

RECORD OF ATTENDANCE

Client NGN

Date 6 June 2008

Matter Gordon Taylor

Ref JCP/my

JCP telephoning Mark Lewis and leaving messages for him to call.

Subsequently attending Mark Lewis.

Said that JCP had sent across a part 36 letter in the sum of £350,000. Said there might be a little bit on the table if a confidentiality deal could be agreed. ML said that he had not spoken to his clients in the last couple of days about precisely what he wanted, but from early discussions, he had clearly been of the view that he wanted seven figures not to open his mouth. He wanted to be vindicated or made rich. As well as £1 million, he wanted all his costs being paid. ML said that his costs were approximately £200,000 including counsel's fees plus VAT.

Said that there was no prospect of his client beating the £250,000 in court. ML confirmed that he had advised his client that he was no longer casually not at risk with the £350,000 paid in. The judge might think he was being generous towards Taylor with any award that still falls short of the money in court.

ML said that Taylor wanted to carry on because of all the issues surrounding what NGN had done. One way or another, this was going to hurt NGN. Taylor wanted to show that the *News of the World* stories had been illegally obtained. He wanted to demonstrate that *The NOW* had been doing this and that it was rife in the organisation when *The NOW* had been making public statements including statements in parliament telling them that they were simply a rogue trader. Taylor was not happy about this. He wanted to speak out about all of this.

Said we thought there was little point in Taylor proceeding to a trial. He was not going to be vindicated by going to trial and failing to beat the payment in court. Did he really want to face the prospect of having to pay or not receiving full payment because he wanted to proceed notwithstanding the money on offer. ML said that his client was quite aware of that possibility. He wanted to push it.

Asked about extending time for service of the defence. We thought it would be helpful to both sides if an opportunity could be given to resolve this matter during the course of next week. We were probably looking to put the defence back until Friday. ML said he would take instructions.