended retraction and apology which should be printed on tHS' letterhead, a copy of which should be provided to our clients. The apology should be published prominently on a banner at the top of tHS' website, and on tHS' Facebook page and twitter feed (by means of the tweet described below) for a period of 14 days.
2. Our clients request that an apology should be tweeted on tHS' twitter account: *"We unreservedly apologise to the Macfarlane Trust, Roger Evans and Jan Barlow for false allegations in our letter of 10 Feb 15. Full apology here [insert link]"*.
3. As well as removing the statement published by your clients on 24 February 2015 on tHS' website ("the Statement"), your clients should also remove all previous links and accompanying tweets, Facebook links (and from all other online sources under their control) which refer to the Letter and the Statement from their website.
4. Our clients agree that the apology should be published to the original named recipients of the Letter. Please provide a copy of the covering letter sending the apology for our clients' records.
5. We require a copy of your clients' proposed deed of undertaking.
6. Your clients to pay our clients' legal fees, on the standard basis to be assessed if not agreed. Our clients' costs to date are approximately £7,750 plus VAT. They will increase rapidly in the event that our client needs to take further action to vindicate their reputation. Our clients require this in light of the serious damage which has been caused by these false publications and in particular to the damage caused to the Macfarlane Trust's relationships with its beneficiaries. It has had to incur significant legal fees to address these fundamental matters which would

NOT RELEVANT



otherwise be spent for the benefit of beneficiaries. This is public money which our clients have a duty to protect.

Our clients require that these actions are agreed and undertaken within 48 hours of the date of this letter to ensure that their reputation is not further damaged and that no greater harm is done to their important work in this charitable sector. Our clients hope that their reasonable requirements to draw this regrettable matter to a prompt conclusion can be agreed swiftly so that both the Macfarlane Trust and tHS can concentrate on serving their respective beneficiaries.

Yours faithfully

GRO-C

Wilsons Solicitors LLP

Enc Amended retraction and apology

**AN APOLOGY BY THE HAEMOPHILIA SOCIETY AND CHIEF EXECUTIVE, LIZ CARROLL, TO
THE INCORPORATED TRUSTEES OF THE MACFARLANE TRUST, ROGER EVANS & JAN
BARLOW.**

In a letter dated 10 February 2015 to Jane Ellison MP, Parliamentary Under Secretary of State for Public Health, which was also published on our website, the Haemophilia Society and its Chief Executive, Liz Carroll stated that at a recent meeting, the Macfarlane Trust's Chair and Chief Executive, Roger Evans and Jan Barlow, had advocated to Mrs Carroll that the Government should delay its response to the Penrose Inquiry so that more people would have died as a result of contaminated blood products and the Government would therefore have to pay lower amounts of compensation to the victims.

The Haemophilia Society and Mrs Carroll accept that these allegations are completely false and that they should never have been published. We admit that Mr Evans, Miss Barlow and the Macfarlane Trust did not express the opinions attributed to them in our letter in that meeting and that the allegations do not reflect the views of Mr Evans, Miss Barlow and the Macfarlane Trust who are completely committed to the work they undertake on behalf of the beneficiaries of the Macfarlane Trust.

The Haemophilia Society and Mrs Carroll take this opportunity to retract these false allegations and to apologise unreservedly for the distress and embarrassment caused to Mr Evans, Miss Barlow and the Macfarlane Trust by the publication of our letter. We have undertaken not to repeat these false allegations. We also apologise unreservedly to the beneficiaries of the Macfarlane Trust for the anger and anxiety these false allegations have caused and for any damage caused to the relationship between the Macfarlane Trust and its beneficiaries.

NOT RELEVANT