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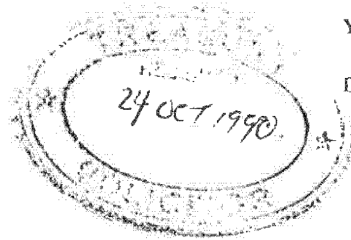
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The Treasury Solicitor
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Our Ref: MM/AAT
Your Ref: L89/JND
Date: 5 October 1990



Dear Sir

HIV HAEMOPHILIA LITIGATION DEPARTMENT OF HEALTH DISCOVERY OF DOCUMENTS

1. Please let us know when you will serve a Supplementary List.
2. We enclose document A which is divided into three parts:
 - i. A list of documents included in your first List of documents but not included in the third List of documents.
 - ii. A List of documents included in the second List of documents but not the third List of documents.
 - iii. A list of documents referred to in disclosed documents but not themselves separately listed.

Can you please supply a copy of each of these documents or an explanation why they have not been or cannot be provided within 14 days? If not, we shall raise the matter of specific discovery with the Judge at the next hearing.

3. Can you please expressly confirm whether any documents exist which are comprised within Category 6 of the documents referred to in the Certificate of Mr France? If there are, could you please supply us with a list of them within 14 days?

4. Please supply copies of all of the following documents which are in the possession of any of the Central Defendants within 14 days:-

A. All correspondence/documents passing between the Medicines Inspectorate Division and BPL and/or the DHSS requesting facilities to inspect Elstree between 1st January 1974 and closure of Elstree and the reaction of BPL and/or DHSS to those requests.

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- ✓ B. The report of the Medicines Inspectorate Division relating to Elstree published in or about Summer 1979 containing or evidencing their findings with regard to (a) overcrowding (b) drains (c) contamination risks (d) equipment (e) maintenance (f) equipment contaminated by mould (g) unfiltered air (h) production capacity and (i) health and safety risks generally.
- ✓ C. All documents in the custody power or possession of the Central Defendants relating to the decision to close BPL.
- D. The report commissioned by the DHSS in 1979 relating to the economics of constructing and operating a new plant at Elstree.
- ✓ E. A report obtained by the DHSS in or about May 1980 from a chemical engineer in the course of which he advised that "The inspection by the Medicines Division shows that the Elstree plant is unsafe for production by present day standards".
- F. All correspondence, internal memoranda, notes of meeting and other documents passing between BPL and the DHSS from 1st October 1978 to 31 December 1983 touching or concerning (a) increased production of Factor VIII and IX and (b) the management and control of health and safety risks.
- ✓ G. Advice given by Professor Ari Zuckerman to the Central Defendants between 1 January 1974 and 31 December 1985 relating to (a) the international commercial market in blood and blood products and associated viral risks (b) the source of blood used in American blood concentrates imported into the United Kingdom and associated viral risks (c) result of tests carried out by Professor Zuckerman on blood products imported into the United Kingdom from America with particular reference to the risks of hepatitis B and hepatitis NANB (d) the incidence of hepatitis B and NANB in English haemophiliacs treated with imported American blood concentrate (e) the wisdom of causing or permitting English haemophiliacs to be treated with imported American blood concentrate.

Yours faithfully

PANNONE NAPIER