

**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

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**From:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 08 November 2018 18:25  
**To:** 'Brian Stanton'  
**Cc:** Deirdre Domingo; Kate Meredith-Hardy; TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** RE: Request for submissions on the Penrose Report

**Importance:** High

<b>Tracking:</b>	<b>Recipient</b>	<b>Delivery</b>
	'Brian Stanton'	
	Deirdre Domingo	
	Kate Meredith-Hardy	
	TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)	Delivered: 08/11/2018 18:25
	'Simon Bowie'	

Dear Brian,

Thank you for your e mail. I note your thoughts.

Can I just clarify that our clients would welcome being requested to provide submissions, along with and at the same time as, the other Penrose Core Participants. We are still in the process of considering how best we could do this, given the vast quantity of material that there is to consider. For example, we are currently considering what contemporaneous analysis documents we may be able to direct you to which, hopefully, you would find of particular assistance.

Our thinking in suggesting that a two stage submissions process might be appropriate, is that allowing parties to make follow on submissions on each others' initial submissions, could be the fastest and easiest way to identify the key areas and issues upon which there remains disagreement and, by inference, what findings and conclusions Penrose Core Participants accept.

I would be very happy to discuss this further tomorrow if that would assist.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B  
Accredited Specialist in Medical Negligence

Central Legal Office | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

Tel: 0131 275 7875

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**From:** Brian Stanton [<mailto:brian.stanton@infectedbloodinquiry.org.uk>]

**Sent:** 08 November 2018 17:36

**To:** TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND); MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)

**Cc:** Deirdre Domingo; Kate Meredith-Hardy; HOGWOOD, Gayle (NHS NATIONAL SERVICES SCOTLAND); JARDINE, Louise (NHS NATIONAL SERVICES SCOTLAND)

**Subject:** Request for submissions on the Penrose Report

Dear Tracey and Susan

Thank you for the extremely helpful conference call just now.

Having considered what you had to say and reminding ourselves of the purpose of this exercise which is to seek to avoid unnecessary duplication and identify key areas upon which to focus, we think the process to be adopted will need to take the following form:

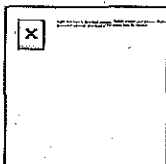
1. Submissions from [REDACTED] alone or together with any other joint IBI/Penrose CPs who wish to make submissions at this stage (namely, yourselves and Scottish Gov).
2. Provision of those submissions to all other CPs, including to yourselves if you decided against submissions at the first stage.

I understand from our call that your clients would prefer not to make submissions in the first instance. If the Scottish Government's position is the same, then we would propose to request submissions from [REDACTED] alone in the first instance, to be provided to all other CPs, including yourselves.

In order to progress this matter I would like to contact the Scottish Government to update them on our call, and I would be grateful if you could confirm that you have no objections to the Inquiry indicating your joint preference not to make submissions in the first instance. Please feel free to contact Scottish Government with an account of our conversation should you wish.

Kind regards

Brian



**Brian Stanton**

**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 08 November 2018 11:24  
**To:** 'Brian Stanton'  
**Cc:** 'Deirdre Domingo'  
**Subject:** RE: Penrose Inquiry and report

Thanks Brian – I look forward to speaking with you all this afternoon.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor – Litigation Team B  
Accredited Specialist in Medical Negligence

Central Legal Office | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

Tel: 0131 275 7875

Mob: [REDACTED]

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**From:** Brian Stanton [<mailto:brian.stanton@infectedbloodinquiry.org.uk>]  
**Sent:** 08 November 2018 08:21  
**To:** TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); Deirdre Domingo; Kate Meredith-Hardy; Thomas Powell; HOGWOOD, Gayle (NHS NATIONAL SERVICES SCOTLAND); JARDINE, Louise (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Re: Penrose Inquiry and report

Tracey/Susan

Thanks for your responses. I have arranged a conference call for 15:00 today on the following number/access code:

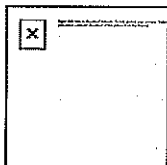
[REDACTED]  
[REDACTED] [REDACTED]

Deirdre, Tom and Kate will also be on the call and please feel free to invite any of your colleagues.

I hope this is convenient. If not we can easily re-arrange to a more convenient time.

Kind regards

Brian



**Brian Stanton**

**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

On Thu, 8 Nov 2018 at 06:23, TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)  
<[tracey.turnbull@nhs.net](mailto:tracey.turnbull@nhs.net)> wrote:

Thank you for your email, Brian. It would be helpful for us to discuss this further. I think Susan called you yesterday to chat about this amongst other things. Perhaps we could arrange a call for this afternoon and both Susan and myself could speak with you then?

Kind regards,

*Tracey*

**Tracey Turnbull**

Senior Solicitor

Litigation Team B

Central Legal Office | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

T: 0131 275 7901

F: 0131 275 7993

[www.clo.scot.nhs.uk](http://www.clo.scot.nhs.uk)

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**From:** Brian Stanton [mailto:[brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)]

**Sent:** 07 November 2018 10:43

**To:** TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND); MURRAY, Susan (NHS NATIONAL SERVICES

**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** Brian Stanton [brian.stanton@infectedbloodinquiry.org.uk]  
**Sent:** 08 November 2018 07:40  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Re: Penrose Inquiry and report

Thanks Susan. Sorry missed your call. I'll send you and Tracey some conference call details with a view to our speaking later today.

Brian

On Wed, 7 Nov 2018 at 18:04, MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
<[susana.murray@nhs.net](mailto:susana.murray@nhs.net)> wrote:

Dear Brian,

Thank you for your e mail. I am just sending you a quick note to say that I tried to phone you earlier today and left you a voicemail message. I am in tomorrow and look forward to speaking with you when you are able to return my call.

Kind regards

Susan

**Susan A. Murray**


Senior Solicitor - Litigation Team B

Accredited Specialist in Medical Negligence

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[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

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**From:** Brian Stanton [mailto:[brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)]

**Sent:** 07 November 2018 10:43

**To:** TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND); MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); Deirdre Domingo; Kate Meredith-Hardy; Thomas Powell

**Subject:** Penrose Inquiry and report

Dear Tracey and Susan

I mentioned to Tracey when we met recently that the Inquiry was considering inviting the core participants to Penrose and the IBI (SNBTS, the Regional Health Boards in Scotland (to be designated CP shortly), Scottish Government, and clients of [REDACTED] to provide submissions to be shared with all core participants to IBI for the purposes of identifying:

- evidence and findings in Penrose that it may be possible to adopt in IBI;
- findings/conclusions with which CPs to the Penrose Inquiry disagree;
- Penrose witnesses who CPs consider should also provide evidence to IBI;
- Penrose witnesses from whom it is unnecessary to take evidence in IBI;
- potential witnesses who, in the opinion of CPs, ought to have given evidence to Penrose but did not.

The IBI has now decided that it will make this request and a formal more detailed note will follow.

However, before issuing that note I would be grateful for your assistance in formulating the request.

The main aims are to benefit from the work already done by Penrose, by avoiding unnecessary duplication and to identify key areas and issues upon which there is either disagreement or which remain unresolved, upon which the IBI should focus.

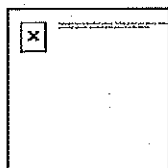
With this in mind I would be very grateful for your input and views as to how the request for submissions should be formulated. Do you agree with the approach adopted above and are there any other areas that you think we should mention?

Happy to discuss if that would assist.

I have copied in Deirdre, Kate and Tom, all from the Inquiry Solicitor Team.

Kind regards

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

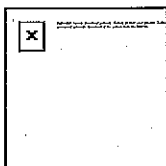
**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

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**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)





## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 07 November 2018 18:04  
**To:** 'Brian Stanton'  
**Cc:** 'Deirdre Domingo'  
**Subject:** RE: Penrose Inquiry and report

Dear Brian,

Thank you for your e mail. I am just sending you a quick note to say that I tried to phone you earlier today and left you a voicemail message. I am in tomorrow and look forward to speaking with you when you are able to return my call.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B  
Accredited Specialist in Medical Negligence

CentralLegalOffice | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

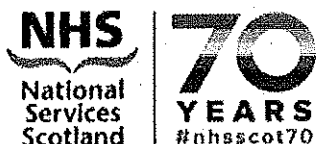
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**From:** Brian Stanton [<mailto:brian.stanton@infectedbloodinquiry.org.uk>]  
**Sent:** 07 November 2018 10:43  
**To:** TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND); MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); Deirdre Domingo; Kate Meredith-Hardy; Thomas Powell  
**Subject:** Penrose Inquiry and report

Dear Tracey and Susan

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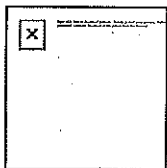
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Happy to discuss if that would assist.

I have copied in Deirdre, Kate and Tom, all from the Inquiry Solicitor Team.

Kind regards

Brian



**Brian Stanton**

**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

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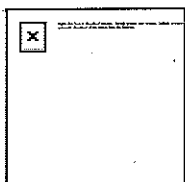
**From:** Deirdre Domingo [deirdre.domingo@infectedbloodinquiry.org.uk]  
**Sent:** 07 November 2018 16:01  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND); Brian Stanton  
**Subject:** Re: Inquiry - Central Legal Office - proposed meeting  
**Attachments:** image001.png

Dear Susan

Thank you very much. We're happy to come to your offices - would 2pm to 3pm on Thursday, 6th December be suitable for you and Tracey?

Best wishes

Deirdre



**Deirdre Domingo**  
**Deputy Solicitor to the Infected Blood Inquiry**  
**Mobile:** [REDACTED]  
**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE  
**Email:** [deirdre.domingo@infectedbloodinquiry.org.uk](mailto:deirdre.domingo@infectedbloodinquiry.org.uk)

On Wed, 7 Nov 2018 at 07:36, MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
<[susana.murray@nhs.net](mailto:susana.murray@nhs.net)> wrote:

Dear Deirdre,

Thank you for your e mail.

I can confirm that I would be very happy to meet with you on either 6<sup>th</sup> or 7<sup>th</sup> December 2018. Tracey will be in the office today and I am sure that she will get back to you shortly.

Would you like us to arrange a meeting room here in our offices, once we have a date and time fixed?

I look forward to hearing from you further.

Kind regards

Susan

**Susan A. Murray**

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**From:** Deirdre Domingo [mailto:[deirdre.domingo@infectedbloodinquiry.org.uk](mailto:deirdre.domingo@infectedbloodinquiry.org.uk)]

**Sent:** 06 November 2018 18:00

**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)

**Cc:** Brian Stanton

**Subject:** Inquiry - Central Legal Office - proposed meeting

Dear Susan and Tracey

We may have mentioned previously that the Inquiry team is planning to visit Edinburgh again on 6 and 7 December (and to visit the SNBTS Jack Copland Centre on the afternoon of 7 December). Would you (and any other members of your team) have availability to meet with Brian and me on 6 December while we are in town?

I hope you are both keeping well.

## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 07 November 2018 07:36  
**To:** 'Deirdre Domingo'; TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** Brian Stanton  
**Subject:** RE: Inquiry - Central Legal Office - proposed meeting

**Importance:** High

<b>Tracking:</b>	<b>Recipient</b>	<b>Delivery</b>
	'Deirdre Domingo'	
	TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)	Delivered: 07/11/2018 07:36
	Brian Stanton	

Dear Deirdre,

Thank you for your e mail.

I can confirm that I would be very happy to meet with you on either 6<sup>th</sup> or 7<sup>th</sup> December 2018. Tracey will be in the office today and I am sure that she will get back to you shortly.

Would you like us to arrange a meeting room here in our offices, once we have a date and time fixed?

I look forward to hearing from you further.

Kind regards

Susan

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**From:** Deirdre Domingo [<mailto:deirdre.domingo@infectedbloodinquiry.org.uk>]  
**Sent:** 06 November 2018 18:00  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)

**Cc:** Brian Stanton

**Subject:** Inquiry - Central Legal Office - proposed meeting

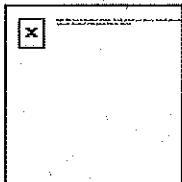
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I hope you are both keeping well.

Best wishes

Deirdre



**Deirdre Domingo**

**Deputy Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [deirdre.domingo@infectedbloodinquiry.org.uk](mailto:deirdre.domingo@infectedbloodinquiry.org.uk)

## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

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**From:** Deirdre Domingo [deirdre.domingo@infectedbloodinquiry.org.uk]  
**Sent:** 06 November 2018 18:00  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** Brian Stanton  
**Subject:** Inquiry - Central Legal Office - proposed meeting

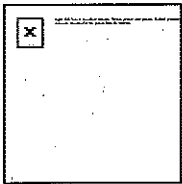
Dear Susan and Tracey

We may have mentioned previously that the Inquiry team is planning to visit Edinburgh again on 6 and 7 December (and to visit the SNBTS Jack Copland Centre on the afternoon of 7 December). Would you (and any other members of your team) have availability to meet with Brian and me on 6 December while we are in town?

I hope you are both keeping well.

Best wishes

Deirdre



**Deirdre Domingo**  
**Deputy Solicitor to the Infected Blood Inquiry**  
**Mobile:** [REDACTED]  
**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE  
**Email:** [deirdre.domingo@infectedbloodinquiry.org.uk](mailto:deirdre.domingo@infectedbloodinquiry.org.uk)





## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 29 October 2018 10:20  
**To:** 'Brian Stanton'  
**Cc:** Sam Green; TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND); JARDINE, Louise (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Confidentiality undertakings  
**Importance:** High

Dear Brian,

I understand that you had a productive meeting with Tracey, Louise and Health Board personnel in Edinburgh last week.

I am writing to you about the Confidentiality Undertakings. The SNBTS have identified 7 people at the moment, They are:-

- Dr Marc Turner
- Hazel Thomson (new Acting Director of the SNBTS)
- Peter Foster (retired former employee of the SNBTS)
- Derek Radin
- Cathy Rooney
- Simon Bowie Q.C.
- Susan Murray

I have not included Tracey and Louise, as I understand that they may be producing their own list for this purpose. If I am wrong about that, please also include Tracey Turnbull and Louise Jardine on the above list.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B  
Accredited Specialist in Medical Negligence

Central Legal Office | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

Tel: 0131 275 7875

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**From:** Brian Stanton [<mailto:brian.stanton@infectedbloodinquiry.org.uk>]  
**Sent:** 03 October 2018 19:50

**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)

**Cc:** Sam Green

**Subject:** Re: Confidentiality undertakings

Dear Susan

Yes, please let us have the undertakings from the people you already know will require licences and we can deal with any additional members of your team at a later date.

Kind regards

Brian

On Wed, 3 Oct 2018 at 10:11, MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
<[susana.murray@nhs.net](mailto:susana.murray@nhs.net)> wrote:

Dear Brian,

It was good to meet you, Deirdre and members of your Team during the course of the Preliminary Hearings.

Thank you for the undernoted e mail re access to Inquiry documents on the e-disclosure platform – Relativity. I can confirm that I will be discussing this matter with my clients and will return to you as soon as possible with the full set of names of individuals in respect of whom we would seek access.

In the meantime, I can advise that, for the SNBTS, access will definitely be requested on behalf of myself, Marc Turner, Derek Radin and Simon Bowie Q.C.. Should we proceed to let you have such confidentiality undertakings now, and then follow up with further names and signed undertakings when a final list been agreed internally?

I look forward to hearing from you.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B

Accredited Specialist in Medical Negligence

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---

**From:** Brian Stanton [<mailto:brian.stanton@infectedbloodinquiry.org.uk>]  
**Sent:** 23 September 2018 16:07  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND); Sam Green  
**Subject:** Confidentiality undertakings

Dear Susan

The Inquiry is now at a stage to provide disclosure to Core Participants and their designated recognised legal representatives. The first tranche of disclosure to be made available will be the documents disclosed in the Penrose Inquiry.

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The Inquiry Information Manager, Sam Green (copied in), will be responsible for the provision of Relativity licences and collection of signed confidentiality undertakings. Please provide your responses to him.

Please do not hesitate to contact me or Sam should you have any queries.

Kind regards

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

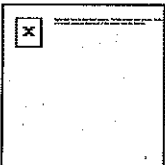
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**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** Brian Stanton [brian.stanton@infectedbloodinquiry.org.uk]  
**Sent:** 03 October 2018 19:50  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** Sam Green  
**Subject:** Re: Confidentiality undertakings

Dear Susan

Yes, please let us have the undertakings from the people you already know will require licences and we can deal with any additional members of your team at a later date.

Kind regards

Brian

On Wed, 3 Oct 2018 at 10:11, MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
<[susana.murray@nhs.net](mailto:susana.murray@nhs.net)> wrote:

Dear Brian,

It was good to meet you, Deirdre and members of your Team during the course of the Preliminary Hearings.

Thank you for the undernoted e mail re access to Inquiry documents on the e-disclosure platform – Relativity. I can confirm that I will be discussing this matter with my clients and will return to you as soon as possible with the full set of names of individuals in respect of whom we would seek access.

In the meantime, I can advise that, for the SNBTS, access will definitely be requested on behalf of myself, Marc Turner, Derek Radin and Simon Bowie Q.C.. Should we proceed to let you have such confidentiality undertakings now, and then follow up with further names and signed undertakings when a final list been agreed internally?

I look forward to hearing from you.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B

Accredited Specialist in Medical Negligence

Central Legal Office | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

Tel: 0131 275 7875

Mob: [REDACTED]  
[www.clo.scot.nhs.uk](http://www.clo.scot.nhs.uk)

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NHS National Services Scotland is the common name for the Common Services Agency for the Scottish Health Service. [www.nhsnss.org](http://www.nhsnss.org)



---

**From:** Brian Stanton [mailto:[brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)]  
**Sent:** 23 September 2018 16:07  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND); Sam Green  
**Subject:** Confidentiality undertakings

Dear Susan

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Please do not hesitate to contact me or Sam should you have any queries.

## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 03 October 2018 10:11  
**To:** 'Brian Stanton'  
**Cc:** Sam Green  
**Subject:** RE: Confidentiality undertakings

**Importance:** High

Dear Brian,

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I look forward to hearing from you.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B  
Accredited Specialist in Medical Negligence

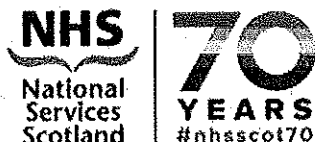
CentralLegalOffice | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

Tel: 0131 275 7875  
Mob: [REDACTED]  
[www.clo.scot.nhs.uk](http://www.clo.scot.nhs.uk)

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NHS National Services Scotland is the common name for the Common Services Agency for the Scottish Health Service. [www.nhsnss.org](http://www.nhsnss.org)



---

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**Sent:** 23 September 2018 16:07  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND); Sam Green  
**Subject:** Confidentiality undertakings

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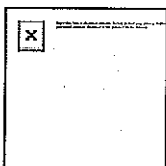
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Please do not hesitate to contact me or Sam should you have any queries.

Kind regards

Brian



**Brian Stanton**

**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)



## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 02 October 2018 19:13  
**To:** Brian Stanton  
**Cc:** TURNER, Marc (NHS NATIONAL SERVICES SCOTLAND); MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** RE: Meeting with UK Blood Services

Dear Brian

Thank you for seeking confirmation that SNBTS(NSS) will provide legal representation to former employees through CLO (Susan Murray). I can confirm that this would be the case through the course of the Inquiry. However, it may be that both previous and current employees may wish to seek individual representation through their respective Professional Organisations or otherwise. During the Penrose Inquiry there was at least one previous employee who secured his own representation. We would be happy for you to indicate that CLO will provide advice to any employee or former employee.

Many thanks, Mary

**Mary Morgan**  
Director  
Scottish National Blood Transfusion Service

### **Scottish National Blood Transfusion Service**

The Jack Copland Centre  
52 Research Avenue North  
Heriot-Watt Research Park,  
Edinburgh  
EH14 4BE  
tel office: 0131 314 5512  
fax office: 0131 536 5714  
tel Mobile: [REDACTED]  
[www.scotblood.co.uk](http://www.scotblood.co.uk)

---

**From:** Brian Stanton [mailto:brian.stanton@infectedbloodinquiry.org.uk]  
**Sent:** 02 October 2018 17:06  
**To:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Re: Meeting with UK Blood Services

It was a pleasure Mary. We will hold the 15 March in our diaries.

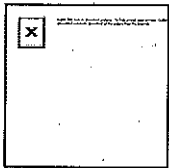
Further to the discussions on this issue on Friday, please may I request written confirmation that SNBTS will provide legal representation to former employees of SNBTS through CLO (I assume Susan Murray).

The Inquiry will always provide witnesses with the option of obtaining legal advice in connection with the provision of a witness statement, and in the case of former employees of SNBTS, subject to your confirmation, I propose to indicate that legal advice is available through CLO and to provide Susan's contact details.

Congratulations again on your new role and thank you for all the assistance provided to date.

Kind regards

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

On Mon, 1 Oct 2018 at 08:25, MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
<[mary.morgan@nhs.net](mailto:mary.morgan@nhs.net)> wrote:

Dear Brian

Thank you very much to you, Deirdre and Tom for meeting with the UK Blood Services Forum on Friday – we found it very helpful. We would like to invite you to a future planned meeting and have the 15 March 2019 date confirmed for our Spring meeting, likely to be held in London. Would it be possible to hold this in your diary?

In addition, I let you know that I would be taking up a new role from 29<sup>th</sup> October 2018. Cath O'Brien (Wales) will take on the role of Chair of the UKF on an interim basis. In the meantime please do not hesitate to contact me if I can be of any help

Best wishes, Mary

**Mary Morgan**

Director

Scottish National Blood Transfusion Service

**Scottish National Blood Transfusion Service**

The Jack Copland Centre  
52 Research Avenue North  
Heriot-Watt Research Park,  
Edinburgh  
EH14 4BE

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fax office: 0131 536 5714

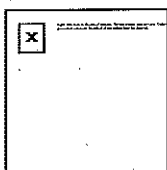
tel Mobile: [REDACTED]

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---

**From:** Brian Stanton [mailto:[brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)]  
**Sent:** 27 September 2018 18:26  
**To:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Re: Meeting with UK Blood Services - Confirmation of venue

Thanks Mary



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

On Thu, 27 Sep 2018 at 15:58, MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
<[mary.morgan@nhs.net](mailto:mary.morgan@nhs.net)> wrote:

Brian

This is absolutely fine. Looking forward to seeing you all then.

Mary

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: Brian Stanton <[brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)>

Date: 9/27/18 15:57 (GMT+00:00)

To: "MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)" <[mary.morgan@nhs.net](mailto:mary.morgan@nhs.net)>

Subject: Re: Meeting with UK Blood Services - Confirmation of venue

Dear Mary

Only if this can easily be accommodated, would it be possible to add someone to tomorrow's meeting?

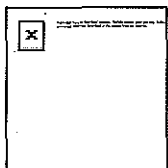
The reason for my hesitation is because I know we will be meeting over lunch.

If this causes any difficulty or inconvenience whatsoever please ignore this request and Deirdre and I look forward to seeing you and your UKF colleagues tomorrow.

If the request can be easily accommodated then the additional member of the Inquiry team is Thomas Powell (Senior Inquiry Lawyer).

Kind regards

Brian



**Brian Stanton**

**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

On Fri, 24 Aug 2018 at 09:01, MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
<[mary.morgan@nhs.net](mailto:mary.morgan@nhs.net)> wrote:

Hi Brian

Just a short note to advise you of the venue for the UKF meeting on 28<sup>th</sup> September. This is:

West End Donor Centre

26 Margaret Street,

London W1W 8NB

We look forward to seeing you and Deirdre at 12.30 for lunch. I aim to finish the meeting by 1530hrs

Many thanks, Mary

**Mary Morgan**

Director

Scottish National Blood Transfusion Service

**Scottish National Blood Transfusion Service**

The Jack Copland Centre  
52 Research Avenue North  
Heriot-Watt Research Park,  
Edinburgh  
EH14 4BE

tel office: 0131 314 5512

fax office: 0131 536 5714

tel Mobile: [REDACTED]

[www.scotblood.co.uk](http://www.scotblood.co.uk)

---

**From:** Brian Stanton [<mailto:brian.stanton@infectedbloodinquiry.org.uk>]

**Sent:** 23 August 2018 08:17

**To:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Re: Meeting with UK Blood Services

Thanks Mary.

I look forward to seeing you on the 28th .

Once I have more information about the attendees on 7 December I'll let you know and I look forward to liaising over the agenda.

Brian

On Wed, 22 Aug 2018 at 09:49, MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
<[mary.morgan@nhs.net](mailto:mary.morgan@nhs.net)> wrote:

Hi Brian

Re UK Forum: How about we arrange for you and Deirdre to join UKF colleagues at 12.30 for lunch and follow with a meeting. I am not sure of the venue as yet and will advise this as soon as I have this. I would plan to finish by 1530hrs as colleagues will wish to make their journeys home in good time.

Re Sir Brian's visit – I am delighted that Sir Brian will visit us and confirm that I have laid aside the day. Of course we can accommodate colleagues – and am happy for you to confirm closer to the time so that I can confirm timings and numbers for lunch etc. Please let me know if there is anything I can do to help facilitate the visit – perhaps we could liaise regarding the agenda for the date.

Best wishes, Mary

**Mary Morgan**

Director

Scottish National Blood Transfusion Service

**Scottish National Blood Transfusion Service**

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Heriot-Watt Research Park,  
Edinburgh  
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tel office: 0131 314 5512

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---

**From:** Brian Stanton [mailto:[brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)]  
**Sent:** 21 August 2018 19:29  
**To:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Re: Meeting with UK Blood Services

Thank you Mary. I would be delighted to attend and I am grateful for you extending the invitation. I can attend at whatever time is most convenient to you. If you are able to accommodate both Deirdre and me that would be ideal but if you prefer just one Inquiry representative I am happy to attend alone.

I can confirm Sir Brian would like to visit you on 7 December. Would you be able to accommodate 3 other representatives on the same visit (to be confirmed but one is likely to be our QC, Jenni Richards)?

Kind regards

Brian

On Mon, 20 Aug 2018 at 16:17, MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
<[mary.morgan@nhs.net](mailto:mary.morgan@nhs.net)> wrote:

Dear Brian

When we met at the JCC, you suggested a meeting with the UK Blood Services Forum. We have a planned UK Forum meeting on Friday 28<sup>th</sup> Sept in London (venue to be confirmed) and wondered if you might be free to join us at some point in the day?

Best wishes, Mary

**Mary Morgan**

Director

Scottish National Blood Transfusion Service

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**Brian Stanton**



**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** Brian Stanton [brian.stanton@infectedbloodinquiry.org.uk]  
**Sent:** 26 September 2018 14:33  
**To:** Simon Bowie  
**Cc:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND); deirdre.domingo@infectedbloodinquiry.org.uk  
**Subject:** Re: Final version opening statement

Thanks Simon

On Wed, 26 Sep 2018 at 14:05, Simon Bowie <[simon.bowie@advocates.org.uk](mailto:simon.bowie@advocates.org.uk)> wrote:

Brian/Deirdre

Please see final version

Simon

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager, [sysadmin@advocates.org.uk](mailto:sysadmin@advocates.org.uk). This footnote also confirms that this email message has been swept by Mimecast Ltd for the presence of computer viruses. Visit our website at [www.advocates.org.uk](http://www.advocates.org.uk)



**Brian Stanton**

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**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)



**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** Simon Bowie [simon.bowie@advocates.org.uk]  
**Sent:** 26 September 2018 14:06  
**To:** brian.stanton@infectedbloodinquiry.org.uk; deirdre.domingo@infectedbloodinquiry.org.uk  
**Cc:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Final version opening statement  
**Attachments:** Draft Opening Statement - mlt marc SB 25.9 final.doc

Brian/Deirdre

Please see final version

Simon

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager, [sysadmin@advocates.org.uk](mailto:sysadmin@advocates.org.uk) This footnote also confirms that this email message has been swept by Mimecast Ltd for the presence of computer viruses. Visit our website at [www.advocates.org.uk](http://www.advocates.org.uk)



**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** Brian Stanton [brian.stanton@infectedbloodinquiry.org.uk]  
**Sent:** 26 September 2018 13:02  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Simon's speech

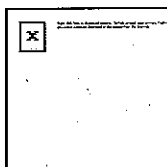
Susan

Grateful if you could email a copy of Simon's submissions ASAP.

Thanks

Brian

--



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)



**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** Brian Stanton [brian.stanton@infectedbloodinquiry.org.uk]  
**Sent:** 23 September 2018 16:07  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND); Sam Green  
**Subject:** Confidentiality undertakings

Dear Susan

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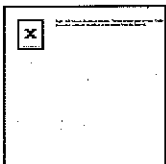
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Please do not hesitate to contact me or Sam should you have any queries.

Kind regards

Brian



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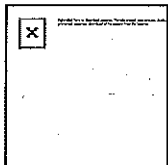


**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

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**From:** Brian Stanton [brian.stanton@infectedbloodinquiry.org.uk]  
**Sent:** 12 September 2018 11:00  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:**

[ruth.clarke@nhsbt.nhs.uk](mailto:ruth.clarke@nhsbt.nhs.uk)



**Brian Stanton**

**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)



**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** Brian Stanton [brian.stanton@infectedbloodinquiry.org.uk]  
**Sent:** 12 September 2018 08:33  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** SNBTS and the preliminary hearings

Morning Susan

Very sorry not to have spoken last week. Are you available today? I just want to organise a slot for you and the other transfusion services to speak at the hearings if you wish [REDACTED] will be saying something and I'm not sure whether they will in part be speaking for all the services that contribute to [REDACTED]

My advice would be to at least provide a written submission which can be read out by Inquiry counsel (which is what NI are doing) but it's entirely a matter for you.

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)



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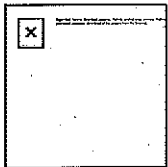
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**From:** Brian Stanton [brian.stanton@infectedbloodinquiry.org.uk]  
**Sent:** 07 September 2018 13:55  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** Deirdre Domingo; TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Re: SNBTS legal representation and attendance at the preliminary hearings

Hi Susan

I should be free from 16:00 today if convenient?

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

On 6 September 2018 at 17:25, MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
<[susana.murray@nhs.net](mailto:susana.murray@nhs.net)> wrote:

Dear Brian,

Just a note to say that I have tried to contact you by phone today and have left a voicemail message on your mobile.

I will be out of the office on business tomorrow, but would be keen to speak to you if you are available. If you could please let me know when you would be available in the afternoon, I will contact you again.

I look forward to hearing from you.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B

Accredited Specialist in Medical Negligence

Central Legal Office | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

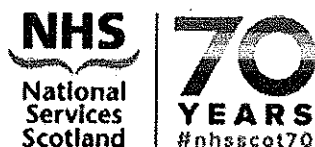
[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

Tel: 0131 275 7875

Mob: [REDACTED]  
[www.clo.scot.nhs.uk](http://www.clo.scot.nhs.uk)

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---

**From:** Brian Stanton [<mailto:brian.stanton@infectedbloodinquiry.org.uk>]  
**Sent:** 06 September 2018 08:41  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** Deirdre Domingo; Sam Green; Sarah Warrington Williams; Rochelle Powell  
**Subject:** SNBTS legal representation and attendance at the preliminary hearings

Good morning Susan

Can I ask whether you have instructed counsel on behalf of SNBTS and whether SNBTS intends to be represented and to make an oral submission at the preliminary hearings. We are considering the scheduling at the moment and it would be useful to know so that you can be accommodated.

I am aware that [REDACTED] have instructed a firm in private practice, [REDACTED]  
[REDACTED] I'm not sure whether you have given any consideration to joint representation?

It might be useful to speak this week if you have time.

## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 06 September 2018 17:26  
**To:** 'Brian Stanton'  
**Cc:** Deirdre Domingo; TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** RE: SNBTS legal representation and attendance at the preliminary hearings

**Importance:** High

Dear Brian,

Just a note to say that I have tried to contact you by phone today and have left a voicemail message on your mobile.

I will be out of the office on business tomorrow, but would be keen to speak to you if you are available. If you could please let me know when you would be available in the afternoon, I will contact you again.

I look forward to hearing from you.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B  
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CentralLegalOffice | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

Tel: 0131 275 7875

Mob: [REDACTED]

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---

**From:** Brian Stanton [<mailto:brian.stanton@infectedbloodinquiry.org.uk>]  
**Sent:** 06 September 2018 08:41  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** Deirdre Domingo; Sam Green; Sarah Warrington Williams; Rochelle Powell  
**Subject:** SNBTS legal representation and attendance at the preliminary hearings

Good morning Susan

Can I ask whether you have instructed counsel on behalf of SNBTS and whether SNBTS intends to be represented and to make an oral submission at the preliminary hearings. We are considering the scheduling at the moment and it would be useful to know so that you can be accommodated.

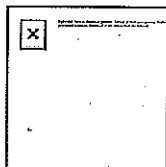
I am aware that [REDACTED] have instructed a firm in private practice, [REDACTED] [REDACTED]  
[REDACTED]. I'm not sure whether you have given any consideration to joint representation?

It might be useful to speak this week if you have time.

I have copied in all members of the Inquiry team who are involved in disclosure work from government and NHS bodies.  
thank you for your assistance to date in the provision of documents which is much appreciated.

Kind regards

Brian



**Brian Stanton**

**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

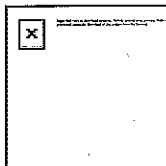
**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)



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thank you for your assistance to date in the provision of documents which is much appreciated.

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Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** brian.stanton@infectedbloodinquiry.org.uk

\*\*\*\*\*  
\*\*\*\*\*

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<https://portal.nhs.net/help/joiningnhsmial>



**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** Brian Stanton [brian.stanton@infectedbloodinquiry.org.uk]  
**Sent:** 06 September 2018 08:41  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** Deirdre Domingo; Sam Green; Sarah Warrington Williams; Rochelle Powell  
**Subject:** SNBTS legal representation and attendance at the preliminary hearings

Good morning Susan

Can I ask whether you have instructed counsel on behalf of SNBTS and whether SNBTS intends to be represented and to make an oral submission at the preliminary hearings. We are considering the scheduling at the moment and it would be useful to know so that you can be accommodated.

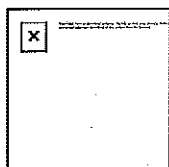
I am aware that [REDACTED] have instructed a firm in private practice, [REDACTED]. I'm not sure whether you have given any consideration to joint representation?

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Kind regards

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**  
**Mobile:** [REDACTED]  
**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE  
**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)



Thank you again for hosting the meeting yesterday. It was a pleasure to meet you both and your colleagues. Deirdre and I found the meeting and tour extremely helpful and informative and I anticipate we will be able to make much quicker progress as a result.

As discussed I attach the Rule 9 request for the documents and information in the schedule provided.

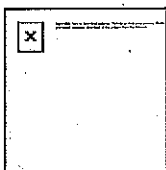
I would be grateful if you could also provide an electronic copy of the schedule you kindly provided in hard copy at our meeting.

Sam is copied to this email and will seek to liaise with Derek regarding the best method of production. I have also copied in Marc, Susan and Derek so that you all have our contact details easily to hand.

I'll reduce future correspondence to a smaller copy list and I would be grateful if you could indicate who should be copied in from your side. From the Inquiry, all correspondence connected to the production of documents and information should be addressed to Sam, Deirdre and me.

Kind regards

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

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**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

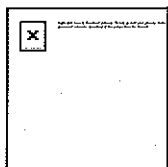
---

**From:** Brian Stanton [brian.stanton@infectedbloodinquiry.org.uk]  
**Sent:** 16 August 2018 08:39  
**To:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); Deirdre Domingo; Sam Green; ROONEY, Catherine (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Re: IBI request under Rule 9

Thank you. We'll discuss further with the Chair next week and revert.

Kind regards

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

On 16 August 2018 at 08:35, MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
<[mary.morgan@nhs.net](mailto:mary.morgan@nhs.net)> wrote:

Thank you Brian.

Of course we can facilitate a meeting for the Chair. From my perspective Friday the 7<sup>th</sup> would be most suitable but either date can be accommodated. Please let me know so that I can confirm with colleagues

Best wishes, Mary

**Mary Morgan**

Director

Scottish National Blood Transfusion Service

**Scottish National Blood Transfusion Service**

The Jack Copland Centre  
52 Research Avenue North  
Heriot-Watt Research Park,

Edinburgh  
EH14 4BE

tel office: 0131 314 5512

fax office: 0131 536 5714

tel Mobile: [REDACTED]

[www.scotblood.co.uk](http://www.scotblood.co.uk)

---

**From:** Brian Stanton [mailto:[brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)]

**Sent:** 16 August 2018 08:33

**To:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)

**Cc:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); Deirdre Domingo; Sam Green; ROONEY, Catherine (NHS NATIONAL SERVICES SCOTLAND)

**Subject:** Re: IBI request under Rule 9

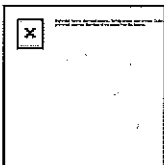
Dear Mary

Thank you. We will communicate with you, Susan and Cathy as you request. We'll leave it to you to forward on as appropriate within your organisation. Sam will liaise direct with Derek regarding the method of provision of the information requested.

We discussed the possibility of the Chair attending your facility for a tour. In this regard would you be able to facilitate a visit on either Thursday or Friday 6/7 December?

Kind regards

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)



## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 16 August 2018 08:35  
**To:** Brian Stanton  
**Cc:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); Deirdre Domingo; Sam Green; ROONEY, Catherine (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** RE: IBI request under Rule 9

Thank you Brian.

Of course we can facilitate a meeting for the Chair. From my perspective Friday the 7<sup>th</sup> would be most suitable but either date can be accommodated. Please let me know so that I can confirm with colleagues

Best wishes, Mary

**Mary Morgan**  
Director  
Scottish National Blood Transfusion Service

### **Scottish National Blood Transfusion Service**

The Jack Copland Centre  
52 Research Avenue North  
Heriot-Watt Research Park,  
Edinburgh  
EH14 4BE  
tel office: 0131 314 5512  
fax office: 0131 536 5714  
tel Mobile: [REDACTED]  
[www.scotblood.co.uk](http://www.scotblood.co.uk)

---

**From:** Brian Stanton [mailto:brian.stanton@infectedbloodinquiry.org.uk]  
**Sent:** 16 August 2018 08:33  
**To:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); Deirdre Domingo; Sam Green; ROONEY, Catherine (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Re: IBI request under Rule 9

Dear Mary

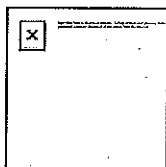
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We discussed the possibility of the Chair attending your facility for a tour. In this regard would you be able to facilitate a visit on either Thursday or Friday 6/7 December?

Kind regards

Brian

**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**



**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

On 15 August 2018 at 11:04, MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
<[mary.morgan@nhs.net](mailto:mary.morgan@nhs.net)> wrote:

Dear Brian

Thanks also to you and Deirdre for allocating so much of your time to our meeting. We felt it positive and constructive.

I acknowledge receipt of the Rule 9 request for information and confirm that we will supply this in the best way for the Inquiry. Sam should liaise directly with Derek Radin this regard.

I would be grateful if you could send any further comms through myself, Cathy Rooney and Susan Murray

Best wishes, Mary

**Mary Morgan**

Director

Scottish National Blood Transfusion Service

**Scottish National Blood Transfusion Service**

The Jack Copland Centre  
52 Research Avenue North  
Heriot-Watt Research Park,  
Edinburgh  
EH14 4BE

tel office: 0131 314 5512

fax office: 0131 536 5714

## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 15 August 2018 10:17  
**To:** 'Deirdre Domingo'  
**Cc:** Brian Stanton; TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND); Sam Green; Thomas Powell  
**Subject:** RE: The Infected Blood Inquiry - The SNBTS

Dear Deirdre,

Many thanks.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B  
Accredited Specialist in Medical Negligence

Central Legal Office | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

Tel: 0131 275 7875

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[www.clo.scot.nhs.uk](http://www.clo.scot.nhs.uk)

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---

**From:** Deirdre Domingo [<mailto:deirdre.domingo@infectedbloodinquiry.org.uk>]  
**Sent:** 15 August 2018 10:12  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** Brian Stanton; TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND); Sam Green; Thomas Powell  
**Subject:** Re: The Infected Blood Inquiry - The SNBTS

Dear Susan

Thank you for your emails this morning, and for your time yesterday. It was a pleasure to meet you and your colleagues in SNBTS, and both Brian and I found the meeting extremely helpful and informative.

I am attaching for your information the Inquiry's Statement of Approach on Expert Groups, which we discussed yesterday. This document should be published on our website later today or tomorrow, but I am happy to provide it to you now. Once you have had a chance to review the document, please don't hesitate to get in touch if you have any queries.

Best wishes

Deirdre



**Deirdre Domingo**  
**Deputy Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [deirdre.domingo@infectedbloodinquiry.org.uk](mailto:deirdre.domingo@infectedbloodinquiry.org.uk)

On 15 August 2018 at 08:43, MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
<[susana.murray@nhs.net](mailto:susana.murray@nhs.net)> wrote:

Dear Brian and Deirdre,

It was a pleasure to meet you yesterday. I hope that your journey home was a good one.

I look forward to hearing from you with the formal requests and other information that we discussed. We will be working through our own action points and will be in touch with you shortly.

In the meantime, if there is anything that you would like to discuss further, please do not hesitate to contact me.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B

Accredited Specialist in Medical Negligence

CentralLegalOffice | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

Tel: 0131 275 7875

Mob: [REDACTED]  
[www.clo.scot.nhs.uk](http://www.clo.scot.nhs.uk)

## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 15 August 2018 08:57  
**To:** Brian Stanton; Deirdre Domingo  
**Cc:** TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** The Infected Blood Inquiry - The SNBTS - Presentation Slides - 14 August 2018  
**Attachments:** SNBTS welcome presentation Inquiry.pptx

**Importance:** High

<b>Tracking:</b>	<b>Recipient</b>	<b>Delivery</b>
	Brian Stanton	
	Deirdre Domingo	
	TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)	Delivered: 15/08/2018 08:57

Dear Brian and Deirdre,

As agreed, here are the slides from the presentation yesterday.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B  
Accredited Specialist in Medical Negligence

Central Legal Office | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

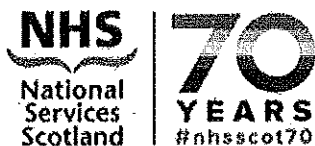
Tel: 0131 275 7875

Mob: [REDACTED]

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## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 15 August 2018 08:44  
**To:** Brian Stanton; Deirdre Domingo  
**Cc:** TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND); Sam Green; Thomas Powell  
**Subject:** The Infected Blood Inquiry - The SNBTS  
**Importance:** High

Dear Brian and Deirdre,

It was a pleasure to meet you yesterday. I hope that your journey home was a good one.

I look forward to hearing from you with the formal requests and other information that we discussed. We will be working through our own action points and will be in touch with you shortly.

In the meantime, if there is anything that you would like to discuss further, please do not hesitate to contact me.

Kind regards

Susan

**Susan A. Murray**

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[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

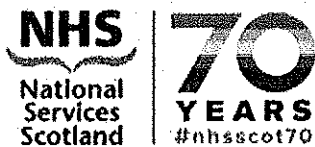
Tel: 0131 275 7875

Mob: [REDACTED]

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## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 08 August 2018 18:44  
**To:** 'Brian Stanton'  
**Cc:** TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** List of Documentation delivered to the Penrose Inquiry by the SNBTS  
**Attachments:** SNBTS Documentation to PI.xlsx

**Importance:** High  
**Sensitivity:** Confidential

Tracking:	Recipient	Delivery
	'Brian Stanton'	
	TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)	Delivered: 08/08/2018 18:44

Dear Brian,

Further to our telephone conversation earlier today, here is the list of 157 instances of document delivery to the Penrose Inquiry by the SNBTS.

As we discussed, there are some acronyms in there which we will be extending out. I will send you the amended version when it is available.

This list was generated in order of date of delivery. It contains documents delivered in response to formal requests by the Penrose Inquiry Team, as well as documents produced by the SNBTS and offered to the Inquiry on a "voluntary" basis. "KTPs" or rather "Key Topics Papers" were the ones proactively produced, although there may be others in the list. We can certainly go through the list with you to explain it further.

All of the documents sitting behind the list are maintained electronically. I understand that it will be possible to electronically produce to you any documents that you wish to recover.

We hope that this is helpful.

Kind regards

Susan

**Susan A. Murray**  
Senior Solicitor - Litigation Team B  
Accredited Specialist in Medical Negligence

CentralLegalOffice | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

Tel: 0131 275 7875

Mob: [REDACTED]

[www.clo.scot.nhs.uk](http://www.clo.scot.nhs.uk)

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**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** Brian Stanton [brian.stanton@infectedbloodinquiry.org.uk]  
**Sent:** 06 August 2018 18:41  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); Deirdre Domingo  
**Cc:** TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Re: Meetings in August

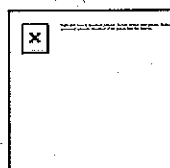
Susan

Thank you for enquiring about the 21st and 22nd.

The 14th is fine and confirmed. Deirdre and I will probably travel up on the afternoon/evening of the 13th so that we can have a full day with you. Any ideas about the best ways of doing so and where might be good to stay overnight, gratefully received!

Kind regards

Brian



**Brian Stanton**

**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

On 6 August 2018 at 17:44, MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
<[susana.murray@nhs.net](mailto:susana.murray@nhs.net)> wrote:

Dear Brian,

Further to our telephone conversation this afternoon, I am afraid that neither 21<sup>st</sup> or 22<sup>nd</sup> August 2018 will work for the SNBTS Medical Director (he is on leave and out of the country). Can we please now confirm the 14<sup>th</sup>?

I will bring Tracey up to speed with our discussions on the 14<sup>th</sup> whenever she gets back. Hopefully, it will be possible to find a suitable date for a further meeting shortly thereafter.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B

Accredited Specialist in Medical Negligence

Central Legal Office | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

Tel: 0131 275 7875

Mob: [REDACTED]  
[www.clo.scot.nhs.uk](http://www.clo.scot.nhs.uk)

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**From:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 06 August 2018 16:16  
**To:** 'Brian Stanton'  
**Subject:** RE: Request for documentation to the Scottish Haemophilia Centres  
**Importance:** High

Dear Brian,

Did you receive my voicemail message this morning indicating that, of the dates that you previously indicated (14 to 16 August), it is 14 August 2018 that is the optimum date for my SNBTS colleagues?

I look forward to receiving your return call.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B

Accredited Specialist in Medical Negligence

Central Legal Office | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

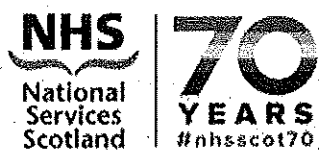
[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

Tel: 0131 275 7875

Mob: [REDACTED]  
[www.clo.scot.nhs.uk](http://www.clo.scot.nhs.uk)

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---

**From:** Brian Stanton [mailto:[brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)]

**Sent:** 06 August 2018 16:13

**To:** TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)

**Cc:** Deirdre Domingo; Thomas Powell; Sam Green; Mike Moore; MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); GALANOPOULOS, Cathy (NHS NATIONAL SERVICES SCOTLAND)

**Subject:** Re: Request for documentation to the Scottish Haemophilia Centres

Dear Tracey and Susan

Thank you for your email.

Deirdre and I met with the Chair and Vice Chair of the UKHCDO Executive Committee (which as I'm sure you know is the UK Haemophilia Centre Doctor's Organisation) on Friday 3 August.

We have agreed to reconsider the nature of our approach to the Haemophilia Centres because it may be better co-ordinated through, or with UKHCDO and/or the relevant Trusts/Boards.

UKHCDO holds the national Haemophilia database (located in Manchester). However, there is still a requirement for all 70 or so centres, both Haemophilia Centres and Comprehensive Care Centres, to engage because it is not possible to otherwise confirm that all potentially relevant material in their possession has been passed to the central repository/database.

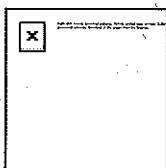
I will be writing to UKHCDO in this regard shortly (next day or so). If you have any views about how the goal of obtaining assurance that all relevant material in the possession of the HCs and CCCs can be best achieved I would be very grateful for your input.

I think it would be worth our discussing by phone, given the potential complexity and co-ordination across the UK between different Trusts and Boards and separate legal representatives.

On the question of our visit to SNBTS, would 21 or 22 August be convenient given your return from leave on the 16th?

Kind regards

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** brian.stanton@infectedbloodinquiry.org.uk

On 3 August 2018 at 07:30, TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)  
<tracey.turnbull@nhs.net> wrote:

Brian,

I understand from my client Boards that the Scottish Haemophilia Centres have received a formal request from you dated 19<sup>th</sup> July for all documentation they hold which is relevant to the Inquiry's Terms of Reference to be submitted to you within 28 days. I do not have a copy of the letter and apologise if I am misquoting in any way. I would be grateful if a copy of the letter could be sent to me to allow me to assist in the process.

I have been contacted by the Boards in relation to this request and to ascertain what is expected of them. We had understood that the UK Inquiry had access to the Penrose Inquiry Archive and we are mindful that the Scottish Health Boards and Haemophilia Centres provided at the time of the Penrose Inquiry what documentation they had relevant to the Inquiry's Terms of Reference. We are, however, mindful that the scope of the UK Inquiry is wider and accordingly, it is anticipated that more documentation than that previously submitted will fall to be relevant.

With a view to assisting the UK Inquiry Team, I have asked the Haemophilia Centres to prepare Inventories, detailing what information/documentation they hold which falls within the UK Inquiry's Terms of Reference, to indicate what Term of Reference it relates to and if possible to indicate whether it was submitted to the Penrose Inquiry Team and hence form part of the archive. This will be submitted to you when prepared (within the 28 day period it is hoped) and would allow you to identify what information you wished to receive/did not have and in what format you wished to receive it.

I do apologise that I am unable to call you to discuss this matter but am currently on annual leave and am about to leave the country. I will be returning to the Office on Thursday 16<sup>th</sup> August and perhaps we can discuss matters further then. Indeed I note from an email exchange with Susan Murray that we may in fact be meeting that week.

If the approach I have suggested is not appropriate to the UK Inquiry Team, then I would be grateful if you would liaise with Susan in my absence and she will ensure that the Haemophilia Centres/ Scottish Health Boards are made aware of what you wish from them at this time.

I look forward to discussing matters further with you.

Kind regards,

**Tracey Turnbull**

Senior Solicitor

Litigation Team B.

CentralLegalOffice | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

Senior Solicitor

Litigation Team B

CentralLegalOffice | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

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For more information and to find out how you can switch,  
<https://portal.nhs.net/help/joiningnhsml>



## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 02 August 2018 12:20  
**To:** 'Brian Stanton'; TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** Deirdre Domingo; Thomas Powell; Sam Green; Mike Moore  
**Subject:** RE: Future engagement between the Inquiry Team and SNBTS

**Importance:** High

Tracking:	Recipient	Delivery	Read
	'Brian Stanton'		
	TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)	Delivered: 02/08/2018 12:20	Read: 02/08/2018 13:15
	Deirdre Domingo		
	Thomas Powell		
	Sam Green		
	Mike Moore		

Dear Brian,

Many thanks for your e mail, sent following our telephone discussion this morning.

I will return to you in respect of the issues that you raise. In particular, I note your preferred dates for us meeting later this month and I will certainly work to these in the first instance.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B  
Accredited Specialist in Medical Negligence

Central Legal Office | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

Tel: 0131 275 7875

Mob [REDACTED]

[www.clo.scot.nhs.uk](http://www.clo.scot.nhs.uk)

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---

**From:** Brian Stanton [<mailto:brian.stanton@infectedbloodinquiry.org.uk>]  
**Sent:** 02 August 2018 12:12  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)

**Cc:** Deirdre Domingo; Thomas Powell; Sam Green; Mike Moore  
**Subject:** Future engagement between the Inquiry Team and SNBTS

Dear Susan

Further to our helpful telephone discussion just now, I am following up by email in the following respects:

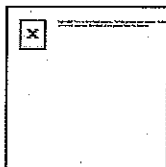
1. I have copied in, for information, my colleagues Deirdre Domingo (Deputy Solicitor), Tom Powell (Senior Inquiry Lawyer), Sam Green (Inquiry Information Manager) and Mike Moore (Inquiry Lead Investigator). I anticipate that at least Deirdre and I will attend the offices of SNBTS in the week of 13 August to meet with you, Tracey and Mary. It may be that Tom, Sam or Mike also join us but I'll get back to you with confirmation. We would prefer a meeting on either 14, 15 or 16 August (Tuesday - Thursday) and we would envisage spending all day with you. Grateful if you could indicate which of those dates is best for you.
2. I attach the Chair's core participant designation of SNBTS. As discussed if the legal personality should be expressed differently please let me know and we will consider whether an amendment is required.
3. Prior to our meeting later this month it would be useful to obtain schedules of all documents, information and witness statement that the SNBTS/NSS provided to the Penrose Inquiry. As we discussed I would propose to submit all requests for information by Rule 9 request and if you think a request in the following terms, for, "Schedules of all documents and information, and witness statements, provided by the SNBTS and NSS to the Penrose Inquiry", by Friday 10 August, can be accommodated and will not omit any other category of relevant document or information provided then I will issue a formal request upon receipt of your response.

If there is any further information that would assist prior to our meeting please don't hesitate to get in touch.

You will find our processes and procedures (in addition to the Act and Rules) set out in the Statements of Approach on our website.

Kind regards

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** Brian Stanton [brian.stanton@infectedbloodinquiry.org.uk]  
**Sent:** 20 July 2018 15:20  
**To:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND); MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); Sam Green; Deirdre Domingo; Thomas Powell; TURNER, Marc (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Re: Core Participant Status at the Infected Blood Inquiry

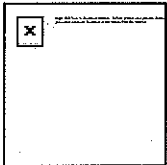
Dear Mary

Many thanks for your application which I have passed to the Chair for consideration.

I will be on leave next week and in my absence, Deirdre (Deputy Solicitor) or Tom (Inquiry Lawyer) will communicate the chair's determination.

Kind regards

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**  
**Mobile:** [REDACTED]  
**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE  
**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

On 20 July 2018 at 14:24, MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND) <[mary.morgan@nhs.net](mailto:mary.morgan@nhs.net)> wrote:

Dear Brian

Thank you for your invitation to apply for core participant status on behalf of SNBTS. This was indeed our intention and I attach a letter by way of application.

Please let me know if you or the application administration team need anything further from me at this stage.

Best wishes, Mary

**Mary Morgan**

Director

Scottish National Blood Transfusion Service

## Scottish National Blood Transfusion Service

The Jack Copland Centre  
52 Research Avenue North  
Heriot-Watt Research Park,  
Edinburgh  
EH14 4BE

tel office: 0131 314 5512

fax office: 0131 536 5714

tel Mobile: [REDACTED]

[www.scotblood.co.uk](http://www.scotblood.co.uk)

---

**From:** Brian Stanton [mailto:[brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)]

**Sent:** 19 July 2018 17:17

**To:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND); TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND); MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); Sam Green; Deirdre Domingo; Thomas Powell

**Subject:** Core Participant Status at the Infected Blood Inquiry

Dear Mary, Tracey, Susan

By way of introduction I am the Solicitor to the Infected Blood Inquiry, and I have just had a very helpful and productive telephone conversation with Tracey.

The Inquiry would like to invite an application for core participant status from the Scottish National Blood Transfusion Service and I understand that Mary would be the lead in this respect and Susan, legal advisor.

The application need not be lengthy and may be submitted by email if you wish.

Guidance can be found on our website within the documents:

- Statement of Approach - Core Participant Status
- Chair's Statement of Intent on Core Participant Status

The first date by which applications are requested is 20 July (tomorrow) in respect of which the Inquiry has committed to provide a response by 3 August. We would hope to receive an application from the SNBTS by the end of 20 July if possible. However, applications can be submitted at a later date.

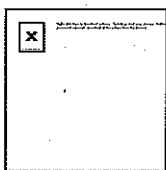
So far as the other Health Boards in Scotland are concerned I indicated to Tracey (as their legal advisor) that the Inquiry was not currently inviting an application for core participant status. However, the issue would be kept under review and if it becomes apparent that core participant status would be desirable then an application can be invited and/or submitted.

If you require any further assistance please do not hesitate to contact me.

I have copied in those of my colleagues who are involved in the administration of the application process.

Kind regards

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

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## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 20 July 2018 14:25  
**To:** Brian Stanton  
**Cc:** TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND); MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); Sam Green; Deirdre Domingo; Thomas Powell; TURNER, Marc (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** RE: Core Participant Status at the Infected Blood Inquiry  
**Attachments:** SNBTS Core Participant Status application 20 July 2018.pdf

Dear Brian

Thank you for your invitation to apply for core participant status on behalf of SNBTS. This was indeed our intention and I attach a letter by way of application.

Please let me know if you or the application administration team need anything further from me at this stage.

Best wishes, Mary

**Mary Morgan**  
Director  
Scottish National Blood Transfusion Service

### **Scottish National Blood Transfusion Service**

The Jack Copland Centre  
52 Research Avenue North  
Heriot-Watt Research Park,  
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EH14 4BE  
tel office: 0131 314 5512  
fax office: 0131 536 5714  
tel Mobile: [REDACTED]  
[www.scotblood.co.uk](http://www.scotblood.co.uk)

---

**From:** Brian Stanton [<mailto:brian.stanton@infectedbloodinquiry.org.uk>]  
**Sent:** 19 July 2018 17:17  
**To:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND); TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND); MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND); Sam Green; Deirdre Domingo; Thomas Powell  
**Subject:** Core Participant Status at the Infected Blood Inquiry

Dear Mary, Tracey, Susan

By way of introduction I am the Solicitor to the Infected Blood Inquiry, and I have just had a very helpful and productive telephone conversation with Tracey.

The Inquiry would like to invite an application for core participant status from the Scottish National Blood Transfusion Service and I understand that Mary would be the lead in this respect and Susan, legal advisor.

The application need not be lengthy and may be submitted by email if you wish.

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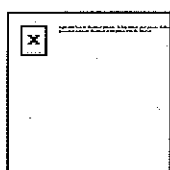
So far as the other Health Boards in Scotland are concerned I indicated to Tracey (as their legal advisor) that the Inquiry was not currently inviting an application for core participant status. However, the issue would be kept under review and if it becomes apparent that core participant status would be desirable then an application can be invited and/or submitted.

If you require any further assistance please do not hesitate to contact me.

I have copied in those of my colleagues who are involved in the administration of the application process.

Kind regards

Brian



**Brian Stanton**

**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)



## MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)

---

**From:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 16 August 2018 08:29  
**To:** 'Brian Stanton'; MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** Deirdre Domingo; ROONEY, Catherine (NHS NATIONAL SERVICES SCOTLAND); TURNBULL, Tracey (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** RE: Application for legal expenses

Dear Brian,

Many thanks.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B  
Accredited Specialist in Medical Negligence

CentralLegalOffice | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

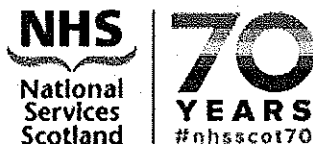
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Mob: [REDACTED]

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---

**From:** Brian Stanton [<mailto:brian.stanton@infectedbloodinquiry.org.uk>]  
**Sent:** 16 August 2018 08:27  
**To:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** Deirdre Domingo; ROONEY, Catherine (NHS NATIONAL SERVICES SCOTLAND); MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Re: Application for legal expenses

Hi Mary

The electronic form will be made available shortly (I intend by 31 August) and this will enable you and Susan to make application for your legal expenses (in the first instance the legal expenses associated with the provision of information to the Inquiry and of representation at the preliminary hearing).

Once your application is received I will ensure it is placed before the Inquiry Chair for his consideration.

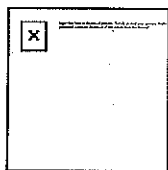
One of the issues to address in your application is the special circumstances justifying an award, as set out in paragraph 6 of the Statement of Approach:

*Awards will generally not be made in respect of the legal expenses of substantial bodies, or the legal expenses of individuals which could reasonably be expected to be met by such bodies, unless there are special circumstances which justify a call on public funds.*

I hope this is of assistance. Happy to provide further information by email or to discuss by phone with you and Susan.

Kind regards

Brian



**Brian Stanton**

**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

On 15 August 2018 at 11:27, MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)

<[mary.morgan@nhs.net](mailto:mary.morgan@nhs.net)> wrote:

Hi Brian

I have reflected on our meeting yesterday and consider that I may wish to make an application for funding in respect of expenditure that we incur as a result of the Inquiry. I have read the statement of approach in this regard and note that application should be made electronically but cannot find the electronic form through which to do this. Can you please advise?

Thanks, Mary

**Mary Morgan**

Director

Scottish National Blood Transfusion Service

**Scottish National Blood Transfusion Service**

The Jack Copland Centre  
52 Research Avenue North  
Heriot-Watt Research Park,  
Edinburgh  
EH14 4BE

tel office: 0131 314 5512

## **MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 15 August 2018 13:17  
**To:** Brian Stanton; 'Deirdre Domingo'  
**Cc:** Sam Green; RADIN, Derek (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** SNBTS - Electronic Version of Index of Documents delivered to The Penrose Inquiry  
**Attachments:** SNBTS Requests to PI.xlsx

**Importance:** High

Tracking:	Recipient	Delivery
	Brian Stanton	
	'Deirdre Domingo'	
	Sam Green	
	RADIN, Derek (NHS NATIONAL SERVICES SCOTLAND)	Delivered: 15/08/2018 13:17

Dear Brian and Deirdre,

As requested, please find attached an electronic version of the list of documents passed to you yesterday. This has been sent to me by my colleague, Derek Radin.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B  
Accredited Specialist in Medical Negligence

CentralLegalOffice | Anderson House | Broadalbane Street | Edinburgh | EH6 5JR

[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

Tel: 0131 275 7875  
Mob: [REDACTED]  
[www.clo.scot.nhs.uk](http://www.clo.scot.nhs.uk)

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**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

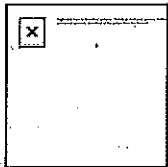
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**From:** Brian Stanton [brian.stanton@infectedbloodinquiry.org.uk]  
**Sent:** 16 August 2018 08:03  
**To:** MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** Deirdre Domingo  
**Subject:** Re: Infected Blood Inquiry - Identity of Scottish Government Solicitors involved in the Penrose Inquiry

Many thanks Susan. I have received a response from Roddy.

Kind regards

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

On 15 August 2018 at 11:59, MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
<[susana.murray@nhs.net](mailto:susana.murray@nhs.net)> wrote:

Dear Brian and Deirdre,

I have now e mailed the two Solicitors who were involved in the Penrose Inquiry, on behalf of the Scottish Government.

Please expect either an e mail or a call from [REDACTED], to whom I have spoken this morning.

Kind regards

Susan

**Susan A. Murray**

Senior Solicitor - Litigation Team B

Accredited Specialist in Medical Negligence

CentralLegalOffice | Anderson House | Breadalbane Street | Edinburgh | EH6 5JR

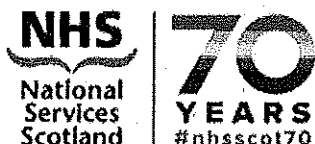
[susana.murray@nhs.net](mailto:susana.murray@nhs.net)

Tel: 0131 275 7875

Mob: [REDACTED]  
[www.clo.scot.nhs.uk](http://www.clo.scot.nhs.uk)

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**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

---

**From:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 15 August 2018 11:28  
**To:** Brian Stanton  
**Cc:** Deirdre Domingo; ROONEY, Catherine (NHS NATIONAL SERVICES SCOTLAND); MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Application for legal expenses

Hi Brian

I have reflected on our meeting yesterday and consider that I may wish to make an application for funding in respect of expenditure that we incur as a result of the Inquiry. I have read the statement of approach in this regard and note that application should be made electronically but cannot find the electronic form through which to do this. Can you please advise?

Thanks, Mary

**Mary Morgan**  
Director  
Scottish National Blood Transfusion Service

**Scottish National Blood Transfusion Service**

The Jack Copland Centre  
52 Research Avenue North  
Heriot-Watt Research Park,  
Edinburgh  
EH14 4BE  
tel office: 0131 314 5512  
fax office: 0131 536 5714  
tel Mobile [REDACTED]  
[www.scotblood.co.uk](http://www.scotblood.co.uk)





**MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)**

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**From:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND)  
**Sent:** 15 August 2018 11:05  
**To:** Brian Stanton; MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** Deirdre Domingo; Sam Green; TURNER, Marc (NHS NATIONAL SERVICES SCOTLAND); ROONEY, Catherine (NHS NATIONAL SERVICES SCOTLAND); RADIN, Derek (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** RE: IBI request under Rule 9

Dear Brian

Thanks also to you and Deirdre for allocating so much of your time to our meeting. We felt it positive and constructive.

I acknowledge receipt of the Rule 9 request for information and confirm that we will supply this in the best way for the Inquiry. Sam should liaise directly with Derek Radin this regard.

I would be grateful if you could send any further comms through myself, Cathy Rooney and Susan Murray

Best wishes, Mary

**Mary Morgan**

Director

Scottish National Blood Transfusion Service

**Scottish National Blood Transfusion Service**

The Jack Copland Centre  
52 Research Avenue North  
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tel office: 0131 314 5512  
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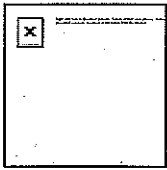
**From:** Brian Stanton [<mailto:brian.stanton@infectedbloodinquiry.org.uk>]  
**Sent:** 15 August 2018 10:31  
**To:** MORGAN, Mary (NHS NATIONAL SERVICES SCOTLAND); MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)  
**Cc:** Deirdre Domingo; Sam Green; TURNER, Marc (NHS NATIONAL SERVICES SCOTLAND); ROONEY, Catherine (NHS NATIONAL SERVICES SCOTLAND); RADIN, Derek (NHS NATIONAL SERVICES SCOTLAND)  
**Subject:** Fwd: IBI request under Rule 9

Dear Mary

My apologies. I sent the email below to [REDACTED] (a member of Inquiry staff) rather than yourself. I am re-sending to the original copy list with you now included.

Kind regards

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)

----- Forwarded message -----

From: **Brian Stanton** <[brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)>

Date: 15 August 2018 at 10:23

Subject: IBI request under Rule 9

To: "MURRAY, Susan (NHS NATIONAL SERVICES SCOTLAND)" <[susana.murray@nhs.net](mailto:susana.murray@nhs.net)>, [REDACTED]

Cc: [Derek.radin@nhs.net](mailto:Derek.radin@nhs.net), [crooney@nhs.net](mailto:crooney@nhs.net), Sam Green <[sam.green@infectedbloodinquiry.org.uk](mailto:sam.green@infectedbloodinquiry.org.uk)>, Deirdre Domingo <[deirdre.domingo@infectedbloodinquiry.org.uk](mailto:deirdre.domingo@infectedbloodinquiry.org.uk)>, "TURNER, Marc (NHS NATIONAL SERVICES SCOTLAND)" <[marcturner@nhs.net](mailto:marcturner@nhs.net)>

Dear Susan and Mary

Thank you again for hosting the meeting yesterday. It was a pleasure to meet you both and your colleagues. Deirdre and I found the meeting and tour extremely helpful and informative and I anticipate we will be able to make much quicker progress as a result.

As discussed I attach the Rule 9 request for the documents and information in the schedule provided.

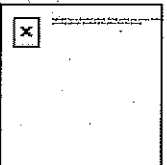
I would be grateful if you could also provide an electronic copy of the schedule you kindly provided in hard copy at our meeting.

Sam is copied to this email and will seek to liaise with Derek regarding the best method of production. I have also copied in Marc, Susan and Derek so that you all have our contact details easily to hand.

I'll reduce future correspondence to a smaller copy list and I would be grateful if you could indicate who should be copied in from your side. From the Inquiry, all correspondence connected to the production of documents and information should be addressed to Sam, Deirdre and me.

Kind regards

Brian



**Brian Stanton**  
**Solicitor to the Infected Blood Inquiry**

**Mobile:** [REDACTED]

**Address:** Fleetbank House, 1st Floor, 2-6 Salisbury Square, London, EC4Y 8AE

**Email:** [brian.stanton@infectedbloodinquiry.org.uk](mailto:brian.stanton@infectedbloodinquiry.org.uk)