Witness Name: Jane Campbell Statement No: WITN0664002

Exhibits: WITN0664003 -

Dated: 3 June 2019

## **INFECTED BLOOD INQUIRY**

## SECOND WRITTEN STATEMENT OF BARONESS JANE CAMPBELL

I provide this statement in response to a request under Rule 9 of the Inquiry Rules 2006 dated 15 January 2019.

- I, Jane Campbell, will say as follows: -
- I make this statement in addition to my statement of 3 June 2019 (WITN0664001) and for the sole purpose of exhibiting documents.
- In this regard:
  - a) At paragraph 56 of my first statement I state that Graham and I started litigation as part of a class action. I attach a copy of the Statement of Claim issued 5 January 1990 marked WITN0664003. It details how Graham received blood products for the treatment of Haemophilia A, the dates in which samples of his blood were taken and the date of the first positive test for antibodies to HIV. There is particular attention to the physical injury and psychological damage he experienced (also referred to in paragraph 29 of my first statement). I also attach correspondence received from Pannone

Napier Solicitors between 8 December 1989 and 11 December 1990 in relation to the HIV Haemophilia Litigation Claim. These are marked WITN0664004 to WITN06640010.

- b) At paragraph 54 of my first statement I discuss the financial assistance provided by the Macfarlane Trust. I attach a copy of a letter received in 1991 enclosing the cheque and a further letter from the Department of Social Security, affirming that the payment does not have to be counted against entitlement to certain benefits. This is marked WITN06640011.
- c) I attached exerts from application forms in regard to legal aid marked WITN06640012 and WITN06640013. It relates to the impact section of my first statement (section 5), and details the physical and mental affects of Graham's infection with HIV on both of us.
- d) At paragraphs 33 and 34 of my first statement I state the further medication complications from Graham's HIV infection. I attach a copy of a letter dated 30 September 1993 from Dr M.J. O'Doherty explaining how Graham developed severe epiglottitis. This is marked WITN06640014.

## Statement of Truth

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

