CENTRAL SERVICES AGENCY

PLEASE REPLY TO:
NEVILLE L. FINCH
DIRECTOR OF LEGAL SERVICES

25 Adelaide Street, Belfast BT2 8FH

Tel: Fax:

Гах

Our Ref: MN T02/7/1017

Date: 10 May 1996

Dr G A Murnaghan
Director of Medical Administration
Royal Group of Hospitals and Dental Hospital
Health and Social Services Trust
First Floor East Wing
Royal Victoria Hospital
Grosvenor Road
BELFAST
BT12 6BA

Dear Sir

DEBRA STRAIN / ADAM STRAIN

K. Willeum

Please find enclosed copy correspondence relating to the above-named.

Further information has been requested from the Plaintiff's Solicitors and I will contact you in due course regarding same. Please ensure that all hospital records are retained for further use.

Yours faithfully

Legal Assistant

Enc

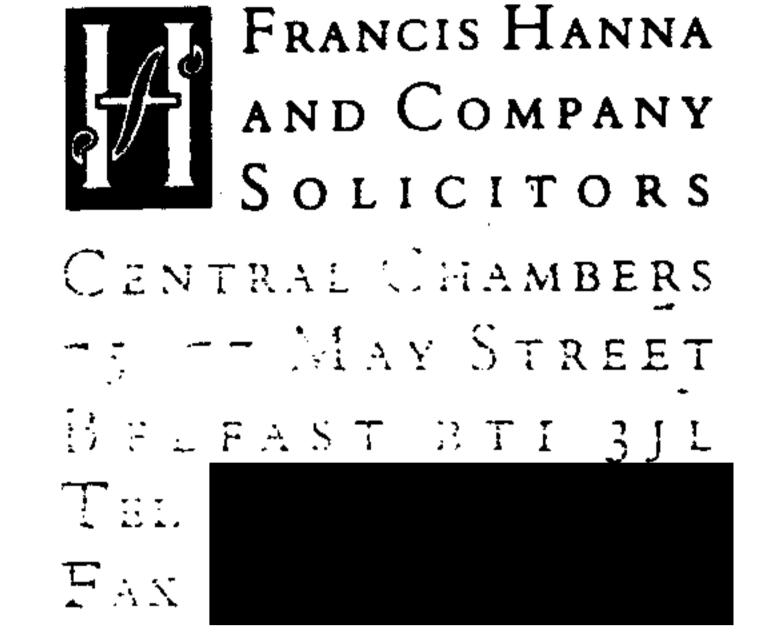
9ri2a1



Our Ref: 70560/DD/CMcL

April 25, 1996

Central Services Agency
DX BELFAST 3: 2842 NR



Dear Sirs,

Re:

Our Client: Debra Strain, Mother and Personal Representative of Adam Strain (A

Minor, Deceased)

Address:

We enclose herewith copy letter to the Royal Group of Hospitals and Dental Hospital Trust the contents of which should be self explanatory.

Yours faithfully,

Francis Hanna and Company.

Form J (= 5-5) Form J (= 5-6) FJ (= 7-5-7)

PARTNERS FRANCIS J. HANNA LINDA R. JOHNSTON GERARD B. DALY SOLICITORS PAUL SMART MICHAEL HOLLYWOOD SIOBHAN BRODERICK DAMIAN DEAZLEY MICHAELA MURRAY

DX 473 NR BELFAST I.

059-025-053

Our Ref: 70560/DD/CMcL

April 25, 1996

Royal Group of Hospitals and Dental Hospitals HSS Trust Royal Victoria Hospital Grosvenor Road Belfast



Dear Sirs,

Re: Our Client: Miss Debra Strain, Mother and Personal Representative of

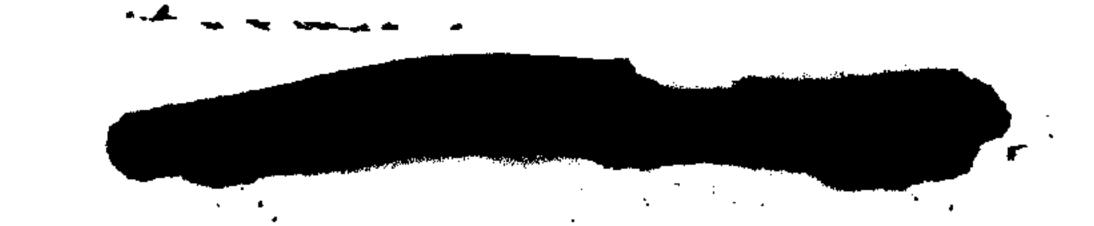
Adam Strain (A Minor, Deceased)

Address:

We have been consulted by our above named Client in connection with a potential claim for damages for personal injury, loss and damage sustained by reason of negligence in and about the performance of a renal transplant operation on or about 27th November 1995. It is our instructions that on or about 26th November 1995 Adam Strain was admitted for a renal transplant operation. The operation took place on 27th November 1995. Unfortunately Adam subsequently died following the operation on the 28th November 1995. It is in these circumstances we are applying to you for voluntary disclosure of all his medical records. We cannot of course be more specific about the allegations that may be made at this stage.

We would therefore ask you to furnish us with all medical notes and records, all medication records, all laboratory test reports, all records relating to surgery performed and all clinical and hospital correspondence together with any additional written documentation of any nature relevant to this matter.

We undertake to preserve the confidentiality of the records and to use them only for the purpose of the present proposed claim. We will accept either the originals in which case we undertake to take proper care of them and return them to you with all due speed, or in the alternative, legible and properly photocopied copies. If you provide copies please ensure that these are in some resemblance of order and that any dates that occur near the edges of any documents are clear. We also require you to supply a list of all documents furnished to avoid the possibility of any arguments at a later stage about what was sent. We reserve our right to inspect copies against the originals in your possession.





We also require you to confirm if you have passed any relevant documents to any other party and if so identify the parties. Please also undertake to preserve in their entirety pending production and inspection at Trial all documents.

We are sure that we do not need to tell you that we will not accept disclosure to a nominated Medical Advisor only.

We must ask you to signify your consent to this disclosure within two weeks from today and thereafter to provide the records within at most a further four weeks failing which we are instructed to apply to the Court without further delay.

Finally, as a matter of course we would advise that we are forwarding a copy of this letter to the Legal Branch at the Central Services Agency.

Yours faithfully,

Francis Hanna and Company.