

Witness Name: Elizabeth Helen Carroll
Statement No.: WITN3078009
Exhibits: WITN3078010 - WITN3078031
Dated: 21 September 2020

THE INFECTED BLOOD INQUIRY

EXHIBIT WITN3078023

Wilson Solicitors LLP
DX: 58003 Salisbury 1

Our Ref : PAS/111261/0001
Your Ref : AOK/HCW/MacFarlane
Direct Dial : **GRO-C**
Ext. No : **GRO-C**
Email : pas@**GRO-C**
Reply to : Paul Sutton - Bath
Date : 27 February 2015

By DX and by e-mail:
andrew.okeeffe@**GRO-C**

Dispute Resolution Team

Without Prejudice Save as to Costs

Dear Sirs

Re: Our clients – The Haemophilia Society and Liz Carroll
Your clients – The Incorporated Trustees of the Macfarlane Trust, Roger Evans and Jan Barlow

We act on behalf of The Haemophilia Society ("THS") and its chief executive, Liz Carroll. We write with reference to your letter of yesterday, 26 February 2015, regarding our clients' letter to Jane Ellison MP dated 10 February 2015 ("the Letter").

In the shared hope that it will be possible to resolve this matter without recourse to costly and time-consuming litigation, we are instructed to put forward the following proposal in full and final settlement of any claim by your clients in respect of our clients' publications.

1. Our clients will publish a retraction and apology to your clients on THS' website, Facebook page and Twitter feed for 7 days. The retraction and apology will also be published to the original recipients of the letter, namely Jane Ellison MP, the six other MPs to whom the letter was copied and Baroness Meacher. We enclose proposed wording for the retraction and apology for your agreement.
2. THS will undertake to your clients not to further publish whether by its directors, officers, servants or agents or otherwise howsoever, and Mrs Carroll will undertake not to further publish by herself, her servants agents or otherwise howsoever the following words complained of in the Letter or any similar words defamatory of your clients:

"at a recent meeting between [Liz Carroll] and the chief executive, Jan Barlow and chair of The MacFarlane Trust Roger Evans...they expressed the opinion that the Department of Health should wait before responding to Penrose so more people will have died and they will have less to pay out."
3. Our clients will remove the statement published by our clients on 24 February 2015 on THS' website ("the Statement") from any online source under their control where it continues to be published. (For the avoidance of doubt the Statement was in fact only published on THS' website.) Our clients have already removed the Letter complained of from all online sources under their control.

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SK STONE KING

We should be grateful if you would take instructions and let us have your clients' response to this offer.

Yours faithfully

GRO-C

Stone King LLP