

Witness Name: Jason Jonathan Evans

Statement No: WITN1210008

Exhibits: WITN1210009-036

Dated: February 2020

**INFECTED BLOOD INQUIRY**

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**EXHIBIT WITN1210030**

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## Des Collins

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**From:** Des Collins  
**Sent:** 28 April 2018 17:38  
**To:** Danielle Holliday Hotmal  
**Subject:** Fwd: Factor8 protest

Sent from my iPad

Begin forwarded message:

**From:** "Hormozi, Mitra" [REDACTED] **GRO-C**  
**Date:** 27 April 2018 at 6:22:05 pm BST  
**To:** [REDACTED] **GRO-C**  
**Cc:** "Sheehan, Michael" [REDACTED] **GRO-C**  
**Subject:** Factor8 protest

Dear Des,

I write to you regarding the Facebook posts of Factor8 calling for protests of Revlon for this coming Monday. It is factually inaccurate to hold Revlon, Inc. responsible for the conduct of Armour Pharmaceutical Company ("Armour"). Armour was acquired by Rorer Group Inc. ("Rorer") in November 1985, the same month that Pantry Pride acquired its interest in the then Revlon predecessor company. Pantry Pride's negotiations to acquire Revlon's predecessor in November 1985 were premised on Rorer simultaneously acquiring Armour, and Pantry Pride never sought to, nor did it, own any interest in Armour.

The current Revlon, Inc. was created on April 24, 1992 and did not have any ownership or control over Armour. Accordingly, there is no link or connection to Revlon, Inc. or its directors and stockholders and Armour and to say or suggest otherwise is factually inaccurate.

Please contact me at your earliest convenience.

**Mitra Hormozi**

EVP, General Counsel

[REDACTED] **GRO-C**

**REVLON** One New York Plaza | 50<sup>th</sup> floor | New York, NY 10004

Assistant:

[REDACTED] **GRO-C**

[REDACTED] **GRO-C**



## Worldwide Biopharmaceutical Businesses

Mr Des Collins  
Founder and Senior Partner  
Collins Solicitors

**GRO-C**

11 September 2018

Dear Mr Collins,

It has come to our attention that an inaccurate statement claiming that Pfizer has been 'involved in the Contaminated Blood Scandal' is currently being hosted on your organisation's website<sup>1</sup>.

Pfizer, alongside Wyeth Pharmaceuticals Ltd. – a biopharmaceutical company with a portfolio of recombinant haemophilia treatments that we acquired in 2009 - have never supplied blood or plasma derived products to patients in the UK.

**We request that all references to Pfizer being involved in the Contaminated Blood Scandal are immediately removed from your organisation's website and other channels of communication, and you undertake to not make any such future references to Pfizer.**

Pfizer has a proud heritage in, and an ongoing commitment to, helping make a difference to the lives of patients living with haemophilia around the world. As a supplier of recombinant factor VIII and IX treatments, we are proud of the role we have played in producing non-plasma derived innovative haemophilia treatments, which do not carry a risk to patients of transmitting blood borne diseases.

Please can you confirm receipt of this letter and provide written confirmation when all such references to Pfizer have been removed.

Yours sincerely,

**GRO-C**

James Pearson  
Legal Director, Pfizer UK

**GRO-C**

Dr Berkeley Phillips  
Medical Director, Pfizer UK

<sup>1</sup> Collins Solicitors. Accessed on 11 September 2018. Available at: <http://www.collinslaw.co.uk/contaminated--blood-doe>

Date: 11 September 2018

Collins Solicitors

GRO-C

**Without Prejudice**

Dear Sirs,

**Defamatory Article on Collins Law's website**

It has been brought to our attention today, that an article has been published on your website about the Department of Health, the Haemophilia Society and the contaminated blood scandal at the following URL <http://www.collinslaw.co.uk/contaminated--blood-doe>. I attach a copy of the article for your reference.

The article contains a statement that a particular individual now hired by the Haemophilia Society has worked "*in the Pharmaceutical industry including for the companies Pfizer and Merck, both of which were involved in the Contaminated Blood Scandal.*" I have highlighted the relevant statement in the attached copy of the article.

This statement is incorrect as we do not manufacture or distribute Factor VIII and IX products and have no involvement in this highly sensitive matter.

Please note that there are two separate companies that bear the name "Merck" and are active in the same marketplaces: our company Merck (an affiliate of Merck KGaA, Darmstadt, Germany) and the pharmaceutical company Merck & Co, Inc. (trading as Merck Sharp and Dohme or MSD outside the US and Canada).

This statement is unsubstantiated and untrue. Particularly given the sensitive nature of the issue, I am sure you can appreciate that this statement is likely to cause Merck reputational damage. This statement is therefore defamatory.

The offending article is on a website hosted by you. We therefore request that you remove or disable access to the webpage on which the article is published within no more than two days from the date of this letter.

We are looking forward to receiving confirmation that you have removed or disabled access to the offending article. In the meantime, we reserve all our rights in this matter.

Yours faithfully,

GRO-C

Anne-Claire Bailey  
Head of Legal



**Merck Serono Limited**  
Bedfont Cross, Stanwell Road

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[www.merckgroup.com](http://www.merckgroup.com)

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## Department of Health / The Haemophilia Society

*Excellent communication  
and advice.*

### Department of Health

The Department of Health oversaw the events throughout the time of the Contaminated Blood Scandal and is ultimately the Government department responsible for the disaster. It is alleged that the Department did not act properly to prevent the scale of infection, issued misleading public statements and subsequently destroyed or "lost" some of the key evidence whilst denying Truth & Justice to those affected.

### The Haemophilia Society:

The Haemophilia Society was established in 1950 and still exists today. During the material time of the Contaminated Blood Scandal, it is alleged that The Haemophilia Society issued wrong advice to those with Haemophilia and had entered into financial agreements with the Pharmaceutical companies that produced and distributed the infected Factor VIII and IX products. It is believed some of The Haemophilia Society's medical advisers had also entered into similar agreements.

Today, The Haemophilia Society still receives large amounts of money from a number of those pharmaceutical companies and others. The person that The Haemophilia Society has hired to lead their involvement in the Public Inquiry (Debra Morgan) has spent almost two decades working in the Pharmaceutical industry including for the companies Pfizer and Merck, both of which were involved in the Contaminated Blood Scandal.

For the above reasons and others, it is our clients' view that The Haemophilia Society has a gross conflict of interest and should not claim to represent the interests of any of those infected or affected at the Public Inquiry.

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