

<p>1 Tuesday, 22 November 2011</p> <p>2 (10.00 am)</p> <p>3 Housekeeping</p> <p>4 LORD JUSTICE LEVESON: Yes, Mr Barr.</p> <p>5 MR BARR: Good morning, sir. Our first witness today is</p> <p>6 going to be Mary-Ellen Field. Then we're going to hear</p> <p>7 from Mr Flitcroft, Mr and Mrs Watson, and then this</p> <p>8 afternoon from Mr Coogan.</p> <p>9 So could I call, please, Mary-Ellen Field?</p> <p>10 LORD JUSTICE LEVESON: Just a moment. Yes, Mr Garden.</p> <p>11 MR GARNHAM: Before Mr Barr calls his first witness, sir,</p> <p>12 I rise to express some concern about some of the</p> <p>13 reporting of yesterday's proceedings in this Inquiry.</p> <p>14 It is, with respect, somewhat objectionable that when</p> <p>15 one core participant -- in this case, Mr Grant -- gives</p> <p>16 evidence at the invitation of the Inquiry as to his</p> <p>17 opinion on certain matters, that the following morning</p> <p>18 he should then be accused, in the electronic version of</p> <p>19 the Mail on Sunday, of mendacity and we ask</p> <p>20 rhetorically: are we to expect that everyone who has the</p> <p>21 temerity to give evidence critical of the press is going</p> <p>22 to have to face this the following morning?</p> <p>23 The alternative is that I and perhaps other core</p> <p>24 participants will need to warn our witnesses that they</p> <p>25 must anticipate this as soon as they give evidence, if</p> <p style="text-align: center;">Page 1</p>	<p>1 LORD JUSTICE LEVESON: I'll write that down. All right.</p> <p>2 We will return to it when Mr Caplan returns.</p> <p>3 I think that's better. Mr Sherborne, yes?</p> <p>4 MR SHERBORNE: Sir, I'm not going to complain that</p> <p>5 Mr Garnham has risen to steer my thunder. It's</p> <p>6 obviously a matter that's regarded important enough for</p> <p>7 the police to mention it. I do have a number of things</p> <p>8 I want to say as a result of the reporting that we've</p> <p>9 all read in relation to Mr Grant's evidence as well as</p> <p>10 the Dowlers' evidence yesterday.</p> <p>11 I'm happy, sir, if you think the appropriate time</p> <p>12 for me to raise these matters is when Mr Caplan is here,</p> <p>13 although he may benefit from having heard what I say and</p> <p>14 having had a little time to digest it. I'm entirely in</p> <p>15 your hands as to how you want me to deal with this.</p> <p>16 LORD JUSTICE LEVESON: Well --</p> <p>17 MR SHERBORNE: This is a matter which is significant and is</p> <p>18 one which needs to be addressed as soon as possible.</p> <p>19 LORD JUSTICE LEVESON: I'm comfortable about that. Is it</p> <p>20 likely to create any difficulty in relation to the first</p> <p>21 witness? Does anybody -- Mr Garnham, you don't know.</p> <p>22 Mr Barr, you've been given forewarning of the questions</p> <p>23 that core participants wish you to ask this witness. Is</p> <p>24 there anything in relation to her evidence that's likely</p> <p>25 to give rise to this sort of issue?</p> <p style="text-align: center;">Page 3</p>
<p>1 it's evidence that some newspapers don't approve of, and</p> <p>2 with respect, it seems to us that that is likely to have</p> <p>3 a seriously deleterious effect on the Inquiry you're</p> <p>4 conducting, sir.</p> <p>5 LORD JUSTICE LEVESON: I understand the point. Of course it</p> <p>6 must be right, Mr Garnham, that first of all these</p> <p>7 proceedings can be, as they are being, reported as</p> <p>8 widely as the press wish.</p> <p>9 MR GARNHAM: Plainly, sir.</p> <p>10 LORD JUSTICE LEVESON: And secondly, that there must be some</p> <p>11 room for comment. How balanced that is going to be is</p> <p>12 always going to be a difficult judgment.</p> <p>13 I notice that Mr Caplan isn't here. Is Mr Caplan --</p> <p>14 MS PALIN: Sir, Mr Caplan is detained in a short hearing in</p> <p>15 the Administrative Court that started at 9.30. He's</p> <p>16 expected to be here shortly. I know Mr Grant's evidence</p> <p>17 is a subject which he wishes to address the Inquiry on,</p> <p>18 so perhaps we could defer dealing with Mr Garnham's</p> <p>19 point until later in the morning.</p> <p>20 LORD JUSTICE LEVESON: I think that may be a good idea.</p> <p>21 MR GARNHAM: So there's no doubt, the particular observation</p> <p>22 which gives us concern is a comment in the Mail Online</p> <p>23 to the effect that -- and I have it in front of me:</p> <p>24 "Mr Grant's allegations are mendacious smears driven</p> <p>25 by his hatred of the media."</p> <p style="text-align: center;">Page 2</p>	<p>1 MR BARR: I think that's most unlikely, sir. I sincerely</p> <p>2 hope not.</p> <p>3 LORD JUSTICE LEVESON: Yes, all right. Thank you.</p> <p>4 Mr Sherborne, although I recognise that there may be</p> <p>5 advantage in you outlining your concerns in the absence</p> <p>6 of Mr Caplan so that he can read them later, I think</p> <p>7 it's probably better to wait for him, and if he needs</p> <p>8 a few minutes, then he can have it.</p> <p>9 MR SHERBORNE: Sir, the concerns are not just mind. We have</p> <p>10 had concerns expressed by other core participants who</p> <p>11 are coming to give evidence about the sort of</p> <p>12 intimidatory tactics that we've seen in the press this</p> <p>13 morning.</p> <p>14 LORD JUSTICE LEVESON: I understand. We'll address them</p> <p>15 when Mr Caplan has returned.</p> <p>16 Mr Sherborne, I have one question to ask you.</p> <p>17 I became slightly concerned during the course of</p> <p>18 Mr Grant's evidence yesterday that he hadn't understood</p> <p>19 that the balance decision that I made about</p> <p>20 cross-examination inevitably meant that Mr Jay would</p> <p>21 have to put questions that weren't necessarily of his</p> <p>22 making, but which had been provided to him by other core</p> <p>23 participants, which they wished to have tested, and</p> <p>24 I hope that -- I mean, I sought to explain it to him</p> <p>25 halfway through his evidence, but I hope that those who</p> <p style="text-align: center;">Page 4</p>

<p>1 are coming do understand the wide-ranging role that                  2 counsel to the Inquiry has to adopt in order to make the                  3 proceedings fair, and not to require multifarious --                  4 that's absolutely the wrong word -- many different                  5 cross-examinations.                  6 MR SHERBORNE: Sir, I appreciate that point. Of course                  7 there are matters which these witnesses have come here                  8 to deal with of their own experience, and there are                  9 points that can be put to them and which have been put                  10 to them which have originated not from the Inquiry but                  11 from the other core participants. I understand that.                  12 The danger, if I may say it, lies in the perception                  13 that those are points which are adopted by the Inquiry.                  14 I use the word "perception" not because it's Mr Grant's                  15 perception that matters; it is the perception of the                  16 public, and if one wants to see -- or more importantly,                  17 the perception as portrayed in the press. If you look                  18 at the coverage this morning of what happened yesterday,                  19 it's quite clear that that is a perception that has been                  20 picked up by the media.                  21 LORD JUSTICE LEVESON: We're on day two so we have a long                  22 way to go. So that it's abundantly clear, the purpose                  23 of the counsel to the Inquiry is specifically to put not                  24 only questions that they wish to investigate, but also                  25 those which the other core participants wish to</p> <p style="text-align: center;">Page 5</p>	<p>1 LORD JUSTICE LEVESON: I understand the point. We'll                  2 doubtless return to it. All right. Yes, Mr Barr.                  3 MR BARR: Thank you, sir. I call Mary-Ellen Field.                  4 MS MARY-ELLEN FIELD (sworn)                  5 Questions from MR BARR                  6 MR BARR: Good morning.                  7 A. Good morning.                  8 Q. Could you tell the Inquiry your full name, please?                  9 A. My name is Mary-Ellen Field.                  10 Q. You've provided a contact address to the Inquiry so I do                  11 not need to ask you about that.                  12 LORD JUSTICE LEVESON: Ms Field, as I've said to others,                  13 thank you very much for coming. If you need a break at                  14 any time, don't hesitate to say so. I'm conscious that                  15 you're talking about things -- I'm aware that you                  16 mentioned them at the seminar, that some of the things                  17 may be things you would prefer not to be airing in                  18 public, but I'm grateful to you for doing so                  19 nonetheless.                  20 A. Thank you, sir.                  21 MR BARR: You've voluntarily provided a witness statement to                  22 the Inquiry, which is signed and dated 26 October of                  23 this year. Are you familiar with the contents of that                  24 statement?                  25 A. I am, Mr Barr.</p> <p style="text-align: center;">Page 7</p>
<p>1 investigate, and as I made clear to Mr Grant yesterday,                  2 the mere fact that Mr Jay is asking the questions                  3 doesn't mean to say that he adopts or believes them.                  4 It may be that there ought to be some form of words                  5 adopted for some of the questions that identify that                  6 they come from others rather than from the Inquiry, but                  7 of course it shouldn't be assumed that because they're                  8 even being asked by the Inquiry they are necessarily                  9 reflecting my thinking, because one of the tasks of                  10 counsel to the Inquiry is to put out the possibilities                  11 so that I might consider them, rather than merely to                  12 reflect where I am or where I might be.                  13 MR SHERBORNE: Sir, I understand that course is an approach                  14 that's going to be adopted in relation to all the                  15 witnesses. But as you yourself have said -- and with                  16 respect, rightly -- there is a fundamental distinction                  17 between the core participant victims coming to give                  18 evidence to this Inquiry as to their experiences and the                  19 witnesses who come to give evidence on behalf of the                  20 newspapers, who, to use my phrase and not yours, are in                  21 the dock, in the sense that it is their practices that                  22 are being scrutinised, not the practices, culture and                  23 ethics of the individuals who come to give evidence to                  24 this Inquiry about what they've suffered at the hands of                  25 the press. I say no more than that.</p> <p style="text-align: center;">Page 6</p>	<p>1 Q. And are they true to the best of your knowledge and                  2 belief?                  3 A. They are.                  4 Q. Thank you. You tell us near the start of the statement                  5 that you are a claimant in the voicemail interception                  6 cases which are currently being managed by                  7 Mr Justice Vos in the Chancery Division of the High                  8 Court; is that right?                  9 A. That's correct.                  10 Q. And that litigation is still ongoing?                  11 A. It is.                  12 Q. Can I take you back, please, to 2003. In your                  13 statement, you tell us that at that time -- indeed,                  14 I think it's still the case -- you were working as an                  15 expert in the protection, management and exploitation of                  16 intellectual property rights.                  17 A. I am. I was.                  18 Q. Was and am?                  19 A. Yes.                  20 Q. Thank you. And here there may be a difference: in 2003,                  21 you were working for a company called Chiltern; is that                  22 right?                  23 A. Yes, Chiltern -- it no longer exists, it was bought by                  24 BDO Stoy Hayward. It was an international tax and                  25 accounting firm.</p> <p style="text-align: center;">Page 8</p>

<p>1 Q. We'll hear a little bit more about the circumstances in 2 which you came to lead Chiltern in due course, but 3 perhaps you could tell us about 2003 and how it came to 4 be that you were working for Chiltern? 5 A. I was offered a job by Chiltern at the beginning of 2003 6 and I began there in April -- at the end of March 2003. 7 Q. We understand from your statement that through your work 8 for Chiltern you were introduced to the supermodel Elle 9 Macpherson? 10 A. Yes, virtually the first week I started there, I was 11 asked to look at some -- a box of contracts that -- 12 she'd only recently become a client -- a tax client of 13 the firm, and one of the tax partners asked me to look 14 at some contracts because it was not an area of 15 expertise that he had and there were licence agreements 16 and various other agreements that you would expect 17 a model to have. 18 Q. So did there come a time when you sat down with 19 Elle Macpherson to discuss business? 20 A. Yes, the next day. 21 Q. And how did that go? 22 A. It was excellent. There were a lot of issues that I had 23 found in the box of documents that were -- that needed 24 to be dealt with immediately. Some licences had expired 25 and needed to be renegotiated and we got on very well.</p> <p style="text-align: center;">Page 9</p>	<p>1 Q. I understand from your statement that the relationship 2 became close enough that an office was provided for Elle 3 Macpherson at Chiltern's premises? 4 A. Yes, we'd had some problems in one particular case. 5 I was unhappy about her giving interviews to the media 6 at home, and in one instance the journalist asked if he 7 could go to the lavatory and she showed him where it was 8 and then he came back on his own and went into the 9 dining room and drawing room and looked at some of the 10 paintings and wrote them up in an item, which is, you 11 know, just a magnet for burglars, so after that I said, 12 "I don't think it's a good idea to have journalists in 13 the house." 14 So in around August 2005, she said, "Why don't 15 I move into your office?" And I asked my CEO, who was 16 a man, and it took them probably three nanoseconds to 17 make up his mind that it would be a good idea for 18 Elle Macpherson to have an office in our building and so 19 she moved in quickly after that. 20 Q. I think people will be able to readily understand that 21 evidence. Perhaps we can go now to one of the exhibits 22 to your witness statement. It's an article which deals 23 with your business relationship with Elle Macpherson. 24 Perhaps I can ask the technician to put up on the screen 25 the document which ends with reference number 31806,</p> <p style="text-align: center;">Page 11</p>
<p>1 We're both from Sydney. We got on very well and she 2 decided immediately to retain me to look after that side 3 of her life. I said maybe she'd like to wait and think 4 about it, but she makes up her mind quickly on things 5 and I started working for her from that day, or she 6 became a client of mine from that day. 7 Q. Thank you. And did the business relationship between 8 you and Elle Macpherson blossom? 9 A. Yes. It was very successful for both of us, both 10 financially and from a developmental thing. We had -- 11 we did lots of exciting things. 12 Q. And how much contact did you have with her? 13 A. Well, having a supermodel as a client -- I didn't have 14 any experience with celebrities before that and working 15 with a celebrity when you're used to working with large 16 corporations or large governments like I always have, 17 it's a sort of a learning curve for everybody because, 18 without meaning to be insulting, often those sort of 19 people don't understand about billable hours and things 20 and you do tend to have to overservice, but it was fun 21 and -- from the point of view of my billings, it was 22 only a very small part of the billings, but it did take 23 a lot of time. 24 Q. Was it professionally satisfying? 25 A. It was very professionally satisfying.</p> <p style="text-align: center;">Page 10</p>	<p>1 please. Can you see it? 2 A. Yes, I can. 3 Q. This, we're told in your statement, is an article from 4 Accountancy Age Best Practice magazine; is that right? 5 A. Yes, the October 2005 edition. 6 Q. I see. This is an article which seems to blend 7 interviews with both yourself and Elle Macpherson. Is 8 that correct? 9 A. Yes. It was -- I don't know if they still do it, but 10 Accountancy Age were trying to get people in the 11 industry to get clients to sort of give them a good, you 12 know, review, and the PR -- and PR people at Chiltern 13 asked Elle if she would give this interview. I wasn't 14 present when she gave the interview and I was -- it was 15 a very flattering article and I was very touched that 16 she had given that -- say those things about me. 17 Q. It is indeed flattering. Those who are following the 18 Inquiry on the Internet will in due course be able to 19 read the whole article, which will be posted later 20 today, but for present purposes, can I perhaps choose 21 a couple of passages. The first one has been put up on 22 the screen. It reads: 23 "Mary-ellen is the nuts and bolts of the machine on 24 the commercial side. I work in many countries, so 25 I need to have advisers who can cope with all the</p> <p style="text-align: center;">Page 12</p>

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<p>1 international interests."</p> <p>2 Could we now move to the second passage that I've</p> <p>3 asked the technicians to highlight. For those following</p> <p>4 from the hard copy, it's the last paragraph on the page.</p> <p>5 Here we have another quotation from Elle Macpherson:</p> <p>6 "'She's a fantastic communicator and quip as</p> <p>7 a whip,' says Macpherson. 'she has a fantastic stroke</p> <p>8 of knowledge and a very good mediator. She's one of my</p> <p>9 right-hand people. I couldn't do this business without</p> <p>10 her.'"</p> <p>11 So I don't wish to make you blush, Ms Field, but</p> <p>12 it's fair to say, isn't it, that this was a thriving</p> <p>13 business relationship?</p> <p>14 A. Yes.</p> <p>15 Q. And I understand from your statement that your</p> <p>16 relationship went beyond strictly professional matters</p> <p>17 and there was a friendship between you; is that right?</p> <p>18 A. Well, I don't know -- she confided in things that you</p> <p>19 probably wouldn't -- confided in me things that you</p> <p>20 wouldn't normally confide, family issues that you</p> <p>21 wouldn't normally expect a client to confide in you</p> <p>22 about.</p> <p>23 Q. Perhaps as an example of that, could I ask the</p> <p>24 technician, please, to display the document the</p> <p>25 reference number of which ends 31808. A slight</p> <p style="text-align: center;">Page 13</p>	<p>1 Elle Macpherson's private life and she separated from</p> <p>2 her boyfriend, who was the father of her children?</p> <p>3 A. Yes, but that had been planned for a long time. It</p> <p>4 wasn't a surprise to us and it had been kept out of the</p> <p>5 media.</p> <p>6 Q. Was that something that became a matter for press</p> <p>7 interest?</p> <p>8 A. Yes, obviously, because they were two very high profile</p> <p>9 people.</p> <p>10 Q. Was it a matter which you discussed with</p> <p>11 Elle Macpherson?</p> <p>12 A. She had begun discussing that with me in October 2003</p> <p>13 and had sworn me to secrecy, which was very difficult</p> <p>14 because her partner was also a client of the firm, and</p> <p>15 I used to see a lot of him and got on very well with him</p> <p>16 and it was quite difficult for me to be in that</p> <p>17 position, and so, as many people here who work for</p> <p>18 professional services firms, it's a bit difficult when</p> <p>19 a client asks you to keep something secret and, you</p> <p>20 know, it's sort of a bit difficult, bit of an issue, but</p> <p>21 she started planning this back in October 2003, so</p> <p>22 I found a family lawyer for her and she worked through</p> <p>23 that lawyer.</p> <p>24 Q. Thank you. As time passed and the media published</p> <p>25 stories about Elle Macpherson's private life, did there</p> <p style="text-align: center;">Page 15</p>
<p>1 technical hitch for a moment. We'll wait and see if</p> <p>2 that can be resolved. Thank you. If you could magnify,</p> <p>3 please, the card at the bottom of the page.</p> <p>4 Your statement exhibits a number of cards from Elle</p> <p>5 Macpherson. This one is dated 1 October 2005. So have</p> <p>6 I understood correctly, that's about the same time as</p> <p>7 the article?</p> <p>8 A. Yes.</p> <p>9 Q. It reads:</p> <p>10 "Dear Mary-Ellen, thank you for the endless days and</p> <p>11 infinite dedication to me and my brand. I really,</p> <p>12 really, really respect and appreciate it."</p> <p>13 And it's a heart sign and for reasons of confidence,</p> <p>14 we've redacted Elle Macpherson's signature, but that has</p> <p>15 been seen by the Inquiry team and by core participants.</p> <p>16 Can I turn now to the question of press reporting</p> <p>17 about Elle Macpherson. You tell us in your statement</p> <p>18 that there was an article in 2003. We need not go into</p> <p>19 the details of the article, but it led, you tell us, to</p> <p>20 some successful litigation by Macpherson against</p> <p>21 a newspaper?</p> <p>22 A. Yes, against the Sun. An article was run in October</p> <p>23 that Elle objected to and they settled in February 2004,</p> <p>24 and the Sun published an apology.</p> <p>25 Q. Then you tell us that during 2005 there was a hiatus in</p> <p style="text-align: center;">Page 14</p>	<p>1 come a point in time where there was a concern that</p> <p>2 there might be leaks?</p> <p>3 A. Yes. In -- around -- just before she moved into our</p> <p>4 offices -- and I think that was another reason why she</p> <p>5 wanted to move in -- stories were appearing. Mostly</p> <p>6 they were silly tittle-tattle, the sort of things that</p> <p>7 Mr Grant was talking about yesterday. Silly</p> <p>8 tittle-tattle things that the sort of people that</p> <p>9 read -- that sell those sort of papers, but she was very</p> <p>10 concerned and she was concerned that there were</p> <p>11 listening devices in the house and I have to say I was</p> <p>12 concerned as well. So I talked to some security people</p> <p>13 and they said, you know, you can avoid that if you get</p> <p>14 'pay as you go' phones, mobile phones that are not on an</p> <p>15 account, so -- like terrorists use. So that was a bit</p> <p>16 much trouble, she didn't want to do that, so she said,</p> <p>17 "Well, get the house swept for me, get the house checked</p> <p>18 for me." So I found a reputable security company and</p> <p>19 obviously I couldn't ring her and tell her that we were</p> <p>20 going to do that because if they were listening, it</p> <p>21 would be pointless. So my husband and I drove over to</p> <p>22 her place in Kensington and I rang the door bell and she</p> <p>23 came out and we stood out on the street and talked</p> <p>24 about.</p> <p>25 So I had -- the next Monday, the chap came and he</p> <p style="text-align: center;">Page 16</p>

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<p>1 was there all day and we checked the car and the sort of</p> <p>2 things that Mr Grant talked about yesterday. We had the</p> <p>3 house checked, we had the car checked, we had all the</p> <p>4 phones checked and he found nothing, but we now know</p> <p>5 that isn't how they were getting the messages.</p> <p>6 Q. That's what we'll come to in just a moment. Could I ask</p> <p>7 you to speak a little bit more slowly, please, for the</p> <p>8 sake of the stenographer.</p> <p>9 A. Sorry.</p> <p>10 Q. Could you tell us, after you'd arranged for the sweep</p> <p>11 and taken the other precautions which you've just</p> <p>12 described, did the media coverage of Elle Macpherson's</p> <p>13 private life stop?</p> <p>14 A. No, it got worse.</p> <p>15 Q. And you tell us in your witness statement that there was</p> <p>16 a particular story which concerned custody of the</p> <p>17 children?</p> <p>18 A. Yes, but it was an -- it was a non-story because it</p> <p>19 wasn't an issue. I don't -- I don't really want --</p> <p>20 correct me if I'm wrong -- to go too much into people's</p> <p>21 children --</p> <p>22 Q. No, there's no need to.</p> <p>23 A. -- but she'd separated from her partner and they weren't</p> <p>24 married, so as -- I've been an expert witness for a long</p> <p>25 time --</p> <p style="text-align: center;">Page 17</p>	<p>1 was published. We had a big event at the Wallace</p> <p>2 Collection in Manchester Square, and we had about 200</p> <p>3 guests and we launched a range of body products for</p> <p>4 Elle, and we hadn't been able to have the proper launch</p> <p>5 because the bombings happened in July and the launch was</p> <p>6 planned for the next day, so we obviously couldn't do it</p> <p>7 the next day.</p> <p>8 So we put it off until 3 November when we had the</p> <p>9 event, which was very successful and Elle was getting</p> <p>10 very good at speaking to PowerPoint presentations, and</p> <p>11 we did a presentation about the new products that we'd</p> <p>12 launched at Boots and she had asked me to ask</p> <p>13 Suzy Menkes, as you've said, who is the fashion editor</p> <p>14 of the International Herald Tribune. And Suzy came and</p> <p>15 I sat with her while Elle was speaking and at the end of</p> <p>16 the event, she said, "Oh, Elle, that was fantastic,</p> <p>17 could you come and speak at the IHT Luxury event in</p> <p>18 Dubai in December?" And Elle said, yes, that would be</p> <p>19 great, but could she organise it with me because I would</p> <p>20 have to go with her.</p> <p>21 Organising events was not part of my job</p> <p>22 specification. As you've described, I looked after her</p> <p>23 intellectual property rights and her business.</p> <p>24 I didn't -- she had a manager in Australia who used to</p> <p>25 manage events like this. So you're in the position --</p> <p style="text-align: center;">Page 19</p>
<p>1 Q. If I could just stop you there. I don't think there's</p> <p>2 any need to go into the details.</p> <p>3 A. It was just that we were planning the -- she thought</p> <p>4 there might be litigation and we were planning it and</p> <p>5 I was saying to her -- and this is what we were</p> <p>6 discussing on the phone -- that she needed to tell the</p> <p>7 lawyers everything, because if you don't tell the</p> <p>8 lawyers the whole situation then you're tying their</p> <p>9 hands behind their backs. So I suggested that she</p> <p>10 needed to tell -- to avoid anything like this in the</p> <p>11 future, she needed to be honest with her family lawyer,</p> <p>12 and she agreed with me and she did.</p> <p>13 Q. Can I take from your answers that you were privy to</p> <p>14 intimate details about Elle Macpherson's private life --</p> <p>15 A. I used to attend --</p> <p>16 Q. -- at that stage?</p> <p>17 A. I on several occasions attended meetings with the family</p> <p>18 lawyer.</p> <p>19 Q. You then describe in your witness statement how matters</p> <p>20 came to a head. In particular, you tell us that there</p> <p>21 was a meeting between you and the fashion editor of the</p> <p>22 International Herald Tribune, Suzy Mekes. Is that</p> <p>23 right?</p> <p>24 A. Yes. Can I just go back? It was after -- about three</p> <p>25 weeks after the flattering article in Accountancy Age</p> <p style="text-align: center;">Page 18</p>	<p>1 she says, "Can you do it?" And then she said to Suzy:</p> <p>2 "Oh, perhaps you two could meet in the next week or so</p> <p>3 and organise it?" So when I went back to -- when I went</p> <p>4 to the office the next day, I asked my PA to set up</p> <p>5 a meeting with Suzy Mekes in ten days' time and we</p> <p>6 organised to have tea at the Dorchester from about ten</p> <p>7 days after that.</p> <p>8 Q. Thank you. You tell us that in fact before that meeting</p> <p>9 could take place, something happened to intervene. You</p> <p>10 were telephoned by Elle Macpherson's lawyer?</p> <p>11 A. I was, who I had appointed for her, yes.</p> <p>12 Q. Mr Carter-Silk?</p> <p>13 A. Yes.</p> <p>14 Q. Can you tell us about that telephone call, please?</p> <p>15 A. He told me that -- it was only about three days before</p> <p>16 I was due to have afternoon tea with Suzy Menkes, and he</p> <p>17 told me that I was not to go, that Elle didn't want me</p> <p>18 to go, that she was not prepared to have me speaking to</p> <p>19 the press anymore. And I was astounded, because I</p> <p>20 didn't speak to the press. As I said, it wasn't my job.</p> <p>21 I'd only ever once spoken to a journalist when I was</p> <p>22 with Elle and that was Guy Dennis, who was at the</p> <p>23 Telegraph then, which was back in 2004. And I was</p> <p>24 amazed, so I called Elle and I said, "Alex has just</p> <p>25 called me and said you don't want me to go to this</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 lunch -- this afternoon tea with Suzy Menkes", and she  2 was, the first time ever, really grouchy with me and she  3 said, "I can't have you speaking to the media. You've  4 been speaking to the press without my permission." And  5 I thought she was just having a bad day, so I didn't  6 worry about it too much and I got my PA to take the  7 afternoon tea out of my diary and then, when the  8 afternoon tea was supposed to take place -- I was due to  9 meet her at 3.00 and when I -- I had another meeting  10 scheduled and I got a call from my PA saying that she'd  11 heard from Suzy Menkes' PA, who said she was waiting at  12 the Dorchester for me, so they'd told me not to speak to  13 the media but neglected to tell the other end that, you  14 know, I wasn't coming. So nobody met her.  15 Q. Just so that we can be absolutely clear as to the  16 position, had you been speaking to the media about  17 Elle Macpherson?  18 A. Absolutely not. As I said, the only journalist I'd ever  19 spoken to was Guy Dennis from the Telegraph at the  20 Drapers conference in November 2004 and the girl from  21 the -- whose name escapes me, who wrote that article in  22 the Accountancy Age, but I'd never -- I didn't know --  23 until this year, I'd probably met four journalists in my  24 entire life.  25 Q. If we move on now in your statement, you tell us that</p> <p style="text-align: center;">Page 21</p>	<p>1 the Internal Revenue Service in the United States for --  2 since 2002 on the Glaxo dispute with the IRS, and we  3 were very busy at that time and a lot -- we'd had a lot  4 of discovery material come in and I was frankly not --  5 I had other things to do than worry about supermodels  6 because there wasn't anything that specifically needed  7 to be done, and I was also very busy with Allied Domecq  8 because they were launching a new range in New York, and  9 I had, bizarrely, not listened to any of my voicemails  10 that day.  11 When I got home -- my battery had run out and  12 I couldn't listen to it in the cab on the way home, and  13 when I got home, my husband said, "Why didn't you call  14 me?" He said, "Alex rang today and he told me that  15 you're going to get fired on Thursday. You've been  16 speaking to the press without Elle's permission and she  17 knows that you wouldn't do it on purpose but you did it  18 because you're a alcoholic." I said, "Excuse me?"  19 Anyway, the next minute my phone and it was Tatiana,  20 my friend who I'd just been out with, my friend and  21 client, and she said that Mr Carter-Silk had rung her on  22 her mobile number because she had given him her business  23 card and her mobile number was on it, and he had said  24 the same thing to her, that I was going to be fired  25 unless I came to this meeting at his offices around the</p> <p style="text-align: center;">Page 23</p>
<p>1 unsettled though you were by this turn of events, you  2 carried on with your work and there was a meeting that  3 you attended at which a lawyer from Allied Domecq was  4 present and also Mr Carter-Silk?  5 A. Yes, that was -- as I said earlier, celebrity work was  6 a very small part of my case load, and I had worked for  7 Allied Domecq for a long time on the Courvoisier  8 account. I'd written the original strategy for it back  9 in 1996 and then in about 2004 I started working on it  10 again. We had a meeting at Claridges and they said they  11 were looking to appoint external lawyers, some -- for  12 a particular job, and could I recommend someone. So  13 I recommended Mr Carter-Silk and he came along to the  14 meeting and he came to Claridges to see Tatiana  15 Whytelord, who was trademark counsel at Allied Domecq,  16 and two of her colleagues.  17 Q. Thank you. Can you tell us, please, how that meeting  18 went?  19 A. It was horrible. He was rude to me, he was rude to  20 the -- his potential clients, my existing clients, and  21 then he left. So we all went out to dinner in  22 St Christopher's Place at Pizza Express and then I went  23 home.  24 Now, that day I had been very busy. As I've said in  25 my witness statement, I had been an expert witness for</p> <p style="text-align: center;">Page 22</p>	<p>1 corner in Aldwych. Unless I came to this meeting on  2 Thursday and agreed to do what I was told that I had to  3 do, I would be fired.  4 I thought they'd all gone mad. So I just went to  5 sleep and went to work in the morning, and went to see  6 my CEO and ask him what was going on, and he said, "Oh,  7 Elle's made a complaint. It's nothing, don't worry  8 about it."  9 And so I asked my PA what was going on and she said,  10 "Oh, they have put something about a marketing meeting  11 in there", but Matthew, my CEO, is also going.  12 I thought: "He doesn't know anything about marketing.  13 He's an accountant."  14 And I was -- I had -- I was to so busy, I was  15 just -- I thought they'd all gone mad and I didn't take  16 too much notice of it. But on the Tuesday while I was  17 at work, Mr Carter-Silk rang my husband again and said  18 that if I didn't go to this meeting, Chiltern would fire  19 me, that Elle had proposed that I be sent to rehab to  20 recover from my alcoholism, to the same place that she  21 goes to, and that they will pay for it and then I would  22 then get better and when I came back after five weeks,  23 everything would be lovely. Well, I honestly thought --  24 I mean, put yourself in my position. What would you  25 think?</p> <p style="text-align: center;">Page 24</p>

1 My husband said to Mr Carter-Silk -- and said it  
 2 again on the Thursday: "I've been married to my wife  
 3 for 33 years. I think I might know if she was an  
 4 alcoholic", but --  
 5 Q. Perhaps I can just pause you there. Again, so we can be  
 6 absolutely clear, were you an alcoholic?  
 7 A. No. No.  
 8 Q. So you've been asked, in the circumstances that you've  
 9 described, to attend a meeting?  
 10 A. Yes, at Manches around the corner.  
 11 Q. You tell us in your statement that the meeting was, as  
 12 you say, at Manches on 24 November 2005 and that you did  
 13 attend?  
 14 A. Yes. That was a big mistake. I called -- obviously  
 15 I've always worked with lawyers and I know lots of  
 16 lawyers and I called friends, and one of them on the  
 17 Wednesday evening organised for me to see an employment  
 18 lawyer, and he said what every other lawyer I talked to  
 19 said: "Do not go to that meeting under any  
 20 circumstances. Go and see the HR people at Chiltern and  
 21 if you don't get any satisfactory explanation, resign  
 22 and sue for constructive dismissal."  
 23 Well, I didn't do that, obviously. Resigning and  
 24 suing for constructive -- constructive dismissal is  
 25 a really difficult thing and I have a seriously

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1 handicapped, disabled child who will never be able to  
 2 look after himself, so just walking away from a very  
 3 high-paying job is not really a great idea. I also  
 4 thought they'd all gone mad and that I could go to this  
 5 meeting and I could convince them that they had all  
 6 turned into lunatics.  
 7 I just thought that's what I could do, and they were  
 8 breaking all the employment rules insisting that my  
 9 husband came. What did my husband have to do with it?  
 10 He didn't have anything to do with Elle and he didn't  
 11 have anything to do with where I worked. But anyway, we  
 12 went, which was a very stupid thing to do.  
 13 Q. If I can now ask you about that meeting. You tell us  
 14 you went to try and persuade them that they were wrong.  
 15 What in fact happened?  
 16 A. The meeting was set for 10. My husband and I got there  
 17 just before 10 and Elle came downstairs -- there's sort  
 18 of an atrium thing. She came downstairs and said she  
 19 wanted to see me on my own. Again, I was very stupid,  
 20 I shouldn't have done that. So I went in there and she  
 21 put her arms around me and cries and tells me that,  
 22 you know, she knows what it's like to be an alcoholic --  
 23 that's a matter of public record, so I'm not saying  
 24 anything I shouldn't say -- and that she's going to help  
 25 me and she knows that I would never have spoken to the

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1 media were it not for my alcoholism.  
 2 I just was speechless. I said, "Can you give me an  
 3 example of when I've done this?" She said, "You've done  
 4 11 things." I said, "Tell me what the 11 things are",  
 5 but she wouldn't, and I said, "You can't haul me in  
 6 here, tell me I've done something and then not tell me  
 7 what I've done." And she said, "I'm not allowed to tell  
 8 you", and she said, "If you don't do what we want,  
 9 Matthew [my CEO] will come in here and you'll be fired."  
 10 So I was just -- I mean, I don't know, it sounds  
 11 like a B movie, but it was -- and after half an hour of  
 12 psycho-babble, I said I wanted to see my husband, so my  
 13 husband came in, followed by Mr Carter-Silk, one of my  
 14 colleagues from work, Fiona Hoxton-Moore(?) and  
 15 Matthew Wickers, our CEO, and they proceeded to  
 16 basically trash my reputation, trash my everything, and  
 17 then say I had to go to this place and I had to go on  
 18 the Monday.  
 19 Q. Did you go?  
 20 A. I wasn't going to go. When I went home that night, it  
 21 was 11 -- as you know, I'm Australian. There's 11  
 22 hours' difference this time of the year because of  
 23 daylight saving, and I rang my oldest friend, who's  
 24 a lawyer, but also at that time was the Federal Attorney  
 25 General of Australia, and I told him what had happened.

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1 We've been friends since I was 15 and we're godparents  
 2 to each other's children and I told him what had  
 3 happened and he just was speechless and said exactly  
 4 what my lawyer friends in London had said: "Do not go  
 5 there. Resign immediately and sue for constructive  
 6 dismissal." But as I've said, I'm an idiot and I didn't  
 7 do that.  
 8 So the next day I was still determined that  
 9 I wouldn't go. My CEO had gone to Spain to play golf  
 10 and he sent me a text saying, "You don't have to do this  
 11 if you don't want to." So I went down to Elle's office  
 12 in the building and I showed her the text and I said,  
 13 "Look, I don't know what's going on here but he says  
 14 I don't have to go." And she said, "Oh, he's only  
 15 saying that. If you don't go, you'll be fired." And  
 16 she said, "I'm going home ..." to pick up her older son,  
 17 who had started school then, "... and then I'll come  
 18 back and I want to talk to you."  
 19 So she came back and she parked up on the forecourt  
 20 of the building where we were, chucked the driver out of  
 21 the car, and spent an hour -- she totally broke me down  
 22 and I gave in. I know I'm an idiot, but I gave in and  
 23 I went to this horrible place.  
 24 Q. When you went to The Meadows, were you seen there by  
 25 medical experts?

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<p>1 A. I was.</p> <p>2 Q. What did they conclude about whether or not you were an</p> <p>3 alcoholic?</p> <p>4 A. Well, for the first ten days you're sort of in this</p> <p>5 hospital thing, where they -- there's no plugs in the</p> <p>6 hand basin in case you drown yourself in the hand basin,</p> <p>7 and all these strange people -- I mean, I've never even</p> <p>8 had a cigarette in my life. I didn't even know what</p> <p>9 these people were talking about most of the time. Plus</p> <p>10 they try to make you take anti-depressants or some sort</p> <p>11 of -- and I wouldn't take them, so that makes them think</p> <p>12 you're hostile. Then because I'm a runner, I wanted to</p> <p>13 use the gym and then they wouldn't let me use the gym</p> <p>14 because they said it was obsessive behaviour.</p> <p>15 After ten days, they rang my husband and they said</p> <p>16 that I had been subjected to -- it's called an</p> <p>17 intervention, like one of those CIA renditions, except</p> <p>18 they don't put you in chains -- and talk to you about --</p> <p>19 they said that I wasn't an alcoholic and that I had been</p> <p>20 bullied. They also rang my employer, who didn't take</p> <p>21 the call. Anyway, they paid for it, so -- and it's very</p> <p>22 expensive, so I stayed there because that -- it's not --</p> <p>23 Elle had made out it was like sort of a spa or</p> <p>24 something, but you know, it's a grade one psychiatric</p> <p>25 facility with men with guns in holsters parading -- you</p> <p style="text-align: center;">Page 29</p>	<p>1 was the CEO, who did, look, I have to say, terribly</p> <p>2 shocked because we'd all kept our side of the bargain.</p> <p>3 So ... Things went from bad to worse after that.</p> <p>4 Q. You explained to us that you continued for a while to</p> <p>5 work for Chiltern, although without the Elle Macpherson</p> <p>6 account.</p> <p>7 A. Well, I had deadlines coming up for the -- you know, we</p> <p>8 were due to go to trial for the Glaxo trial in the --</p> <p>9 sort of in the autumn of 2006, so I had a lot of work</p> <p>10 on.</p> <p>11 Q. In terms of your employment with Chiltern, what happened</p> <p>12 next?</p> <p>13 A. In the -- after she fired me, the following week, I was</p> <p>14 called in for a meeting and told that I had to</p> <p>15 replace -- that Elle was going -- she didn't want to</p> <p>16 keep her business there any more and I had to replace</p> <p>17 that business. But she was such a tiny part of my</p> <p>18 overall billings, it seemed insane. Then I got some new</p> <p>19 work in -- the nature of working with the US government</p> <p>20 is it's sort of tenders -- well, not tenders as such.</p> <p>21 Once you're accredited, the work just rolls in and</p> <p>22 another six-figure sum came in, and I thought that would</p> <p>23 fix that and nobody would worry.</p> <p>24 Then they produced a glossy brochure at the office</p> <p>25 and fears that I had that I was being removed were sort</p> <p style="text-align: center;">Page 31</p>
<p>1 know, going around the outside of the thing, so it was</p> <p>2 fairly horrible. Not all the people there were drug</p> <p>3 addicts. I mean, when I came out of the hospital thing,</p> <p>4 I had to share a dormitory with these people, this</p> <p>5 woman -- and one woman who injected drugs between her</p> <p>6 totals so people couldn't -- I'd just never met people</p> <p>7 like that. It was horrible. Anyway, I survived.</p> <p>8 Q. You've explained to us rather graphically what it was</p> <p>9 like at The Meadows. You returned from The Meadows.</p> <p>10 What were you hoping was going to happen upon your</p> <p>11 return?</p> <p>12 A. Well, I'd kept my side of the bargain. I came back with</p> <p>13 a clean bill of health with a thing that said I was</p> <p>14 suffering from "adjustment disorder", which apparently</p> <p>15 means "stress" in American psychiatric hospitals, and --</p> <p>16 and so I came back. I was back in the office on</p> <p>17 6 January and I went to see Matthew and I said, "Well,</p> <p>18 what do I do now?" And he said, "Well, it's business as</p> <p>19 usual. You've done what she wanted." And so she was</p> <p>20 still away and I sent her a text, and on the night she</p> <p>21 rang me on the way back from the airport and said I was</p> <p>22 fired, she didn't want me to handle her business any</p> <p>23 more, she couldn't trust me, I was ungrateful for what</p> <p>24 she had done for me.</p> <p>25 So I went and reported this to my line manager, who</p> <p style="text-align: center;">Page 30</p>	<p>1 of -- that sort of took it away. If they spend the</p> <p>2 money on doing a big glossy brochure about me, I have to</p> <p>3 assume that they're not going to fire me any time soon.</p> <p>4 Q. Perhaps I can fast forward just a little bit to March</p> <p>5 2006. Two months after the account with Elle Macpherson</p> <p>6 had come to an end, what did your employers do?</p> <p>7 A. On 10 March, they made me redundant. I had no warning,</p> <p>8 nothing. I was made redundant, and because I was</p> <p>9 involved -- you know, because I was an expert witness</p> <p>10 for the IRS, I was -- frankly, who are you going to be</p> <p>11 more scared of: the IRS or Chiltern? So I rang chief</p> <p>12 counsel and he flew out on the Monday and we had</p> <p>13 a meeting with them, but they clearly were not going to</p> <p>14 keep me there any more, despite the large billings that</p> <p>15 I had there.</p> <p>16 Q. Was there really a redundancy situation?</p> <p>17 A. No, because they immediately -- I mean, I do a lot of</p> <p>18 work in transfer pricing. They immediately hired a new</p> <p>19 transfer pricing person.</p> <p>20 Q. The way you put it in your witness statement is:</p> <p>21 "There is no doubt in my mind that the termination</p> <p>22 of my contract with Chiltern came as a direct result of</p> <p>23 the allegations made by Elle."</p> <p>24 A. Yes, they said in their documents to me I'd been</p> <p>25 indiscreet, that the client didn't trust me, despite the</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

<p>1 fact that no other client said this.</p> <p>2 Q. What impact did losing your job with Chiltern have upon</p> <p>3 you? Can I first of all ask you financially?</p> <p>4 A. Well, initially, you know, I wasn't exactly living from</p> <p>5 month to month. It wasn't --</p> <p>6 Q. I don't need the details, but would it be fair to say it</p> <p>7 had a very serious effect on you?</p> <p>8 A. It had, it had a very serious -- and because I'd become</p> <p>9 ill, I couldn't -- and I was falling down all the time,</p> <p>10 I couldn't -- it was not a really good advertisement for</p> <p>11 yourself looking for a new job.</p> <p>12 Q. Did it have an effect on your standing in society?</p> <p>13 A. Well, you know, you take those things more personally.</p> <p>14 Even now, I was at a meeting recently and they wouldn't</p> <p>15 say the name of the client when I was there and</p> <p>16 I thought: "They still don't trust me." I'm just being</p> <p>17 pathetic, I know, but at the time -- well, it was -- it</p> <p>18 was made worse by the fact that I was ill, that I'd</p> <p>19 become ill.</p> <p>20 Q. Perhaps we can move to that. Again, I have no desire to</p> <p>21 ask you any details about this, but you tell us in your</p> <p>22 statement that there was a period of decline in your</p> <p>23 health at the end of January 2006 and that it ultimately</p> <p>24 led to you requiring surgery and a pacemaker being</p> <p>25 fitted in 2009?</p> <p style="text-align: center;">Page 33</p>	<p>1 Q. I think I can stop you there.</p> <p>2 LORD JUSTICE LEVESON: The important thing is this was</p> <p>3 a physical condition eventually diagnosed?</p> <p>4 A. Yes, yes.</p> <p>5 MR BARR: Now if we move to March 2006. You tell us that</p> <p>6 you received a call out of the blue from</p> <p>7 Elle Macpherson, asking you who the security people were</p> <p>8 who checked her house and office; is that right?</p> <p>9 A. She was very friendly and she asked me what was the name</p> <p>10 of the -- it was the week before I was made redundant</p> <p>11 and I didn't have it in my mind and I looked it up and</p> <p>12 told her what it was, who the person was, and she</p> <p>13 thanked me and went.</p> <p>14 Q. You tell us in your statement that you now know that</p> <p>15 Clive Goodman's column in the News of the World was</p> <p>16 cancelled the week before this call.</p> <p>17 A. Yes.</p> <p>18 Q. If I can ask the technician, please, to put up on the</p> <p>19 screen the document the reference for which ends 31809.</p> <p>20 If you could highlight, please, the bottom of those two</p> <p>21 parts -- sorry, I meant magnify. Thank you.</p> <p>22 We see that that's a card, it says:</p> <p>23 "Dear MEF ..."</p> <p>24 That's you, isn't it?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 35</p>
<p>1 A. Yes.</p> <p>2 Q. It may be that this is a matter which will need to be</p> <p>3 fully resolved in the civil litigation in which you are</p> <p>4 involved, but perhaps I could ask you this: do you</p> <p>5 attribute the decline in your health in any way to the</p> <p>6 events that you have told us about involving</p> <p>7 Elle Macpherson, the loss of trust and the ending of</p> <p>8 your employment by Chiltern?</p> <p>9 A. Well, I've never been sick. The only time I've ever --</p> <p>10 I got hurt playing tennis in 1993 and had to have spinal</p> <p>11 surgery, but that was a sporting accident, but I've</p> <p>12 never been sick. I had actually never missed a day of</p> <p>13 work at Chiltern. But I began falling, which -- as I'd</p> <p>14 been accused of being an alcoholic, falling probably</p> <p>15 wasn't the best thing for me to do, but I became very</p> <p>16 ill on the evening of the 28th and my husband called an</p> <p>17 ambulance and I was rushed to Chelsea and Westminster</p> <p>18 and received the same excellent treatment that Mr Grant</p> <p>19 described that he received yesterday, but because I'm</p> <p>20 a nobody, fortunately nobody was ringing up anyone and</p> <p>21 telling them I was there. But they referred me to</p> <p>22 people and the situation got worse and worse.</p> <p>23 I couldn't drive any more. I didn't know when I was</p> <p>24 going to fall down, and that wasn't resolved until --</p> <p>25 I wasn't diagnosed until February --</p> <p style="text-align: center;">Page 34</p>	<p>1 Q. It's from Elle Macpherson, dated April 2006, so not very</p> <p>2 long after she telephoned you?</p> <p>3 A. No.</p> <p>4 Q. And it says:</p> <p>5 "Dear MEF, thank you for my birthday card. Was very</p> <p>6 touched. It means a lot to me. Have been meaning to</p> <p>7 put pen to paper for some time now. Will do ASAP. Much</p> <p>8 love and ..."</p> <p>9 Can't quite read the --</p> <p>10 A. "Light".</p> <p>11 Q. "Much love and light ..."</p> <p>12 And again, we've redacted the signature. Did you in</p> <p>13 fact hear anything further from Elle Macpherson after</p> <p>14 that?</p> <p>15 A. Never again.</p> <p>16 Q. You then tell us that a few months later, in August</p> <p>17 2006, that you heard on the radio that Glenn Mulcaire</p> <p>18 and Clive Goodman had been arrested for phone hacking</p> <p>19 and that Elle Macpherson was one of the victims?</p> <p>20 A. Yes. I heard it early on the Today programme, and then</p> <p>21 suddenly my phone -- I started getting emails and texts</p> <p>22 from people and then a call from a girlfriend who's</p> <p>23 a lawyer, saying, "Oh my God, that's what happened. You</p> <p>24 know, that's why -- you have to ring the police straight</p> <p>25 away, ring your former employer", blah, blah, blah. So</p> <p style="text-align: center;">Page 36</p>

<p>1 I emailed and texted Elle and I emailed my former 2 employer and I didn't get a response, and so I tried to 3 contact the police. 4 Q. How did you try and contact the police? 5 A. I haven't had much contact with the police in my life, 6 so I wasn't sure how you did that, but I -- I looked up 7 on the Internet and our closest police station was 8 Wandsworth. So I called the number for Wandsworth and 9 nobody answered and I tried again later in the day and 10 still nobody answered. There wasn't even a voicemail, 11 so I looked on the Internet again and I saw 12 Scotland Yard, which -- that was the only name -- I'd 13 actually never heard of the Metropolitan Police service, 14 so I saw -- and I found a phone number on there, 15 a general number, and I called, and the lady who 16 answered seemed quite helpful and I told her and she 17 said she'd put me through to someone, and she put me 18 through to another line and I waited and waited and then 19 suddenly it disconnected. So I thought I'd better write 20 and there wasn't any point writing, so I looked up to 21 see who the police commissioner was, because that was 22 the top person, and I wrote to him. 23 Q. Did you get a reply? 24 A. No. 25 Q. You then tell us that you learnt in January 2007 that</p> <p style="text-align: center;">Page 37</p>	<p>1 were jailed and nothing happened and I was getting 2 sicker and sicker, I again heard the story in -- I think 3 it was 12 July 2009, a report on the Today Show that the 4 Guardian had published this story about phone hacking 5 and I've never actually bought the Guardian before so 6 I went -- I walked down to the newspaper place down the 7 road and bought the Guardian and read it. I couldn't 8 believe it. So I rang the reporter, Stephen Brook, who 9 had written the story -- or it was somebody, Nick 10 Davies, and I spoke to Stephen Brook and he said, "Can 11 you come give us an interview?" 12 So I did, and they made a video, which is still on 13 the Internet, and then I thought about it. Before I -- 14 you know, I thought about it for a little while 15 before I -- seeing as I'd made such bad judgments in the 16 past. I thought: "Well, I will talk to them. I'll see 17 if anything happens." I actually honestly expected to 18 get angry letters from lawyers or abusive phone case 19 saying that I shouldn't have said that, but nothing 20 happened, absolutely nothing, and then the BBC One Show 21 called the Guardian and said would I do an interview for 22 them, so I did an interview for them the next night and 23 nothing happened. And then I just felt: "Well, that's 24 hopeless. I'll give up. I can't spend my whole life 25 obsessing about what happened."</p> <p style="text-align: center;">Page 39</p>
<p>1 Glenn Mulcaire and Clive Goodman were jailed for 2 phone hacking. Did this development and the news that 3 you've already told us about, that Elle Macpherson had 4 been a victim of phone hacking, lead to any change in 5 your relationship with Chiltern? 6 A. No. I -- they didn't respond to -- when I wrote to them 7 back in August, I emailed them back in August about: 8 "Look, obviously I'm totally vindicated. I didn't do 9 this." No, I had no response. So I wrote again to 10 Commissioner Blair. 11 Q. Did you get a response that time? 12 A. No. I think the letters are in the exhibits. 13 Q. They are indeed. You tell us that much later on in this 14 year, I think, in 2011, you've had further contact with 15 the police; is that right? 16 A. Well, it started -- when Sienna Miller kept going to 17 court to try to get access to her phone records, 18 I thought that -- that is out of sequence. Can I -- 19 because I had actually given an interview to the 20 Guardian in -- 21 Q. If you want to tell us about your interview with the 22 Guardian -- 23 A. Do you want to do that later? 24 Q. Now is a convenient time. 25 A. Okay. Nothing happened. After the Mulcaire and Goodman</p> <p style="text-align: center;">Page 38</p>	<p>1 And then, at the beginning of 2010, the New York 2 Times rang me and asked me if I'd help them with their 3 investigations, so I worked with them and then they 4 published their story in the autumn of last year, so 5 I thought -- and then at the same time, Sienna Miller 6 was going -- finally got her phone records, so I wrote 7 to -- I wrote to -- Dominic Lawson had published 8 a really sort of -- in his column in the Sunday Times -- 9 because I subscribe to the Sunday Times, so I replied to 10 his email because it said that this was a Labour Party 11 plot to get at the Conservatives and blah, blah, blah, 12 and I just thought that was a load of total rubbish, 13 so I wrote to him and told him that I'd been collateral 14 damage and that's the first person who has actually ever 15 responded to me and he wrote a very nice email back and 16 then wrote an article -- he didn't mention me -- about 17 it in January of this year. 18 Then I thought: "Well, I'll give it another try. 19 I'll write to the Crown Prosecution Service." And they 20 responded, and then in -- I think it was between 21 Christmas and New Year, they announced that there would 22 be no further investigation, there was no further 23 evidence, and lots of people complained. So I wrote 24 back and then I got a letter from a woman called Alison 25 Levitt QC, which I think you have, and then I wrote back</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 and sort of queried a couple of things she'd said and  2 I got another letter sort of putting me off, and then  3 I had a call from the CPS and they said -- and a letter  4 following it up, saying that I would be contacted by  5 a policeman, and I was, but he was horrible to me. He  6 was really rude to me and behaved like I'd done  7 something wrong. So I rang the  8 Crown Prosecution Service back and said, "Well, if  9 that's the sort of help I'm going to get, I'm not  10 interested."  11 But then, about four days later, a nice policeman --  12 I gave someone from last night -- one of the detectives  13 who I gave the chap's mobile number -- and he was really  14 nice and he said he'd had a good look at it and he could  15 see, you know, that I had had a lot of problems, and --  16 but then things sort of took a life of their own. Then  17 Rupert Murdoch came over and sort of took control of it  18 and was out at Wapping and then the one journalist that  19 I did know at the BBC, who had helped me with a client  20 years before, who had a trademark problem and was being  21 monstered by a big corporation who -- they'd done a show  22 on it on Radio 4 and he organised for me to do an  23 interview on 30 January of this year with Paddy  24 O'Connell from Broadcasting House.  25 So I did the interview and I had no idea how widely</p> <p style="text-align: center;">Page 41</p>	<p>1 be able to see the exhibits which will be posted later  2 today. Thank you very much indeed.  3 A. Thank you.  4 LORD JUSTICE LEVESON: I suppose that all one can say is  5 that you've correctly described your own position; not  6 your fault, the collateral damage of what somebody else  7 did to the person for whom you worked. Thank you very,  8 very much indeed for coming to tell me about it. Thank  9 you.  10 A. Thank you.  11 MR BARR: Sir, could we have a short break between the  12 witnesses?  13 LORD JUSTICE LEVESON: Yes.  14 (11.05 am)  15 (A short break)  16 (11.12 am)  17 LORD JUSTICE LEVESON: Five minutes is going to be five  18 minutes, because otherwise we're going to just lose  19 time.  20 MS PATRY HOSKINS: We're still missing a few, sir. I don't  21 know if you want to wait.  22 LORD JUSTICE LEVESON: I'm going to wait here. Could you  23 just announce that I'm sitting again, please, outside.  24 (Pause)  25 Right.</p> <p style="text-align: center;">Page 43</p>
<p>1 that was listened to around the world and then people  2 contacted me from all around the world and that's how  3 I got lawyers and so on.  4 Q. Thank you very much for filling us in on the intervening  5 events. Is the position now -- and I don't want you to  6 go into the details of communications with the police --  7 that you are in contact with them on a satisfactory  8 basis?  9 A. Yes.  10 Q. Thank you. You've told us already that you're  11 a litigant. How are you funded, if I may ask, in the  12 litigation?  13 A. I have a conditional fee arrangement. I couldn't do it  14 otherwise.  15 Q. And you tell us finally in your statements that you are  16 active in politics?  17 A. (Nods head)  18 Q. And you tell us that you have raised your concerns about  19 how the phone hacking issue has been dealt with  20 internally within the Conservative party. Is that  21 right?  22 A. I have.  23 Q. Thank you.  24 A. They don't take any notice of me, but I have.  25 Q. For those who are following on the Internet, they will</p> <p style="text-align: center;">Page 42</p>	<p>1 MS PATRY HOSKINS: Sir, the next witness is  2 Mr Garry Flitcroft. I'll just ask for him to come and  3 take a seat.  4 MR GARRY WILLIAM FLITCROFT (sworn)  5 LORD JUSTICE LEVESON: Mr Flitcroft, thank you very much for  6 coming. I appreciate this is not your normal terrain,  7 but don't worry about it.  8 A. Thank you.  9 LORD JUSTICE LEVESON: If you need a break, say so. I'm  10 conscious that you're going to be speaking about things  11 which are personal to you, and I'm grateful to you for  12 sharing your experience so that it can all be taken into  13 account. Thank you very much.  14 A. Yes.  15 Questions from MS PATRY HOSKINS  16 MS PATRY HOSKINS: First of all, could you say your full  17 name?  18 A. Garry William Flitcroft.  19 Q. Thank you very much. You have provided a witness  20 statement to this Inquiry. Those of us who are in the  21 room will either see it on screen or have it already.  22 Those who are watching on television or on the Internet  23 will have it later today.  24 Can I clarify, before I ask you any questions about  25 it, that you can confirm to me that the contents in the</p> <p style="text-align: center;">Page 44</p>

<p>1 statement are true to the best of your knowledge and 2 belief? 3 A. Yes, they are. 4 Q. I'm going to start with your career history. I'm going 5 to lead you through this, if I can, for the purposes of 6 saving time and for those who do have the witness 7 statement, paragraphs 3 to 6 are the paragraphs that 8 we're going to be looking at. 9 You explain that you are currently a football 10 manager, manager of Chorley, but you're also a retired 11 professional footballer. You explain that you have 12 three children, aged 8, 10 and 14, and your wife and you 13 have been separated for some years, you're not divorced, 14 you currently live with your girlfriend. Then you 15 explain your footballing history, if I can put it that 16 way. 17 Can I just ask you to say in your own words, when 18 did you first start playing football? 19 A. I started playing football when I was about 7-year-old 20 as a young kid and then I got signed for Manchester City 21 when I was 12, signed apprenticeship forms when I was 16 22 and then got in the first team when I was 18. 23 Q. So when you first signed for a club, you said that 24 was -- 25 A. When I was 12, but I started when I was 7.</p> <p style="text-align: center;">Page 45</p>	<p>1 people who are not familiar with the meaning of that. 2 Can you confirm that this simply means finishing in the 3 top four places in the Premiership, thereby qualifying 4 for a League that is played out amongst the top European 5 clubs? 6 A. Yeah. 7 Q. You didn't qualify for Champions League football? 8 A. No. 9 Q. Did you ever play for the full England team, the 10 national team, during that time? 11 A. No, I just played for England under 15s and under 21s. 12 Q. Never for the full team? 13 A. No, never for the full team. 14 Q. No? Did you ever sell your story by appearing, for 15 example, in a publication such as Hello or OK magazine? 16 A. No. 17 Q. You ever write for any publication? 18 A. Never. 19 Q. Did you ever make any public pronouncements that you are 20 aware of about your family life or your public life? 21 A. Never, no. 22 Q. How often did you appear at non-football-related public 23 events, for example? So premieres of films or -- 24 A. No, never anything like that. Just hospital visits, 25 really.</p> <p style="text-align: center;">Page 47</p>
<p>1 Q. Which club? 2 A. Just a junior football team in Bolton. 3 Q. When you signed for that club and as you moved through, 4 what was your intention? Did you seek fame and fortune? 5 A. No, my intention was just to be a professional 6 footballer, try and be a footballer when I got older. 7 Q. You explain that you played for Manchester City and then 8 you moved to Blackburn Rovers and played there, you tell 9 us, from March 1996 to 2004; is that right? 10 A. Yes, that's correct. 11 Q. You had three seasons as captain of the club. Can I ask 12 you about the fortunes of Blackburn Rovers during that 13 time, just in order to understand the public profile 14 that you had during that time. First of all, which 15 League was Blackburn Rovers in at that time? 16 A. We were in the Premiership. 17 Q. Throughout the time that you played for them? 18 A. Yes. 19 Q. Did you ever win the Premiership? 20 A. No, I signed the season after we won the Premiership. 21 Q. Did you ever qualify for Champions League football? 22 A. No. 23 Q. For those of us who aren't familiar -- 24 LORD JUSTICE LEVESON: You're not doing badly -- 25 MS PATRY HOSKINS: I'm sad to say that there might be some</p> <p style="text-align: center;">Page 46</p>	<p>1 Q. Charity events? 2 A. Charity events, yeah. 3 Q. Did you ever obtain any corporate sponsorship, TV 4 advertising in your own name? 5 A. No, nothing on the TV. 6 Q. Did you ever have your own aftershave? 7 A. No. 8 Q. All right. Against that background, I'm going to turn 9 to ask you about media conduct. You deal with this in 10 your statement and from paragraph 7 onwards for those of 11 us who have it. It's obvious to those who know a little 12 bit about you, Mr Flitcroft, that you were granted an 13 injunction to restrain a story about your private life 14 being published back in 2001. I'm going to take you 15 through the chronology, if I can. 16 You explain in paragraph 7 that it was a story about 17 your private life. Can you just tell us a bit about 18 what happened? 19 A. Yeah, I got an injunction. A girl that I'd seen three 20 or four times had contacted me to say that she wanted 21 money off me, otherwise she was going to go to the 22 newspapers. 23 Q. Can I just pause you there? Let's be graphic about 24 this. When you say a girl you'd seen a few times, what 25 does that mean?</p> <p style="text-align: center;">Page 48</p>

<p>1 A. I'd seen --</p> <p>2 Q. Were you in a relationship with her?</p> <p>3 A. I wouldn't say a full-blown relationship, no. I took</p> <p>4 her to a hotel once and seen her twice at her house.</p> <p>5 Q. But an intimate relationship?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. So she contacted you. In what way?</p> <p>8 A. She telephoned me.</p> <p>9 Q. Right, and what happened then?</p> <p>10 A. She told me -- we'd just got back from Dubai with the</p> <p>11 football team and she told me that she wanted to see me</p> <p>12 and I just said, "Listen, I don't want to see you</p> <p>13 anymore", and she said, "Right, I want £3,000 for a boob</p> <p>14 job", which I said, "I'm not paying you." Then she</p> <p>15 said, "You'll have to go to your mum and dad's house.</p> <p>16 I've left an envelope there." Then the phone went dead.</p> <p>17 Q. So she said she'd taken an envelope to your parents'</p> <p>18 house, right?</p> <p>19 A. Yes, being that she lived in Chester, which was probably</p> <p>20 an hour and 15 minutes away and she never -- didn't even</p> <p>21 know where I lived, never mind my parents. I went</p> <p>22 around to my mum's house there was an inevitably there</p> <p>23 with "Garry" and a big kiss on it, and inside the</p> <p>24 envelope there was text messages that I'd been sending</p> <p>25 her.</p> <p style="text-align: center;">Page 49</p>	<p>1 A. No. Like I say, when I took the envelope to the PFA</p> <p>2 solicitors, I just let them deal with it then, and</p> <p>3 then --</p> <p>4 Q. But your story is that she did try to blackmail you; is</p> <p>5 that right?</p> <p>6 A. Yeah.</p> <p>7 Q. Tell me what happened then. What contact did you have</p> <p>8 with the Sunday People?</p> <p>9 A. Obviously I went to the PFA. They put me in touch with</p> <p>10 my solicitor there, Mark, who then dealt with the</p> <p>11 injunction.</p> <p>12 Q. Okay. When you say he dealt with the injunction, at</p> <p>13 some stage you must have decided whether or not you</p> <p>14 wanted to apply for this injunction; is that right?</p> <p>15 A. Yeah. We discussed it and we discussed it with the PFA.</p> <p>16 Q. Why did you decide to try and obtain the injunction?</p> <p>17 A. To try and obtain the injunction because my family is</p> <p>18 close and I didn't want to get it out. You're obviously</p> <p>19 covering your own back as well. I hold my hands up.</p> <p>20 Like I say, I know I did wrong but nobody's perfect and</p> <p>21 at the end of the day, I had a wife and a kid and I had</p> <p>22 a very, very close family and I didn't want it to get</p> <p>23 out to them either.</p> <p>24 Q. How did you think your wife would react if she did find</p> <p>25 out at that time, when you were applying for the</p> <p style="text-align: center;">Page 51</p>
<p>1 Q. What do you mean by text messages? Printouts?</p> <p>2 A. That she'd been writing down and the dates and times and</p> <p>3 a room -- the card key from the hotel where I'd stayed</p> <p>4 with her.</p> <p>5 Q. How did you feel when you saw this envelope?</p> <p>6 A. Obviously stressed because then I was thinking: what do</p> <p>7 I do in a -- you know, I know I've done wrong and I hold</p> <p>8 my hands up that I did wrong and, you know, I made</p> <p>9 I mistake but at the end of the day, I didn't want my</p> <p>10 family to find out about what I'd been doing.</p> <p>11 Q. What did you do after you'd found this envelope at your</p> <p>12 parents' house?</p> <p>13 A. I took it straight to the PFA solicitor and I said --</p> <p>14 sorry, I got the envelope, took it to the PFA solicitor</p> <p>15 and then Craig Hignett, who I played with at Blackburn</p> <p>16 Rovers had told me he spoke to a sports reporter and my</p> <p>17 story was going to be printed on the Sunday. So my</p> <p>18 solicitor then got hold of the paper.</p> <p>19 Q. Can I pause you there. Before we move on to the</p> <p>20 discussions you had with the Sunday newspaper, I've been</p> <p>21 asked to ask you this question: it was disputed later by</p> <p>22 this lady, who you say gave you the envelope, that she</p> <p>23 had in fact tried to blackmail you. As I understand it,</p> <p>24 that issue was never decided by any court. Is that</p> <p>25 right?</p> <p style="text-align: center;">Page 50</p>	<p>1 injunction?</p> <p>2 A. All I could think about was it going in the newspapers</p> <p>3 and it being seen nationally and what effects it would</p> <p>4 have on her at the time. You know, I would have liked</p> <p>5 to take it on the chin, but for my wife to find out that</p> <p>6 way, it wouldn't have been right.</p> <p>7 Q. You explain in your witness statement, for those who</p> <p>8 have it, that you then obtained an injunction on</p> <p>9 27 April 2001 against the Sunday People. Did you ever</p> <p>10 speak to the Sunday People yourself or have any contact</p> <p>11 with them?</p> <p>12 A. No.</p> <p>13 Q. What was your understanding of what they were going to</p> <p>14 do if you had not obtained the injunction?</p> <p>15 A. They were going to print my story on the following</p> <p>16 Sunday.</p> <p>17 Q. Can you remember who was editor of the Sunday People at</p> <p>18 that time?</p> <p>19 A. It was Neil Wallis.</p> <p>20 Q. Now, you go on to then say at paragraph 15 of the</p> <p>21 statement, for those who have it, that as soon as you</p> <p>22 obtained the injunction, you say, the Sunday People</p> <p>23 launched a dirt-digging exercise. What do you mean by</p> <p>24 that?</p> <p>25 A. Well, the injunction got put into place, and then when</p> <p style="text-align: center;">Page 52</p>

13 (Pages 49 to 52)

<p>1 I was at the football club, I had lads come in and phone 2 me up from other clubs to say that, you know: "I'd been 3 told by sports journalists that the footballer was [me] 4 that was gagging the press." At that point, I was 5 worrying that they were going to go home and tell their 6 wives and the wives in the players' lounge at football 7 would then tell my wife. 8 Q. In terms of the conduct of the Sunday People, you say 9 they carried out a dirt digging exercise. What did they 10 do? 11 A. They put things in the papers where they were saying 12 it's an unfashionable club he's at, a north-west club, 13 so -- 14 Q. So they were printing details about you, but not your 15 name? 16 A. Yeah. 17 Q. I understand. You say at paragraph 15 I have been asked 18 to ask you this question. You say: 19 "For reasons I do not quite understand, it seemed 20 that details of my affair, even though it had been over 21 for some time, was of huge interest to the paper." 22 I've been asked to ask you this: how long had it 23 been over by that stage? By the time you obtained the 24 injunction, how long had it been since you stopped 25 seeing this lady?</p> <p style="text-align: center;">Page 53</p>	<p>1 admitted she asked me for 5,000, if I can remember. 2 Q. Thank you. And again, you say that they had discovered 3 you'd had an affair. Do you accept that you had had an 4 intimate relationship with the second woman? 5 A. Yeah, I'd been in contact with her for probably over 6 a year, so ... 7 Q. I understand. You then go on to say that you cannot 8 think how the paper found out about this second affair 9 because as far as you're aware, no one else knew about 10 it: 11 "It had been over for some time and on the occasions 12 we met it had always been at her apartment, where she 13 lived alone." 14 You go on to say: 15 "I strongly suspect that my phone was hacked by 16 journalists and as a result, the second woman was 17 contacted and asked to sell her story to the paper." 18 Again, I've been asked to ask you: do you have any 19 firm evidence that your phone was hacked or is that just 20 speculation? 21 A. No, that's just speculation. I have no evidence at all. 22 All I can say is that one of the girls lived in 23 Stockport and one lived in Chester. They didn't know 24 each other, so it just seems a massive coincidence that 25 the same newspaper linked two girls in the space of Page 55</p>
<p>1 A. Probably about three months, four months. 2 Q. You go on to explain at paragraph 16 that their 3 investigations, this dirt-digging that you explain, led 4 to the discovery that you'd had an affair with a second 5 woman. Do you see that? 6 A. Yeah. 7 Q. "She was contacted by the paper and asked to sell her 8 story. As a result, she telephoned me and asked for 9 £5,000 in return for not telling her story." 10 Can you tell me about that conversation? 11 A. Yeah, she phoned me up and said that a reporter had come 12 and seen her and told her he'd pay her money and would 13 I pay the £5,000, which I think she said in -- she 14 said -- she did say that to me as well in her statement 15 to the court, so ... 16 Q. She said, "The People is offering me a certain sum"? 17 A. Yeah. 18 Q. "But you can pay it and I won't sell my story"? 19 A. Yeah. 20 Q. Is that right? 21 A. Yeah. 22 Q. Again, I've been asked to put it to you that she denies 23 having tried to blackmail you in that way. What's your 24 version? 25 A. I think in her evidence, going back ten years, she Page 54</p>	<p>1 a couple of months to me. 2 Q. I understand. You then go on to tell us that 3 subsequently the High Court upheld the original 4 injunction in relation to the stories of both these 5 women, since revealing details, it was found, in 6 a national newspaper would be an unjustified intrusion 7 into your privacy. That's paragraph 19 that you have 8 there. But you say that despite the injunction being 9 upheld at that stage -- so now against two different 10 women -- the Sunday People deliberately published, you 11 say, enough details behind of the subject matter behind 12 the injunction, without naming you or the women, so as 13 to spark speculation as to which Premiership footballer 14 they were talking about and you've already touched on 15 that. You said they published the fact it was 16 a north-west club, an unfashionable club, you said. Are 17 there any other details you can remember that could have 18 helped identify you? 19 A. Not really that come to mind, no. 20 Q. Okay. You say that also word had got out to a number of 21 players through sports journalists that the person 22 behind the injunction was you, which meant that fellow 23 players and colleagues took the mickey out of you in the 24 dressing rooms. Can you tell me about that? 25 A. It was a sports journalist that had told Craig Hignett Page 56</p>

<p>1 that the story was going to be printed and that's what 2 alerted me, so then took out the injunction. I had 3 footballers that I've played with at other football 4 clubs before phoning me up and saying, "Garry, we've 5 heard it's you, is it you?" And it carried on from 6 there, and then coming in the dressing room and -- 7 Q. What would they say? Try and give me a typical example 8 of what someone might say to you in that context? 9 A. "We're going to be going into the lapdancing place 10 tonight and go and dance with your (overspeaking)", and 11 things like that. "She can strip off for us", or 12 whatever it was. 13 Q. How did you feel about that sort of teasing or taking 14 the mickey? 15 A. Same again. I could take it on the chin, but because 16 people were saying things to me, you start wondering: 17 "When's it going to get out?" 18 Q. I understand. We know that you go on to say that the 19 injunction was lifted by the Court of Appeal in March 20 2002 and by that stage, it was widely suspected that the 21 person behind the injunction was you and you explain 22 that you believe this Court of Appeal decision was 23 wrongly decided. You say that in terms. Do you want to 24 go into the legal niceties of that or not? 25 A. No, I don't know enough about it. I can only say what</p> <p style="text-align: center;">Page 57</p>	<p>1 A. And said could he talk to me from the intercom, and 2 Karen asked me what was going on and I eventually -- you 3 know, I took her for a ride. I said, "Listen", told her 4 exactly what had happened, took her back and the press 5 were already at the bottom gates. We've got two sets of 6 gates. It's a private driveway with three other houses 7 on it. And I said, "We're going to have to get out and 8 I'll have to take you up to the Lake District with your 9 parents, my parents, and we'll go out there." 10 Q. Pause there. I don't want you to tell me about the 11 details of the conversation that you had with her in the 12 car that day, but how did she react? 13 A. She was angry, started crying. Hit me in the chest. 14 She was absolutely devastated. 15 Q. I understand. When you returned to your house and you 16 saw this media frenzy, I guess I could call it, what did 17 you decide to do? 18 A. We'd already decided that we needed to get away 19 somewhere, so I got my brothers to come around and get 20 us out of the house as quick as we could. 21 Q. Were your club supportive of the fact you were going to 22 be away for a few days? 23 A. My club were great. They gave me four days off and they 24 supported me, yeah. 25 Q. Again, I don't want any personal details of any</p> <p style="text-align: center;">Page 59</p>
<p>1 my solicitors have said to me. 2 Q. I understand. All right. What I want to explore with 3 you now is the impact of the lifting of that injunction 4 on you and your family, if I can take that, because it 5 was lifted, as you explained, in March 2002. Can you 6 tell me, did you get advance warning of the fact that 7 the injunction was about to be lifted and that the press 8 were about to reveal that you are the Premiership 9 footballer? 10 A. Yeah. My solicitor had phoned me up at the time and 11 said, "You're going to need to get out of the house, 12 because you've lost the -- the injunction had been 13 lifted and you're going to have a lot of press and 14 photographers coming over to your house." 15 Q. So what did you do? 16 A. I told Karen straight away. In the meantime, when 17 I told her, I had a buzz on my gate and it was the 18 Daily Mirror -- sorry, the Daily Mail. 19 Q. So wait a minute. When did have you the buzz on your -- 20 A. Sorry, before -- 21 Q. Before you'd even told her? 22 A. Before I was going to tell her, the Daily Mail buzzed on 23 my gates, about an hour, literally, after Mark had told 24 me. 25 Q. Right.</p> <p style="text-align: center;">Page 58</p>	<p>1 conversations which you had with your wife during that 2 time, but if I can put it this way: was there hope of 3 a reconciliation during that period? 4 A. Yeah, I mean, at the end of the day, me and Karen were 5 getting on the best we could for the sake of the 6 little'un, but it finally didn't work out and I ended up 7 moving out. 8 Q. Thank you. I want to ask you about the impact on your 9 children. Can you tell us about the impact on them of 10 the fact that their father had been named in the 11 newspapers in this way? 12 A. I'll be honest with you. The littlest one was only 13 young then, so to say he didn't get much attention and 14 it's only later on now in life now where he does do. 15 Q. Tell me about that. 16 A. Well, from the beginning, obviously Karen's taken him to 17 school and the mums are saying things about her, but as 18 far as the kids go, you know, teasing him at school. He 19 comes watching me now for my team at Chorley and there 20 is other fans that, you know, sing chants about his dad 21 and -- 22 Q. They still sing chants to this day? 23 A. Yeah, at Chester City the other week they were singing 24 chants about me. And I just think when your lads are 25 coming to watch you play football now and they're at an</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 age where they know what's going on, you know, it's 2 unfair.</p> <p>3 Q. Okay. You've told me about the immediate impact on your 4 wife when the injunction was lifted. Can you tell me 5 a bit about the impact that this whole media frenzy has 6 had on your wife since that time?</p> <p>7 A. Well, obviously we split up, which is -- you know, from 8 mine and Karen's point of view is, you know, a massive 9 disappointment when you have three kids. But the fact 10 that Karen's always been a private person, you know, 11 a picture took -- and like I say, you Google her on the 12 Internet and it comes up with my case now. I think it's 13 wrong when she's done nothing wrong. It's me who's done 14 something wrong, and she shouldn't have to deal with all 15 that.</p> <p>16 Q. Can you tell me a little about the level of media 17 interest that there was in you and your family after the 18 injunction was lifted?</p> <p>19 A. Yeah, I mean, it was -- it had been going on for maybe 20 12 months that Mark had told me to expect the worst if 21 the injunction got lifted and I'd say there were always 22 at least 20 reporters, photographers at my gates. You 23 know, going on top of that, you know, there's been -- 24 there was an helicopter taking pictures above my house, 25 and it just seemed that they wanted, the Sunday People</p> <p style="text-align: center;">Page 61</p>	<p>1 A. Yeah, it was about £190,000, I think, to fight for my 2 privacy.</p> <p>3 Q. I understand. I am going to ask you to look at a second 4 document, which is, I think, probably just slightly 5 further on in the bundle. It's 32032. It's an article 6 in the Telegraph reporting on the same issue, obviously. 7 Just wait a moment until it's on the screen for those at 8 the back of the room. If we focus for the moment on the 9 title of that. If we could just zoom in on that: 10 "Saga of the love rat footballer leaves one 11 question: Garry who?"</p> <p>12 So that's how the Telegraph is reporting it, and if 13 we look at the first three paragraphs -- if we could 14 just highlight the first three paragraphs, please: 15 "So now the truth can be told. The Premiership 16 footballer who fought for so long and at such great 17 expense, et cetera, is Garry Flitcroft. The question 18 that inevitably arises is: Garry who?"</p> <p>19 Why were they saying that? Why were they 20 questioning who you were, in your view?</p> <p>21 A. I don't think I was a high profile player. I never 22 caught myself in the papers. You know, I was at 23 probably an unfashionable club being at Blackburn Rovers 24 and when you're looking at high profile people -- you 25 know, there are a lot more high profile people than me,</p> <p style="text-align: center;">Page 63</p>
<p>1 especially wanted to make a -- make a statement to me 2 that they were -- you know, it was never to take on the 3 press again type of thing.</p> <p>4 Q. You say at paragraph 30, for those who have it, that 5 following the lifting of the injunction, the national 6 press ran a series of follow-up articles, revealing the 7 nature the injunction and the subject matter behind the 8 injunction and there was an absolute feeding frenzy. 9 Can I just ask you now, please, to look very briefly at 10 some of the articles, just two of the articles.</p> <p>11 For the sake of the technician who's behind us, 12 could we have a look, please, first at the document 13 which ends -- the number ends 32030. It's in your 14 exhibits and it's a Sun article headed, "Love rat is 15 Garry Flitcroft". Do you have that?</p> <p>16 A. Yes.</p> <p>17 Q. That's obviously one example of the Sun, and you'll see 18 it says quite clearly: 19 "The married soccer ace who used the law to hide two 20 affairs can be today named as Garry Flitcroft. The 21 Blackburn Rovers skipper has blown £200,000 on his bid 22 to avoid being exposed." 23 The first two paragraphs there. First of all, is 24 that right? Did you blow £200,000 in legal costs to 25 avoid being exposed?</p> <p style="text-align: center;">Page 62</p>	<p>1 but the facts is -- you know, they say it's got to be 2 published because it's public interest and then say 3 "Garry who" is just totally wrong.</p> <p>4 Q. I understand. I think I can probably guess the answer 5 to this question, but do you think it was in the public 6 interest for the Sunday People to tell the world about 7 the fact that you'd had two extra-marital affairs?</p> <p>8 A. No, it was private. It was between me and Karen and 9 there's no reason why my private life should be in the 10 public interest. You know, people -- I was a footballer 11 and the Sunday People printed the story because it was 12 probably interesting to the public, but at the end of 13 the day, it wasn't public interest. If I'd been done 14 for match-fixing or taking cocaine, then that's in the 15 public interest, but I disagree with them putting it in.</p> <p>16 Q. I understand. I have been asking you about the impact 17 on your wife and children and I will come back to ask 18 but the impact on other members of your family, but if 19 you don't mind, I'm going to move chronologically, 20 please, through the years. We'll move now to three 21 years later, 2005, please, and paragraph 37 onwards in 22 the witness statement. You say this: 23 "I also found out that in 2005 the tabloid press 24 were still carrying out secret surveillance on me in 25 an attempt to uncover another sensational story."</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

<p>1 What do you mean by "secret surveillance"? Do you                  2 mean someone was following you around and taking                  3 pictures of you?                  4 A. No, someone was following someone else around.                  5 Q. Can you just tell me in your own words about that?                  6 A. Yeah, in 2005 --                  7 Q. Can I just pause there. Parts of your statement here                  8 are redacted.                  9 A. Yeah.                  10 Q. And I think you understand for legal reasons it's had to                  11 be redacted.                  12 A. Yeah.                  13 Q. If I could just ask you to be careful about that and not                  14 mention anything that's been redacted.                  15 A. Yeah.                  16 LORD JUSTICE LEVESON: Do you have a copy that has the                  17 redacted bits blacked out? Good, okay.                  18 A. In 2005, I got a text message and answerphone message                  19 left by a lady that said she'd been doorstepped and                  20 would I get hold of her. I never got back to her                  21 because I thought nothing of it at the time.                  22 MS PATRY HOSKINS: Did you know this lady?                  23 A. No.                  24 Q. You just didn't know her. You'd never met her?                  25 A. No, I never met her in my life.</p> <p style="text-align: center;">Page 65</p>	<p>1 A. She then was followed home. She went on her holidays                  2 with her husband and the morning she come back,                  3 7 o'clock, a newspaper knocked on her door and said                  4 she'd been having an affair with me and another girl                  5 called Sarah, to which -- Sarah's the girl I now see.                  6 Q. All right. Can you tell me a bit more about your                  7 knowledge of what happened to her after that?                  8 I appreciate that she'd been doorstepped in this way,                  9 but then did she have any other contact with the press?                  10 A. Well, obviously over the last few months, after my                  11 solicitor's been speaking to her, she hasn't been in                  12 contact with me as well, because I wanted to see if the                  13 newspaper had gone. She said they'd knocked on her                  14 door, said that she'd been seeing me and she'd phoned                  15 Orange up and they'd -- the newspaper had phoned Orange                  16 up to get numbers, apparently, to see if my numbers were                  17 on her phone records.                  18 Q. The newspaper had?                  19 A. Yeah.                  20 Q. Right. Can I just be absolutely clear: had you been                  21 exchanging telephone calls or messages with this woman?                  22 A. Never. I have never met the lady in my life. Never.                  23 Q. So if the newspaper did contact her mobile phone                  24 company, would they have found any messages from you?                  25 A. No.</p> <p style="text-align: center;">Page 67</p>
<p>1 Q. Right.                  2 A. And I just thought it was the press trying to get                  3 something out of me again, so I never contacted her.                  4 Q. Right.                  5 A. Then in January, I got a text message saying                  6 such-and-such: "I've seen things going on with the phone                  7 hacking. If you need any evidence, contact me."                  8 Q. Who was this message from?                  9 A. The same lady in 2005, that I never spoke to, yeah.                  10 I've never met her in my life.                  11 Q. Did you then speak to her?                  12 A. No, I gave her number to Mark, my solicitor, and Mark                  13 spoke to her for me because I was still nervy if it was                  14 someone trying to catch me out.                  15 Q. I appreciate this is hearsay evidence, but do you know                  16 anything about what she told him about the circumstances                  17 in which she'd been approached?                  18 A. Yeah, she'd been delivering some exercise bikes at                  19 Blackburn Rovers --                  20 Q. First of all, did she work for Blackburn Rovers?                  21 A. No.                  22 Q. Who did she work for?                  23 A. She just worked for a company who delivered exercise                  24 bikes to Blackburn.                  25 Q. Right.</p> <p style="text-align: center;">Page 66</p>	<p>1 Q. Are your numbers stored in her phone or anything like                  2 that?                  3 A. Nothing at all.                  4 Q. Okay. After that happened, did she have any other                  5 contact with the press?                  6 A. I don't --                  7 Q. Can I just ask you to look at paragraph 44. Perhaps I'm                  8 being too cryptic. Paragraph 44 sets out that she                  9 subsequently telephoned "redacted" -- and I don't want                  10 you to mention that --                  11 A. Yeah.                  12 Q. -- and confronted this person:                  13 "He confirmed that he had telephoned Orange and said                  14 he'd been trying to access information about her mobile                  15 phone usage and this had led to her phone being cut off.                  16 He also said something along the lines of that he wanted                  17 to catch me out again."                  18 By "me", can we presume he wanted to catch you out                  19 again?                  20 A. Yeah.                  21 Q. It's clear also from the end of that paragraph that she                  22 just denied the story and nothing was ever published.                  23 A. Yeah.                  24 Q. Why do you refer to this incident in your statement?                  25 What do you want the Inquiry to take away from that</p> <p style="text-align: center;">Page 68</p>

<p>1 incident?</p> <p>2 A. I just think that when -- you know, it just shows you</p> <p>3 that they're still digging for information three or four</p> <p>4 years after I've already been done and reading Neil</p> <p>5 Wallis's -- some of his quotes that I want to go to</p> <p>6 later on, you know, when they finally come out in the</p> <p>7 newspapers, he just says that, you know, I could get on</p> <p>8 with my life, but they don't let you get on with your</p> <p>9 life. They're still digging for information and that's</p> <p>10 the point I'm trying to prove there. This lady, it</p> <p>11 nearly wrecked her marriage and that's why she wanted to</p> <p>12 get in touch with me because she felt so aggrieved by</p> <p>13 what this reporter had done to her.</p> <p>14 Q. I understand. Since you retired as a professional</p> <p>15 footballer, have you had any contact with the press?</p> <p>16 Have you sold your story to Hello or OK, given any</p> <p>17 interviews or so on?</p> <p>18 A. No. The only thing I do, I've got sports journalists at</p> <p>19 Chorley that I speak to sometimes, just the local press</p> <p>20 with my football club.</p> <p>21 Q. About Chorley?</p> <p>22 A. Yeah.</p> <p>23 Q. Rather than about you?</p> <p>24 A. Yeah.</p> <p>25 Q. Can I ask you then to go back to the impact on you and</p> <p style="text-align: center;">Page 69</p>	<p>1 A. Barbara come to the front door. Malcolm was in the</p> <p>2 chair and -- he struggled getting out of the chair.</p> <p>3 Q. I understand.</p> <p>4 A. But it was a shock to see a load of press at his door</p> <p>5 looking for his daughter.</p> <p>6 Q. Can I ask you about the impact on your father? First of</p> <p>7 all, tell me a bit about the relationship that you had</p> <p>8 with your father.</p> <p>9 A. Me and me dad were really, really close. Ever since</p> <p>10 I was 7, he took me on the back field for two hours</p> <p>11 every night. He followed me everywhere, home and away.</p> <p>12 Q. When you say he followed you everywhere, does that mean</p> <p>13 he attended --</p> <p>14 A. Every football match.</p> <p>15 Q. -- every football game that you played in?</p> <p>16 A. Yeah.</p> <p>17 Q. From the age of 7?</p> <p>18 A. Yeah.</p> <p>19 Q. Right through to the time when you were a professional</p> <p>20 footballer?</p> <p>21 A. Yeah.</p> <p>22 Q. Home and away?</p> <p>23 A. Yeah.</p> <p>24 Q. That's quite a commitment.</p> <p>25 A. Yeah.</p> <p style="text-align: center;">Page 71</p>
<p>1 your family. You've set out quite clearly the impact on</p> <p>2 your wife and children. I want to ask you about the</p> <p>3 impact on others, if I can. The first is you said at</p> <p>4 the start of this examination that you've got a close</p> <p>5 family. I want to ask you about your relationship with</p> <p>6 your father-in-law and how this whole situation impacted</p> <p>7 on him. Can you tell us a bit about him?</p> <p>8 A. He had Parkinson's disease for years. He's died now,</p> <p>9 but I was very close to him, and to have the press</p> <p>10 turning up on his doorstep is totally wrong, trying to</p> <p>11 get a story about me and his daughter, when he was</p> <p>12 critically ill.</p> <p>13 Q. Was he critically ill at the time?</p> <p>14 A. Yeah, he was really bad, yeah.</p> <p>15 Q. Tell me about the media intrusion on his life. Were</p> <p>16 there people at his door? What was happening?</p> <p>17 A. Obviously he's -- you know, he didn't need it at the</p> <p>18 time. He'd had operations to fit something onto his</p> <p>19 brain for the Parkinson's disease and Barbara, Karen's</p> <p>20 mum, was looking after him, Karen was looking after him,</p> <p>21 and just as a family, they didn't need the grief that</p> <p>22 was going on with, you know, what should have been</p> <p>23 between me and Karen.</p> <p>24 Q. Did they actually come to his front door or contact him</p> <p>25 in any way, the press?</p> <p style="text-align: center;">Page 70</p>	<p>1 Q. Why do you think he did that?</p> <p>2 A. I was his life, at the end of the day. He loved coming</p> <p>3 and watching me play football.</p> <p>4 Q. I understand. Can you tell me about whether that</p> <p>5 changed following the lifting of the injunction and the</p> <p>6 subsequent press publicity?</p> <p>7 A. Yeah, it definitely changed because the taunting I was</p> <p>8 getting on the terraces -- you know, my dad suffered the</p> <p>9 pressure and anxiety. He'd suffered it since he were</p> <p>10 a 20-year-old kid, and he stopped then watching me play</p> <p>11 football.</p> <p>12 Q. He stopped watching you -- within how long of the</p> <p>13 injunction being lifted did he stop coming to watch you?</p> <p>14 A. We played Leicester away and the story had come out in</p> <p>15 the morning and the chants were so bad that he just</p> <p>16 said, "I can't come and watch you again."</p> <p>17 Q. So it was immediately he stopped coming to watch you?</p> <p>18 A. Yeah. Yeah.</p> <p>19 Q. You said he suffered from depression for a long time.</p> <p>20 Did you notice any change after the injunction was</p> <p>21 lifted?</p> <p>22 A. It's one of them -- I mean, my dad become -- you know,</p> <p>23 suffering from anxiety and depression, you've got to</p> <p>24 have something in your life and his life was coming and</p> <p>25 watching me play football, and his work, and that took</p> <p style="text-align: center;">Page 72</p>

<p>1 him out of his life. He became very housebound, started                  2 taking more tablets and he got into a real rut, and                  3 obviously not coming out (inaudible - coughing).                  4 Q. And what happened to your father?                  5 A. Me dad committed suicide in 2008.                  6 Q. I've been asked to put you -- sorry, but I have to put                  7 it to you -- that that means there was a period of six                  8 years between the time that the injunction was lifted                  9 and the time when he committed suicide. But in your                  10 mind, are those two events linked?                  11 A. To be honest with you, I mean, it's a long time from me                  12 dad committing suicide from when it come out in the                  13 papers, but all I can say is it affected him a lot.                  14 Something was taken out of his life that he loved doing                  15 and, yeah, I would say over the years his depression got                  16 worse because he wasn't come watching me play football.                  17 Q. Some might say, Mr Flitcroft, that footballers are in                  18 the public eye by definition. If you're a Premiership                  19 footballer, you play in the public eye, and because of                  20 that, you're somehow a role model, such that the press                  21 are entitled to expose your private life. Do you agree                  22 with that sentiment?                  23 A. Well, who says we're role models? It's the papers who                  24 say we're role models, I think, so from my point of                  25 view, we're doing a job and our job is playing football.</p> <p style="text-align: center;">Page 73</p>	<p>1 A. Just that, you know, there's been some high-profile                  2 cases lately and mine was a massive case, you know.                  3 Neil Wallis says it was a historic victory for press                  4 freedom, and I just felt that at the time when they got                  5 the second girl, when I had the injunction, they were                  6 trying everything they could, and if they got                  7 information illegally, then my injunction shouldn't have                  8 been lifted, and it may have helped some of the other                  9 footballers that have been in, you know, in -- trying to                  10 protect their private lives lately. You know, at the                  11 end of the day, they might be high profile, the John                  12 Terrys and Rio Ferdinands and Ryan Giggs, but what gets                  13 put in the paper does affect how them kids feel about                  14 them and at the end of the day, they're in the public                  15 and in the newspapers because they're excellent                  16 footballers. You know, John Terry gets the captaincy                  17 took off him by Capello. Well, did Capello want to take                  18 the captaincy off him? I presume not, because John                  19 Terry's a leader. I would have thought that he knew                  20 that if he didn't, then the press that he was going to                  21 get was going to be horrendous for him, and at the same                  22 time, Graham Souness stood by me at Blackburn. He said,                  23 "What happens in Garry's private life is private. It's                  24 nothing to do what's going on at the club and it only                  25 matters on the pitch what he does."</p> <p style="text-align: center;">Page 75</p>
<p>1 If that puts you in the public eye, then surely it                  2 doesn't affect your private life. Like I say again,                  3 even though I did wrong, that was something that me and                  4 Karen should have dealt with. That's all I can say                  5 about that.                  6 Q. I understand. Did you ever complain about any of this                  7 to the Press Complaints Commission? Did you ever have                  8 any contact with them in?                  9 A. No. To be totally honest with you, I wouldn't know                  10 anything about the PCC, really, other than going on the                  11 Internet, and Neil Wallis, who did my case, was on the                  12 panel at the time.                  13 Q. He was on the PCC panel at the time, what, of the                  14 injunction?                  15 A. Yeah, around that time.                  16 Q. But did you ever think about going down that route,                  17 complaining to them?                  18 A. Never. I mean, once I got the injunction -- you know,                  19 I didn't have the press turning up at my house through                  20 the injunction. It was when it got lifted that it was                  21 horrendous.                  22 Q. I understand. Is there anything that you wish to add?                  23 This is your opportunity if there's anything that you'd                  24 like to say or you'd like the judge to take away from                  25 your evidence?</p> <p style="text-align: center;">Page 74</p>	<p>1 MS PATRY HOSKINS: Thank you very much on behalf of the                  2 Inquiry and I'm sure the judge will have a few points.                  3 LORD JUSTICE LEVESON: Thank you very much indeed.                  4 I appreciate you coming. I really do. Thank you.                  5 A. Okay.                  6 MS PATRY HOSKINS: Sir, again, I don't know if we should                  7 take a short break just to get the witnesses ready.                  8 MR DAVIES: Sir, I just wonder if I might say something                  9 before we take a break. It's simply this: the copy                  10 I have of Mr Flitcroft's statement is redacted for about                  11 ten paragraphs in the middle.                  12 LORD JUSTICE LEVESON: Ten paragraphs?                  13 MR DAVIES: Ten paragraphs, from what looks to be halfway                  14 through 35 to the beginning of 45. It's headed "For                  15 distribution to core participants", so I was slightly                  16 taken by surprise when questions were asked about those                  17 paragraphs. I'm not suggesting any harm was done but it                  18 did mean that we didn't have notice of the evidence.                  19 LORD JUSTICE LEVESON: I'm very sorry to hear about that.                  20 What I'm more concerned to hear about is that some                  21 failure of the system.                  22 MS PATRY HOSKINS: I think we'll just have to check which                  23 version is on the Lextranet database. It could be that                  24 Mr Davies has obtained an earlier copy, because there                  25 was an earlier version of the statement that had more</p> <p style="text-align: center;">Page 76</p>

<p>1 significant redactions. It could be that he simply got 2 an earlier version, but we will check the Lextranet 3 system and we'll find out whether there's been a glitch 4 in the system. I don't know if any of the other core 5 participants have the same problem. 6 MR GARNHAM: Yes. 7 MS PATRY HOSKINS: There's been a glitch. I can only 8 apologise for that. We'll ensure that the correct 9 version goes onto the website in due course and if there 10 is any concerns -- if any of the core participants wish 11 to raise any concerns with us about whether or not they 12 would have wished to ask additional questions, I would 13 be grateful if they could have a chat with me in the 14 short break. 15 MR DAVIES: I'm not suggesting harm was done. I really 16 raised it for the future. 17 LORD JUSTICE LEVESON: No, no. That's absolutely correct, 18 Mr Davies. The care that we obviously have to take is 19 that it's the final version that everybody sees. 20 All right, thank you very much. I think we'll carry 21 on. I know that there's a point to raise at some stage, 22 but given the identity of the next witnesses, I don't 23 think it's fair to let them wait. 24 MS PATRY HOSKINS: Sir, in that case, I ask Mr and 25 Mrs Watson to come.</p> <p style="text-align: center;">Page 77</p>	<p>1 course, Mr Watson, if you would like to answer any of 2 the questions, it's entirely acceptable. 3 MR WATSON: Thank you. 4 Q. For the sake of the technician, the witness statement is 5 24125. First of all, could I ask you, Mrs Watson -- I'm 6 going to direct my questions to your wife. 7 MR WATSON: Yes. 8 Q. Could I ask you to state your full name to the Inquiry? 9 A. Margaret Watson. 10 Q. You've provided a witness statement to this Inquiry, 11 which I think you have in front of you. Can you confirm 12 that everything you say in that is true to the best of 13 your knowledge and belief? 14 A. It's absolutely true, yes. 15 Q. I'm going to take you through why you're here and what 16 has happened to you. For everyone who has the 17 statement -- again, the caveat everyone else who's 18 watching will have it later on today -- we're going to 19 be looking at paragraph 2 of the statement. If you 20 would like to turn that up so that you know where I am, 21 feel free to do that. It should just be over the page 22 behind that. Exactly. 23 If I can, I'm going to lead you through some of the 24 background. You just tell me whether you think what I'm 25 saying is correct or not.</p> <p style="text-align: center;">Page 79</p>
<p>1 LORD JUSTICE LEVESON: Very good. 2 MR JAMES WATSON AND MRS MARGARET WATSON (affirmed) 3 LORD JUSTICE LEVESON: Please sit down. You've probably 4 heard me say that I recognise that this is a difficult 5 exercise and that you're speaking about matters that are 6 private and extremely deeply felt by you. I'm very 7 grateful to you for giving me the information that you 8 give me. It all goes back, I readily recognise, a long 9 time, and I'm sure you appreciate that there are limits 10 to what this Inquiry can do, but I do think there are 11 features of what you've said in your statement that are 12 important to hear for the purposes of fairness and 13 balance. So thank you very much for coming. 14 You've equally heard me say that if you need a break 15 at any stage, then you only need to say so, and I've 16 stored up five minutes by not having a break between the 17 two witnesses. 18 MRS WATSON: Thank you. 19 LORD JUSTICE LEVESON: All right? But please, this is not 20 to be more stressful than it absolutely has to be. 21 MRS WATSON: Thank you. 22 LORD JUSTICE LEVESON: Thank you. 23 Questions from MS PATRY HOSKINS 24 MS PATRY HOSKINS: I understand that you, Mrs Watson, are 25 going to be giving the majority of the answers, but of</p> <p style="text-align: center;">Page 78</p>	<p>1 You explain that on 10 April 1991, you're much loved 2 and now sorely missed 16-year-old daughter, Diane, was 3 stabbed to death by a fellow pupil, Barbara Glover, in 4 the grounds of Whitehill Secondary School, her school, 5 during morning recess, so during the morning break. 6 A. Yes. 7 Q. You tell us that on 25 July, so a few months later, 8 Barbara was convicted of her murder. 9 A. Yes. 10 Q. She was also found guilty of assaulting Diane the day 11 before the murder? 12 A. That's correct, yes. 13 Q. You say that she received -- this is Barbara, of 14 course -- a sentence without limit to time and was 15 committed to a secure unit? 16 A. That's correct. 17 Q. And then she was released, you explain, several years 18 later, 26 January? 19 A. January, yes, 2000. 20 Q. Okay. 21 LORD JUSTICE LEVESON: So for English ears, effectively she 22 was convicted of murder and received a mandatory life 23 sentence? 24 A. Yes, exactly. 25 MS PATRY HOSKINS: I really don't want to have to ask you</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

1 any detailed questions about --  
 2 A. Please feel free. We want this information to come out.  
 3 Q. All right. Let me ask you about the day that Diane  
 4 died. Can you tell me a little bit about that day?  
 5 A. On 9 January -- sorry, April 1991, Diane had been  
 6 threatened by Barbara Glover through our son Alan. She  
 7 told Alan to give Diane a message that she was going to  
 8 sort her out, have her beaten up and slash her. Do you  
 9 want me to go into detail about --  
 10 Q. Yes, absolutely.  
 11 A. This revolved around a boy --  
 12 Q. I understand.  
 13 A. -- who was going out with Barbara. Am I doing all  
 14 right?  
 15 Q. Can you just pause a moment?  
 16 LORD JUSTICE LEVESON: You're absolutely fine. I don't want  
 17 to distress you by going into all the details.  
 18 I understand. The statement is there. I don't think  
 19 it's necessary for you to do that because what really  
 20 matters is what happened thereafter, isn't it? And what  
 21 concerns you, I know, is not that there was anything  
 22 wrong in the criminal justice system -- she was  
 23 convicted of murder. There was no question, as  
 24 I understand it, of provocation. It wasn't raised or  
 25 was entirely rejected by the court.

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1 A. Rejected.  
 2 LORD JUSTICE LEVESON: And that's what the position was. Is  
 3 that a fair summary?  
 4 A. Yes, that's true.  
 5 LORD JUSTICE LEVESON: I just don't want to --  
 6 A. Yes, I understand.  
 7 LORD JUSTICE LEVESON: -- make you go through the process of  
 8 that summary.  
 9 MS PATRY HOSKINS: Thank you. That's very helpful. I'm  
 10 only asking you these questions to get to exactly the  
 11 same point.  
 12 LORD JUSTICE LEVESON: Well, there you are.  
 13 MS PATRY HOSKINS: That's always the way. Your Lordship is  
 14 much faster and much better than me.  
 15 Essentially, when she was tried for the murder of  
 16 your daughter, she attempted to argue that she had been  
 17 provoked but that was expressly rejected by the judge.  
 18 A. Yes.  
 19 Q. Okay. You explain at paragraph 6 that just days  
 20 after -- sorry, I'll let you turn over the page so you  
 21 know where I am. Just a few days after the conviction  
 22 on 2 August 1991, an article by Jack McLean was  
 23 published in the Glasgow Herald. You set out the  
 24 article in your exhibits but we won't turn it up because  
 25 it's minuscule and hard to read. But I'd like you to

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1 explain in your own words what that article said and why  
 2 you were so upset by it.  
 3 A. Well, I didn't see it when it was first released because  
 4 we were too upset and couldn't speak to anyone, but  
 5 a friend of ours had read it and later on, maybe a month  
 6 or two after, she brought it to our attention and it  
 7 just wasn't factually correct. What he was doing, Jack  
 8 McLean of the Glasgow Herald, he was painting a picture  
 9 of the murderer of our daughter as being the victim, and  
 10 we came from an upper working class and looked down on  
 11 others with disdain.  
 12 Q. Let's pause there. The article was about the murder of  
 13 your daughter; is that correct?  
 14 A. Yes.  
 15 Q. It was also explaining that this Barbara Glover had been  
 16 convicted?  
 17 A. Yes.  
 18 Q. And you explain that he seemed to indicate that she was  
 19 a victim some way?  
 20 A. Yes.  
 21 Q. Can you remember what concerned you about that  
 22 allegation?  
 23 A. He said that he -- we came from an upper working class  
 24 background and Diane looked down on Barbara Glover with  
 25 disdain.

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1 Q. You obviously attended the trial. Had there ever been  
 2 any discussion, either by Barbara Glover or in the  
 3 findings of the judge, that your daughter had looked  
 4 down on Barbara Glover with disdain?  
 5 A. No, none of this evidence came out in court. This was  
 6 just his assessment because he was a campaigner for  
 7 young offenders and didn't like the idea of Barbara  
 8 Glover getting a life sentence for murdering my  
 9 daughter.  
 10 Q. I understand.  
 11 A. He knew nothing about the case. Absolutely nothing.  
 12 Q. Okay. He also, in the article you tell us at  
 13 paragraph 8, indicated in the article that Barbara  
 14 Glover had been so scared that she had wet herself in  
 15 the dock. Was that right?  
 16 A. That never happened. We were at the trial throughout  
 17 it, and I can assure you she did not wet herself in  
 18 court. That was to gain public sympathy on her side for  
 19 his campaign for young offenders, and what he did there,  
 20 he picked an individual case he knew nothing about to  
 21 spearhead his campaign, which he's absolutely no right  
 22 to do. If journalists want to do campaigns for anyone  
 23 about anything, they must ensure they have all the facts  
 24 before them before they start delving into people's  
 25 private lives and causing other tragedies to take place.

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<p>1 Q. So if I can summarise it in this way: the article, in 2 your eyes, portrayed Diane as the bully? 3 A. No doubt. 4 Q. And portrayed Barbara Glover as the victim? 5 A. Yes, (overspeaking) so, yes. 6 Q. How did you feel about that when you saw the article for 7 the first time? 8 A. To be perfectly honest, we were in too much pain and 9 distress at that time about Diane. All we wanted was 10 Diane back. We wanted to take her place and give her 11 her life back. We couldn't do that, but we decided 12 after a while to go up to the Glasgow Herald office and 13 ask to speak to Mr McLean. 14 Q. Just pause before you tell us that because there was 15 a second article, you tell us -- 16 A. Yes, we didn't do much about the first because we 17 weren't fit. 18 Q. I understand. You were grieving. 19 A. Yes. 20 Q. 26 June 1992, the Glasgow Herald published a second 21 article by the same gentleman, which compared Diane's 22 murder with another murder case where the accused had 23 been found not guilty. 24 A. Mm. 25 Q. Again, you say the comparisons may give a misleading</p> <p style="text-align: center;">Page 85</p>	<p>1 Q. I'll come back to that later. You got this response and 2 you weren't happy with it. 3 A. Sorry? 4 Q. You got this response from the Glasgow Herald and you 5 weren't happy with it, obviously. You've explained 6 that. What would you have liked for them to do? In an 7 ideal world, what would they have done as a result of -- 8 A. All they have to simply do is look into the facts. We 9 didn't have a transcript of the trial then, but if 10 they'd taken the time to study even the newspaper 11 cuttings, they'd have realised that not only was Barbara 12 Glover found for first-degree murder; she was found 13 guilty of assaulting Diane -- an unprovoked assault on 14 Diane the day before. So it's a completely unjustified 15 column. 16 Q. I don't mean to cut across you. Should they have 17 contacted you maybe to check the facts? 18 A. Oh, that would have been too much bother, wouldn't it? 19 His only interest was in offenders, which he's quite 20 entitled to do, but as I said before, they must get 21 their facts before they delve into a private case and 22 make sure -- it was certainly -- obviously it was a 23 biased article. It was intended to be a biased article, 24 but what he has no right doing is painting Diane as 25 something she wasn't.</p> <p style="text-align: center;">Page 87</p>
<p>1 picture of the situation. Mr McLean, you say, "used 2 this article on this unrelated case to call for the 3 murderer of our daughter to be released, something we 4 found insensitive." 5 A. Yes. 6 Q. What was your reaction? 7 A. I was absolutely fuming. Enough was enough. I realised 8 it was going to be some kind of campaign on his behalf 9 and I couldn't take it any more and I thought -- being 10 unaware how the media works, I thought I would go down 11 to Glasgow, the Herald's office, and ask to either speak 12 to Mr McLean personally or the editor, and I was told by 13 the reception I had no right to come up and ask to speak 14 to any journalist. If I have a complaint about 15 a journalist, I must put it in writing, which we duly 16 did. 17 Q. Did you have any response to that letter? 18 A. Yes. 19 Q. Right. 20 A. It wasn't exactly helpful. 21 Q. What did they say in that letter? 22 A. It's more or less standing by his original article. It 23 wasn't so much what he wrote to me. It was what he 24 wrote to my MP, who he had also been in touch with, 25 Mr Michael Martin, which cause the upset.</p> <p style="text-align: center;">Page 86</p>	<p>1 Q. I understand. 2 A. He tore everything that we had of Diane apart, the 3 essence of her life, the person who she was. We didn't 4 even have the memory(?) of her life because of people 5 like him. 6 Q. Obviously they hadn't checked the facts. 7 A. No. 8 Q. They hadn't spoken to you and you were not happy with 9 the written response that you'd got. 10 A. You could say that. 11 Q. So what did you do then? Still focusing on the Glasgow 12 Herald, what did you do? 13 A. As I say, my MP also wrote to Mr McLean too, and I did 14 ask for another meeting through the Glasgow Herald. 15 I requested a meeting, which I'd been refused before, 16 and I was told no, it wouldn't be possible. So -- 17 Q. You eventually did get your meeting. How did you get 18 that meeting? 19 A. Yes, we did a six-week campaign standing outside the 20 Herald office with a banner, demanding to meet with 21 Mr McLean. 22 Q. A banner which said -- can you remember? 23 A. Well -- 24 Q. You don't want to repeat it? 25 A. No.</p> <p style="text-align: center;">Page 88</p>

<p>1 Q. You don't have to repeat it, but indicating that you 2 wanted to have a meeting about this and eventually you 3 had a meeting -- 4 A. Yes. 5 Q. -- with Mr McLean and the editor of the Glasgow Herald 6 and again, did they apologise? 7 A. No, no. 8 Q. What did they say? 9 A. We drafted questions on the transcript of the trial and 10 the evidence, and on the printed questions to Mr McLean, 11 Mr McLean decided to compound the pain he had caused to 12 us by making up false allegations that he'd spoken to 13 our doctor, Barbara Glover's doctor, the teachers from 14 Diane's side of the case and teachers from Barbara 15 Glover's side of the case, but we went up to Whitehall 16 Secondary School and got written confirmation that 17 no one had even heard of Mr McLean, let alone spoken to 18 him -- 19 Q. So he told you things that were untrue? 20 A. The doctor gave his written confirmation, and 21 unfortunately before I sent my witness -- my evidence to 22 you, I've just come across last week a new piece of 23 evidence where the headmaster has written -- 24 Q. Okay. 25 A. -- about his concerns about his reputation being called</p> <p style="text-align: center;">Page 89</p>	<p>1 a campaign of harassment or diminishing by your 2 daughter? 3 A. Yes. 4 Q. And for one of the allegations made in the article that 5 you refer to is that previous to the murder, Donna, so 6 Diane, had pulled Barbara's T-shirt off, leaving her 7 standing in her bra in front of other children. That's 8 simply fiction, isn't it? 9 A. It simply did not happen. For the start, it wasn't 10 a t-shirt Barbara Glover had on; it was a sweatshirt. 11 That's one fact it didn't get right. And it reads as if 12 Diane walked up to Barbara Glover and simply pulled off 13 her T-shirt. That is not what happened. What happened 14 is Barbara Glover -- this is on the night when Barbara 15 Glover had assaulted Diane, unprovoked assault, 16 remember, she'd been found guilty of. She had Diane -- 17 Diane was small, like me. Barbara Glover was tall, so 18 to try and defend herself, Diane had got hold of the 19 hood of her sweatshirt to try and get her down and her 20 sweatshirt did ride up but it didn't come off, anywhere 21 near come off. So where these people are getting this 22 information, I would like to know. 23 Q. So again, you would say that that article portrayed your 24 daughter as a bully? 25 A. Yes.</p> <p style="text-align: center;">Page 91</p>
<p>1 into question. 2 Q. I understand. 3 A. Because he was the only teacher that dealt with both the 4 Watsons and the Glovers. No other teacher dealt with 5 our families. 6 Q. I understand. 7 A. So he feels his reputation has been besmirched. 8 Q. I understand. So you weren't happy with the outcome of 9 that meeting. I can understand that. Can I move you on 10 then to an article that was written shortly after that 11 in September 1992, in Marie Claire feature magazine, 12 a feature, you tell us at paragraph 10, by Meg Henderson 13 about British children serving life sentences. That 14 article is in the exhibits. I don't think we need to 15 turn it up on the screen, but I'm going to ask you some 16 brief questions about. 17 Obviously it didn't actually mention your daughter 18 by name, did it? 19 A. No, it used other names. 20 Q. It used another name, so it used the name "Donna" 21 instead of "Diane"? 22 A. "Donna", that's correct. 23 Q. And "Jean" instead of "Barbara"? 24 A. Yes. 25 Q. And it alleged that there had been essentially</p> <p style="text-align: center;">Page 90</p>	<p>1 Q. It didn't get its facts right? 2 A. No. 3 Q. And it portrayed Barbara Glover as the victim? 4 A. Uh-huh. 5 Q. Did Marie Claire contact you prior to writing that 6 article? 7 A. No, none of them have. 8 Q. Did you take any action in respect of that article? 9 A. Yes. We felt the best course there -- because we'd 10 never heard of the Marie Claire magazine before -- was 11 to see a solicitor. 12 Q. How did it come to your attention, that article? 13 A. It was actually a friend of my daughter's who'd read it 14 and thought that we should read it because her mother 15 was more than aware it was referring to Diane. 16 Q. What action did you take as a result of that? 17 A. We sought the advice of a solicitor. 18 Q. I understand. I understand that you eventually did get 19 an apology from Marie Claire. 20 A. Not just like that. 21 Q. I appreciate -- 22 A. At first, they were not interested. The original answer 23 to our complaint -- I don't know if you have a copy of 24 the small reply we were -- today -- they actually were 25 to write it. They wrote it. It was only about three</p> <p style="text-align: center;">Page 92</p>

<p>1 lines to go in the letters page, but we weren't to have 2 any say in it, and obviously we refused to accept that. 3 We wanted a full retraction and apology. We didn't get 4 a retraction, but we eventually got the apology. 5 Q. How much later? 6 A. Oh, that was about a year, wasn't it? 7 Q. And how many letters? Can you remember, approximately? 8 A. No, the only reason we got -- we went down to London and 9 demanded to speak to Glenda Bailey, who was then the 10 editor of the Marie Claire. At first she refused to see 11 us, then she finally relented. We showed her the 12 evidence that we had and she said she had the full 13 transcript of the trial and I said, "That's funny. 14 We're not allowed to get that." You have to go through 15 a process. I don't know if it's the same, but then you 16 did. And she said, "Well, I can assure you we have." 17 I said, "Right, can we see it?" It was press cuttings, 18 all circled with Barbara Glover's evidence. I said, 19 "Where is the other witnesses?" She says, "We don't 20 have copies of that." I think that says it all. 21 Q. So it was based simply on Barbara Glover's evidence? 22 A. Oh yes, because it was a campaign to get her released. 23 Q. Turn to paragraph 14 of your statement and I'm going to 24 take you through this. I don't want to cause you any 25 distress, but you tell us there that --</p> <p style="text-align: center;">Page 93</p>	<p>1 moving, time was getting on and nothing -- letters were 2 flying back and forward but nothing was happening. 3 I phoned the solicitor one morning and I say how upset 4 Alan was becoming, and could he possibly explain the law 5 to Alan because he's accusing Jim and I of just sitting 6 back and doing nothing. So when he come out of school 7 that particular day, we took him to see the solicitor 8 who explained that the dead cannot be defamed, so once 9 you are dead, you can say what you like about the 10 deceased, and we have no recourse in the law. 11 Q. How did Alan react to that? 12 A. He was extremely upset. He said, "Surely there's 13 something can be done?" He says, "Not legally." He 14 says, "All we can do is write to the magazine", and I'm 15 afraid that all just became too much for Alan. And 16 I don't blame him because I can understand. So the 17 journalists in this country kicking on about the 18 chilling effect if you do away with the Press Complaints 19 Commission -- which you have to do away with -- but if 20 you do away with the Press Complaints Commission, it 21 will have a chilling effect on journalists. What about 22 the deadly effect it has on the victims and 23 misreporting, the malicious lies, the malicious 24 falsehoods. Just because a person's deceased, you can 25 write what you want, and they certainly did it.</p> <p style="text-align: center;">Page 95</p>
<p>1 LORD JUSTICE LEVESON: Give them a minute. 2 MS PATRY HOSKINS: Do you have that? Paragraph 14, page 4. 3 You tell us there that tragically, these articles -- and 4 obviously you refer to those articles in some details -- 5 tragically it was all too much to bear for your son, 6 Alan, and he took his own life on 5 December 1992. How 7 old was Alan? 8 A. 15. 9 Q. He was found, you tell us, holding copies of the 10 articles referred to above? 11 A. Without a doubt. 12 Q. "We were in no doubt", you say, "that the way that 13 Diane's death was misreporting by Meg Henderson of Marie 14 Claire, Jack McLean and others --" 15 A. We've actually got the proof now because we managed to 16 get a transcript of the trial, which will prove 17 everything we said is correct. 18 Q. Why do you say that you are sure in your own minds that 19 these articles and the misreporting contributed directly 20 to his death? 21 A. Well, Alan couldn't understand particularly -- the Marie 22 Claire one particularly upset Alan because it was 23 a disgrace. That's not journalism. But he wanted to 24 know what we were doing about it, and we told him we'd 25 sought the advice of a solicitor and as things weren't</p> <p style="text-align: center;">Page 94</p>	<p>1 Q. I understand that to add insult to injury, on the day of 2 Alan's funeral, a third article by Jack McLean was 3 published in the Glasgow Herald. It made scathing 4 reference to a debate in the House of Commons which had 5 taken place shortly after Alan's death and during which 6 your local MP Michael Martin criticised Mr McLean about 7 his insensitive article. How did you feel when you saw 8 that article? 9 A. I couldn't believe it because that was the day of Alan's 10 funeral. I thought at least they would leave us alone 11 for Alan's funeral. They took away his respect, they 12 took away his dignity, and the very day that we were 13 laying our son to rest. If you say that's good 14 journalism -- if any journalists thinks that's good, God 15 forgive you, because I won't. 16 Q. I want to take you on then to the action or the steps 17 that you took following -- I mean in respect of all 18 these articles, if I can. You've explained the contact 19 you had with the Glasgow Herald. You've explained the 20 contact that you had with Marie Claire magazine. I want 21 to ask you about your experiences with the Press 22 Complaints Commission, if that's all right. That part 23 of your evidence starts at paragraph 24, if you want me 24 to refresh your memory. 25 A. Refresh my memory.</p> <p style="text-align: center;">Page 96</p>

24 (Pages 93 to 96)

<p>1 Q. You explain that your husband and yourself made a 2 complaint to the PCC in September 1992 based on the Code 3 of Practice, as it was then, and you explain that in 4 particular the Marie Claire article had been inaccurate 5 to the point of distortion and had intruded on your 6 privacy with tragic consequences. You say the complaint 7 was pursued but then you were unable to take matters 8 further at that time because of ill health and so on, 9 and your solicitor in error wrote to the PCC saying that 10 you were happy and that it had been concluded -- 11 A. Well, I can understand because he had been trying to get 12 in touch with us, but because we'd lost Alan -- 13 Q. I understand. I don't want to ask you any more of that, 14 but you then recontacted the PCC after that, didn't you, 15 to say that actually it hadn't been resolved and that 16 was a mistake? 17 A. Error, yes. November. 18 Q. Can you tell me briefly about what happened then with 19 the PCC and whether you feel that they'd dealt 20 adequately with your complaint? 21 A. Well, the gentleman I spoke to -- Mr Austin, I believe 22 his name was -- he wasn't the least bit interested in 23 what we had to say. He didn't take -- he couldn't seem 24 to take on board that we had started a complaint, 25 unfortunately we'd lost a son in between that complaint</p> <p style="text-align: center;">Page 97</p>	<p>1 about it. Do you have the article there? 2 Q. Yes, I have. I'm just trying to find the number. 3 I think it's 31843. It's the article itself. In your 4 little bundle, if you turn past your witness statement 5 and look to page 14A? 6 LORD JUSTICE LEVESON: If you can read that, you'll do very 7 much better than I. 8 MS PATRY HOSKINS: I don't think we'll be able to read that, 9 but I'm sure you can tell us about the gist of it. Why 10 did that article upset you? 11 A. I think the headline says it all: 12 "Child crime fighters turn into criminals." 13 Then it goes on to describe how when children are 14 young, if they're bullied or abused, they may go on to 15 commit violent crime. Then there's a photograph, 16 a large photograph -- obviously this is a small one -- 17 of Mary Vale(?) and a photograph of the daughter -- of 18 my daughter's murderer, Barbara Glover. 19 Q. We can see that. I don't think anybody will be able to 20 read that, but the photograph on the right-hand side is 21 Barbara Glover, yes. Did it portray -- 22 A. Yes, apparently, Scottish Office had released some 23 report about children who are violated when they're 24 younger may go on to commit violent crime, and to make 25 this case, the Mail on Sunday in Scotland decided to</p> <p style="text-align: center;">Page 99</p>
<p>1 and that we would like to now try, if we could possibly 2 take it forward, but he was not interested. He said our 3 solicitor had written to him, which apparently he had 4 done. I'm not disputing that. Our solicitor's done it 5 in good faith because he knew we weren't fit to deal 6 with anything, let alone the Press Complaints. 7 Q. So you're saying that the PCC said to you that this has 8 already been dealt with and closed -- 9 A. As far as we were concerned, yes. 10 Q. -- and they're not reopening it? "We're not reopening 11 it, despite the fact that you've told us that you want 12 it reopened." 13 Is that right? 14 A. Mm-hm. 15 Q. Did you have any other contact with the PCC at all after 16 that? 17 A. Yes. There was a -- are you referring to the article 18 that was you're published in the Sunday Mail? It was 19 grossly misleading and an insult, again, to our 20 daughter's memory. 21 Q. Could you tell us a little about that article? 22 A. Well, once again we weren't informed this article was 23 going to print. I think it was someone else, I can't 24 remember, came up to the door when the Sunday was 25 released and gave us a copy because they were so upset</p> <p style="text-align: center;">Page 98</p>	<p>1 publish a large spread on child fighters turned into 2 criminals. 3 Q. Did they portray Ms Glover as a victim? 4 A. Well, obviously, just looking at that at a glance -- you 5 don't have to read the article. Just looking at it at 6 a glance, you think that the reporter's referring to 7 Barbara Glover as being a victim and most certainly does 8 not. It doesn't even mention Barbara Glover. 9 Q. At the trial of Barbara Glover, was there any hint of 10 a -- 11 A. No. 12 Q. Was there a hint of a suggestion that she had been such 13 a victim? 14 A. No. 15 Q. I understand. Right, so as a result of that article, 16 you were telling me you took -- you had further contact 17 with the -- 18 A. Sorry? 19 Q. As a result of that article, you had further contact 20 with the Press Complaints Commission? 21 A. Yes. I emailed them and I hoped they would take this 22 one seriously, but clearly they did not. 23 Q. Can you just tell me in a nutshell what their response 24 to you was? 25 A. Well, basically because -- I mean, I can't remember</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 verbatim. I would need to --                  2 Q. You really don't have to remember verbatim. It's                  3 page 15 of the exhibit, so just after your witness                  4 statement and it's 31844.                  5 A. Well, if I just say it in general.                  6 Q. Is this a correct letter?                  7 A. Yes. 3 November 2003.                  8 Q. Yes.                  9 A. What they were basically saying, although they found the                  10 Sunday Mail article misleading, the headlines                  11 misleading, they didn't really see any reason to take it                  12 further because in the context, they did put on the                  13 other side that Barbara Glover had -- the judge had said                  14 that Barbara Glover had not been bullied by Diane and                  15 Mr Sweet had written a letter. He was -- I think it was                  16 the deputy editor, I think, and he'd written a letter to                  17 the Press Complaints. I think that would say it all.                  18 Q. I understand. So your complaint about the article was                  19 that the headline was completely misrepresentative --                  20 A. Grossly misleading, an insult.                  21 Q. And it was misrepresentative of what the article                  22 actually said?                  23 A. Yes.                  24 Q. And it was insulting?                  25 A. Yes.</p> <p style="text-align: center;">Page 101</p>	<p>1 a section which describes the work that you have done                  2 since your children passed away. You've campaigned, you                  3 explain to us, for change in relation to a number of                  4 issues which are of importance for both families of                  5 crime victims which have been subject to press                  6 wrongdoing, and the public at large. One of the things                  7 you tell us that you've done is you've been involved in                  8 various support groups, including families of murdered                  9 children and justice for victims, and --                  10 A. We actually set up the families of murdered children                  11 one.                  12 Q. You set that one up?                  13 A. Yes.                  14 Q. And you've, in fact, had success to this extent, that                  15 there are now provisions in the Coroners and Justice Act                  16 2009 which allow the courts to make exploitation                  17 proceeds orders in respect of offenders and so on.                  18 A. Yes.                  19 Q. That's the first thing. But the second issue, and more                  20 importantly for you, you say, is the issue of defamation                  21 of the deceased. Would you like to say a few words                  22 about your campaign in respect of that?                  23 A. Well, we're pleased to say that the Scottish government,                  24 after a lot of years of campaigning, did publish                  25 a consultation paper on defamation of the deceased --</p> <p style="text-align: center;">Page 103</p>
<p>1 Q. To you?                  2 A. Well, our childrens' memory, yes.                  3 Q. I understand, and the Press Complaints Commission                  4 essentially said -- we can see it from the text of the                  5 letter -- that well, it is misleading but the article                  6 itself doesn't suggest that she's a victim.                  7 A. They accepted it was misleading. And I also found                  8 something else out. When I got this letter back, I sent                  9 another email, a follow-up email to the Press Complaints                  10 once they'd given me their judgment, and asking them why                  11 their complaint was not on a website because they seemed                  12 to have made this big thing of set up a website and all                  13 complaints are on it. I think you've got a copy of the                  14 response to that too, which clearly states that they                  15 don't.                  16 Q. Yes.                  17 A. So they either do one thing or they don't. They're                  18 misleading the public and they're misleading this                  19 Inquiry.                  20 Q. I understand. Is it safe for me to say that you weren't                  21 entire satisfied with the way they dealt with that                  22 complaint either?                  23 A. No.                  24 Q. Let me ask you finally about the section of your                  25 statement headed "Our campaign for change". This is</p> <p style="text-align: center;">Page 102</p>	<p>1 it's called "Death of a Good Name -- Defamation and the                  2 Deceased" -- which closed in April 9 this year.                  3 Obviously, we're still waiting for the results of that,                  4 and hopefully they'll get a stronger power. So we need                  5 protection. Just because a person's died, their                  6 reputation shouldn't die with them. They shouldn't be                  7 besmirched at the will of some sick journalists --                  8 because that's what they are, sick.                  9 Q. I understand.                  10 A. They unjustly attack the memory of the deceased, because                  11 you've got to remember, that memory's all the living                  12 have of them. So please don't besmirch the innocent to                  13 make a case for offenders. That's not right and it's                  14 not just.                  15 Q. I understand.                  16 A. So we're hoping to get the results this year, but we                  17 don't know.                  18 Q. In a moment, I'm going to ask your husband to read out                  19 a short statement that he's prepared about but before                  20 I do, would you like to add anything?                  21 A. I would like to see the English Parliamentarians getting                  22 some backbone and publishing a consultation paper here                  23 in England for victims of crime on defamation of                  24 homicide victims.                  25 Q. Is there anything else that you'd like to add?</p> <p style="text-align: center;">Page 104</p>

<p>1 A. No, just to thank everyone for being so kind and 2 listening to us.</p> <p>3 Q. Not at all. Thank you. Mr Watson, I think you have a 4 short --</p> <p>5 MR WATSON: Just a short one. It says: 6 "Given the Inquiry looking into the media and the 7 ethics and complaint procedure of the Press Complaints 8 Commission, we strongly feel the PCC is paid for by the 9 newspapers who published false, grossly misleading 10 articles about the events leading up to our dear 11 murdered daughter Diane, which added to our family's 12 unbearable pain and anguish. Sadly, the malicious 13 falsehoods published as fact were too much for our son, 14 Alan, who died with these articles in his hand. We feel 15 that the PCC should be replaced by a completely 16 independent body or tribunal who will go over the 17 complaints evidence in person."</p> <p>18 A. That's what I meant to say, if I may say that. 19 Q. Of course? 20 A. If you're going to set up an independent regulatory body 21 or tribunal, please allow the victims of the media to go 22 and give their evidence in person to that tribunal, 23 where they can look it over. It would be nice if the 24 actual offending journalist was there when these 25 hearings took place and they can ask each other</p> <p style="text-align: center;">Page 105</p>	<p>1 Right. I'm sure you've been told, Mr Caplan, that 2 in your absence, Mr Garnham raised a concern about the 3 way in which the rebuttal to Mr Grant's evidence was 4 printed by one of the titles for whom you appear. The 5 phrase that he pointed to was "mendacious smears driven 6 by a hatred of the media". What I'm going to do, before 7 I ask Mr Sherborne, who wants to raise some other 8 points, is to ask Mr Garnham just to articulate so that 9 you can hear him, his concerns about that phrase.</p> <p>10 MR GARNHAM: Sir, as I sought to explain this morning, our 11 concerns are that when a witness comes to give evidence 12 to your Inquiry, whoever it is, and in particular when 13 they give opinion evidence at the invitation of counsel 14 to the Inquiry, they should be able to do so without 15 fear that by the following morning they will be confused 16 by a national newspaper of lying. It seems to us, sir, 17 that the judgment as to whether or not a witness is 18 telling the truth is yours and yours alone, and there is 19 a real danger in the sort of level of press commentary 20 that we've seen this morning having a deleterious effect 21 on the work of your Inquiry because, to put it frankly, 22 witnesses will be very cautious, we fear, about coming 23 and giving opinion evidence, or that matter, factual 24 evidence, if the likelihood is that they will face that 25 sort of onslaught in the press the following morning.</p> <p style="text-align: center;">Page 107</p>
<p>1 questions and sort it out and hopefully I'll know they 2 try their best.</p> <p>3 Q. Do either of you have anything that you wish to add? 4 MR WATSON: No. Thank you very much. 5 MS PATRY HOSKINS: Those are all my questions. I don't know 6 if the judge has questions. 7 LORD JUSTICE LEVESON: No. Thank you very much. Your 8 concerns and complaints range over a number of issues, 9 some of which are not really for me, but the way in 10 which complaints about accuracy are dealt with and the 11 very difficult issue about headlines and what can be 12 read into headlines, most certainly is. I'm very 13 grateful to you for coming down from Scotland and taking 14 the time. Thank you. 15 MR WATSON: Thank you, sir. 16 MRS WATSON: Thank you. 17 MS PATRY HOSKINS: Sir, it's 12.30. 18 LORD JUSTICE LEVESON: Yes. 19 MS PATRY HOSKINS: The next witness is Mr Coogan, as 20 I understand it, but he was scheduled in for this 21 afternoon. 22 Discussion 23 LORD JUSTICE LEVESON: That's fine, because we have to deal 24 with the issues that Mr Sherborne wants to raise. We 25 can deal with that now.</p> <p style="text-align: center;">Page 106</p>	<p>1 LORD JUSTICE LEVESON: Thank you. Mr Sherborne, you want to 2 elaborate that and raise some other issues, so do that 3 now. 4 MR SHERBORNE: Sir, I do indeed. There are two matters 5 I wanted to raise. Can I deal with the first, which 6 relates to the evidence given by Mr and Mrs Dowler. You 7 will be aware that following this evidence, Mr Mulcaire 8 has made a public statement saying that it was not him 9 who deleted Milly's voicemails. Obviously if -- and 10 I say "if" -- he didn't, then the finger points firmly 11 at the newspaper's journalists themselves. Obviously, 12 sir, that is a matter that you will want to deal with at 13 least in part 2, if not perhaps in general terms in 14 part. 15 Can I then turn to my second point, and that is to 16 refer to the coverage in Associated Newspapers of 17 yesterday's evidence given by Mr Grant, which, as 18 I forewarned in my speech of last week, has been to 19 attack a witness giving evidence not in this room, but 20 outside, through the pages of their own newspaper and in 21 the editorial this morning. 22 Sir, you will recall that when Mr Caplan spoke 23 yesterday morning before the evidence started, he said 24 that if there were statements that had been made about 25 the behaviour of Associated journalists, they would seek</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 to file evidence, statements to balance this, and 2 correct anything they perceived as being wrong, and 3 no one demurred.</p> <p>4 Of course, Associated Newspapers has had Mr Grant's 5 statement for a number of days. Unfortunately -- and it 6 is a matter of regret -- none of the public saw it until 7 yesterday evening because it was not up on the system. 8 But certainly Associated Newspapers had it for several, 9 so they were well aware that Mr Grant believed that 10 there was a very strong inference -- and I use the word 11 "inference", not "speculation" -- that the source for 12 the freelancer who wrote that sorry in the Mail on 13 Sunday in 2007 must have listened to his voicemails 14 because how else would he have got this information.</p> <p>15 As I said, you heard Mr Caplan say yesterday morning 16 that they might put in statements in response. You 17 might have been forgiven for thinking, as I did, that 18 this meant statements of evidence to be put before the 19 Inquiry as opposed to a press statement, but be that as 20 it may, what was filed, so to speak, in the pages of the 21 Daily Mail website and the Daily Mail itself was not 22 a denial but a personal attack on Mr Grant as a witness, 23 in which they referred to his inference not as mistaken, 24 not even wrong, but as "a mendacious smear from a man 25 driven by hatred of the media".</p> <p style="text-align: center;">Page 109</p>	<p>1 LORD JUSTICE LEVESON: No, Mr Sherborne, let's not make 2 a speech about it. I understand the concern that you're 3 raising and I'm equally conscious of the balance 4 between, on the one hand, legitimate reporting of the 5 proceedings and comment upon them, and going beyond the 6 line that I identified at the very beginning of this 7 hearing, where it might have an impact on the witnesses.</p> <p>8 MR SHERBORNE: Sir, this was not comment. This was, as us 9 libel lawyers refer to it, an allegation of fact. This 10 was a press statement put out by the Daily Mail stating 11 in terms that these were "mendacious smears". It was 12 not comment. And as if to reinforce this point, we have 13 this morning in the editorial from the Daily Mail, 14 a repeat of these allegations and they are headed with 15 the words: 16 "Mr Grant: the facts." 17 This is not a comment, sir, with the greatest 18 respect.</p> <p>19 LORD JUSTICE LEVESON: You'd better let me see it.</p> <p>20 MR SHERBORNE: The press statement went out yesterday 21 afternoon and was repeated in the newspaper, and that is 22 the comment in the editorial. As I say, it is headlined 23 with the words "the facts".</p> <p>24 LORD JUSTICE LEVESON: Yes.</p> <p>25 MR SHERBORNE: Sir, it's not just that they stepped beyond Page 111</p>
<p>1 Whilst Associated Newspapers' statement was clearly 2 an attempt, however feeble, to strike out as hard as 3 possible, it is, of course, no substitute for evidence. 4 Mr Grant went on oath yesterday to explain what happened 5 to him and what he believes to be the case --</p> <p>6 LORD JUSTICE LEVESON: Mr Sherborne, let me cut across you 7 a little bit. As regards evidence, you don't need to be 8 too concerned about that because although I haven't read 9 the newspapers today. I was already of the mind that it 10 may be appropriate for me to require evidence on this 11 issue because of the way in which matters emerged. So 12 you don't need to develop an argument about that at this 13 stage, although I'll hear what Mr Caplan has to say.</p> <p>14 That's one side of it. The other side of it: of 15 course Associated are entitled to deny that which 16 Mr Grant says. That must be entirely fair and 17 appropriate.</p> <p>18 MR SHERBORNE: Of course, but what they didn't do was simply 19 deny it. What they suggested with as that he was 20 deliberately lying. "Mendacious" appears to be 21 a favourite word on the Daily Mail website, if you 22 search it.</p> <p>23 Sir, if you need a picture of how the tabloid press 24 works, this top of the table tabloid, one only needs to 25 look --</p> <p style="text-align: center;">Page 110</p>	<p>1 the bounds of comment but it's the intimidating nature 2 of what has been published.</p> <p>3 LORD JUSTICE LEVESON: I understand that, but the editorial 4 to which you've referred doesn't repeat the word 5 "mendacious". It asserts that he's a man consumed by 6 hatred for the media, but then it asserts that they 7 don't hack phones --</p> <p>8 MR SHERBORNE: "Do not", using the present tense, rather 9 than "did not".</p> <p>10 LORD JUSTICE LEVESON: "Do not", yes, and they did not 11 receive information about the recent birth of the child 12 from a hospital source.</p> <p>13 MR SHERBORNE: This is a repetition of what was in their 14 press statement yesterday, in which the words 15 "mendacious smears" were in, as well as "driven by 16 hatred of the media".</p> <p>17 LORD JUSTICE LEVESON: Yes.</p> <p>18 MR SHERBORNE: As I say, and I repeat, this is not a comment 19 on Mr Grant's evidence. These are allegations of fact 20 which go beyond merely saying, as Mr Caplan said that 21 his clients might, that the inference that was drawn by 22 Mr Grant was wrong or mistaken. It was said to be 23 a lie, and I don't need to point out that in the context 24 of somebody giving evidence to this Inquiry, that is an 25 allegation of the most serious kind. It is the Page 112</p>

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<p>1 intimidatory nature of it which, in my submission, is                  2 something, sir, that this Inquiry needs to take very                  3 seriously.                  4 As I said in my submissions last week, this was                  5 foreshadowed by the Daily Mail, and Ms Platell in                  6 particular, in her article on 20 September when she                  7 described the Leveson Inquiry and the line-up of                  8 witnesses in the way that I read out last week,                  9 including reference to "S&amp;M spanker Max Mosley,                  10 prostitute procurer Hugh Grant, gold-digger                  11 Sheryl Gascoigne" and so on, and followed that with:                  12 "Gerry and Kate McCann are also expected to appear                  13 ... What sleazy, degrading company for those who truly                  14 suffered."                  15 If one needs a reminder, given that it is said that                  16 Mr Grant -- and everyone heard his evidence yesterday --                  17 hates all the media, which is said to be his                  18 motivation -- if one needs a gentle steer as to who                  19 hates who here, Mr Jay did not read out Ms Platell's                  20 article that was written about Mr Grant after the birth                  21 of his daughter, but can I simply refer to a very few                  22 passages to give you a flavour of what was said.                  23 Ms Platell said this:                  24 "Once a loved actor, the truth is that Grant has                  25 become a lonely, bitter man, consumed with hatred of the                  Page 113</p>	<p>1 had spoken to her that had provided it.                  2 If and when Associated Newspapers do file their                  3 evidence, perhaps they can deal with why there is                  4 a specific reference to what this supposed LA                  5 executive's voice sounded like, and how anyone knew that                  6 this woman had a "plummy voice". Maybe that's just me                  7 speculating.                  8 But what is also important to remember is that                  9 Associated Newspapers were forced to apologise and pay                  10 damages to Mr Grant, damages which were given to                  11 a cancer charity, following the publication of the                  12 article, an article which they did not defend at all.                  13 And if I can leave the last word --                  14 LORD JUSTICE LEVESON: Which article?                  15 MR SHERBORNE: The article in 2007.                  16 LORD JUSTICE LEVESON: Oh, yes.                  17 MR SHERBORNE: And if I can leave the last word to Mr Grant                  18 who after that victory made a public statement, he said                  19 this:                  20 "I took this action because I was tired of the                  21 Daily Mail and Mail on Sunday newspapers publishing                  22 almost entirely fictional articles about my private life                  23 for their own financial gain and also hoping [he said]                  24 that this statement in court might remind people that                  25 the so-called close friends or close sources [once                  Page 115</p>
<p>1 media ..."                  2 Sounds something like a party line.                  3 "... consumed with hatred of the media who helped                  4 make him a star. One can only imagine how scarred his                  5 abandoned daughter is going to feel. It remains to be                  6 seen if the self-obsessed Mr Grant will be able to give                  7 any long-term commitment. Pity his poor daughter. In                  8 truth, this great moral crusader is just another                  9 hypocritical celebrity who enjoys the money and fame                  10 that media exposure gives him but refuses to accept the                  11 accompanying responsibilities. This week's news that he                  12 secretly fathered a child certainly puts into telling                  13 perspective his efforts to silence the press by                  14 demanding privacy laws."                  15 Mr Caplan made his little speech yesterday morning.                  16 I made a rather bigger one last Wednesday. This is not,                  17 as you say, a time for speeches. This is the time for                  18 evidence. Mr Grant has given his. If                  19 Associated Newspapers wants to put evidence in on oath,                  20 then they should do so. It's important to say, of                  21 course, as was said very publicly yesterday by Ms Khan                  22 herself, that she, the first time she ever knew about                  23 this story was when it appeared in the Daily Mail,                  24 contrary to what was said yesterday by                  25 Associated Newspapers that somehow it was a source that                  Page 114</p>	<p>1 again, this is what Associated referred to yesterday] on                  2 which these stories claim to be based almost never                  3 exist."                  4 I didn't hear Associated Newspapers complain that                  5 this criticism of the so-called sources was a mendacious                  6 smear at the time of the statement in open court in                  7 2007, but maybe now they might want to complain to the                  8 PCC, sir.                  9 LORD JUSTICE LEVESON: Right. Mr Caplan?                  10 MR CAPLAN: May I begin by saying that I agree with                  11 Mr Sherborne that this is not the time for speeches,                  12 although he seems to have made another one. Can I be                  13 constructive, please, and just say one or two things                  14 about yesterday and what happened?                  15 First of all, sir, you will have seen, I'm sure, the                  16 coverage that followed Mr Grant's evidence yesterday                  17 afternoon, and by that I mean the coverage last night                  18 and the coverage in the national newspapers -- in the                  19 afternoon, last night and in the national newspapers                  20 this morning, and it in effect was to this order: it was                  21 that the Mail on Sunday has been implicated in the phone                  22 hacking scandal.                  23 We should not underestimate that the coverage from                  24 these proceedings goes worldwide. There was                  25 a tremendous amount of enquiries to                  Page 116</p>

<p>1 Associated Newspapers about their position in relation                  2 to being implicated, and there was pressure on them from                  3 the Press Association and others to comment.                  4 Mr Grant is entitled to comment as he wishes, but we                  5 sought to make the point that that comment was based on                  6 the flimsiest of material and his allegations that the                  7 journalists of Associated Newspapers had been involved                  8 in phone hacking was utterly refuted.                  9 Sir, that allegation is extremely serious. It is                  10 an allegation of criminal conduct.                  11 LORD JUSTICE LEVESON: As is the allegation, it would                  12 appear, that has been made against Mr Grant.                  13 MR CAPLAN: Well, I -- do you mean in relation to the --                  14 LORD JUSTICE LEVESON: His evidence yesterday.                  15 MR CAPLAN: That was a response to the fact that he was                  16 commenting freely when there was not a substratum of                  17 evidence to support that comment.                  18 The issue, I think, here is about the limits of the                  19 rights to reply and comment. I think that's where we                  20 are.                  21 LORD JUSTICE LEVESON: Yes, absolutely, and as I made clear,                  22 I have absolutely no difficulty at all with the press                  23 reporting and dealing with allegations that are made                  24 against them. That's entirely fair.                  25 MR CAPLAN: Can I then just come -- it is an issue</p> <p style="text-align: center;">Page 117</p>	<p>1 so, and you referred yesterday to a right of reply, or                  2 I might have been, you suggested, referring to                  3 a possible right of reply, is that if a serious                  4 allegation is made by a witness, it might be possible                  5 for a core participant at the end of that evidence                  6 simply to say to the Inquiry that that allegation is                  7 refuted and a very brief word or two responding to it.                  8 Sir, that again would be a mechanism for dealing                  9 with serious allegations as they are made in these                  10 televised proceedings.                  11 LORD JUSTICE LEVESON: All right. But actually it goes on                  12 a bit from that, doesn't it, because, Mr Caplan, if all                  13 Associated had said was, "This is what Grant said, this                  14 was the basis upon which he said it, this is our case,                  15 this is our view, A, B, C, D, facts, therefore we reject                  16 it", then that's absolutely, seems to me, subject to                  17 hearing anybody else, that's fine, because that's                  18 reporting and that's reporting on the day's proceedings                  19 and dealing with what I understand is the legitimate                  20 interests and the reputation interests of your clients.                  21 But the real issue is the extent to which it's                  22 appropriate to go from the defensive onto the offensive                  23 in that way.                  24 I hope that you will feel it appropriate, and if                  25 not, I might ask you for the names so that I feel it</p> <p style="text-align: center;">Page 119</p>
<p>1 I foreshadowed, I think, yesterday morning -- to the                  2 position in which we were yesterday afternoon. A very                  3 serious criminal allegation had been made about                  4 Associated Newspapers and its staff. Under the Inquiry                  5 procedure, there was no right for me to put questions                  6 directly to Mr Grant on behalf of Associated Newspapers                  7 to cross-examine him, I obviously put those questions                  8 through Mr Jay, Inquiry counsel, and there was no right                  9 for me to make any contemporaneous reply at the                  10 conclusion of his evidence to rebut or to deny the                  11 allegation that had been made.                  12 Sir, could I suggest two possible solutions? The                  13 first is this, that when Mr Jay puts questions to                  14 a witness, it would be perhaps clear to everybody if, in                  15 putting a denial or a refutation to a witness about an                  16 allegation that he makes, if he says that this is denied                  17 by a particular core participant and he's putting these                  18 questions on their behalf.                  19 LORD JUSTICE LEVESON: Yes, I think that's a good idea.                  20 I agree with that.                  21 MR CAPLAN: Because yesterday, I'm not sure people were                  22 clear, and I mean members of the press as well, that                  23 Associated Newspapers was expressly denying in these                  24 proceedings the allegation that had been made.                  25 Secondly, sir, the other possibility, if I may say</p> <p style="text-align: center;">Page 118</p>	<p>1 appropriate, to serve some evidence, not because, not                  2 because at the end of the day I'm going to have to make                  3 a decision about whether your clients did unlawfully                  4 obtain information from Mr Grant, because that, if it's                  5 ever going to happen, will be later, and I'm not going                  6 to do it because, if I'm going to do it for one, then                  7 I have to do it for all, and the situation becomes                  8 utterly untenable, but I do recognise that if it becomes                  9 graphic, as it did yesterday, then the reputation and                  10 interests of the relevant core participant do require it                  11 to be able, equally graphically, to be able to answer                  12 it.                  13 MR CAPLAN: Yes. So could I grapple with that? As you                  14 know, any allegation of phone tapping is absolutely                  15 refuted on behalf of my clients and the journalists.                  16 I cannot be clearer than that. And if this kind of                  17 serious allegation is being made in these proceedings,                  18 I do ask for an effective mechanism for a right of                  19 reply, if possible, within this Inquiry.                  20 LORD JUSTICE LEVESON: Well --                  21 MR CAPLAN: And I'm happy to certainly suggest -- I have                  22 suggested two, but I do respectfully suggest it's                  23 something that's --                  24 LORD JUSTICE LEVESON: In relation to the first, I have                  25 no -- I'll hear Mr Jay, but I have no difficulty about</p> <p style="text-align: center;">Page 120</p>

<p>1 that. In relation to the second, I'm not sure about.</p> <p>2 But what do you say about my possible requirement that</p> <p>3 the relevant journalists make statements and come give</p> <p>4 evidence?</p> <p>5 MR CAPLAN: Yes, I'm very happy to do that. This is in</p> <p>6 relation to the allegations Mr Grant made?</p> <p>7 LORD JUSTICE LEVESON: Yes.</p> <p>8 MR CAPLAN: I'm very happy to do that. I think we already</p> <p>9 said, I'm being reminded, that that's something that we</p> <p>10 would do.</p> <p>11 LORD JUSTICE LEVESON: Yes.</p> <p>12 MR CAPLAN: The trouble is, by the time that happens, it may</p> <p>13 well be January --</p> <p>14 LORD JUSTICE LEVESON: It may not, actually.</p> <p>15 MR CAPLAN: -- and the allegations may have gone around the</p> <p>16 world (overspeaking) phone hacking.</p> <p>17 LORD JUSTICE LEVESON: No, no, it may not, because if you</p> <p>18 get them in -- you know, I'm a master of the procedure</p> <p>19 in this Inquiry and I can move people around, subject to</p> <p>20 their convenience, rather like chess pieces, and I am</p> <p>21 perfectly happy to do that, recognising the point that</p> <p>22 is made.</p> <p>23 But I do want you to make a comment, please, or to</p> <p>24 deal with the underlying allegation or concern expressed</p> <p>25 by Mr Garnham and Mr Sherborne that the comment went</p> <p style="text-align: center;">Page 121</p>	<p>1 that brave any longer.</p> <p>2 LORD JUSTICE LEVESON: I understand the point entirely, and</p> <p>3 given the way in which Mr Caplan has just dealt with the</p> <p>4 proposition that I put to him in that regard, I expect</p> <p>5 there to be some conversation over the next hour as to</p> <p>6 how we're going to cope with it. I'm not taking it</p> <p>7 other than extremely seriously. I am very concerned to</p> <p>8 reflect and recognise the concern that has been</p> <p>9 expressed by those who have come and given evidence, and</p> <p>10 I think I've said it to every witness or almost every</p> <p>11 witness, and I will continue to do so.</p> <p>12 So I'm alert to the position. I think it would</p> <p>13 probably be sensible if some thought be given, and I'll</p> <p>14 ask the Inquiry team also to do so, as to how we're</p> <p>15 going to cope.</p> <p>16 There are two specific problems. There's first of</p> <p>17 all the issue in relation to Mr Grant, and secondly is</p> <p>18 the issue for the future.</p> <p>19 I have the point firmly in mind.</p> <p>20 MR SHERBORNE: Sir, I'm very grateful.</p> <p>21 LORD JUSTICE LEVESON: Right. Mr Jay, is there anything</p> <p>22 that you want to say at this stage about this?</p> <p>23 MR JAY: Sir, I would respectfully endorse Mr Garnham's</p> <p>24 concern, which was expressed with his usual moderation,</p> <p>25 that language such as "mendacious smears", should, if at</p> <p style="text-align: center;">Page 123</p>
<p>1 rather further than was appropriate, given the</p> <p>2 circumstances.</p> <p>3 MR CAPLAN: Can I say here I hear everything that you've</p> <p>4 said.</p> <p>5 LORD JUSTICE LEVESON: Right. All right. Mr Sherborne,</p> <p>6 you're very keen to add something?</p> <p>7 MR SHERBORNE: I am, sir, because it gives no reassurance to</p> <p>8 those of my clients who are coming to give evidence to</p> <p>9 hear Mr Caplan's plea in mitigation which nowhere deals</p> <p>10 with the fact that those words "mendacious smears" were</p> <p>11 used. "Mendacious" means lies, and for Mr Caplan's</p> <p>12 benefit and for the benefit of the Daily Mail and the</p> <p>13 Mail on Sunday, when there is a real distinction between</p> <p>14 someone who makes a statement which he or she knows to</p> <p>15 be untrue, and, to quote Mr Caplan's words, someone who</p> <p>16 says something that doesn't have a "sufficient</p> <p>17 substratum of truth" to make it. I shouldn't need to</p> <p>18 point that out. And I shouldn't need to point out, sir,</p> <p>19 that there is another critical distinction between</p> <p>20 a right of reply and a right of attack, and that is what</p> <p>21 has happened here, and if those who have been brave</p> <p>22 enough to come and give evidence to this Inquiry about</p> <p>23 what they suffered at the hands of the press hear that</p> <p>24 kind of plea in mitigation, then as Mr Garnham himself</p> <p>25 warned, we may well face people who are unwilling to be</p> <p style="text-align: center;">Page 122</p>	<p>1 all possible, be avoided.</p> <p>2 LORD JUSTICE LEVESON: It's not merely possible; it's,</p> <p>3 I would have thought, necessary.</p> <p>4 MR JAY: I'm putting the point with excessive moderation.</p> <p>5 What I really mean is exactly what you've said.</p> <p>6 LORD JUSTICE LEVESON: Yes, well, there's time for</p> <p>7 moderation, Mr Jay, and indeed Mr Caplan has got the</p> <p>8 point, which is why I didn't seek to go further.</p> <p>9 MR JAY: Yes.</p> <p>10 LORD JUSTICE LEVESON: But, therefore, we need to know how</p> <p>11 we're going to cope with that and we're going to need to</p> <p>12 know how we're going to cope in the future for those</p> <p>13 witnesses who are to come.</p> <p>14 MR JAY: Yes.</p> <p>15 LORD JUSTICE LEVESON: I think it's possibly sensible that</p> <p>16 there can be a discussion other than in the full glare</p> <p>17 of televised reporting, but we shall return to the topic</p> <p>18 at 2 o'clock.</p> <p>19 MR JAY: Yes. May I just deal with the two practical</p> <p>20 solutions which Mr Caplan came up with?</p> <p>21 LORD JUSTICE LEVESON: Yes.</p> <p>22 MR JAY: We took the view that if a line of questioning was</p> <p>23 put to us by a core participant, unless they agreed, we</p> <p>24 would not attribute that line expressly to the core</p> <p>25 participant, because after all, during the course of</p> <p style="text-align: center;">Page 124</p>

<p>1 this Inquiry, we may be receiving lines of                  2 a confidential nature where the core participant might                  3 not want it to be known who the ultimate source is.                  4 However, if a core participant does not mind that we                  5 make it clear who the source is, then of course we will                  6 make it clear, and that may apply in relation to                  7 witnesses we're hearing in the very near future, but                  8 I will obtain confirmation of that.                  9 LORD JUSTICE LEVESON: Yes, but in relation to the questions                  10 that you asked Mr Grant, it was, I am sure, obvious to                  11 all that you were dealing with a particular article                  12 which could only -- the information for which could only                  13 have come from the Daily Mail.                  14 MR JAY: Yes. Not merely is that right, but the lines of                  15 questioning were put to Mr Grant through his legal team                  16 in advance, in general terms, and it must have been                  17 entirely obvious --                  18 LORD JUSTICE LEVESON: Well, I'm sure.                  19 MR JAY: It did not require any powers of inference or                  20 deduction. Indeed, that was clear when Mr Grant gave                  21 his evidence.                  22 As for an immediate right of reply, in my                  23 submission, I doubt whether that's going to work. What                  24 would be preferable is that evidence in rebuttal be                  25 obtained as soon as possible and we hear it as soon as</p> <p style="text-align: center;">Page 125</p>	<p>1 MR JAY: And that is what happened yesterday. Insofar as                  2 I have opinions, I keep them private and I did not                  3 intend, and I hope it did not appear as such, to express                  4 any opinion yesterday.                  5 LORD JUSTICE LEVESON: Yes, I got concerned, as you will                  6 remember, during the course of the afternoon that                  7 Mr Grant might not have been understanding why some of                  8 the questions you were asking, you were asking, which is                  9 why I raised the concern again this morning.                  10 MR JAY: Yes.                  11 LORD JUSTICE LEVESON: It may be that he did, and there it                  12 is.                  13 All right. I've got the point. I want to know how                  14 we are going to solve the position in relation to the                  15 concern which Mr Garnham raised, and Mr Sherborne has                  16 developed, and which Mr Caplan has recognised, so that                  17 we retrieve the balance that I think is absolutely                  18 critical for the consideration of these witnesses'                  19 evidence.                  20 MR JAY: Yes.                  21 LORD JUSTICE LEVESON: And then also consider the way                  22 forward.                  23 MR JAY: Thank you.                  24 LORD JUSTICE LEVESON: We will resume at 2 o'clock with                  25 that, I think, solution first, if Mr Coogan doesn't mind</p> <p style="text-align: center;">Page 127</p>
<p>1 possible. As you've indicated, the chess pieces can be                  2 moved around quite quickly to accommodate urgent                  3 evidence in the interests of justice, and we will do our                  4 best to achieve that. But if there's going to be                  5 a series of speeches at various moments of this Inquiry,                  6 the system, in my submission, is not going to work and                  7 the temperature is simply going to rise further.                  8 LORD JUSTICE LEVESON: Yes. I don't know how often this is                  9 going to arise. I think this might be one of a very,                  10 very limited number of examples. But what do you say to                  11 the proposition that, having put the questions that                  12 emanate from the relevant core participant, which he'll                  13 deal with, or he or she will deal with, as they feel                  14 appropriate --                  15 MR JAY: Yes.                  16 LORD JUSTICE LEVESON: -- where you have been told in terms                  17 that that allegation is denied, you can put the final                  18 follow-up question: for the avoidance of all doubt, you                  19 understand that that allegation is denied entirely.                  20 MR JAY: Yes. I have absolutely no difficulty in doing                  21 that. To be absolutely clear, when a question is put of                  22 any witness, there is not a viewpoint in the question                  23 which is behind the question. It is merely testing                  24 a proposition.                  25 LORD JUSTICE LEVESON: Yes.</p> <p style="text-align: center;">Page 126</p>	<p>1 waiting a little bit longer. Thank you.                  2 (1.05 pm)                  3 (The luncheon adjournment)                  4                  5                  6                  7                  8                  9                  10                  11                  12                  13                  14                  15                  16                  17                  18                  19                  20                  21                  22                  23                  24                  25</p> <p style="text-align: center;">Page 128</p>

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