

[REDACTED]

From: [REDACTED]
Sent: Thursday, November 04, 2004 12:41 PM
To: Michael McBride
Cc: [REDACTED]
Subject: Letter re Insight programme
Importance: High

Dear Dr McBride,

Further to Mr D C Gowdy's letter, I am writing to confirm that we have the following papers "secured" in the Litigation office:-

1. Re AS: RBHSC notes and records are to be collected from RBHSC medical records library this afternoon, as are coming from off-site Mullusk. We also have a file relating to HMC investigation and a closed Clinical Negligence claim file.
2. Re RF: We have RBHSC notes, HMC investigation file and Clinical Negligence claim file.
3. Re LC: We have RBHSC notes and HMC investigation file.

We also have a small file of papers relating to Media Interest in Hyponatraemia.

Mr Walby has asked Brangam Bagnall & Co to advise urgently on Discoverability issues particularly in relation to their advice to us (as their client) and also the point that there was a "Confidentiality Clause" included at the time of settlement in relation to AS.

I trust that this is helpful.

[REDACTED]

11/4/2004