

Witness Name: CHRISTOPHER ANDREW ERIC STUDD

Statement No: WITN5679004

Dated: 22nd April 2021

INFECTED BLOOD INQUIRY

THIRD WRITTEN STATEMENT OF CHRISTOPHER ANDREW ERIC STUDD

I provide this statement in response to a request for a written statement and production of documents under Rule 9 of the Inquiry Rules dated 31 March 2021.

I, CHRISTOPHER ANDREW ERIC STUDD, will say as follows: -

1. I am a solicitor and partner in Russell-Cooke LLP. I am also a director of Skipton Fund Limited. I make this statement on behalf of Skipton Fund Limited and confirm that this statement is a joint response to the Rule 9 Request by me and the other director, James Sinclair Taylor.
2. The facts and matters set out in this witness statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where the information is outside of my own knowledge, I have identified the source of my knowledge or belief.
3. I would also refer the Inquiry to my statement dated 22 March 2021 [WITN5679003] in response to the notice under subsection 21(2)(b) of the Inquiries Act 2005 dated 1 March 2021.

Response

4. I set out below *in italics* the specific requests made by the Inquiry below for ease of reference together with the response:

Mr Fish stated at pages 96-97 of the attached transcript that he "noticed in .. [the Inquiry's] numbers...[the Inquiry] might be missing three lever-arch folders' worth of natural clearer rejections. The solicitor should have those if you [the Inquiry] request

them. They were stored in lever-arch folders instead of box files".

1. Please confirm whether these three lever-arch folders containing rejected 'natural clearer' application forms were received by Russell-Cooke LLP from the Skipton Fund and stored with Iron Mountain. If so, please arrange for these folders to be provided to the Inquiry.

As previously indicated Russell-Cooke never received the historic files from the Skipton Fund. These were sent by members of staff who were dealing with the closure of the Alliance House organisations direct to Iron Mountain. Russell-Cooke received copies of the Transmittal Sheets and a Master Spreadsheet to assist in the identification of beneficiaries and the location of their historic records within the boxes stored at Iron Mountain. Copies of these Transmittal Sheets and the Master Spreadsheet have been provided to the Inquiry Team.

Since James Sinclair Taylor and I were appointed directors of the Skipton Fund, we have not undertaken a detailed review and analysis of all the documentation in storage at Iron Mountain.

Boxes have been retrieved as necessary to identify the information required to respond to requests from the Inquiry and subject access requests or other requests for information by beneficiaries.

I understand the Inquiry itself has reviewed or had the opportunity to review, all the documentation held at Iron Mountain.

2. Please provide any other information you may have relating to the location of these files and/or the un-accounted for 389 declined or unresolved Skipton applications referred to above.

I would refer to paragraphs 18-23 of my witness statement dated 22 March 2021 [WITN5679003].

I confirm that the only information Russell-Cooke holds in relation to the historic files is as set out in the Transmittal Sheets and the Master Spreadsheet and some working notes accumulated by our administrator who has been providing copy information to the various parties requesting documentation.

However looking at the Skipton Fund transmittal sheets, it appears that files relating to the "natural clearers" that Nicholas Fish refers to in his oral evidence should be contained within Box 1.

- a) *Declined where no appeal heard* – the transmittal sheets indicate these should be found within Boxes 2 – 5
- b) *Declined where an appeal was heard and successful* – presumably as a successful application these cases would then have been put into the normal filing system and so would not be within Boxes 1-13
- c) *Declined where an appeal was heard and was unsuccessful* – the transmittal sheets indicate these should be found within Boxes 5 - 12
- d) *Unresolved applications* – the transmittal sheets indicate these should be found within Boxes 11 and 13

Naturally if the Inquiry wishes to check this documentation we can instruct Iron Mountain to deliver them to the Inquiry or make them available as on previous occasions.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Signed:

GRO-C

Christopher Andrew Eric Studd

Dated: 22nd April 2021