Addendum to Collins Closing Submissions dated 16th December 2022 in the light of disclosure of documents with the pre-fix 'MULL' provided by US Attorneys arising from legal proceedings in the 1990's in the US against pharmaceutical companies.

1. For the sake of convenience, we set out here what we said at paragraphs 441, 443 and 502 of our submissions dated 16th December 2022:-

> **441**.There was a failure by both UK & US manufacturers of FVIII to invest proper time and resources into finding an appropriate stabiliser, before distributing products for patient use. In effect, the known safety step was skipped over.
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> **443**. It is also submitted that it was cheaper, at least in the short term, for manufacturers to forego this crucial Research & Development exercise; and err on the side of risk.
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> **502**.The main impression that the CPs will take from the evidence relating to Pharma companies during this Inquiry is their failure to participate despite the fact that:
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> (a) they knew about the transmission of hepatitis through blood products in the decades before the 1970's
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> (b) they knew about the virtually universal contamination of products with non A non B hepatitis in the mid 1970's and 1980's;
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> (c) they were aware of the developing position with AIDS and the fact that it may be transmitted by blood and blood products
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> (d) they failed to put adequate warnings on their product labels
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> and yet those companies have watched but not actively participated in any meaningful way in this Inquiry. We invite the Chair to reach his own conclusions as to why they

have taken this cowardly stance.

2. Those submissions are repeated and indeed reinforced by the 'MULL' evidence now available. While the Inquiry still remains without the benefit of active and meaningful participation of the pharmaceutical companies (the Companies), it now has the benefit of the 'MULL' disclosure being very often the evidence of those within or on behalf of the Companies at the relevant time, which evidence is largely supportive of the 'main impression' gained earlier.

3. For the purpose of this Addendum we submit that it is reasonable to assume that if the Companies had provided evidence and produced documents to the Inquiry, they would have adopted an approach similar to that which they adopted in the 'MULL' litigation.

4. In simple terms the approach taken by the Companies was to ignore (as far as possible) underlying themes and problems. This allowed them to maintain a fairly unified position in that the victims had to identify precisely which product had infected which individual at which particular time.

5. For those purposes the documents and relevant summaries (which are by no means exhaustive of the evidence available) listed below are relied upon by the Collins CP's in support of their Addendum submissions.

Document	**Expert/Dr**	**Date of Document**	**Document Ref**	**Points of Interest**
Transcript of Testimony	David Aronson	5 Mar 1987	MULL0000007	Page 52 – 'At that time, there became a sufficient body of data, a sufficient number of patients to say, we are having more patients with this syndrome and its very similar to what's happening in homosexuals and it is possibly a transmissible disease, possibly a virus in the blood'
Deposition	Steven Ojala	14 Oct 1985	MULL0000026_0001	'These risks were well known prior to the AIDS Epidemic' 'This is a reckless practice to approve a donor center with this

				high proportion of high risk donors for a pooled product' 'If a Donor has Hepatitis and has donated to the pool, the lots are not withdrawn'
Affidavit	J Garrot Allen	9 Dec 1988	MULL0000027_0001	'Thus there is no real regulation and the blood industry has become largely self regulating over the years. This has lead to considerable abuse culminating in a disastrous epidemic which we know as AIDS. In my opinion, this was predictable as far back as 1975 when the American Blood Policy Act was not vigorously implemented by the blood industry. Then when the HB Core Test was not used this lead to the needless contamination of the blood supply with Hepatitis B and Non A Non B. Even more disastrous for the blood supply was the fact that high risk donors became the 'order of the day' and FDA regulations were largely ignored.'
Deposition	Donald Francis	3 Jul 1992	MULL0000028_0001	'Francis testifies that between 8 and 9 High Risk units of blood out of 10 would have been eliminated with B-Core Test' 'Instead they were actually recruiting the very people deemed to be at High Risk.
Deposition	John Hink	10 Nov 1988	MULL0000030_0001	'Admits that AHF was a high risk product for transmission of Hepatitis' 'Stopped taking Prison Plasma a year after he retired'
Deposition	Michael Rodell	17 Oct 1988	MULL0000031_0001	'Admits that there was a significant Hepatitis risk from B and non A Non B from 1972-1982 with use of AHF' 'Rodell demonstrates the reluctance of the Industry Officials to

				admit the relationship between Homosexuality and Virus transmission risk' Also admits Hyland was unable or unwilling to change the location of their Plasma Centers from high risk areas even at the height of the AIDS Epidemic.'
Videotape Deposition	Bruce Lee Evatt	1 Jan 1999	MULL0000032_0001	'we had accumulated enough evidence in terms of the hemophilia patients and the transfusion-associated patients by the end of 2982 that I personally felt that it was clear that this was a blood-transmitted disease.'
Videotape Deposition of Armour	Michael B Rodell	10 Jul 1995	MULL0000035_0001	Rodell admits that high tittered HBc Positive doners are used in the manufacturing process because immune globulins are made from the same plasma pool. HBc testing would eliminate HBs doners needed to reduce HBsAg levels to undetectable amounts in the AHF lots and to manufacture immune globulins. 'By removing units of plasma and depleting the plasma pool of anti-HBs you run the risk of preparing units of coagulation factor concentrate that are going to have a higher level of antigen which could increase its potential for transmitting Hep B.'
Deposition	Steven Ojala	11 Sept 1987	MULL0000037_0001	'Ojala admits that Cutter knew their HBs Positive, High Titered Donors posed a threat of AIDS transmission'
Deposition	John D Ryan	8 Oct 1987	MULL0000038_0001	'the purchase and subsequent resale of the diseased blood of the donor was so clearly contraindicated by sound medical practices and reasonable judgment that it was acutely reckless and demonstrated a callous, wanton indifference to the rights of the plaintiff and the medical profession whose needs the plaintiffs served'.
Deposition	William Hartin	27 Apr 1995	MULL0000040_0001	Hartin admits that the usual procedure at Alpha was to mix high tittered HBs Plasma with the Plasma used to make AHF Products
Videotape Deposition	Bruce Lee Evatt	28 Mar 1995	MULL0000041_0001	'in that mid part of 1982 a contagious agent that is capable of being spread person to person, that's the group that it's attached are associated with blood-borne diseases and then the sudden

				appearance in the hemophilia population and its only risk factor that it has in combination with the other groups is the fact it receives blood products, it doesn't take a rocket scientist to begin to make those associations that this is a blood-borne disease'.
Affidavit	Donald Pinkston Francis	19 Oct 1993	MULL0000043_0001	'I have reached the firm conclusion that the reason why this medical catastrophe occurred with literally no warning to hemophiliacs was because plasma fractionators (manufacturers of AHF or Factor VIII including Armour, Alpha, Cutter and Baxter allowed their blood product to become contaminated with other viruses as well as HIV from the mid 1970's until 1985 when they began heat treating AHF products'.
Deposition	Steven Ojala	11 Sept 1987	MULL0000044_0001	'The Fractionators all get together after the January 4 1983 CDC meeting and decide how they are going to keep their products on the market knowing that they are all contaminated with the AIDS agent'
Deposition	Steven Ojala	14 Oct 1985	MULL0000045_0001	'In layman's terms basically there is the potential for this kind of product to transmit something such as AIDS'
Testimony	Ernst Weidmann	8 Nov 1993	MULL0000046_0001	'So I would say that evidence came up during the year of 1984 that HIV could be identified as the infectious agent in hemophiliacs.'
Transcript of Proceedings	Martha Sue Preston	17 Nov 1993	MULL0000047_0001	'During the time of the inspection of this plasma manufacturer we noticed, the inspectors noticed that there were a number of hepatitis B transmissions associated with coagulation products. We asked the manufacturer why was that so, because at that point we did not believe that hepatitis B should be so transmissible by the coagulation factors.'
Deposition	Milton Mozen	2 May 1989	MULL0000048_0001	'The percentage of the product that had an infectious level of AIDS virus was increasing, yes. And would you agree that in 1980, generally speaking, the Factor VIII that was being sold was relatively free of the virus and in '81 and '82, the percentage of

				the product being sold had more and more of the virus? Correct. And that's because there were more and more infected donors that were donating plasma? That's correct. AIDS was spreading more and more in the population? That is correct.'
Deposition	William Martin		MULL0000063	Admits that usual procedure at Alpha was to mix high titre HBg with plasma used to make AHF
Summary of Deposition Testimony	Louis Aledort	4 Sept 1991	MULL0000072_0001	'Opinion that it would not be below the standard of care for a physician to be unaware of heat treated Factor VIII. However he would find it hard to believe that any treater would be unaware of it unless he treated only one patient. The info was announced by all the companies and all the detail men.' 'Opinion that it was not necessary for physicians to inform patients about this new product, unless he felt it was better for them and he kept the info from them or if he thought it was worse for them and gave it to them.' In '83 he did not know whether heat treatment might ameliorate the risk of AIDS transmission and he never conveyed this to his patients.'
Summary of Deposition Testimony	Louis Aledort	6 Jul 1990	MULL0000073_0001	'In '76 we were concerned enough that a conference was held to look at exactly what we were doing to our patients with large quantities of Factor VIII.' 'The similar demography among homosexuals, heroin addicts and hemophiliacs caused him to share the growing concern, prior to 11/2//82 of the possibility that AIDS may be transmitted by blood products.'

Summary of Telephonic Deposition	David Aronson	4 Aug 1991	MULL0000107_0001	'There were reports in 1982 that donors to certain lots of Factor VIII had died of AIDS. The FDA took steps to recall those lots after this first info came as to every lot to which it knew there was a donor who had died of AIDS or was infected with AIDS. By May '80 we were beginning to get a concern that you may have to withdraw it all or a very large proportion of it, very significant'.
Continued videotaped Deposition of David L Castaldi		21 Jul 1995	MULL0000155_0075	- "the one manufactured in Lessines, which was wet 'pasteurized' directly..."
Continued videotaped Deposition of David L Castaldi		21 Jul 1995	MULL0000155_0076	"in production - - introduction into the market in both Lessines and Glendale, was a product..."
Continued videotaped Deposition of David L Castaldi		21 Jul 1995	MULL0000155_0154	"all plasma processed in Lessines was procured by our group in Glendale"
Deposition	Peter Foster		MULL0000241	Started work on pasteurisation in 1982 (p.58)
			MULL0000366_0188	"Costa Rican plasma went to Lessines, Belgium and to Glendale for manufacturing"
			MULL0000452_0156	"Do you recall for what period of time the Travenol operation in Lessines, Belgium, was obtaining plasma from the centre in Lesotho? A. Some -- some years in the mid-'70s..."
			MULL0000452_0157	"Was any of the product that was manufactured at Lessines sold in the US, say, up until 1980? A. No. The Lessines facility at that point in time was not licensed by the FDA. Q. Where was the finished product made in Lessines sold in that period of time, do you know? A. Europe, and possibly Japan. Q. Was it sold in England, or the United Kingdom? A. I don't know. Q. And would that product include clotting factor concentrates? A. It's -- it

				would have included clotting factor concentrates that were sold in Europe."
Deposition	James K Smith		MULL0000486	Should read from page 133 to end. Re Heat treatment knowledge and stabilizers
Deposition	Donald P Francis	11 Aug 1998	MULL0000533_0001	'Dr Donohue of FDA-BOB has asked you (Cutter) to voluntarily exclude plasma collected from known homosexuals from pools used in the production of Koate and presumably Konyne' 'In the second line down he is talking about Penny Carr: She will make the recommendations that they voluntarily exclude all anti-HBs plasma, (almost exclusively collected from homosexuals) from coagulation components.' 'Question: Standard practice at Alpha from 1978 to 1982 so far as you know was to use the same plasma pool for the manufacture of both Factor VIII, Factor IX and immunoglobulin. Is that correct? Answer: For most but not all plasma.'
Testimony	Louis Aledort	21 Oct 1988	MULL0000546_0001	'That there were high risk groups which that little blow-up addresses, since we didn't have any idea what the cause of the syndrome was, it was felt that it would be wise to at least try to identify better those patients who were at high risk from being in the donor pool, but we also knew that it would never be a complete success and we certainly know even later than that that we are absolutely correct. You can't have a complete success by just donor screening.'
Deposition Summary	Jean J. Huxsoll	21 Jul 1989	MULL0000617_002	Refers to a memo dated the 29th of December 1982, from Ed Cutter sent to plasma centres, telling them what symptoms they should look forward with donors.

Transcript of Deposition	Harry M Meyer	28 Apr 1997	MULL0000693_0001	'It is the FDA taking the recommendations of the old Public Health Services and converting them to a memo form that is applied directly to instructions to the centers, the plasma centers in this case and a similar recommendation was made to blood banks. Again, I've already testified that although there was no established proof that this AIDS was caused by a new virus, all of us felt that it was prudent by this time to take a worse case scenario and to develop screening mechanisms to identify populations that we wanted to exclude as donors of blood and plasma.'
Memo	R. Barjan (Cutter)	3 Jun 1982	MULL0000913_017	Setting up a plasma centre in Arkansas State Prison … great opportunity to produce low cost plasma
Memo	Hainski (Alpha)	17 Sept 1982	MULL0001055_005	Re 60 C pasteurization
Deposition	Steven Ojala	17 Nov 1988	MULL0001181	Received a notice from CDC of immunodeficiency occurring in haemophiliacs in July 1982. (p. 28) Still receiving source plasma from prisons in 1982
Memo	Carl Koopman (Travenol)	12 Jan 1982	MULL0001245_079	Comment re working with British Army Chemical Welfare Laboratories
Memo	T. Andray (Hyland)	2 Feb 1981	MULL0001271_001_0132	Refers to prison plasma at Lessines "10 percent"
Deposition Summary	Louis Aledort	2 Apr 1992	MULL0001432	Paragraph 41 Confirms that it has been known since prior to 1980 that heat treatment can be successfully used to inactivate some viruses Paragraph, 82-83 Refers to a letter from Aledort dated the 27th of December 1982 Stating that there were now eight haemophiliac, who have

				contracted aids and two highly suspect cases, and that there was every reason to believe the number would grow based on the fact that if it was associated with factor
Deposition Summary	Robert Remis	27 Jul 1993	MULL0001455	Paragraph, 26–27 He is of the opinion that it was known that blood and blood products could transmit the HIV virus in 1982 Paragraph, 27–33 There was a consensus in mid 1982, among the scientific and medical community on the above point based on a July 1982 MMWR article
Deposition Summary	Dr Donald Francis	13 Jan 1994	MULL0001539	Everyone in clinical care of hemophilia and certainly everyone in the epidemiology side of it, knew that hemophiliacs were essentially all infected with hep B virus and non-A non- B virus, called Hep C then. The data was already coming through in the late 1970's that this was not a benign condition and that the chronic hep resulting from this was a serious problem in hemophiliacs and would result in significant death due to cirrhosis and other liver problems. "With that in mind and the knowledge that other products, heat inactivated plasma products, for example albumin, did not transmit those agents, I think there was more than enough evidence that an attempt to improve the factor VIII through pasteurization or other techniques, if one wanted to, would be something that an organisation wanting to market the best product would have done. And certainly it was justifiable in public health and medical sense because of the rates of infection in these people." (page 3)

				In '78, there was more than enough info that shows that there were dangers in these products. Would take 3 years to develop heat inactivated product so would have been on the market by 1981 which clearly would have had a major impact on the HIV epidemic which would have come in about that time. Says FDA approval time shortened because of AIDS. (Page 4) [T]hinks the whole history of this epidemic is that treaters were remarkable (sic) removed from the understanding of the potential risk of AIDS and stayed far too narrow in their own speciality, didn't look at the info that was available. That isolation from the epidemiologic reality led to this over balance of risks and benefits. Even the statement about there being no evidence that cryo would be any safe than F. VIII. "It flies in the face of all the epidemiologic and clinical evidence at the time." (Page 6) Clearly by '82 there was more than ample evidence that the unknown agent causing AIDS was transmissible by Factor VIII material, in D.F's opinion, that users and prescribers be told about the potential risk so they would balance whether they wanted to take that risk. (Page 7)
Summary of Deposition	Donald P Francis	4 Jan 1992	MULL0001540_0001	'The fact that AIDS could be spread in the blood was known in 1982 to the medical and scientific community' 'Unfortunately there was a tremendous resistance from the blood

				banking community to accept even the existence of transfusion associated AIDS' 'About 2000 people got AIDS from transfusions. We could have eliminated 75 to 90 percent of those'
Corrected Deposition Summary	Donald Francis	6 Jan 1992	MULL0001541_0001	'I think Dr Koplan's minutes of that meeting reflect that we had no reservations about, at least as a minimum, what should be done to prevent transfusion-associated AIDS. But there was a tremendous obstruction from a few people in the blood-collecting sector regarding that. Dr Kellner and especially Dr Bove.'
Deposition Summary	Donald Pinkston Francis	21 Oct 1992	MULL0001542_0001	'CDC has a solid consensus that blood and blood products associated with AIDS was caused by an infectious agent and that the risk to recipients of the blood and plasma was considerable'
Deposition Summary	Donald Francis	16 Sept 1993	MULL0001544	Paragraph 20 The discovery of aids occurred in the summer of 1981, with a few cases of severe infectious diseases discovered in Los Angeles In July 1982, the first cases of aids in individuals suffering from haemophilia appeared Paragraph, 26–27 Refers to a letter dated 9 of July 1982, from Dr Foege to Cutter laboratories which was an alarm sounded by the CDC to the manufacturers of Factor V111 Paragraph 89–103 All these paragraphs should be read
Summary of Deposition	Maureen	12 Sept	MULL0001552_0001	'Page 3 of Exhibit 2, which is the budget for research and

	Goettlich	1995		development expense for the year 1982 shows a budget of $359,000 for hepatitis-free products. That account, Account No 546 does not appear for any of the previous years, thus indicating that Cutter's first budget for hepatitis-free products was the 1982 budget.' 'Admits that since the page 3 1982 R&D budget shows an item for hepatitis-free product development for 1982, but in the column to the left for 1980 there was no money, but probably as a specific product development there was no heat treatment R&D budget for 1980'.
Deposition Summaryh	Peter Levene	15 Jun 1990	MULL0001597	Paragraph 36 Believes that in 1982 and 83 he probably discussed with the industry, the fact that they were going to warn physicians that the blood products might carry aids Does not recall personally discussing it with anybody at Cutter or Armour, nor does he recall any meetings with anyone at Cutter or Armour on the subject of warnings in 82 and 83 Paragraph 61 Sometime around December 1982, when the MMWR article came out, he personally reached the medical opinion that concentrates carried a potential risk for transmitting aids
Deposition Summary	Peter Levene	18 Oct 1988	MULL0001599	Paragraphs, 113–114 Levine was aware in 1980 of a relationship between hepatitis and homosexuality and hepatitis and IV drug users, because of the high incidents of hepatitis B, in patients, who were IV drug

				abuses, and who were gay men
Deposition Summary	James Mosley M D	17 Nov 1992	MULL0001616	Paragraph 8 Confirms the deponent had previously run a study from 1974 to 1980 of the test for hepatitis B surface antigen to detect carriers of hepatitis B Among donors Paragraph 14 Mentions that an individual haemophiliac was enrolled in a transfusion safety study in 1986, because haemophiliacs were identified as a group within which aids would occur as early as July 1982 Paragraph 65 Dr Tabor investigated in 1965–66, an outbreak of hepatitis involving about 1000 persons and prisoners in a plasmapheresis program Paragraph 66 Refers to a paper published by Dr tabor on hepatitis spread by drug addicts in Kentucky in the 1950s
Deposition	Professor Luc Montagnier		MULL00001702	Believed AIDS to be a virus from November 1982.
Deposition Summary	Roger C Grimson	23 Aug 1986	MULL0001747	Paragraph 37 Refers to a paper published in the late 1970s on hepatitis Paragraph 39 States that the haemophiliacs formally became a member of the

				HIV risk group in July 1982, after the MMWR publication. There was recognition of the high probability that there was a risk group many months before that publication dating, even back to probably at least the latter part of 1981 Paragraph 39–40 States that in late 81 or 82, there was a very strong feeling among professionals that blood products and blood could be a source of transmission because of the emerging similarities between the disease, aids and other diseases Paragraph, 81–83 Prior to July 82 the evidence he had that suggested a transmissible agent as opposed to a common exposure causation included an MMWR report, articles that people with Aids had hepatitis CMV and other infections
Memo	D. L. Castalidi (Travenol)	3 Jun 1981	MULL0001939_058	Developing heat treated product to enable claim of non-infectivity for hepatitis similar to Behringwerke
Technological Perspective – The Risk and Safety Precautions for Blood Products	Edward Shanbrom		MULL0003193_0001	Dr Ed Shanbrom's speech in Japan in 1996, describing the dangers of immune globulins and the necessity to use solvent-detergent processes to sterilize blood products. Also the availability of the technology to sterilize Factor VIII and IX before the AIDS epidemic had the fractionators been so inclined. Page 4 From about mid 1970 until 1986 I tried to convince plasma fractionators to use detergents for the inactivation of hepatitis and other viruses. I contacted, visited or demonstrated the concept of detergent use to almost all plasma fractionators in the

				United States, in Europe, Japan, the American Red Cross, the American CDC and the FDA. That was done and completed by 1982. A series of patents for my ideas were issued in the early 1980's and therefore they were publicly known.
Memo	C. Heldebrant (Alpha)	16 Jul 1982	MULL3422_012	Re attendance at "Opportunist Infection in Haemophiliacs" meeting. Discussion re low-risk products. "The high risj products, AHF and PTC concentrates, can and do transmit hepatitis, Non A non B hepatitis and other viral diseases with low frequency. However, continued prophylactic or acute use of AHF concentrates leads to eventual liver disease. Dr Curran noted that homosexuals and drug addicts spread sexually transmitted and other diseases more rapidly than the normal population. ....This epidemic is developing in the pattern of an epidemic of Hepatitis B ....
Memo	M Downing (Hyland)	12 October 1980	MULL0004129	Recognizing the risks of Hep B in certain high risk groups
Memo	Paul Roberts (Revlon)	4 Dec 1982	MULL0004233	... AIDS is now a major issue ...may be found in blood products... High risk groups for Hepatitis B are also high risk for AIDs .... Also30% of haemophiliacs die of liver disease ... discussion on viral inactivation .... AIDS has been known for several years and was thought to be confined to active male homosexuals, some drug users some Haitians ... it is in the commercial blood supply and in blood derivatives such as AHF
Memo from L.Kriley to Distribution, Hyland Therapeutics Division, Travenol Laboratories re: Project decision council booklet Project		14 Jun 1979	MULL0004896	From Page 3, under the heading "Project Benefits", the primary benefit listed is *"dramatic increases in unit sales and in average selling price"*. Nothing is said about patient safety here. This adds weight to the argument that commercial manufacturers prioritised profits over patient safety.

decision council booklet				
Memo from L.Kriley to Distribution, Hyland Therapeutics Division, Travenol Laboratories re: Project decision council booklet Project decision council booklet		14 Jun 1979	MULL0004896	On Page 4, under the heading “Key Considerations, Risks”... a. At A, it is said the probability of success is 60%. Given it is acknowledged here that it was more probable than not that such efforts would be successful, much greater efforts in this regard should have been made by manufacturers. a. At B, it is said "Proof of non-infectiviety must be accomplished in chimpanzees and it is increasingly difficult and expensive to obtain chimpanzees." i. It is submitted that the alleged difficulties with chimp’s, encouraged such research, wrongly, in human patients. This will not be a new prospect to the Inquiry and the date of this document as contrasted to the Hemofil infectivity studies in the UK, led by Dr Craske, is noted. If the Inquiry disagrees with the assertion that chimp difficulties were a factor, then Dr Craske’s studies become even more difficult to justify. i. The word “expensive” can be quantified from MULL0005173, Page 3, where it is said five chimps would be rented at $9 per day.
Memo	G. Roland (Travenol)	27 Mar 1981	MULL0004898	Given the high prevalence of NANB donors ... it is likely that the vast majority if not all plasma pools are also NANB positive.
Third Update on		21 May	MULL0005173	Page 3 "There are currently two lots of Lessines produced AHF on

Hepatitis Free AHF 2023-01-10 PA Epiq: Memorandum from T. Stagnaro, Hyland Therapeutics to D. Castaldi, M. Chelebowski, G. de Caritat, R. Dolkart, J. Higgins, S. Holst, H. Kingdon, C. Lichtenstein, D. McClure, A, Nicholson, R. Olivarez, M.		1981		stability."
Minutes	Various	23 Apr 1982	MULL0005910	Meeting to discuss the production of hepatitis free products …
Memo		21 Sept 1982	MULL0006548	Re AIDS studies in haemophilliacs
Advert	N/N	13 May 1982	MULL0006827_015	Active recruitment of those infected with hepatitis in gay magazines
Newsletter	ABRA	16 Aug 1982	MULL0007738	Deadly new disease defies analysis … called AIDS
Memo	Cutter	30 Aug 1982	MULL0007803	Plasma from homosexual for anti-HBg not used in Hyland fractionation but sold to Alpha…. Until recently Cutter's anti-HBg plasma (all collected from centres dealing predominantly with homosexuals) has been used in the manufacture od=f coagulation products ….
Letter to NHF	Michael Rodell (Hyland)	9 Dec 1982	MULL0007809	…. Within the past several months, we have made a commitment to withhold from AHF manufacture any plasma obtained as a result of specific recruiting in the gay community……

Memo	Robert C. Johnson (Armour)	23 Jul 1982	MULL0007991	Mention of opportunist agents recently discussed
Memo	Dr Clyde McAuley (Alpha)	22 Dec 1982	MULL	… groups considered high risk for AIDS including homosexuals, drug abusers and Haitians, We do not operate in prisons

DATED 21st December 2023

Collins Solicitors