

Dr Rejman
CA OPU2

From: Ruth McEwen
SOLB4
Date: 29 July 1996

c.c Christine Corrigan
CA OPU2

Ann Towner
CA OPU2

RE: HEPATITIS C

1. There seems to be some confusion over areas of responsibility within CA OPU2. I would be grateful if it could be clarified as to who will be carrying out the discovery of CA OPU2 files. As I mentioned in my minute of 27 June, a fresh discovery process will have to be begun for the blood transfusion claims, listing all documents concerned with the introduction of testing in the period up to 1991. As regards the blood products claims, although the HIV discovery is our starting point, any additional relevant documents or documents omitted from HIV will have to be listed. I know that you have completed discovery of your files but CAOPU2 must start locating **all** their files and listing their documents. I would appreciate your help in sorting out this matter so that the process can start now.

2. Having received some details about the NBA's functions from Anne Towner, I now understand that the NBA did not take over responsibility for the blood service until 1 April 1994. I would like to know, again so that I can draft instructions for Counsel, about who had responsibility for the production of blood prior to 1994. I gather that blood centres were run by regional health authorities. Who was responsible for the production of the blood at this time? Presumably the individual health authorities did not produce the blood so it must have come from a central body? Again I would ask for CA OPU2's help.

3. As regards your discovery, I have some detailed queries upon which I would like some help;

i. As regards your discovery list for 1989-1991 (7 June 1995) are there any documents on this list that are relevant for blood products claims or are they all only relevant to blood transfusions?

ii. As regards your discovery list for pre 1989 (26 June 1996) are there any documents that are relevant for blood products or only blood transfusions? If there are any that are relevant to blood products on either list, I will need separate lists so that I have one list for each type of claim.

iii. Please can you confirm that you have no additional documents relevant to either blood products or blood transfusion claims.

iv. As regards your lists, I will have to ask you to consider whether there are any documents on your lists that we would wish to claim PII for. Perhaps you could flag any potential PII documents. I will be happy to discuss this further prior to you starting this exercise.

v. I have asked you, CA OPU2, the MCA (CSM and LA) and MDA to consider discovery. Are there any other departments that I should contact that may have relevant documents?

vi. On reading your minute of 7 June 1995, you mention having completed discovery of Mr Burrages files, GEB vols 1-14. I am unaware of GEB? Does it still exist? who is its successor? You also mention HP?

4. One final matter which I have recently raised with Ann Towner, is an informal discussion with

the NBA. You may remember that Counsel asked about the progress of any hepatitis C litigation against the NBA and local health Authorities. I would be grateful for the names of any contacts so that I can make some informal enquiries. Of course I am happy for CA OPU2 to do this if you would rather.

5. Many thanks again.

Ruth McEwen

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Ext: **GRO-C**