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BRANGAM BAGNALL & CO.

Solicitors

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Telephone: [REDACTED] Fax: [REDACTED] DX No. 3873NR e-mail: consult [REDACTED]
A.51/2003/12/J

OUR REF:

21 May 2003

YOUR REF:

Mr A P Walby
Directorate of Risk & Litigation Management
Royal Group of Hospitals and Dental Hospital
Health and Social Services Trust
1st Floor, East Wing
Royal Victoria Hospital
Grosvenor Road
BELFAST
BT12 6BA

Dear Sir

RACHEL FERGUSON

Thank you for your letter of the 15th instant enclosing correspondence which you had received from the Plaintiff's Solicitors. We have written to the said Solicitors identifying our interest on behalf of the Trust and asking that all future correspondence be directed to us.

We should be grateful if you would arrange for the original case notes to be made available to us as soon as possible for the purposes of Discovery. If these are required for clinical purposes, then please let us know as a matter of urgency in order that we might inform the Plaintiff's Solicitors of the prospect of delay in dealing with their application for Discovery.

If it is convenient at this stage to obtain Statements from the Clinicians, then please do so, but if this is likely to cause delay in sending the case notes, then Statements can be obtained after Discovery has been completed.

Finally given that there is now a threat of litigation it is important that all clinical and nursing records and other documentation relating to the care and treatment given to the patient are kept intact and are not removed from the Trust's custody during the currency of these proceedings. Please ensure in any future correspondence you quote our reference and should you have any queries in relation to this matter please do not hesitate to contact our Mr Brangam.

Yours faithfully

Brangam, Bagnall & Co.

Brangam, Bagnall & Co

/RS/210503 1

4.6.03
Spoke to Laura
RBC. Letter sent
in error.
They have the
case notes
from AUG 1.



Also at Hildon House, 30-34 Hill Street, Belfast BT1 2LB
Telephone: [REDACTED] Fax: [REDACTED] DX No. 485NR e-mail: advice [REDACTED]

George D. H. Brangam Fiona E. E. Bagnall

Uel A. Crothers

RF - ROYAL

065-008-017

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OF NORTHERN IRELAND