<table>
<thead>
<tr>
<th>Page 1</th>
<th>Day 4 - PM</th>
<th>Leveson Inquiry</th>
<th>21 November 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>20</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>22</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>23</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>24</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>25</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Page 2</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>20</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>22</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>23</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>24</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>25</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Page 3</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>20</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>22</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>23</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>24</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>25</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Page 4</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>20</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>22</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>23</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>24</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>25</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I know they were desperate to get some kind of access.

MR JAY: At paragraph 8 and following you deal with various libel actions, all of which were successful. Can you assist us, please, with a general idea of how many libel claims we're talking about?

A. I don't know. It's been 16, 17 years since "Four Weddings", since I became of any kind of interest to the tabloid press, and I would imagine that in those 17 years, I don't know, half a dozen, maybe more, maybe 10. I've got -- my lawyer's over there. You could ask him. He'd know.

Q. Yes.

A. I just mention two here out of those because it would be very boring to go through them all, and in themselves they're not significant, but these two particular examples I think are significant.

Q. Yes. The example you give in paragraph 11, February 2007 --

A. Yeah.

Q. -- the plummy-voiced woman issue.

A. Mm.

Q. Are you suggesting there that the story must have come from phone hacking?

A. Well, what I say in this paragraph is that the Mail on Sunday ran an article in February 2007 saying that my relationship with my then girlfriend, Jemima Khan, was on the rocks because of my persistent late-night flirtatious phonecalls with a plummy-voiced studio executive from Warner Brothers, and it was a bizarre story, completely untrue, that I sued for libel over and won and damages were awarded, a statement was made in open court.

But thinking about how they could possibly come up with such a bizarre left-field story, I realised that although there was no plummy-voiced studio executive from Warner Brothers with whom I'd had any kind of relationship, flirtatious or otherwise, there was a great friend of mine in Los Angeles who runs a production company which is associated with Warner Brothers and whose assistant is a charming married middle-aged lady, English, who, as happens in Hollywood, is the person who rings you. The executive never rings you. It's always their assistant: "Hi, we have Jack Bealy(?) on the phone for you." And this is what she used to do. She used to call and she used to leave messages and because she was a nice English girl in LA, sometimes when we spoke, we'd have a chat about English stuff, Marmite or whatever.

So she would leave charming, jokey messages saying, "Please call this studio executive back", and she has never rang me.
Q. You haven't alleged that before, have you, in the public domain?
A. No, but when I was preparing this statement and going through all my old trials and tribulations with the press, I looked at that one again and thought that is weird, and then the penny dropped.

Q. I think the highest it can be put is, frankly, it's a piece of speculation on your part, isn't it, in relation to this?
A. Yes, you could -- yes, speculation, okay, but I would love to know -- I mean, I think Mr Caplan, who represents Associated, was saying earlier today that he'd like to put in a supplementary statement and -- you know, referring to the things I say today. Well, I'd love to hear what the Daily Mail's or the Sunday Mail's explanation for that article is, what that source was, if it wasn't phone hacking.

Q. Okay. I may come back to that, but I'll leave that for the time being.
A. Okay. I may come back to that, but I'll leave that for the time being.

The next article you refer to is in paragraph 12 of your statement, which is one in the Sunday Express. The
Page 9

point about this article -- and we have it in HG1 on the internal numbering at page 3 but on the numbering at the bottom right-hand side, a number ending 1921 -- is that this article was entirely untrue.

A. Yes, it's an article that purported to be written by me and which I hadn't written. Nor had I done that thing that you know, happens a lot in papers, where it's someone talking to someone. I had not even spoken to a journalist. It was completely, as far as I could see, either made up or patched and pasted from previous quotations I might have given in interview.

Q. Right.
A. That is why, as I recall, the Express lost their case and had to apologise.

Q. This statement in open court makes precisely that point, that you did not contribute to the article in any way and the Express admitted that.
A. Mm.

Q. Those are the two examples of defamation claims. You also provide examples of privacy claims.
A. Mm.

Q. The first one of these over which there was litigation was paragraph 13 of your witness statement, a visit to Charing Cross Hospital.
A. Yes.

Q. Details of which it's probably unnecessary to go into, but it did culminate in a claim against the Mirror for breach of confidence and you got judgment from Mr Justice Wright; that's correct, isn't it?
A. Yes.

Q. You also complained to the PCC and that claim was upheld, was it not?
A. Yes, finally, after a lot of effort. I mean, it took months and months. They were very reluctant to do anything. Finally, I got a tiny recognition that my complaint had been upheld deep in the newspaper.

Q. Right.
A. Without referring to what the complaint was about.

Q. Could I take that in stages? The PCC adjudication you will have in the bundle we have prepared for you, under tab 4.
A. Yes. This will take me hours.

Q. It won't.
A. Tab 4. Okay, I see, all right. Yes.

Q. They upheld the privacy complaint but they noted, you'll see in the second paragraph:
"The complainant also raised a number of issues arising from the complaint, involving confidentiality and sources of information which were outside the Commission's remit."

And then at the bottom:
"The Commission regretted the delay."
That was to do with resolving issues of jurisdiction. So rightly or wrongly -- I don't think it's going to be possible for us to go into this -- there were questions raised as to whether your complaint fell within the remit of the PCC and it took them time to resolve those questions. Once they resolved the questions, they upheld that part of the complaint which they felt they could deal with. Do you understand that?
A. I understand that that's what they wrote.

Q. Yes.
A. But I fail entirely to understand how an individual's medical records being appropriated and printed for commercial profit could not come under the remit of the PCC. If that doesn't come under the remit of the PCC, what the hell is the PCC for?

Q. I think they were saying it did.
A. Yes, but why did it take them so long?
Q. It was other matters they were saying -- they don't identify what those matters were -- that may be outside of the remit, but your essential complaint -- you can see that in the first paragraph of the adjudication, confidential medical information about you was published -- that's the complaint they eventually published -- that's the complaint they eventually
MR JAY: There's another similar complaint, or rather issue, and you touched on this in paragraph 15 of your statement. It's much more recent. It involves a visit to the Chelsea and Westminster Hospital in March of this year.

A. Yes.

Q. Is this your point, Mr Grant, that it doesn't matter to the Chelsea and Westminster Hospital in March of this year.

A. Yes.

Q. First of all, Mr Grant, are you happy that we talk about that?

A. Yes, otherwise I wouldn't have put it in the statement.

Q. Fair enough. The article itself is under HG1. The internal numbering is page 14. It's a longer number at the bottom right-hand side of the page. It's the number ending 1932. HG1 is tab 2, Mr Grant.

A. Thank you. 1932.

Q. Yes.

MR JAY: There's a 14 just above it.

A. Okay. Yes, I have it.

MR JAY: I'm going to ask you to comment about this. The details probably don't matter. You ended up in the Accident & Emergency department of this hospital. What the article is saying, or may be trying to say, is that here was a famous man, he didn't pull rank, he waited his turn in the queue. We all know from these A&E departments that you sometimes have to wait a long time, particularly if it's not serious. You made no complaint. This all reflects rather well on you. Do you follow that? That's what they were trying to get at.

A. Yes, but that's not my interpretation of the story.

Q. Okay.

A. The classic tabloid technique to cover a really egregious breach of someone's privacy is to wrap it up in a nice story. So if they photograph someone's baby, they'll say, "Oh, what a pretty baby" to try and stop the parents suing them for breach of privacy.

This is exactly the same. This is an article which says not only that I went to hospital for but what I went for. It's my medical record. It's the exact complaint, that I was dizzy and short of breath, which to me is a gross intrusion in my privacy and they have deliberately dressed that up as a flattering article about undiva-ish I was to try and get away with that.

Q. I'll come back to further comment on it, but it ended up with The Sun either paying damages or paying to a charity; is that right?

A. Yeah. It wasn't just the Sun who ran that piece. The Express ran a piece similar, as I recall, and as I say in my statement, by that stage of my life -- this was only this year, wasn't it? I think it was this year.

I was weary and, to a certain degree, wary of endless lawsuits against tabloids. They take a long time, there's a lot of stress. So I tried to shortcircuit it by offering them: "Look, there'll be no lawsuit if you just each pay £5,000 to a charity which I support called Healhtalkonline", and seeing as they had both talked about my health online, I thought that was elegant. The Express flatly refused to pay a penny, and after much protesting, the Sun gave the charity £1,500.

Q. Is this your point, Mr Grant, that it doesn't matter whether the underlying story is true; the point is it's an invasion of your privacy and there is not a public interest in people putting out articles about your health? Is that your point in a nutshell?
Day 4 - PM
Leveson Inquiry
21 November 2011

Q. In paragraphs 16 and 17 of your statement, you deal with
other intrusions on your privacy, which I think we'll
just, if you don't mind, take as read. I would like to
move on to paragraph 18 and the section about paparazzi.

You give one example at the bottom of paragraph 18
about being chased at high speed. Your girlfriend was.

Could you tell us a little bit more about that?

A. That was a relatively common occurrence with two of the
girlfriends I've had. They both have children and in
both cases -- actually, that's not quite fair. The
first girlfriend, when she was with me, we didn't have
children, so that doesn't apply, but the second
girlfriend -- although that first girlfriend has
subsequently had children and been very badly chased and
abused, but the second girlfriend, she did have children
and she was frequently, especially in the early days of
our romance, followed and chased, even when she had her
children in the car and even when the children were not

enjoying it, crying. They pulled up for petrol, they'd
ask the paparazzi who pulled in and started taking
pictures: "Please go away, there's children in this car
and they're frightened", and these paparazzi would
continue to take pictures and then they'd be bought by
one of the national newspapers.

Q. The paparazzi presumably were working freelance?

A. Yes. As I explain in this statement, there are two
types of press photographers. There are either ones who
are on staff for the papers. They just occasionally
show a modicum of decency, although they didn't in the
case of, recently, my baby. They staked out a new
mother for three days. She couldn't really leave her
home.

And then there are the much worse freelance
paparazzi who are increasingly -- well, the police tell
me they are increasingly recruited from criminal classes
and very often they have criminal records, they have
been in different fields of crime previous to being
paparazzi and who will really stop the nothing, who show
no mercy, no ethics, because the bounty on some of these
pictures is very high, and I suspect that the ones who,
for instance, were chasing my girlfriend and her
children, were those freelance types. I suspect they
were the ones who try to -- who always try to take

pictures up girls' skirts and then digitally remove
their underwear because they can sell the picture for
a little more if they do that. I suspect they are the
ones who were following Princess Diana when she died and
whom the tabloid papers, particularly the Daily Mail,
promised they would never buy pictures from again but
which they subsequently did, about three months later.

LORD JUSTICE LEVESON: Not now, but I'd like to come back to
the mechanisms whereby any of that can be controlled,
just for your view on it. Not now. Mr Jay will come to
it.

A. Sure.

MR JAY: If we move on to the issue of hacking, Mr Grant,
which you cover in some detail.

To set the scene, you tell us in paragraph 24 that
warnings started to come through from media lawyers
about how to protect privacy, and amongst the advice
they gave was that phone numbers should be changed
frequently and voicemails set on PINs other than
defaults. Can you remember when those warnings started
to emanate?

A. I can't exactly, but I mean I'm guessing it was early
2000s, you know? Sort of 2000 to 2005, that kind of
time.

Q. Right. Were you the direct recipient of such warnings?

A. I had circular emails that were sent from Schillings,
the media lawyers, to lots of clients and to ex-clients.
I think I might have been an ex-client of Schillings by
then -- I can't remember -- and I remember looking at
this list. It was just a warning, saying, "These are
some of the things they're up to. Be careful of
Bluetooth, be careful of your PIN numbers, be careful of
your phones", and so on. "Get your car swept."

Q. Then, paragraph 25, you say it was about 2004 when
someone came from the Information Commissioner's office?

A. Yes, out of the blue.

Q. Can you remember whether it was a policeman who came or
was it an official from the Information Commissioner?

A. To be honest with you, I've always been confused about
that. He was not wearing a uniform, but for some reason
I've always told the story as a policeman, and maybe he
had a rank or something. I wish I could tell you
accurately and I can't find I've looked everywhere
for the details of the meeting. I mean, it definitely
happened. I didn't make it up. He came to my house, he
sat in my kitchen and he told me that they had arrested
a private detective, a private investigator, who --
whose notebook contained intimate personal details on
a number of people and I was one of them. And that it
continued my address, the address of my -- some close
friends, relations. I remember him saying phone
two options although I know you're about to contest that,
but I can't imagine they'd come to tell me they had my
address because everyone had my address. I said, "Who's
this person working for?" And he said, "Well, it looks
from his notebook like he's working for most of the
British press."
Q. Yes, which might suggest it was the
Information Commissioner's office rather than
Mr Mulcaire, but --
A. I'm sure it was. I'm sure it wasn't Mulcaire --

LORD JUSTICE LEVESON: I think you'll find the
Information Commissioner employs ex-police officers.

MR JAY: Yes.
A. Yes, we know that because there was the story recently
in the Independent about one of those police officers
who was shocked that at the end of this particular
inquiry, they weren't allowed to interview any of the
journalists who had hired the private detective in the
first place.
MR JAY: You're in danger of foreshadowing evidence we'll be
hearing next week from the relevant person, but what
I need to put to you, Mr Grant, is that it's clearly the
Information Commissioner's office's position that they
never discovered any evidence relating to phone hacking.

So if that's right, it would suggest that your
recollection must be incorrect and you must be confusing
this with the Mulcaire notebooks and not the Wittamore
notebooks.
A. I know that this wasn't the Mulcaire case that came to
me. As I said to you before, I cannot understand why
they would come and tell me that a man had my address,
because everyone had my address. The papas were out
there, you know, all the time.
Q. Yes.
A. So if he didn't also have my phone numbers at the very
least -- and I think he said PIN numbers as well -- then
I don't understand why he'd want to see me.
Q. Can I just break that down? Having your address,
although it may not be that difficult a piece of data to
obtain, could be attained in breach of the Data
Protection Act. Do you follow me?
A. Yeah, yeah.
Q. And maybe, yeah.
A. Yeah, yeah.
Q. And it may be that you are associating what could have
been a reasonably limited if not unremarkable discussion
which was limited to breaches of the Data Protection Act
and then extrapolating from that and bringing in more
sinister details about PIN numbers and possible evidence
of voicemail hacking. Do you see that?
A. We're obviously not going to agree on this so we'll have
to leave it. We'll have to park that issue. Certainly
they were telling me about blagging and that kind of
thing, certainly.
Q. Was that the phrase they used?
A. I can't remember. It was 2004. But it was --

LORD JUSTICE LEVESON: I don't think you ought to assume
that Mr Jay is agreeing or disagreeing. The fact it
that as I'm sure you appreciate, it's very important
that those others who are going to give evidence -- some
of them have seen parts of what you've said in order to
come.
A. Yes.
LORD JUSTICE LEVESON: And part of the system is that you
are asked about their concerns so they can respond.
A. Yes.

LORD JUSTICE LEVESON: But you shouldn't assume that
because Mr Jay is asking the question, he necessarily is
agreeing with or disagreeing with the proposition he's
putting to you.
A. I understand.
MR JAY: Was Mr Wittamore's name mentioned by the gentleman
ex-policeman or otherwise, from the
Information Commissioner's office?
A. I don't think so. But seeing as that whole Inquiry was
about the Wittamore arrest, it's difficult to imagine
that it was about anyone else.
Q. Yes, you learned that subsequently, didn't you?
A. Yes.
Q. The next event was a chance encounter with a Mr Paul
McMullan, Mr Grant, and you deal with that in
paragraph 26 of your witness statement.
A. Yes.
Q. Tell us about the chance encounter. We've read about
it, but you ended up in the same car as him, didn't you?
A. Yes. I broke down --
Q. Yes.
A. -- in my car in Kent, in the remotest countryside just
before Christmas last year, and thought: "What am
I going to do? I'm late for my appointment." And there
was no taxis around, it was Christmassy, it was icy, and
then amazingly a car -- van pulled up in the other
carriageway of this dual carriageway, and I thought:
"Good, some nice Kent-ish person has come to help", and instead out stepped a man with a great long lens.
I thought: "I can't believe in the middle of Kent, in
the middle of winter, there's a pap." And he came over
and he took lots of pictures. I wasn't entirely polite
to him. Then to my horror I realised there was no other
way of getting to this appointment. He kept saying, "Do
you want a lift?" and I thought: "I know this is in your

6 (Pages 21 to 24)
Day 4 - PM  Leveson Inquiry  21 November 2011

1 A. Thank you.
2 Q. Is this, Mr Grant, a verbatim transcript of the tape recording?
3 A. Yes. There are boring bits left out. I put in just all the juicy bits.
4 Q. We've all read it and I'm not going to go over all of it, you understand, but I have been asked to go over in particular -- and I was in any event intending to do so -- the very bottom of the first page.
5 A. Yes.
6 Q. You're chipping in. It reads at the moment: "And ... it wasn't just the News of the World; it was ..."
7 And then it continues. First of all, can you remember what goes in the "..."?
8 A. No. That would be one of the boring bits. But I mean, it's nothing sinister. Or it could be that the jukebox was too loud at that point. The tape recording is quite hard to hear, and I was only able to transcribe it, you know, having just had the meeting.
9 Q. Yes. I suppose if necessary, we're not going to do it now, but we could listen to it, if you agreed?
10 A. Well --
11 Q. Do you have a problem with that?
12 A. I do have a problem with that. I feel like I did my
13 Q. Quite a zippy title.
15 A. Yeah.
16 Q. I'm asking you to be very careful when you answer the
17 Q. Is this, Mr Grant, a verbatim transcript of the tape recording?
18 A. Thank you.
19 Q. Is this, Mr Grant, a verbatim transcript of the tape recording?
20 A. Yes. There are boring bits left out. I put in just all the juicy bits.
21 Q. We've all read it and I'm not going to go over all of it, you understand, but I have been asked to go over in particular -- and I was in any event intending to do so -- the very bottom of the first page.
22 A. Yes.
23 Q. You're chipping in. It reads at the moment: "And ... it wasn't just the News of the World; it was ..."
24 A. No. That would be one of the boring bits. But I mean, it's nothing sinister. Or it could be that the jukebox was too loud at that point. The tape recording is quite hard to hear, and I was only able to transcribe it, you know, having just had the meeting.
25 Q. Yes. I suppose if necessary, we're not going to do it now, but we could listen to it, if you agreed?
26 A. Well --
27 Q. Do you have a problem with that?
28 A. I do have a problem with that. I feel like I did my
29 Q. Is this, Mr Grant, a verbatim transcript of the tape recording?
30 A. Thank you.
31 Q. Is this, Mr Grant, a verbatim transcript of the tape recording?
32 A. Yes. There are boring bits left out. I put in just all the juicy bits.
33 Q. We've all read it and I'm not going to go over all of it, you understand, but I have been asked to go over in particular -- and I was in any event intending to do so -- the very bottom of the first page.
34 A. Yes.
35 Q. You're chipping in. It reads at the moment: "And ... it wasn't just the News of the World; it was ..."
36 A. No. That would be one of the boring bits. But I mean, it's nothing sinister. Or it could be that the jukebox was too loud at that point. The tape recording is quite hard to hear, and I was only able to transcribe it, you know, having just had the meeting.
37 Q. Yes. I suppose if necessary, we're not going to do it now, but we could listen to it, if you agreed?
38 A. Well --
39 Q. Do you have a problem with that?
40 A. I do have a problem with that. I feel like I did my
41 Q. Is this, Mr Grant, a verbatim transcript of the tape recording?
42 A. Thank you.
43 Q. Is this, Mr Grant, a verbatim transcript of the tape recording?
44 A. Yes. There are boring bits left out. I put in just all the juicy bits.
45 Q. We've all read it and I'm not going to go over all of it, you understand, but I have been asked to go over in particular -- and I was in any event intending to do so -- the very bottom of the first page.
46 A. Yes.
47 Q. You're chipping in. It reads at the moment: "And ... it wasn't just the News of the World; it was ..."
48 A. No. That would be one of the boring bits. But I mean, it's nothing sinister. Or it could be that the jukebox was too loud at that point. The tape recording is quite hard to hear, and I was only able to transcribe it, you know, having just had the meeting.
49 Q. Yes. I suppose if necessary, we're not going to do it now, but we could listen to it, if you agreed?
50 A. Well --
51 Q. Do you have a problem with that?
52 A. I do have a problem with that. I feel like I did my
53 Q. Is this, Mr Grant, a verbatim transcript of the tape recording?
54 A. Thank you.
55 Q. Is this, Mr Grant, a verbatim transcript of the tape recording?
56 A. Yes. There are boring bits left out. I put in just all the juicy bits.
57 Q. We've all read it and I'm not going to go over all of it, you understand, but I have been asked to go over in particular -- and I was in any event intending to do so -- the very bottom of the first page.
58 A. Yes.
59 Q. You're chipping in. It reads at the moment: "And ... it wasn't just the News of the World; it was ..."
60 A. No. That would be one of the boring bits. But I mean, it's nothing sinister. Or it could be that the jukebox was too loud at that point. The tape recording is quite hard to hear, and I was only able to transcribe it, you know, having just had the meeting.
61 Q. Yes. I suppose if necessary, we're not going to do it now, but we could listen to it, if you agreed?
62 A. Well --
63 Q. Do you have a problem with that?
64 A. I do have a problem with that. I feel like I did my
65 Q. Is this, Mr Grant, a verbatim transcript of the tape recording?
66 A. Thank you.
67 Q. Is this, Mr Grant, a verbatim transcript of the tape recording?
68 A. Yes. There are boring bits left out. I put in just all the juicy bits.
69 Q. We've all read it and I'm not going to go over all of it, you understand, but I have been asked to go over in particular -- and I was in any event intending to do so -- the very bottom of the first page.
70 A. Yes.
71 Q. You're chipping in. It reads at the moment: "And ... it wasn't just the News of the World; it was ..."
72 A. No. That would be one of the boring bits. But I mean, it's nothing sinister. Or it could be that the jukebox was too loud at that point. The tape recording is quite hard to hear, and I was only able to transcribe it, you know, having just had the meeting.
73 Q. Yes. I suppose if necessary, we're not going to do it now, but we could listen to it, if you agreed?
74 A. Well --
75 Q. Do you have a problem with that?
Daily Mail."
That is the sequence of the conversation. There's nothing left out.

Q. So what you're asking us to do then is to read carefully what he says and interpret his answer, and certainly one highly reasonable interpretation of his answer is that he's limiting his comment, his evidence, if you like, to the selling of photographs, isn't he?
A. As I said before, he segues in that answer straight on to photographs. He goes:
"If I take a good picture, the first person I go to is ..."
So I agree that it's strange syntax, it's a segue, but I have no reason to believe that his answer, "Oh, absolutely, yeah", referred to the Daily Mail being involved in phone hacking.

Q. Okay, Mr Grant. I have to ask this blunt question. We'll hear from Mr McMullen and have his version. Had he been drinking?
A. Had I been drinking?
Q. No, had Mr McMullen been drinking?
A. He didn't seem drunk at all.
Q. He didn't?
A. No.
Q. And then you say:
"But would they, the Mail, buy a phone-hacked story?"
Isn't that a bit of an odd question, given that he hadn't referred to a phone-hacked story?
A. It's not an odd question at all, given that he'd just done this strange segue. So there's me trying to get him back on the interesting bits. It's not interesting that they bought photographs of me broken down; it's very interesting whether they were involved in phone hacking or not. So what I do is I immediately -- and there's no dot dot dots here -- I say, "but would they, the Mail, buy a phone-hacked story?" To which he answers:
"For about four or five years, they've been absolutely cleaner than clean, and before that, they weren't. They were as dirty as anyone. They had the most money."

Q. It's a matter for comment, but he's not given any details there of any specific phone hacking activity by the Daily Mail, has he?
A. No.
Q. Then we can read on. Some of the rest of what he says is quite controversial, so it's probably best if I don't read it out, but --
A. I thought this Inquiry was full of controversy.
had not appeared in the News of the World but had appeared in the Daily Mail and the Daily Mirror.

Q. Again, you mention the Daily Mail. You mentioned it for the first time because it's not in your witness statement.

A. Yes, it is.

LORD JUSTICE LEVESON: 28.

MR JAY: Yes, my apologies, you have.

LORD JUSTICE LEVESON: Just for the avoidance of doubt, the top corner, which of course we're cybering again for the reasons I've explained, that was in fact somebody who you linked to News of the World?

A. To get access to the redacted top left-hand corner, I was told I had to ask for it formally through a court.

I had to get a disclosure order from the Metropolitan Police, so I got it and it was in fact, or seemed to be, a journalist from the News of the World. So that is a mystery that he commissioned the work but it appeared in the Mail and the Mirror.

MR JAY: A mystery we're not, I believe, going to be able to get to the bottom of today or possibly at all.

May I move on, please, to your supplementary statement. This deals with quite recent events, culminating in the grant of an injunction last week by Mr Justice Tugendhat, and we've seen a copy of his judgment.

First of all, can I ask you, please, to look at HG2, which will be behind your witness statement in this bundle, not as a separate tab. I'm not going to go into this in much detail unless you want me to. It relates to a front page of the News of the World. The greeting is "Happy Easter". It's 24 April of this year. It looks as if these are photographs taken with a telephoto lens; is that right?

A. I would imagine so, yes. I was definitely unaware they were being taken. I wish I could find the piece of paper. Give me another clue where it's in. What's the tab number?

Q. It's under tab 2. If you go through the first six or seven pages, you'll reach the end of your witness statement and then you should find the start of an exhibit, HG2, and the first three pages of the exhibit are the article we are referring to. Are you with me on that?

A. Obviously, I'm being stupid. I'm on the second tab --

Q. Third tab.

A. It's the third tab?

MR SHERBORNE: Can Mr Grant be handed a clean copy?

LORD JUSTICE LEVESON: He can have my copy if there's any problem with it.
25 A. When she told me about the next day, I immediately called my lawyer and we agreed to get the police onto it, which we did, but at the last moment Tinglan, the mother, probably rightly in retrospect, said, "Let's not do that because there's always a chance of a leak from the police and that will bring down the press storm on my head", so we didn't.

2 Q. Taking that in stages, the contact was made with the police. The police were willing to assist, were they not?

8 A. Yes. They were.

11 Q. But then they were, as it were, called off because of concern about leaks from the press to the police. That's the sequence of events, isn't it?

14 A. From the police to the press.

15 Q. Police to the press.

16 A. Yes.

17 Q. You touch on this or you deal with this in the final sentence of paragraph 6 of your second statement.

19 A. Yeah.

20 Q. I'm going to ask you to try and exclude from your mind supposition, speculation and opinion. Do you have any direct evidence of leaks from the police to the press of which you can give us evidence, Mr Grant?

24 A. I'm not quite sure where supposition blends into evidence, but --
A. They threatened to, but because we didn't comment, they didn't, and so it was broken by an American magazine.

Q. You say they threatened to, but another way of looking at this is that until they had a comment from you confirming the truth of the story, they quite rightly decided not to publish. Would that be fair?

A. That would be wrong. It doesn't say it in these emails, but you could bring in my assistant or my publicity people in New York, who started to get the calls as well, and on these phone calls it was consistently: "We are publishing this story tomorrow", which is a tactic of brinkmanship to make you say something so they can stand up a story which would otherwise have to stand up entirely on a piece of leaked information from a hospital.

Q. Whatever they were saying to you in order to try to get you to confirm or deny the story, it is an incontestable fact they didn't publish the story, did they?

A. They did not, no.

Q. And it's a fair inference, isn't it, that the reason they didn't publish the story was that you hadn't confirmed its truth?

A. Yes. Thank you.

Q. To be clear about this, the Daily Mail did not publish a story, did they, until the news had been broken by someone else? That's right, isn't it?

A. Yes. Thank you.

Q. But they might have obtained the information from somewhere else altogether, mightn't they?

A. It's possible, but so highly unlikely that I find it incredible.

Q. Was there interest from other newspapers at this time?

A. There was the Daily Star, I think, were onto it in some way, yeah. But originally the whole story had been the subject of a -- back in the days of the pregnancy, had been the subject of News of the World interest, one journalist in particular. When the News of the World was closed down, that journalist appears to have moved over to the Daily Mail, because a lot of this work, these calls, come from that same journalist, now representing the Daily Mail.

Q. That's right. There's no evidence that that journalist, though, took any photographs with him from the News of the World to the Daily Mail, is there?

A. The photographs subsequently published in the Daily Mail when they did publish a story about my baby, some of those came from -- are identical to the pictures used earlier by the News of the World, so whether he took the pictures himself or one of his photographers took the pictures, they are the same pictures that the News of the World used, long lens surveillance shots,
that the Daily Mail subsequently published more recently.

Q. Right. But those pictures could have been purchased from the same paparazzo -- that's the singular of the noun -- who had provided the photographs to the News of the World originally, couldn't they?

A. Yes, they could.

Q. I'm going to deal, slightly out of sequence, before going back, with the incident which culminated in injunction proceedings in front of Mr Justice Tugendhat.

You cover this in paragraph 20 of your supplementary statement.

A. Yes.

Q. Potentially it was a very dangerous incident, because the grandmother of the child had to jump out of the way of the car in which was one or more of these individuals with the cameras; that's correct, isn't it?

A. Yes. The house where the mother of my child and my child were besieged was surrounded by these paparazzi, and I asked my lawyer what could possibly be done. He said maybe if they get some pictures of some of these people, we could have a chance, ask them to be called off. So the mother -- the 61-year-old grandmother of my child went out into the street, took a picture of a man sitting in a car with a great big camera. He turned around, took a lot of pictures of her, wound the window down, shouted a lot of abuse at her, and then as she crossed the door, he menaced her with his car, drove at her very fast, made her jump out of the way, and then at the end of the road, he did a u-turn and came back and menaced her again with the car.

Q. I think the police were also involved, were they not?

A. Yes. The police have been called and they are coming to see Tinglan on Wednesday about this.

Q. Oh, right. At the time, my understanding is that the police offered to go around and to get a statement or investigate the matter with the mother and the grandmother. Do you know about that?

A. I think -- I can't remember. I think we may have thought about that. I can't remember the exact facts, but certainly the police should be involved in this.

Q. Yes. But the police did want to become involved, and they were told -- and there's no suggestion that this is improper -- they were told by your solicitor you'd prefer in the first instance to get an injunction. Is that possible?

A. Well, that may be true that my solicitor said that, and he may well have been in the right in that a police investigation would have taken some time. It might have been a bit, perhaps, with that form of words?

Q. Putting it bluntly, weren't you leading with the chin a bit, perhaps, with that form of words?

A. Mm.

Q. And we know what has happened and we've read the reasons the police offered to go around and to get a statement.

A. Okay.

Q. But as a little coda to these serious matters, your publicist put out a statement about the birth.

A. In the end.

Q. Is that right?

A. Yeah, in the end, having held off all that time from all these inquiries and this brinkmanship from the British papers, a magazine in America, US magazine, seemed to have got hold of the story and they published, at which point I was in a sort of no-win situation. I, in the end, decided the best thing to do -- because the story within hours was going to go everywhere, particularly into the British tabloids and I was very anxious that they would give it a twisted spin, so I thought the best thing to do would be to be as honest about the thing as possible, so I said I was delighted with the birth but...
be honest and not to have a wrong version, a twisted
version appear in the papers which was that she was my
girlfriend who had been dumped when she got pregnant,
which was simply not the case, or that it was a planned
pregnancy that I then ran away from. So I was
protecting her reputation as a -- I didn't want her to
appear to be a jilted girlfriend. I was protecting
mine -- I didn't want it to seem that I was a monster
who ran away from my girlfriend. It's true I've been
given a hard time for using those words because -- which
is ironic, seeing as it's actually the truth, but that
doesn't seem to be very popular.

Q. Well, one alternative strategy might have been simply to
confirm the birth of the child and that you're
a delighted father, but otherwise words to the effect:
"This is a private matter and neither the mother nor the
father wish to comment further."

A. Yes, which would have been an invitation to the papers
to write something invented about the relationship that
I had with that girl. In the absence of information,
they'll make it up.

Q. You see, what did happen in response to the form of
text you selected -- you alight in one piece in the
Daily Mail by Amanda Platell, which is written in
a particular tone or house style, but other newspapers
have put in similar pieces, as you're aware. Giles
Coren in the Times saying words to the effect that you
should marry the woman, there's some even in the
Guardian, which isn't altogether complimentary, and
something in the Daily Telegraph. It could be said all
organs of the press are intruding into your privacy, but
the theme from each of them is not inconsistent. Do you
know what I mean?

A. First of all -- well, first of all, there were some
supportive pieces as well, especially in the broad
sheets, that said that -- you know, gave me some credit
for having put my hand up and said, "This is my baby and
I'm delighted with it", and providing for the child and
the mother. The hatchet jobs -- that's fine; I expect
to be a really good father, I wouldn't have visited at
all, seeing as it brought down a press storm on the
mother's head.

Q. I'll just finish this little sequence of evidence before
we'll break, but in terms of your privacy, is it your
position that those matters should not have been
covered at all in the press or is it your position that
they should have been covered in a certain way, in a way
which didn't misrepresent?

A. Well, if you cling to the naive notion that newspapers
are there to report the truth, nothing could really be
wrong with that. I mean, I had a baby with this girl.
She's a good friend of mine, she still is a good friend.
It's a nice thing. There's really not much more to it
than that, but that doesn't sell newspapers, so a nasty
spin has to be given to it, hence the extraordinary
efforts of various newspapers to dig dirt on the new
mother happily enjoying her new baby while the
Daily Mail paid £125,000 to her ex-lover to sell private
pictures of her.

Q. I think your complaint is it's not the intrusion into
your privacy per se; it is the nasty spin they put on
a story which, had they reported in a fairer and more
accurate way, would have been a proper story for them to
print. Is that right?
MR JAY: Sir, this may be a convenient moment to break.

LORD JUSTICE LEVESON: All right. We'll have a break and you can have a break, too, but let me just ask this: you've been granted relief by Mr Justice Tugendhat; has that grant of relief been reflected in your child and matter mother being left alone?

A. Yes. Very grateful for it.

LORD JUSTICE LEVESON: You'll be conscious that I've made it clear that I would want to know if intrusion arose as a result of anybody giving evidence to this Inquiry.

A. Yes, I heard that and I'm grateful for that, too.

MR SHERBORNE: Sir, before you rise, can I deal with two very brief matters of chronology?

The first was raised in relation to the 1996 Daily Mirror article that Mr Grant refers to in paragraph 13 of his witness statement. Sir, you asked that it might be possible that we would have the dates. Can I just give you those dates, because we've managed to obtain them.

LORD JUSTICE LEVESON: Yes.

MR SHERBORNE: As I understand it, the visit to the hospital was in May 1996, 29 May.

LORD JUSTICE LEVESON: Yes. That's all I wanted to say, sir.

MR JAY: Mr Grant, I have been asked to clarify one matter we covered earlier this afternoon. It's in your first witness statement and it's in paragraph 28, please.


Q. You refer to a detailed expose story written by both the Mirror and the Mail. I won't ask you for details of the story as such, but can you help us with details as to the approximate date?


Q. Thank you.

Go back to the issue of press misreporting and particularly in the context of your supplementary statement. You refer in that statement to two articles in the Sun, don't you?

A. Do I? What do I say?

MR SHERBORNE: The article which appeared in the Sunday Mirror was on 23 June of 1996. The adjudication was not until 27 July of 1997. So Mr Grant in his recollection perhaps was being somewhat generous. It took over a year for that adjudication to arise.

As I understand it, a legal claim was issued in October of 1997, which resulted somewhat more speedily in the judgment that he refers to in paragraph 14 being given in his favour in December, only some two months later.

LORD JUSTICE LEVESON: Right. Thank you.

MR SHERBORNE: Then can I move on secondly to the injunction. Mr Jay referred to the report to the police and the decision to follow a civil course instead, or at least in the first instance. Can I just remind you, sir, that the incident relating to the paparazzo who was trying to run over Mr Grant's baby's grandmother took place on Thursday, 10 November, and I applied the next day for an emergency injunction on Friday, 11 November, which was granted by Mr Justice Tugendhat, although his reasons arrived a week later. The purpose, of course, was to immediately bring the campaign to an end, which, as you've just heard, it did, with remarkable efficiency.

That's all I wanted to say, sir.
<table>
<thead>
<tr>
<th>Page 57</th>
<th>Page 58</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 MR JAY: No.</td>
<td>1 the article.</td>
</tr>
<tr>
<td>2 A. So, there's three girls in this article, three pictures</td>
<td>2 Q. But then it does add in the middle a local report, which</td>
</tr>
<tr>
<td>3 of three girls.</td>
<td>3 is the report from the German magazine, Bild?</td>
</tr>
<tr>
<td>4 Q. Yes. We're looking at the one at the bottom of the</td>
<td>4 A. Correct, which said there had been -- after this dinner,</td>
</tr>
<tr>
<td>5 page.</td>
<td>5 this innocent dinner I'd had with this German girl --</td>
</tr>
<tr>
<td>6 A. Sorry, two girls.</td>
<td>6 not this one but the one pictured on the page before.</td>
</tr>
<tr>
<td>7 Q. Yes.</td>
<td>7 I'd had a completely innocent dinner, dropped her off in</td>
</tr>
<tr>
<td>8 A. Yes. Is that --</td>
<td>8 a taxi, and because the paparazzi had got a rather</td>
</tr>
<tr>
<td>9 Q. It's the same girl?</td>
<td>9 boring shot of a man getting into a taxi with a girl,</td>
</tr>
<tr>
<td>10 A. That is the same girl.</td>
<td>10 woman, either he or his agency or Bild invented</td>
</tr>
<tr>
<td>11 Q. Yes. Because to be clear, the article on the following</td>
<td>11 passionate kissing in the taxi, because there</td>
</tr>
<tr>
<td>12 day, 4 November, is some different young woman</td>
<td>12 emphatically was none. And yes, I do know I'm under</td>
</tr>
<tr>
<td>13 altogether?</td>
<td>13 oath here. I only went on about</td>
</tr>
<tr>
<td>14 A. That's right. On the following day, the Sun published</td>
<td>14 it in my supplementary statement because it was</td>
</tr>
<tr>
<td>15 this article saying, &quot;Hugh a new girl three weeks before</td>
<td>15 a particular stick used to beat me round the head with</td>
</tr>
<tr>
<td>16 baby&quot;, and there's a picture of me and a girl, who is</td>
<td>16 during the birth of my daughter, and, some people think,</td>
</tr>
<tr>
<td>17 not the same girl. In fact, I have no idea who she is.</td>
<td>17 because I'm here giving evidence to the Leveson Inquiry.</td>
</tr>
<tr>
<td>18 One of the reasons why they're unable to find any</td>
<td>18 So they look for any stick they can find and -- oh yeah,</td>
</tr>
<tr>
<td>19 pictures of me and my new German girlfriend is because</td>
<td>19 much too young girlfriend, even though she doesn't</td>
</tr>
<tr>
<td>20 I don't have one. So they have had to find a picture of</td>
<td>20 exist, and even though she had twice denied that she was</td>
</tr>
<tr>
<td>21 just me and some girl.</td>
<td>21 my girlfriend. It wasn't just in the Sun. It was in</td>
</tr>
<tr>
<td>22 Q. To be fair to the article -- I'm just looking at what it</td>
<td>22 many, many papers.</td>
</tr>
<tr>
<td>23 says and not any inferences or innuendo which might be</td>
<td>23 Q. I'm not putting a point of view. I'm just seeking to</td>
</tr>
<tr>
<td>24 drawn from it -- this woman is not described as your</td>
<td>24 analyse what appears in this article and receive your</td>
</tr>
<tr>
<td>25 girlfriend, is she?</td>
<td>25 comment upon it, and you've kindly given me that. Okay.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Page 59</th>
<th>Page 60</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 A. What, you want me to read the whole thing now?</td>
<td>1 LORD JUSTICE LEVESON: Could I just ask you: what's the</td>
</tr>
<tr>
<td>2 Q. I think you've had the chance to look at it. Maybe</td>
<td>2 position of the papers in Germany? Have they reported</td>
</tr>
<tr>
<td>3 you'll trust me. She's not described as your</td>
<td>3 you in the way in which you've complained about being --</td>
</tr>
<tr>
<td>4 girlfriend, is she?</td>
<td>4 A. Yes, yes, yes, and it wouldn't just be in Germany now.</td>
</tr>
<tr>
<td>5 MR SHERBORNE: I don't think Mr Grant has had a chance to</td>
<td>5 It's everywhere. I say in my main statement, you know,</td>
</tr>
<tr>
<td>6 look at that. He hasn't seen that before.</td>
<td>6 this is one of the problems, that if something's</td>
</tr>
<tr>
<td>7 LORD JUSTICE LEVESON: I'm sorry about that. Then he ought</td>
<td>7 misreported, it just splatters all around the Internet</td>
</tr>
<tr>
<td>8 to have the chance to read it.</td>
<td>8 instantly. So this is now fact that I have a new</td>
</tr>
<tr>
<td>9 MR JAY: Yes.</td>
<td>9 21-year-old German girlfriend all round the world.</td>
</tr>
<tr>
<td>10 A. Well, I don't know. To me, the headline, &quot;Hugh a new</td>
<td>10 Well, so what? It doesn't really matter that much</td>
</tr>
<tr>
<td>11 girl three weeks before baby&quot; suggests girlfriend, but</td>
<td>11 except when it's used, you know, as a stick to beat me</td>
</tr>
<tr>
<td>12 maybe I'm reading a different language.</td>
<td>12 with again and again, and then it does become a little</td>
</tr>
<tr>
<td>13 MR JAY: Mm, okay. I'm just trying to be fair to the</td>
<td>13 wearying, and you sort of wish that they'd bothered to</td>
</tr>
<tr>
<td>14 authors of this piece, Mr Grant. It's for others to</td>
<td>14 either ask me or that they'd bothered to listen to the</td>
</tr>
<tr>
<td>15 make a judgment about it.</td>
<td>15 girl's two denials.</td>
</tr>
<tr>
<td>16 A. You've been very, very fair to News International and to</td>
<td>16 LORD JUSTICE LEVESON: Is it possible to do something about</td>
</tr>
<tr>
<td>17 Associated today.</td>
<td>17 this in Germany?</td>
</tr>
<tr>
<td>18 Q. I hope I've been fair to everybody.</td>
<td>18 A. Well, really, it's not a big -- it's not like it's</td>
</tr>
<tr>
<td>19 A. You told me back stage you were going to bowl me</td>
<td>19 libellous. I was merely giving an example of the use of</td>
</tr>
<tr>
<td>20 straight balls, but if these are straight balls, I'd</td>
<td>20 lazy reporting and misreporting to beat someone up</td>
</tr>
<tr>
<td>21 hate to see your googlies.</td>
<td>21 a bit, if there was an agenda for beating someone up.</td>
</tr>
<tr>
<td>22 Q. Let me continue to bowl you straight balls. It also</td>
<td>22 LORD JUSTICE LEVESON: I understand your point.</td>
</tr>
<tr>
<td>23 reports the woman's denial that this is other than</td>
<td>23 A. If the girl had been 12, I would have sued.</td>
</tr>
<tr>
<td>24 a friendship, doesn't it?</td>
<td>24 LORD JUSTICE LEVESON: I understand the point entirely, but</td>
</tr>
<tr>
<td>25 A. It does. Right down at the bottom line at the end of</td>
<td>25 I'm trying to understand what I can put a box around in</td>
</tr>
</tbody>
</table>

(Pages 57 to 60)
<table>
<thead>
<tr>
<th>Page 61</th>
<th>Page 62</th>
</tr>
</thead>
<tbody>
<tr>
<td>L ORD JUSTICE LEVESON: I see that. Then the question arises where stories emanate from. One of the stories you talked about actually I think you said emanated initially in America, but whether it went to America from here or where, I don't know.</td>
<td>when they spread around the Internet.</td>
</tr>
<tr>
<td>A. That is always difficult to know.</td>
<td>LORD JUSTICE LEVESON: Yes. I’m just trying to grapple with the whole problem; that’s all. I’m certainly not focusing on individual stories.</td>
</tr>
<tr>
<td>LORD JUSTICE LEVESON: For the reasons that you understand.</td>
<td>A. Yes.</td>
</tr>
<tr>
<td>LORD JUSTICE LEVESON: Indeed, as you probably know, this part of this Inquiry isn’t about who precisely did what at what circumstance to whom. I’m trying to look at a bigger picture.</td>
<td>MR JAY: Okay, Mr Grant, we’ll move off the Sun in your second witness statement. I’m going to cover now some matters of opinion to try and look at the bigger picture.</td>
</tr>
<tr>
<td>LORD JUSTICE LEVESON: And the bigger picture is not merely a bigger picture.</td>
<td>Before I do that, can I ask you some questions about publicity and publicists?</td>
</tr>
<tr>
<td>LORD JUSTICE LEVESON: The bigger picture is not merely the whole question of regulation of the press in this country and their culture and practices, but also how that is impacted or affected by what happens abroad or what happens on the Internet. You heard the question.</td>
<td>A. Yes.</td>
</tr>
<tr>
<td>LORD JUSTICE LEVESON: And the bigger picture is not merely the whole question of regulation of the press in this country and their culture and practices, but also how that is impacted or affected by what happens abroad or what happens on the Internet. You heard the question.</td>
<td>Q. You’ve referred now at least once to a publicist you have in the US. Is that right?</td>
</tr>
<tr>
<td>LORD JUSTICE LEVESON: And the bigger picture is not merely the whole question of regulation of the press in this country and their culture and practices, but also how that is impacted or affected by what happens abroad or what happens on the Internet. You heard the question.</td>
<td>A. Yeah.</td>
</tr>
<tr>
<td>LORD JUSTICE LEVESON: And the bigger picture is not merely the whole question of regulation of the press in this country and their culture and practices, but also how that is impacted or affected by what happens abroad or what happens on the Internet. You heard the question.</td>
<td>Q. How many publicists do you have around the world?</td>
</tr>
<tr>
<td>LORD JUSTICE LEVESON: And the bigger picture is not merely the whole question of regulation of the press in this country and their culture and practices, but also how that is impacted or affected by what happens abroad or what happens on the Internet. You heard the question.</td>
<td>A. Well, I have one. They’re in New York, and I only use them sporadically when a film is coming out, and they’re not for -- they’re like anti-publicists. They’re for not getting publicity but for fending off -- a studio may have a film coming out. The studio -- say Warner Brothers -- will be desperate for you to do everything, particularly in America, and the job of my publicist -- I pay them not very much money -- is to say, &quot;No, he’s not doing that, he’s not doing that. He might do that because that’s a classy one.&quot; That’s all they’re there for. Between films I don’t pay them, they go on hiatus and they knew nothing about this until they kept getting calls from British tabloids saying, &quot;We’ve heard he’s had a baby.&quot;</td>
</tr>
<tr>
<td>LORD JUSTICE LEVESON: And the bigger picture is not merely the whole question of regulation of the press in this country and their culture and practices, but also how that is impacted or affected by what happens abroad or what happens on the Internet. You heard the question.</td>
<td>Q. It’s not their function to advise you in relation to your dealings with the press?</td>
</tr>
<tr>
<td>LORD JUSTICE LEVESON: And the bigger picture is not merely the whole question of regulation of the press in this country and their culture and practices, but also how that is impacted or affected by what happens abroad or what happens on the Internet. You heard the question.</td>
<td>A. It is in relation to my dealings with the press in America when a film comes out and a little bit around the world, although they try to be experts on what TV show is a good one to do if you’re on a world tour in Russia, but obviously they’re not massive experts on that, and to be absolutely honest, they throw up their hands when it comes to Britain. They say, &quot;We have no advice. It’s uncontrollable.&quot;</td>
</tr>
<tr>
<td>LORD JUSTICE LEVESON: And the bigger picture is not merely the whole question of regulation of the press in this country and their culture and practices, but also how that is impacted or affected by what happens abroad or what happens on the Internet. You heard the question.</td>
<td>Q. Yes, okay. We did see, I think, in relation to that little piece in the Sun about your health, that your</td>
</tr>
<tr>
<td>LORD JUSTICE LEVESON: And the bigger picture is not merely the whole question of regulation of the press in this country and their culture and practices, but also how that is impacted or affected by what happens abroad or what happens on the Internet. You heard the question.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Page 63</th>
</tr>
</thead>
<tbody>
<tr>
<td>16 (Pages 61 to 64)</td>
</tr>
</tbody>
</table>

1. I asked this morning.
2. A. Mm.
3. LORD JUSTICE LEVESON: So I'm just trying to bet a bigger picture.
4. A. All I can say is when it comes to stories being copied around the world, they are copied from the Internet, and they're particularly copied if they come from a website that belongs to a newspaper because newspapers are generally considered to have a certain gravitas and to have been -- the news-gathering techniques to have a certain professionalism, albeit often that may be a mistaken assumption. But that is why -- you know, if a story is in a -- on a newspaper website, it will scatter much faster than if it's just on someone's blog or it's a tweet or something like that. I can sense I haven't answered your question.
5. LORD JUSTICE LEVESON: No, my question is really aimed at the impact that I can have on other press activity in relation to somebody with an international reputation simply by doing what I can do in this country.
6. A. There's obviously nothing you can do outside this country.
7. LORD JUSTICE LEVESON: I agree.
8. A. But if you made our press behave more professionally, then stories that they write would not be so damaging.
1 publicist declined to comment.
2 A. They called my assistant --
3 Q. Just wait for the question, please.
4 A. Yes.
5 Q. It looks as if, rightly or wrongly, someone at the Sun telephoned your assistant or your publicist for comment and quite rightly got no comment. Is that a fair inference?
6 A. Yes, they will either have phoned the publicist in America, which is unlikely, or they phoned my assistant in London --
7 MR JAY: Right.
8 A. -- who is an executive assistant. She's fantastic, but she's not a publicist, but they may have given her that label.
9 Q. Okay, I understand. So it's a standard PA?
10 A. Right.
11 Q. It's not really part of her role to advise you in relation to your dealings with the press?
12 A. Not at all. In terms of the British press, I have no advice except myself.
13 Q. Right. So if, for example, you give an interview to the press, you consult your own advice and no one else's; is that correct?
14 A. You're talking about the British press?
15 Q. Yes.
16 A. Well, in 17 years I've only given two interviews to the British press. The rest have all been either bought in from abroad or patch and pasted together or invented, and so the question doesn't really arise.
17 Q. Yes. You gave one interview, I think, in 2002, which has been drawn to my attention. So that you have your bearings, it relates to about the time you were doing a film with Sandra Bullock. Do you remember that?
18 A. Yes.
19 Q. I can't remember the name of the film now.
20 A. "Two Weeks' Notice"?
21 Q. Yes. The question you got was:
22 "How frustrating is it for you that people are more interested in your love life than your films?"
23 And your answer, probably quite accurately, was:
24 "I do get frustrated but I do understand where the -- where the interest comes from."
25 A. Mm-hm.
26 Q. It's pretty obvious, isn't it, where the interest comes from?
27 A. Yeah, of course people are interested in people's love lives. We all have that natural curiosity or prurience. It doesn't mean to at that say that you can obtain that information illegally.
28 Q. No, of course not. Yes. Then you continue:
29 "When I think about actors I know, I'd much rather hear about who they're shagging than what film they're doing next."
30 A. That remains true. But again, as I say, it doesn't mean to say that information should be obtained illegally.
31 Q. No, fair point, and then you go on probably into an area which it's unnecessary for me to --
32 A. I know that it was given -- that quote, I think, comes from a press conference with a thing called the Hollywood Foreign Press Association, the people who control the Golden Globes. It's always a very light-hearted occasion and always try to give light-hearted answers and as I say in my main statement, prior to about a year ago, if the subject of the British tabloids came up in an interview, I took the line that just about everyone else in the country who's ever been in the crosshairs of the British tabloids will take, which is to give either a neutral answer or a flippant answer --
33 Q. Yes.
34 A. -- because to speak out and criticise is to invite a terrible press storm on your head and hatchet jobs, et cetera.
35 Q. Yes.
36 A. So I think the answer that you're referring to there, the Hollywood Foreign presentation, was one of those flippant answers.
37 Q. Yes. I assumed it was, Mr Grant. That's why I wasn't going to read it out.
38 You quite rightly say that whatever the interest of the public may be in your private life, that cannot justify the use of illegal or probably, you would add, unethical news-gathering methods.
39 A. Right.
40 Q. Is that correct? What happens, though, if information has eventually entered the public domain and then once it's in the public domain, the press want to comment on it? Is it fair and right for them to do that, in your view?
41 A. I think not. I've always thought if they've obtained the information illegally or unethically, why should I help them with their story? After all, their motive in the first place was money, profit. It's almost never public interest. It's profit. Someone's making money out of this so why should I help them make money out of invading my privacy?
42 Q. Probably it's my fault for not asking the question not with ultimate precision. We see it a little bit in microcosm in relation to the recent history, that for
43 A. Probably.
<table>
<thead>
<tr>
<th>Day 4 - PM</th>
<th>Leveson Inquiry</th>
<th>21 November 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Whatever reason the Daily Mail don't publish. You've made your point in relation to how the Daily Mail, you think, obtained relevant information, but they didn't act on it. Eventually it comes out in the United States of America. We don't know on what basis they obtained the information for their story, but once it's out in the public domain, it's now in the public domain, and so everyone else -- by which I mean other organs of the press -- can now comment, can't they, on the story which is now, by definition, in the public domain?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11. A. Yes.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>12. Q. Would you agree with that?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>13. A. That's right, and from experience, I know that not only will they comment but they'll write it as news with a little embellishments. For instance, they will say &quot;a friend tells us&quot;, or &quot;an insider tells us&quot;, or &quot;an associate tells us&quot;. And those are usually invented. They almost never exist. So they'll create a whole new story based on the original story which could have a very wrong or twisted slant to it. Hence my decision to put out a statement to try and give the real facts.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>19. Q. You've added a sort of extra dimension, quite rightly, that we've got a story which is now in the public domain. Okay? It's unclear, particularly if it's in this country but one wouldn't be able to regulate the sale of pictures abroad.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>21. Q. Okay. Another factor in your case, which I suppose adds to the --</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Page 69</th>
<th>Page 70</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. The States, how the American magazine or newspaper obtained the story. We simply don't know.</td>
<td></td>
</tr>
<tr>
<td>3. A. Yeah.</td>
<td></td>
</tr>
<tr>
<td>4. Q. Once it's in the public domain there, it's in the public domain across the world and now the press here comment upon it. Your point is: well, what they're certainly not allowed to do is embellish the story, add bits of news which are untrue. Okay, let's agree with that.</td>
<td></td>
</tr>
<tr>
<td>9. A. Mm-hm.</td>
<td></td>
</tr>
<tr>
<td>10. Q. But if they stop short of doing that and they don't embellish, but all they do is comment on you, maybe in a way you don't like --</td>
<td></td>
</tr>
<tr>
<td>13. A. No, that's not --</td>
<td></td>
</tr>
<tr>
<td>14. Q. -- do you have a problem with that?</td>
<td></td>
</tr>
<tr>
<td>15. A. No, I don't mind -- listen, I'm ready for comments. Believe me, I am very ready for that. I've experienced a lot of it. As I said earlier, I just do slightly gnash my teeth when those hatchet jobs are based on wrong facts or lazy journalism, like the 21-year-old girlfriend or like: &quot;It was cruel of him to only visit for half an hour&quot; when in fact I was being kind. I mean, I was trying to protect the mother of my child. That's annoying. But of course everyone's entitled to their opinion.</td>
<td></td>
</tr>
<tr>
<td>24. Q. Yes. Obviously the Inquiry needs to consider this issue of embellishment which is incorrect and ways that that can be corrected or addressed. Of course one way it can be corrected is that you can bring proceedings of defamation.</td>
<td></td>
</tr>
<tr>
<td>5. A. Yeah, if it's -- if my lawyer thinks it's defamatory, yeah.</td>
<td></td>
</tr>
<tr>
<td>6. Q. What about complaining to the PCC in relation to recent events? Have you thought about doing that?</td>
<td></td>
</tr>
<tr>
<td>9. A. My experience, as you saw way back in 1996, was not a positive one with the PCC. They took a year to decide that it was a wrongful thing for a hospital to give out my medical records. So I didn't have massive faith in them since then, and in the case of recent events, my lawyer did -- before he took out the injunction, while we were trying to work out a strategy to get rid of all these paparazzi and reporters who were besieging the mother of my child's house and making her life miserable and following her -- he did send a warning letter to the newspapers and he sent it via the PCC, and there was a 10 per cent dip in activity outside the house for maybe 12 hours, and then it was back to normal. So my verdict on their contribution to this was that they were ineffectual.</td>
<td></td>
</tr>
<tr>
<td>22. Q. Okay. Another factor in your case, which I suppose adds to the --</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Page 71</th>
<th>Page 72</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. LORD JUSTICE LEVESON: Sorry, Mr Jay, let me just consider that for a moment.</td>
<td></td>
</tr>
<tr>
<td>3. The PCC at the moment is monitoring or provides a service to certain of the press but that won't ever touch paparazzi.</td>
<td></td>
</tr>
<tr>
<td>5. A. The freelance paparazzi?</td>
<td></td>
</tr>
<tr>
<td>6. LORD JUSTICE LEVESON: The freelance paparazzi.</td>
<td></td>
</tr>
<tr>
<td>8. A. Right.</td>
<td></td>
</tr>
<tr>
<td>9. LORD JUSTICE LEVESON: So one of the things that one would have to think about is whether one could devise a system that bites irrespective of whether you're employed by a newspaper.</td>
<td></td>
</tr>
<tr>
<td>13. A. Yes. You're probably right. Or to somehow kill the market for those pictures. I think, you know, there would be no rogue paparazzi if there wasn't big national papers paying for their pictures, and so I'm not quite sure which end of that you attack first.</td>
<td></td>
</tr>
<tr>
<td>18. LORD JUSTICE LEVESON: Well, the question then arises, which goes back to the question I was asking just a moment ago, about international interest, because one could say -- one could do something about paying for pictures in this country but one wouldn't be able to regulate the sale of pictures abroad.</td>
<td></td>
</tr>
<tr>
<td>24. A. That is true. That is true. But I think, if I'm right, in France there's various laws -- for instance, you</td>
<td></td>
</tr>
</tbody>
</table>

Merrill Legal Solutions www.merrillcorp/mls.com 8th Floor 165 Fleet Street London EC4A 2DY
Day 4 - PM

Leveson Inquiry

21 November 2011

1 A. Yes, yes.

2 LORD JUSTICE LEVESON: I'm just wondering how that plays into the picture.

3 A. I don't know the answer to your question, I'm afraid, in terms of international. All I can tell you is that not just in my opinion, but in the opinion of other people who are quite well-known around the world and who, for instance, sometimes do tours, publicity tours for a film or whatever, they're unanimous in saying that by far and away the worst territory to do any kind of publicity in is this one.

4 LORD JUSTICE LEVESON: It may be that's right and maybe therefore I just shouldn't worry about anywhere else.

5 I'm just looking for your assistance; that's all.

Q. Okay.

A. The visit to the baby and all that kind of -- didn't know the facts, and it is possible that as many of my friends, professors of journalism who have rang me up and said it's clearly a deliberate hatchet job because you're speaking against the tabloid press -- that may be true, but I was reluctant even to talk about it in this statement because I've always felt that comment is comment and it's not really cool to comment on it. But I was persuaded that because of this theory that it might be a stick to beat me with because I'm doing this, that maybe it was relevant.

Q. Yes. I've put in the equation three other articles which are admittedly not couched in quite the same language but which make the same sort of critical point about you.

A. Mm-hm.

Q. So we're weighing up quite a lot of material of a similar nature. Maybe you hadn't seen all of those.

A. I haven't seen all of them, thank God, but I'm sure, as I said earlier -- you keep coming back to this point -- they are based largely on a lot of misreporting.

Q. Yes.

A. But for the parts that are not based on misreporting, it is perfectly fine to hate me. I have become very accustomed to that. It's been extremely fashionable for a long time and that is what I expect in this country.

Q. Okay. Mr Grant, we probably have another half an hour.

A. I'm going to give you the opportunity now, as I have given previous witnesses, to, as it were, elaborate your opinion. Your opinion is contained mainly in your first statement, beginning at paragraph 39 and 40.

Q. Yes. This is where I go through my ten myths.

A. Your ten myths. What I'd like to do with you is make sure that we've got your points, okay, and that we're not skating over them.

Q. And that we have them in mind. Your first point is one I think we'd probably all agree with, that it isn't only celebrities and politicians who suffer at the hands of popular papers. You've given us quite a few examples there, and indeed some of the examples you've given are human beings who will testify before this Inquiry very shortly.

A. Yeah, I talk about particularly vulnerable people who have been victims of trauma, such as the Dowlers who we saw earlier today, or the victims of the London bombings or families of soldiers killed in Afghanistan. Then I talk about collateral damage.

Q. Yes.
### Day 4 - PM

#### Leveson Inquiry

21 November 2011

<table>
<thead>
<tr>
<th>A. Where, say, my phone is hacked but so is my assistant's, my -- you know, my brother's or my father's, whatever it might be. Innocent people having their privacy invaded just because they're in the -- it's collateral damage. And then I talk about innocent people who have been monstred by the press, like Christopher Jefferies or Robert Murat or Madeleine McCann, who the press have implied very heavily are guilty of heinous crimes when in fact they're entirely innocent.</th>
<th>some of the best in the world in this country -- out of the bath and let the bath water run out. Everyone says it's a very difficult distinction to make, what's good journalism and what's not, and although I don't say it's black and white, there's a grey area, I think it's a lot less grey than people make it out to be. Thank you. Your fifth myth is a related point, which is that over-regulation will lead to tyranny. Can I ask you, please, though about what your positive proposals would be in relation to press regulation?</th>
<th>LORD JUSTICE LEVESON: It's not compulsory for you -- A. Sorry, say that again? You're actually on myth four, I think: &quot;Any attempt to regulate the press means we're heading for Zimbabwe.&quot; Which is another of these arguments like &quot;don't throw the baby out with the bath water&quot; that we often hear, and I simply make the point that (a) that is way too simplistic and (b) very often insincere. It's very often used by tabloid newspapers to protect their lucrative business model, which is, after all, almost no journalism now -- it's mainly the appropriation, usually through illegal means, of British citizens' fundamental rights of privacy to sell them for profit -- and that</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. I'm sorry, yes. LORD JUSTICE LEVESON: I understand, and I only corrected not to get at you but because I don't want anybody to think that you said that.</td>
<td>A. Yes, well, I did and I was wrong.</td>
<td>A. I'm sorry, yes. LORD JUSTICE LEVESON: I understand, and I only corrected not to get at you but because I don't want anybody to think that you said that.</td>
</tr>
<tr>
<td>A. Yes, I'm sorry, yes. LORD JUSTICE LEVESON: I understand, and I only corrected not to get at you but because I don't want anybody to think that you said that.</td>
<td>A. Yes, well, I did and I was wrong.</td>
<td>A. I'm sorry, yes. LORD JUSTICE LEVESON: I understand, and I only corrected not to get at you but because I don't want anybody to think that you said that.</td>
</tr>
<tr>
<td>Q. Your third myth is the risking throwing the baby out with the bath water point. Could you elaborate on that? With the bath water point. Could you elaborate on that?</td>
<td>Q. Your third myth is the risking throwing the baby out with the bath water point. Could you elaborate on that?</td>
<td>Q. Your third myth is the risking throwing the baby out with the bath water point. Could you elaborate on that?</td>
</tr>
<tr>
<td>A. Yes.</td>
<td>A. Yes.</td>
<td>A. Yes.</td>
</tr>
<tr>
<td>Q. And you've given us direct evidence in relation to</td>
<td>Q. And you've given us direct evidence in relation to</td>
<td>Q. And you've given us direct evidence in relation to</td>
</tr>
</tbody>
</table>

---

**Footnotes**

1. A. Where, say, my phone is hacked but so is my assistant's, my -- you know, my brother's or my father's, whatever it might be. Innocent people having their privacy invaded just because they're in the -- it's collateral damage. And then I talk about innocent people who have been monstred by the press, like Christopher Jefferies or Robert Murat or Madeleine McCann, who the press have implied very heavily are guilty of heinous crimes when in fact they're entirely innocent.

2. Radar Valley

3. A. I'm sorry, yes. LORD JUSTICE LEVESON: I understand, and I only corrected not to get at you but because I don't want anybody to think that you said that.

4. A. Yes, well, I did and I was wrong.

5. Q. Your third myth is the risking throwing the baby out with the bath water point. Could you elaborate on that? With the bath water point. Could you elaborate on that?


7. Q. And you've given us direct evidence in relation to | Q. And you've given us direct evidence in relation to | Q. And you've given us direct evidence in relation to | Q. And you've given us direct evidence in relation to |

---

**Legal**

1. A. Where, say, my phone is hacked but so is my assistant's, my -- you know, my brother's or my father's, whatever it might be. Innocent people having their privacy invaded just because they're in the -- it's collateral damage. And then I talk about innocent people who have been monstred by the press, like Christopher Jefferies or Robert Murat or Madeleine McCann, who the press have implied very heavily are guilty of heinous crimes when in fact they're entirely innocent.

2. Radar Valley

3. A. I'm sorry, yes. LORD JUSTICE LEVESON: I understand, and I only corrected not to get at you but because I don't want anybody to think that you said that.

4. A. Yes, well, I did and I was wrong.

5. Q. Your third myth is the risking throwing the baby out with the bath water point. Could you elaborate on that? With the bath water point. Could you elaborate on that?


7. Q. And you've given us direct evidence in relation to | Q. And you've given us direct evidence in relation to | Q. And you've given us direct evidence in relation to | Q. And you've given us direct evidence in relation to |

---

**Contact**

Merrill Legal Solutions
(+44) 207 404 1400

www.merrillcorp/mls.com

8th Floor 165 Fleet Street

London EC4A 2DY

---

**Page Numbers**

Page 77 to 80
Day 4 - PM Leveson Inquiry  
21 November 2011

1. Ethics and would apply it with proper sanctions,
2. meaningful sanctions, either financial or in terms of
3. apologies, but which would need -- and this is where it
4. gets interesting. To have any teeth and to be
5. meaningful, it would have to have, right at the back, as
6. a backstop, some kind of regulation. Otherwise it would
7. be easy, for instance, for the Express Group, as they
8. have done now, to walk-away from the PCC, and say,
9. "We're not having any of that", or you could set up
10. a new regulator who would find some appalling abuse by
11. a paper and say, "You've fined £200,000", and they say,
12. "We're not paying." Somewhere there has to be a little
13. bit of statute right at the back to make it more
14. meaningful. But there are people much more expert on
15. this than me, and I'm sure you'll be calling them.
16. LORD JUSTICE LEVESON: You're absolutely right that we'll be
17. calling a range of people with ideas, but certainly from
18. my perspective it's abundantly clear this is a topic
19. that you've thought about carefully. You've obviously
20. suffered as you've described and had the experiences
21. you've described, whether justifiably or not, and
22. therefore I wanted to make sure that you had the
23. opportunity to say anything you wanted to say on the
24. subject.
25 A. Well, I mean I come to that sort of at the end of my
Page 81

1. statement, yes, that is when I say that I think there
2. are midways that could make everyone happy.
3. The press is, after all, the only industry in this
4. country that has a profound influence over other people,
5. over our citizens, that is regulated only by itself.
6. There's no other industry like that, whether it's
7. medicine or advertising, it's all regulated, and no one
8. calls for those regulators to be tougher than our press,
9. and yet when it comes to itself: no regulation,
10. "we'll do it ourselves"; which, although a lovely idea,
11. which would be fantastic if it had worked, has
12. absolutely been shown not to have worked for the last 20
13. or 30 years. You know, we've had so many last chance
14. saloons and it's been a failure, and this is the big
15. opportunity now, this Inquiry, in my opinion.
16. MR JAY: Thank you. The fifth myth: current privacy law
17. under the Human Rights Act muzzles the press. You make
18. the point a breach of privacy case has never been taken
19. against the Guardian, to your knowledge.
20 A. Yes. There's a lot of squealing, again from the tabloid
21. press, about these injunctions and so on and they say it
22. muzzles the press and it has a chilling effect,
23. et cetera, and I just make the point, well, first of
24. all, no one's taken a privacy case against the Guardian;
25. and secondly, if there's a public interest defence, why
Page 82

1 Q. -- (overspeaking) there you say they don't. You've
2. expressed a view about the Rio Ferdinand case and we'll
3. see what happens to that. Permission to appeal has been
4. refused by the single lord justice, but we understand
5. the application is being renewed.
6. Myth number 7: privacy can only ever be a rich man's
7. toy. That depends a bit on the survival of conditional
8. fee agreements, doesn't it?
9 A. I think it depends on that and on establishing a proper
10. regulator.
11 Q. Yes.
12 A. If you establish a meaningful regulator, if you have
13. your privacy abused or you're libelled, you should be
14. able to go straight to the regulator and skip the whole
15. court process, especially if you're not a person of
16. means, it's a wonderful thing to be able to go to, and
17. I think that would be the most wonderful thing to come
18. out of this Inquiry, if there was a proper regulator
19. that gave access to justice of that kind without having
20. to go through the courts. But there will always be
21. cases when people will have to go through the courts,
22. and when they do, it is scandalous, in my opinion, that
23. this will now be -- if what is going through Parliament
24. now on the back of the Jackson Report happens, people
25. without great means will be excluded from justice.
Page 84

Merrill Legal Solutions  
(+44) 207 404 1400  
www.merrillcorp/mls.com  
8th Floor 165 Fleet Street  
London EC4A 2DY
Day 4 - PM Leveson Inquiry 21 November 2011

1. If you look at the Dowlers, used a CFA to -- if
2. their phone hacking case against the News of the World.
3. They would not have been able to make that case, they
4. would not have been able to prosecute that case without
5. a CFA. Chris Jeffries, the man wrongly accused of that
6. murder down in Bristol, wrongly maligned by the press,
7. had to use a CFA to get justice. Sara Payne, same
8. thing.
9. Without CFAs, those people have no justice, and this
10. whole campaign to restrict the use of CFAs has been very
11. heavily pushed by the tabloid press, and the government,
12. in its infinite obedience to the tabloid press, has
13. simply said, "Yes, fine."
14. Q. Okay, thank you. That's very clear on that point,
15. Mr Grant. The eighth point: most sex exposes (exposes,
16. I think that should be) carry a public interest defence.  
17. I think that you've already made your position clear on that,
18. but --
19. A. I -- I.
20. Q. -- please say whatever you wish to say in addition.
21. A. I say that there are certainly cases where there is
22. a public interest defence. If you're a politician who
23. campaigns on a family values platform, then it's
24. definitely a public interest to have his -- and he's
25. being -- you know, having an extramarital affair or he

Page 85

1. likes to dress up as a nun and sleep with prostitutes,
2. we need to know about it because he's a hypocrite.  But
3. I think that the vast majority of these exposes of
4. people's sex life are not in the public interest and the
5. public interest defences as offered by tabloid
6. newspapers are very flimsy at best. They'll say, oh
7. well, you know, Ryan Giggs trades on his reputation, but
8. he doesn't, he trades -- to me, quite clearly, on the
9. fact that he's a brilliant footballer and I don't
10. believe that anyone is buying a pair of Ryan Giggs
11. football boots because they think that he's a great
12. family man. I think they're buying it because he's a good
13. lots of trophies for Manchester United.
14. Funnily enough, I read in the Independent this
15. morning that apparently I do the same thing, I trade on
16. my good name, and therefore there's a public interest
17. defence in going into my private life, but I wasn't
18. aware I traded on my good name. I've never had a good
19. name. And it's made absolutely no difference at all.
20. I'm the man who was arrested with a prostitute and the
21. film still made tons of money. It doesn't -- it doesn't
22. matter.
23. Q. Okay. I think that's very clear, Mr Grant.
24. A. Okay.
25. Q. Myth number nine: this is the sort of development of the

Page 86

1. Faustian pact idea, isn't it?
2. A. Yes, it's another very common defence of what I would
3. call the privacy invasion industry; some people would
4. call it at tabloid press. What I say is the myth is
5. that people like me want to be in the papers, and need
6. them, and therefore our objections to privacy intrusions
7. are hypocritical.
8. Then I go on to, at some length, explain how that is
9. a myth that in my business -- for instance, what I need
10. is not to be in the Sun or the Daily Mail or the Mirror;
11. it's to make enjoyable films. That is 85 per cent of
12. success. About 10 per cent of success is that the film
13. is then well marketed. You know, if someone cuts a good
14. trailer or a good TV spot.
15. Then right at the end, about 5 per cent of the
16. success might be that just before the film comes out you
17. bang the drum a bit and do a bit of publicity. So it's
18. quite minor and you are under an obligation to do it,
19. not just -- sometimes it's contractual, but more often
20. it's just a moral obligation. Someone put up a lot of
21. money for the film, hundreds of people, sometimes
22. thousands, have worked on this thing for over a year.
23. If you didn't do a little bit of publicity, you'd be
24. about monster, you'd be a bit of a diva, people would
25. hate you, so you have to do a little bit. But it's only

Page 87

1. 5 per cent of what contributes to the success of a film,
2. and within that 5 per cent, how much of that is tabloid
3. newspapers or even newspapers at all? Very little.
4. What everyone does now is they favour broadcast media.
5. You reach many more people faster, you can't be
6. misquoted, so everyone is doing television and radio.
7. If tabloids were so important to the success of
8. a film or the success of an actor or the success of
9. a singer, why is it that, for instance, none of us in
10. the large ensemble cast of "Love Actually" talked to any
11. tabloid newspaper at all when the film was released and
12. the film was still gigantic. The theory put about by
13. the tabloid papers, that they are responsible for the
14. success of films and they create stars, is entirely
15. spurious. It's either their mad arrogance, because they
16. live in this funny cocoon of self-importance, or it's
17. highly convenient because it gives them a chance to the
18. say, "If anyone criticises us, it's hypocritical."
19. Q. Particularly if one goes back towards the start of your
20. successful part of your career in the early 1990s,
21. didn't it help your career that you were quite
22. constantly in the public eye?
23. A. No.
24. Q. Didn't that make you more attractive to future
25. filmmakers, possibly?
<table>
<thead>
<tr>
<th>Page 89</th>
<th>Day 4 - PM</th>
<th>Leveson Inquiry</th>
<th>21 November 2011</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 A. No. That is another --</td>
<td>1 the British press, but when anyone does do an interview,</td>
<td>2 Q. Why do you say that?</td>
<td>2 it is, after all, a bargain. The press of that paper</td>
</tr>
<tr>
<td>2 A. I would argue that's another myth put about by tabloids.</td>
<td>3 gets a boost in sales, they hope, and the person who's</td>
<td>3 What made me attractive to other the filmmakers was that</td>
<td>4 giving the interview gets a bit of noise about their</td>
</tr>
<tr>
<td>4 What made me attractive to other the filmmakers was that</td>
<td>5 forthcoming project. And like any barter, when it's</td>
<td>6 &quot;Four Weddings and a Funeral&quot; made gazillions at the box</td>
<td>7 over, it's over. If I sell you a pint of milk for 50p,</td>
</tr>
<tr>
<td>6 office. That's all they care about. After all, a</td>
<td>8 I would not expect you to come to me forever afterwards,</td>
<td>7 couple of films later, as I say, I was arrested with</td>
<td>9 saying, &quot;You slut, you sold me milk once. I can now</td>
</tr>
<tr>
<td>7 a prostitute, got a lot of -- you couldn't call it</td>
<td>10 help myself to your milk forever.&quot; I would think you</td>
<td>8 positive press, and I was still very hirable because the</td>
<td>11 were mad.</td>
</tr>
<tr>
<td>9 films made money. That's all that's of a</td>
<td>12 a list of hundreds of people in the public eye in this</td>
<td>10 career, that the studios cared about, and audiences only</td>
<td>11 career, who would happily sign up for that. It's such</td>
</tr>
<tr>
<td>10 care about whether the film is entertaining or not.</td>
<td>11 never to mention my name again&quot;, and I could bring you</td>
<td>12 a myth to say oh, we want it so badly, we're so vain,</td>
<td>12 a list of hundreds of people in the public eye in this</td>
</tr>
<tr>
<td>11 I could show you examples of films that is have</td>
<td>12 forget an apology, just make them give an undertaking</td>
<td>13 country who would happily sign up for that. It's such</td>
<td>13 a list of hundreds of people in the public eye in this</td>
</tr>
<tr>
<td>13 wall-to-wall tabloid coverage before they come out and</td>
<td>13 over the years when making settlements, libel or</td>
<td>14 a big myth.</td>
<td>14 a list of hundreds of people in the public eye in this</td>
</tr>
<tr>
<td>14 still die at the box office because they're not</td>
<td>14 whatever, with papers, saying, &quot;Please, forget money,</td>
<td>15 country who would happily sign up for that. It's such</td>
<td>15 a list of hundreds of people in the public eye in this</td>
</tr>
<tr>
<td>15 entertaining. It's a big myth.</td>
<td>15 forget an apology, just make them give an undertaking</td>
<td>16 a myth to say oh, we want it so badly, we're so vain,</td>
<td>16 a list of hundreds of people in the public eye in this</td>
</tr>
<tr>
<td>16 I personally have actually argued with my lawyer</td>
<td>16 never to mention my name again&quot;, and I could bring you</td>
<td>17 we're dying to be in the papers. It's the last thing</td>
<td>17 we're dying to be in the papers. It's the last thing</td>
</tr>
<tr>
<td>17 over the years when making settlements, libel or</td>
<td>17 with teeth, which would not only protect people from</td>
<td>18 we're dying to be in the papers. It's the last thing</td>
<td>18 we're dying to be in the papers. It's the last thing</td>
</tr>
<tr>
<td>18 whatever, with papers, saying, &quot;Please, forget money,</td>
<td>18 anybody wants, to be in a British tabloid paper,</td>
<td>19 we're dying to be in the papers. It's the last thing</td>
<td>19 we're dying to be in the papers. It's the last thing</td>
</tr>
<tr>
<td>19 forget an apology, just make them give an undertaking</td>
<td>20 unnecessary, so long as the work you were doing at that</td>
<td>20 we're dying to be in the papers. It's the last thing</td>
<td>20 we're dying to be in the papers. It's the last thing</td>
</tr>
<tr>
<td>20 never to mention my name again&quot;, and I could bring you</td>
<td>21 moment is okay.</td>
<td>21 we're dying to be in the papers. It's the last thing</td>
<td>21 we're dying to be in the papers. It's the last thing</td>
</tr>
<tr>
<td>21 a list of hundreds of people in the public eye in this</td>
<td>21 Q. You deal with, I suppose, one aspect or the last aspect</td>
<td>21 we're dying to be in the papers. It's the last thing</td>
<td>21 we're dying to be in the papers. It's the last thing</td>
</tr>
<tr>
<td>22 country who would happily sign up for that. It's such</td>
<td>22 of the Faustian pact point in paragraphs 81 to 82 of</td>
<td>22 we're dying to be in the papers. It's the last thing</td>
<td>22 we're dying to be in the papers. It's the last thing</td>
</tr>
<tr>
<td>22 a myth to say oh, we want it so badly, we're so vain,</td>
<td>23 your statement.</td>
<td>23 we're dying to be in the papers. It's the last thing</td>
<td>23 we're dying to be in the papers. It's the last thing</td>
</tr>
<tr>
<td>23 we're dying to be in the papers. It's the last thing</td>
<td>23 A. Yeah.</td>
<td>23 we're dying to be in the papers. It's the last thing</td>
<td>23 we're dying to be in the papers. It's the last thing</td>
</tr>
<tr>
<td>23 A. Yeah.</td>
<td>24 Q. What is the consideration, if one uses a legal term, if</td>
<td>24 Q. Which you say they clearly are not.</td>
<td>24 Q. Which you say they clearly are not.</td>
</tr>
<tr>
<td>24 Q. That, of course, must be right as a matter of common</td>
<td>25 you do an interview with a newspaper or magazine?</td>
<td>25 A. Well, you know, you see them glamourising themselves as,</td>
<td>25 A. Well, you know, you see them glamourising themselves as,</td>
</tr>
<tr>
<td>25 sense, but it surely gives some licence to comment,</td>
<td>25 A. You're saying here, well, it doesn't give a lifelong</td>
<td>26 they're intimidated, not our MPs, because they've been</td>
<td>26 they're intimidated, not our MPs, because they've been</td>
</tr>
<tr>
<td>25 possibly unfavourably, on the subject matter of the</td>
<td>26 licence to publish whatever you like about the subject</td>
<td>27 intimidated, not our MPs, because they've been</td>
<td>27 intimidated, not our MPs, because they've been</td>
</tr>
<tr>
<td>25 interview?</td>
<td>27 matter of the interview?</td>
<td>27 intimidated, not our MPs, because they've been</td>
<td>27 intimidated, not our MPs, because they've been</td>
</tr>
<tr>
<td>25 A. Yes.</td>
<td>27 A. Yes.</td>
<td>27 intimidated, not our MPs, because they've been</td>
<td>27 intimidated, not our MPs, because they've been</td>
</tr>
<tr>
<td>27 Q. That, of course, must be right as a matter of common</td>
<td>27 your positive proposals for the future you've touched on</td>
<td>28 Q. Your positive proposals for the future you've touched on</td>
<td>28 Q. Your positive proposals for the future you've touched on</td>
</tr>
<tr>
<td>28 A. Yeah, of course, that would be fine. Absolutely fine.</td>
<td>28 already and they're encapsulated, are they not, in</td>
<td>29 already and they're encapsulated, are they not, in</td>
<td>29 already and they're encapsulated, are they not, in</td>
</tr>
<tr>
<td>28 But I'm talking here about intrusion, and I have heard</td>
<td>28 paragraph 88 of your statement?</td>
<td>29 paragraph 88 of your statement?</td>
<td>29 paragraph 88 of your statement?</td>
</tr>
<tr>
<td>28 the defence quite frequently from tabloid papers: &quot;Oh,</td>
<td>29 A. Yes. We sort of went over them. I give you -- well,</td>
<td>29 A. Yes. We sort of went over them. I give you -- well,</td>
<td>29 A. Yes. We sort of went over them. I give you -- well,</td>
</tr>
<tr>
<td>29 well, you know, if you have ever talked about your</td>
<td>29 paragraph 86, in a nutshell, it seems clear to me that</td>
<td>29 paragraph 86, in a nutshell, it seems clear to me that</td>
<td>29 paragraph 86, in a nutshell, it seems clear to me that</td>
</tr>
<tr>
<td>29 private life, then you have no defence, you have no</td>
<td>29 it should be unacceptable and illegal to deprive</td>
<td>29 it should be unacceptable and illegal to deprive</td>
<td>29 it should be unacceptable and illegal to deprive</td>
</tr>
<tr>
<td>29 right to an expectation of privacy&quot;, which I think is</td>
<td>29 a person of their fundamental human right to privacy</td>
<td>29 a person of their fundamental human right to privacy</td>
<td>29 a person of their fundamental human right to privacy</td>
</tr>
<tr>
<td>29 absurd. Because anyone -- I mean, as I told you</td>
<td>29 unless there is a real public interest defence. It's</td>
<td>29 unless there is a real public interest defence. It's</td>
<td>29 unless there is a real public interest defence. It's</td>
</tr>
<tr>
<td>29 earlier, I think I've only done two interviews ever with</td>
<td>29 not rocket science and the ways I would protect it are</td>
<td>29 not rocket science and the ways I would protect it are</td>
<td>29 not rocket science and the ways I would protect it are</td>
</tr>
<tr>
<td>29 page 90</td>
<td>29 (1) I would resist the clamour of the privacy-stealing</td>
<td>29 (1) I would resist the clamour of the privacy-stealing</td>
<td>29 (1) I would resist the clamour of the privacy-stealing</td>
</tr>
<tr>
<td>29 (Pages 89 to 92)</td>
<td>29 industry to close down our privacy law as it's emerged</td>
<td>29 industry to close down our privacy law as it's emerged</td>
<td>29 industry to close down our privacy law as it's emerged</td>
</tr>
<tr>
<td>30 Merrill Legal Solutions</td>
<td>29 through common law, through the Human Rights Act, and</td>
<td>29 through common law, through the Human Rights Act, and</td>
<td>29 through common law, through the Human Rights Act, and</td>
</tr>
<tr>
<td>30 (+44) 207 404 1400</td>
<td>29 I would disband the PCC and create a proper regulator</td>
<td>29 I would disband the PCC and create a proper regulator</td>
<td>29 I would disband the PCC and create a proper regulator</td>
</tr>
<tr>
<td>30 <a href="http://www.merrillcorp/mls.com">www.merrillcorp/mls.com</a></td>
<td>29 with teeth, which would not only protect people from</td>
<td>29 with teeth, which would not only protect people from</td>
<td>29 with teeth, which would not only protect people from</td>
</tr>
<tr>
<td>31 8th Floor 165 Fleet Street</td>
<td>29 the British press, but when anyone does do an interview,</td>
<td>29 the British press, but when anyone does do an interview,</td>
<td>29 the British press, but when anyone does do an interview,</td>
</tr>
<tr>
<td>31 London EC4A 2DY</td>
<td>29 it is, after all, a bargain. The press of that paper</td>
<td>29 it is, after all, a bargain. The press of that paper</td>
<td>29 it is, after all, a bargain. The press of that paper</td>
</tr>
</tbody>
</table>
Mr Grant, is there anything else you wish to tell the Inquiry? We've covered the ground --

A. No. I mean, it's a strange form of interview, in the sense that I wish I'd been able to read my two statements out loud first, because, you know, we haven't really -- it's all been me defending positions in them without anyone knowing what the statement actually says.

LORD JUSTICE LEVESON: I think you'll find the statements will be available.

A. Yeah, well, I hope people read it.

MR JAY: They will, Mr Grant, and also all the points, I'd like to think, that you wanted to bring out, you have brought out, but if you feel there's a point that --

MR JAY: They will, Mr Grant, and also all the points, I'd like to think, that you wanted to bring out, you have brought out, but if you feel there's a point that --

A. There is one final point.

Q. Okay, please bring it out.

A. Because I'm tired, I wouldn't mind reading it, actually, seeing as it's in my statement. It's my conclusion.

I just say:

"I don't want to see the end of popular print journalism. I wouldn't want a country that was fawning to power or success. I like and admire and would always want to protect the British instinct to be sceptical, irreverent, difficult and to take the piss and that a free press is, of course, the cornerstone of democracy."

There's no question about that. I just think that there has been a section of our press that has become -- allowed to become toxic over the last 20 or 30 years, its main tactic being bullying and intimidation and blackmail. I think that that needs a lot of courage to stand up to and I feel that it's time -- you know, this country has had historically a good record standing up to bullies, and I think it's time that this country found the courage to stand up to this bully now.

MR JAY: Thank you very much.

A. Okay.

LORD JUSTICE LEVESON: Mr Grant, thank you very much. I'm conscious that a lot of effort went into making the statements you made.

A. Yes.
public domain but in a form that doesn’t damage the anonymity that he has sought and which I have found to be justifiable.

If anybody has any comment about that -- I appreciate you've only just recently seen the suggestions in that regard -- I'd be very, very interested to hear them. As regards other people, I'll make sure that I have a final protocol for you to look at tomorrow, but as I say, I don't think it should really make a difference to whether or not there is an issue that's worthy of ventilation in the Divisional Court, which of course is your decision entirely.

MR CAPLAN: Thank you.

LORD JUSTICE LEVESON: Mr Jay?

MR JAY: Just a couple of points. First, we just received submissions from the Metropolitan Police in relation to the anonymity protocol just this afternoon, so those will have to be considered for obvious reasons.

LORD JUSTICE LEVESON: Yes. Now that's come out, I'll say the reason there hasn't been one is because it was only up to literally the end of Friday that I saw the last one. I wasn't sure we'd got them all -- and indeed, now you've heard that I hadn't got them all -- and I didn't want to finalise anything until we'd heard from anybody. That's what I say in my own defence, which I wasn't going to say anything about.

Right, anything else, Mr Jay?

MR JAY: In relation to HJK, there's one issue which need be touched on, whether when he gives his evidence he will not give evidence in relation to any named newspaper.

In other words, that will be redacted out of his evidence.

LORD JUSTICE LEVESON: Yes. I've made it clear, I think, if not in a ruling then certainly in argument, that in relation to any anonymous witness, in order to protect the position of any of the media, it would be quite wrong to allow names or titles to be identified. I'm not going to make decisions about names and titles. As everybody knows, I'm looking at custom and practices and ethics across the piece, which is why my questions to Mr Grant were of general rather than specific topics. I would adopt the same process for HJK, so if that's a matter of concern to anybody, then they should say so.

Thank you. Well, thank you very much indeed.

I repeat my thanks, as I will to all the witnesses, particularly those who have come, as all have today, voluntarily. Thank you very much.

(4.28 pm)

(The hearing adjourned until 10 o'clock the following day)
Leveson Inquiry

Day 4 - PM

21 November 2011

Page 108
<table>
<thead>
<tr>
<th>Page</th>
<th>Time</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>38:15</td>
<td>87:15</td>
</tr>
<tr>
<td></td>
<td>88:1</td>
<td>95:22</td>
</tr>
<tr>
<td>5,000</td>
<td>15:16</td>
<td></td>
</tr>
<tr>
<td>50</td>
<td>17:3</td>
<td></td>
</tr>
<tr>
<td>50p</td>
<td>91:6</td>
<td></td>
</tr>
<tr>
<td>500</td>
<td>17:4</td>
<td></td>
</tr>
<tr>
<td>56</td>
<td>99:11</td>
<td></td>
</tr>
<tr>
<td>58</td>
<td>99:12,13</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>39:18</td>
<td></td>
</tr>
<tr>
<td>61-year-old</td>
<td>45:23</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>4:4</td>
<td>84:6</td>
</tr>
<tr>
<td>8</td>
<td>7:2</td>
<td>91:18</td>
</tr>
<tr>
<td></td>
<td>81</td>
<td>90:5</td>
</tr>
<tr>
<td></td>
<td>82</td>
<td>90:5</td>
</tr>
<tr>
<td></td>
<td>85</td>
<td>87:11</td>
</tr>
<tr>
<td></td>
<td>86</td>
<td>92:16</td>
</tr>
<tr>
<td></td>
<td>88</td>
<td>92:14</td>
</tr>
<tr>
<td>9</td>
<td>95:16</td>
<td></td>
</tr>
<tr>
<td></td>
<td>98</td>
<td>99:14</td>
</tr>
</tbody>
</table>