

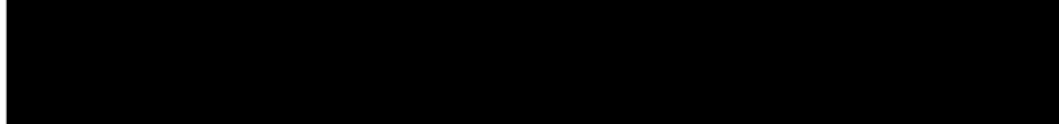


Our Ref: 70560/DD/CMcL


April 25, 1996

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



 FRANCIS HANNA
AND COMPANY
SOLICITORS
CENTRAL CHAMBERS
75/77 MAY STREET
BELFAST BT1 3JL
TEL. 
FAX 

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.