

7/12

Beverly Court. GWMH

MRS S SCANNELL  
Litigation Manager

Education Centre  
St Mary's Hospital  
Milton Road  
Portsmouth  
PO3 6AD

Medical Records  
licensing with  
Sue Scannell

Tel No: **Code A**  
Fax No: **Code A**

re disclosure  
of records

PRIVATE AND CONFIDENTIAL

**Code A**

8<sup>th</sup> November 2000

as patient now  
on Dryad Ward  
GWMH

Your Ref: CJH.SB.CAA  
Our Ref: SS/Hughes/A68/00  
(Please quote Our Ref on all correspondence)

Hold open  
→ F+G.

Dear **Code A**

Re: **Code A**

I refer to your letter of 2<sup>nd</sup> November and our te  
and I thought it would be helpful for you to have  
the issues we discussed on the telephone, as the

Firstly, **Code A** has been a patient in several hospitals and they are managed by the following organisations:-

- Accident & Emergency Department )
- Queen Alexandra Hospital (QAH) )
- Blendworth 2 Ward )
- St Mary's Hospital (where Mrs Hughes is currently )
- a patient) )
- St Christopher's Hospital, Fareham )
- Gosport War Memorial Hospital )
- Edith Keen Ward, QAH )
- Royal Naval Hospital, Haslar )
- Portsmouth Hospitals )
- NHS Trust, based at )
- St Mary's Hospital )
- Portsmouth )
- HealthCare NHS )
- Trust, based at St )
- James Hospital )
- Self-managed for the )
- purposes of litigation )

I hope this information will help you when deciding which organisation any claim you decide to pursue will be against.

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Your Ref: CJH.SB.CAA  
Our Ref: SS/Hughes/A68/00  
(Please quote Our Ref on all correspondence)

Dear Code A

Re: Code A

I refer to your letter of 2<sup>nd</sup> November and our telephone conversation today and I thought it would be helpful for you to have some detail in writing about the issues we discussed on the telephone, as they were quite complex.

Firstly, Code A has been a patient in several hospitals and they are managed by the following organisations:-

- Accident & Emergency Department )
  - Queen Alexandra Hospital (QAH) )
  - Blendworth 2 Ward )
  - St Mary's Hospital (where Mrs Hughes is currently )
  - a patient) )
  - St Christopher's Hospital, Fareham )
  - Gosport War Memorial Hospital )
  - Edith Keen Ward, QAH )
  - Royal Naval Hospital, Haslar )
- ) Portsmouth Hospitals
  - ) NHS Trust, based at
  - ) St Mary's Hospital
  - ) Portsmouth
  - ) HealthCare NHS
  - ) Trust, based at St
  - ) James Hospital
  - ) Self-managed for the purposes of litigation

I hope this information will help you when deciding which organisation any claim you decide to pursue will be against.

- 2 -

Secondly with regard to provision of the medical records, I informed you incorrectly that records for St Christopher's, the Gosport War Memorial Hospital and Haslar should be obtained separately from the Portsmouth Hospital records. However, I am informed that all these records should be amalgamated into the one folder and I will, therefore, be able to disclose them all, once I am able to get them from Blendworth 2 ward where Mrs Hughes is currently a patient.

As promised, I will check the position with the ward and the Consultant looking after Code A and endeavour to obtain the records for photocopying as soon as possible.

Please address all future correspondence about Portsmouth Hospitals issues to me personally at the above address.

Yours sincerely,

**SUE SCANNELL**  
**LITIGATION MANAGER**

c.c. Code A Code A I will of course obtain the necessary consent from your staff before disclosing your records - Sue)

A68/00

# WARNER GOODMAN & STREAT

*solicitors*

8/9 College Place London Road  
Southampton SO15 2FF

Telephone 023 8063 9311

DX 38542 Southampton 3  
Fax 023 8022 6423

Mrs S Scannell  
Portsmouth Hospital NHS Trust  
Queen Alexandra Hospital  
Cosham  
Portsmouth

please ask for:

**Code A**

direct line:

your ref:

our ref: CJH.SB.CAA

2 November, 2000

Dear Mrs Scannell

Re:

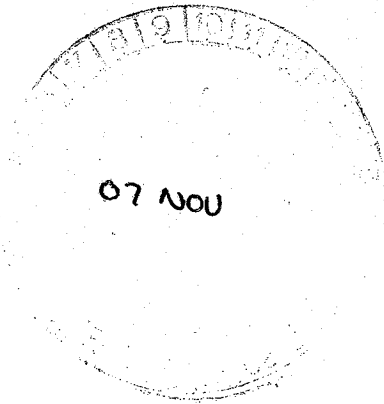
**Code A**

I enclose herewith pre-action protocol request for medical records for your kind attention.

Yours sincerely

**Code A**

H379895  
Q189185



Partners Alan Berman Michael Yeomans Richard Kent Nigel Lewis Ian Curtis (Managing Partner) Anthony Bennett  
Nigel Dobson William Ware Edward Voller Susan Green David Lancaster Chris Hodgkinson Sarah Whitmore  
Kevin Horn Claire Battye Consultants Ian Streat Lawrence Guyer Kathryn Morley John Guyer Jonathan Tawse  
Linda Thomas Non practising consultants Peter Goodman Michael Meggeson Roger Thompson  
Associates Mark Collins David Holt Martin Beames Oscar Vincent Deborah Foundling Julie Culverhouse Sally Goodall  
Financial Services Director Martin Giles

Also at:  
FAREHAM  
PORTSMOUTH  
PARK GATE  
WATERLOOVILLE  
www.warnergoodman.co.uk



**APPLICATION ON BEHALF OF A PATIENT  
FOR HOSPITAL MEDICAL RECORDS FOR US WHEN  
COURT PROCEEDINGS ARE CONTEMPLATED**

This should be completed as fully as possible

**To: Medical Records Officer  
Queen Alexandra Hospital  
Portsmouth**

1 (a)	Full name of patient (including previous surnames)	Code A
(b)	Address now	Code A
(c)	Address at start of treatment	S/A
(d)	Date of birth (and death, if applicable)	Code A
(e)	Hospital ref. no if available	Q 189185 610 716 4714
(f)	N.I.number, if available	
2.	This application is made because the patient is considering	
(a)	a claim against your hospital as detailed in para 7 overleaf	YES
(b)	pursuing an action against someone else	NO
3	Department(s) where treatment was received	A+E + EDITH KEEN
4	Name(s) of consultant(s) at your hospital in charge of the treatment	
5	Whether treatment at your hospital was private or NHS, wholly or in part	Wholly NHS
6	A description of the treatment received, with approximate dates	In-Patient January-May 2000 Admitted on 10/1/00 following Myocardial Infarction

15.01.00 of  
22.01.00

Q A. HOSPITAL 15<sup>th</sup> of 22.01.00 — 14.02.00  
ST CHRISTOPHER'S 14.02.00 — 16.05.00  
HASLAR 10.07.00 — 8.08.00  
GOSPORT WAR MEMORIAL 8.08.00 — 6.11.00  
Blend with II 6.11.00 — STILL IN HOSPITAL

		Also long history of Rheumatoid arthritis and steroid therapy.
7	<p>If the answer to Q2(a) is "Yes" details of</p> <p>(a) the likely nature of the claim,</p> <p>(b) grounds for the claim,</p> <p>(c) approximate dates of the events involved</p>	<p>Hospital acquired haematoma to the legs resulting in chronic leg ulcers</p> <p>MRSA infection</p> <p>Lack of appropriate care. Nurse alleged to have caused injury/haematoma to legs</p> <p>Initial injury approximately 21/01/00</p>
8	<p>If the answer to Q2(b) is "Yes" insert</p> <p>(i) the names of the proposed defendants</p>	
	<p>(ii) whether legal proceedings yet begun</p>	Not yet
9	<p>We confirm we will pay (i) reasonable copying charges</p> <p>(ii) reasonable administration fee</p>	<p>i) Confirmed</p> <p>ii) Confirmed</p>
10	<p>We request prior details of</p> <p>(i) photocopying and administration charges for medical records</p> <p>(ii) number of and cost of copying x-ray and scan films</p>	<p>Yes</p> <p>Yes</p>
11	<p>Any other relevant information, particular requirements, or any particular documents not required (e.g. copies of computerised records)</p>	All documents
	Signature of Solicitor	<b>Code A</b>
	Name Warner Goodman & Streat	
	<p>Address</p> <p>8 College Place</p> <p>London Road</p> <p>Southampton SO15 2FF</p>	
	Ref.CJH	
	Telephone Number 023 80639311	

Fax number 023 80226423

Please print name beneath each signature.  
Signature by child over 12 but under  
18 years also requires signature by parent

Signature of patient

Code A

Signature of parent or next friend  
if appropriate

Signature of personal representative  
where patient has died

n/a

MEDICAL AUTHORITY / CONSENT FORM

FULL NAME: \_\_\_\_\_

DATE OF BIRTH: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

**Code A**

Previous address (if you have moved within the last six months)

HOME TEL NO: \_\_\_\_\_

**Code A**

GENERAL PRACTITIONER'S DETAILS

GP'S NAME: DR SINCLAIR

ADDRESS: JUBILEE SURGERY, BARKY'S MEADOW, HIGH ST  
TITCHFIELD, WICKHAM PO14 4EH

HOSPITAL DETAILS

HOSPITAL (1) QUEEN ALEXANDRA HOSPITAL  
ADDRESS: GOSHAM, PORTSMOUTH

HOSPITAL (2) ST CHRISTOPHER'S HOSPITAL  
ADDRESS: WICKHAM RD, WICKHAM

HOSPITAL (3) HASTON HOSPITAL  
ADDRESS: HASTON, GOSPORT

**Code A**

I, \_\_\_\_\_ of 303 Southampton Rd, Titchfield  
 Authorise and consent to the release of my General Practitioner's and hospitals' notes,  
 records and x-rays to my solicitor, Mr C J Hodgkinson of Warner Goodman and Street, 8  
 College Place, London Road, Southampton, SO15 2FF

HOSPITAL (4) GOSPORT WARR MEMORIAL HOSPITAL