## ( 2.00 pm )

LORD JUSTICE LEVESON: Yes, Mr Jay.
MR JAY: Mr Rowland, we're on the issue of impact now and you pick this up at paragraph 22 of your witness statement.
A. Yes.
Q. In your own words, how would you characterise it?
A. Well, it's an intrusion, firstly. They have no right to do that. It's appalling that it should happen. I had a large number of really quite sensitive business contacts that -- where it would be both embarrassing and potentially awful for my business if this information leaked out and it was traced back to me, and I felt that there was also an element that -- I mean, I've never worked for the News of the World, at that time I didn't know any News of the World journalists, but if they wanted to come and ask me something, then why was it that they routinely got someone to hack my phone instead of coming to me and asking?
Q. Press regulation. You've obviously thought about this carefully and deeply. You give us the benefit of your views in paragraph 23 in your witness statement and following. You've, I think, heard a lot of the evidence over the last few days. You've been taking a keen

Page 1
interest in this Inquiry. What are your recommendations, please?
A. Well, I mean, when I was at the Daily Telegraph, I did a large number of investigative stories in a slightly odd climate, because if you'll recall, the Telegraph at the time was owned by Conrad Black, Lord Black, current address Cell Block H somewhere in Florida. He was forever, if you recall, buying and selling the newspaper or shares in the newspaper. He was either privatising it or floating it and that meant there was a constant regime of due diligence going on and he was frightened that having unresolved defamation actions on the book would damage the potential valuation of the paper.

So there was a lot of moaning at the Telegraph among the journalists that what they saw as innocuous pieces that were routinely being put into other newspapers were being held out of the Telegraph by the in-house defamation lawyers. So it was a quite repressive, they said, regime.

Now I wanted to get more investigative stories in, if I possibly could, so I adopted a different approach, which was to go along to the in-house defamation lawyers and ask one simple question, which is what do I have to do to this story in order for you to be happy to run it? And they said, well, you know, you need to check all of

Page 2
the sources, you need to make sure that you have proper witness statements when you need it, you need to decide all of the things that Alan Rusbridger was talking about in the sort of lists of things that people do these days. They were making sure I did.

It occurred to me that the mantra that exists at the moment, the orthodoxy that more regulation or tighter regulation of the press will inhibit press freedom because journalists will have a lawyer standing at their elbow at the time, actually is completely wrong. Having a lawyer standing at your elbow improves the quality of what you do because the lawyer is the only person in the office, the defamation lawyer, who acts as a proper quality control mechanism.

Everybody in a newspaper room think they know what a good story is. There's very few regulatory mechanisms there to say, well, is it fair? Is it accurate? And has it been put to the people properly before you run it? And because I went through that mechanism, I look back at them now and I think actually they were very good stories and part of the reason was I had all of this great advice that was being given to me.

So when things did go to some extent wrong and people complained and I was taken to the Press Complaints Commission on three occasions -- I checked Page 3
with the PCC actually before this Inquiry started, and I was the very first national newspaper journalist to be exonerated in a PCC inquiry. And the reason I was exonerated is because I'd had the stories lawyered backwards, forwards, up and down, and they were as tight as we could possibly make them.
I would argue that is an entirely beneficial process.

I'd also say that I think there's been a disastrous deterioration in the last ten years in a lot of ways because more and more stories are written by freelance journalists and they do not have the same access to the same legal resources.

I'll give you an example. I worked for a long time -- well, quite a long time, when they set up the supplement I was talking about at the Mail on Sunday, so I was a Mail on Sunday freelance journalist, and I was put in the position of running stories where I thought corners were being cut and I didn't have access to proper legal advice before they were run, and there was one particular occasion when -- it was a very high profile -- I won't refer to the actual details of the story, but it was as very high-profile couple who were involved in some rather esoteric house purchases and there was a whistle-blower and I was unsure about the

Page 4
whistle-blower and I thought we needed to go back and do some more checks, but they ran the story anyway. And I and Mr Caplan down here, the barrister for the Mail on Sunday, had to actually dig them out of the hole afterwards, and I would argue that the freelance journalists should have been talking to the lawyers before it was published, not afterwards.
LORD JUSTICE LEVESON: All right.
MR JAY: Thank you very much, Mr Rowland. You've given your evidence very clearly, thank you very much. May I just check, is there anything you would wish to add?
A. Yes, there is one thing.
Q. Yes, okay.
A. When you had the seminars, sir, there was talk there about press practices in the 1970s and how they've improved greatly because of the regime that's been put into place by the PCC. One of the examples that was given was the theft of photographs, and I think it was Mr Dacre, the editor of the Daily Mail, who said that such a practice was outrageous and that it no longer took place.

Well, I would disagree. I think that there are many, many more photographs that are stolen these days, but they're stolen electronically. It's not in my evidence or my witness statement, but I had examples of Page 5
photographs that have been quite blatantly and shamelessly stolen by national newspapers, not in the 1970s but almost within the last seven months.

The example I'm thinking about, I actually have an audit trail, because I was involved in it, that I've pieced together so you can see what was done and when, or rather what wasn't done and when, and they just sliced off the watermark on the bottom with the copyright notice of the photographer, and then refused to pay him. And that, in Mr Dacre's word, is actually outrageous and it's an abuse that could be stopped by a regime of punitive fines and that, I hope, is something that the Inquiry will think about putting into place.

I can make that photograph available to you, if you think it might help, and put it into the record. I'm prepared to do that.
LORD JUSTICE LEVESON: We'll decide whether we should put i formally into the material that is read into the record. Thank you very much indeed.
A. Okay.

LORD JUSTICE LEVESON: Thank you.
MR JAY: Thank you. I don't think we need a break. Shall we move on to the next person?
LORD JUSTICE LEVESON: We don't need a break after seven Page 6

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minutes,Mr Jay.
MR JAY:The next witnesses are Dr And Dr McCann, please.
DR GERALD PATRICK McCANN and DR KATE MARIE McCANN (sworn)
MR JAY: Thank you very much. First of all, I'm going to
invite each of you to provide us with your full names,
please.
MR McCANN: Gerald Patrick McCann.
MRS McCANN: Kate Marie McCann.
LORD JUSTICE LEVESON: Before we start, you've probably
    heard me thank others before you for coming along,
voluntarily, to speak of matters which I have no doubt
are intensely personal and extremely sensitive, and I am
very, very grateful to you for doing so.
    In your case, of course, nobody, and in particular
nobody with children, could fail to appreciate the
terrible impact of your daughter's abduction on you and
your family, so words of sympathy for these appalling
circumstances are utterly inadequate, but I am very
grateful to you for coming.
MR JAY: I know each of you would like your counsel to ask
a few preliminary questions. Before he does so,
formally can I invite you to confirm the contents of
your respective witness statements. You, Dr Gerald
McCann, there's a statement dated 30 October, and
there's a statement of truth at the end of it. Is that
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## Page 7

correct?
MR McCANN: It is.
Q. And then Dr Kate McCann, a far more recent statement referring to your husband's statement and again with a statement of truth dated 22 November; is that right?
MRS McCANN: That's right.
MR JAY: Just a few questions from Mr Sherborne and then I will proceed.

Questions by MR SHERBORNE
MR SHERBORNE: Thank you. As Mr Jay said, I'm going to jus: ask you a few preliminary questions.

Everybody is well aware, particularly following the submissions last week, that you've been forced to take a number of legal complaints or actions as a result of some of the coverage that you received following the abduction of your daughter. Not just articles that were published, but also to stop articles being published, often on weekends, and I know that Mr Jay is going to talk to you about that in due course.

Can I just ask you, though, have you ever had to give evidence before?
MR McCANN: No.
Q. So this is the first and, I hope, the last time. Given that you've had a lifetime of lawyers, nice ones, of course, can you just explain to the Inquiry why you've Page 8
agreed to give evidence?
MR McCANN: I think it's for one simple reason, in that we feel that a system has to be put in place to protect ordinary people from the damage that the media can cause by their activity, which falls well below the standards that I would deem acceptable.
Q. Of course, we all here understand that your overriding objective is the continuing search for your daughter. We've seen from your statements, or we will see, once the statements are publicly made available, that in terms of reporting, you've experienced what I might call the good, the bad and the particularly ugly side of the press. One might ask this: is it helpful to have Madeleine permanently in the public eye?
MR McCANN: I've talked about this on several occasions in the past, and I do not feel it's helpful, and particularly at the time when there were daily stories running throughout 2007 and 2008. It became very apparent to us early on there was an incredible amount of speculation and misinformation. It led to confusion amongst people. All we need to do is periodically remind the public who have supported us so much that Madeleine is still missing, there's an ongoing search and those responsible for taking her are still at large and have to be brought to justice. Page 9

MRS McCANN: I was just going to say obviously there was a period when Madeleine was on the front page of a paper every day, and I know occasionally people would say to me "That has to be a good thing, hasn't it? She's in the public eye", and that isn't the case because when the story is so negative about her, and we'll come into that, obviously then that is not helpful. As Gerry said, I think it's a reminder that's important, that's all.
Q. That's Madeleine. What about you both being in the public eye? Is that helpful?
MR McCANN: I don't think it is helpful. Obviously we realise that as Madeleine's parents, and particularly given what's happened to us, that if we are delivering the message, then it offers more appeal and is more likely to get coverage. And of course we have also acknowledged that the media have been very helpful on occasion particularly when we have launched appeals, and huge amounts of information have come into the inquiry as a direct result of our appeals, and we'd like to thank everyone in the public who have come forward.
Q. Finally can I ask you this: there are a number of specific things you'll be asked about and Mr Jay is going to take you through your statement, but it might help Lord Justice Leveson and the Inquiry if you could

Page 10
just outline in very general headline terms what your concerns are about the culture, practices and ethics of the press.
MR McCANN: I think there are four main areas I would be keen to give evidence on that we have direct experience of. One is obviously libel, which has been very well publicised, but then also the lasting damage it causes. Secondly, the privacy laws and current, I would say, gaps in legislation at the minute where companies can use photographs, can hound you, without your consent, for commercial gain.

I think there has been contempt demonstrated by the media, primarily the press but to some extent broadcasters as well, both for the judicial process and also at times Madeleine's safety. And the fourth thing, which probably is not regulated by law and I hope this Inquiry will deal with, is about what are acceptable standards and how individual journalists and corporate entities, editors and subeditors, are held to account.
MR SHERBORNE: I'm very grateful. If you wait there, Mr Jay has more questions for you.

Questions from MR JAY
MR JAY: Dr McCann, I have an eye on those four themes and if you don't mind, I'll come back to them at the end of your evidence. Your witness statement is publicly

Page 11
available and I can see it out of the corner of my eye on a screen, but if you could have it in front of you in print, you tell us in terms of your career you're a consultant cardiologist.
MR McCANN: That's correct.
Q. And in terms of fixing ourselves back into the dates, the abduction of your daughter, I think was it 3 May 2007?
A. That's correct.
Q. You tell us in your witness statement that a photograph was made immediately available, provided to the broadcast media and to the press, and was, as it were, displayed everywhere. Is that correct?
A. There's two elements to that. The first element was what we were doing on the night and obviously we had digital cameras and we were trying to get photographs printed of Madeleine from the holiday.
Q. Yes.
A. To give to the police, but secondly, a very good friend of ours who we spoke to in the early hours of 4 May took upon himself to issue photographs of Madeleine to all the major media outlets in the UK.
Q. Within a very short space of time, the British press and perhaps the international press had descended on Praia da Luz; is that correct?

Page 12
A. It is.
Q. And you had to make a decision as to whether to interact with them and, if so, on what basis?
A. Yes.
Q. And what decision did you make and why?
A. The first thing to say is it was incredibly daunting. We had been away all day. It was also apparent to us whilst we were in the police station of Porto Mario(?) in the Algarve that there was already extensive coverage, particularly on Sky News, which was running in the police station, somewhat bizarrely, and when we were driving back towards the apartment, it was in the evening and we could literally see tens, if not hundreds of journalists outside the apartment and satellite vans, et cetera, a large number of cameras.

There were two things going through my head: what are they going to be saying? And we've seen, I think, over many years our privacy being invaded and what stories could be published, but ultimately, possibly because we've seen the same thing being done in the UK, I thought it was an opportunity to issue an appeal. I was given no guidance one way or the other whether to do that. I knew there could be a very heavy downside to interacting, but I made the decision at the time with the information I had that it would probably be in the Page 13
best interests of the search for our daughter, and decided to interact.
Q. Yes. You say in your statement, paragraph 15, that in the initial stages, your engagement with the press worked well. Are you able to amplify that just a little bit for us, please?
A. I think for those people who can remember, it was a very unusual scenario, and we got a distinct impression that there was a genuine want to help attitude from the journalists there, and I think also many of the executives who perhaps saw what had happened to us and there was a huge amount of empathy. So I really did feel early on there was a desire to help.
Q. As you explain, the position changed, but the segue perhaps into that change is some evidence you give in relation to the Portuguese criminal system. Now each culture, each nation has a slightly different criminal system, and obviously there can be no criticism about that, but what you say in Portugal is that there is no permitted interaction between the law enforcement agencies and the press; is that correct?
A. That's correct.
Q. Do you have a view as to the possible drawbacks of that, without necessarily being critical, but it's pretty obvious it gives rise to the possibility of leaks,

Page 14
doesn't it?
A. Sure. I think the system is open to abuse is the first thing, and clearly there was a ferocious appetite and perhaps in the United Kingdom with the SIO and the press office for the constabulary leading the investigation would have had a very clear agenda on how to work with the media, what information could be disclosed, what might be helpful, and steering journalists away from certain areas.

Obviously there was none of that happening, and there was tremendous pressure on the Portuguese authorities to interact with the media, and some of you may remember the very first time that happened, the spokesperson gave a short statement that didn't really say anything, was asked a number of questions and followed every single one of them with, "I can't give you any details because of judicial secrecy".
Q. Yes.
A. So there was a huge appetite, and we quickly realised that there was a tremendous amount of speculation in the coverage both in the newspapers and also you had 24-hour news channels there constantly, and we found that to be unhelpful.
Q. In terms of the conduit type of information, is this correct, that whatever the strict legal position in Page 15

Portugal, information was being leaked by the Portuguese police to the Portuguese press, that's stage one, and having been leaked to the Portuguese press, the British press then picked up on that self-same information, that's stage two? Is that an accurate description?
A. I cannot tell you for certain that it was the Portuguese police who were leaking information, but for anyone who followed the headlines in July, August and September 2007, I think it would be a perfectly reasonable assumption to make that elements of the inquiry were speaking to the Portuguese police -- sorry, Portuguese press. I do not know whether they were speaking directly to the British media, but what we clearly saw were snippets of information which as far as I was concerned the British media could not tell whether it was true or not, which was then reported, often exaggerated and blown up into many tens, in fact hundreds of front page headlines.
Q. The British press did not have the means of verifying the information, but your complaint is that the information was distorted and magnified; do I have it right?
A. I think I'm complaining on all of the grounds, that they didn't know the source, didn't know whether it was accurate, it was exaggerated and often downright

Page 16
untruthful and often I believe, on occasions, made up.
Q. We're going to cover the detail of that in a moment, Dr McCann. Throughout the summer of 2007, the interest of the British press was retained in the story, wasn't it? They were constantly there in Praia da Luz; is that right?
A. Yes. It did surprise us. Obviously after the initial period, and I can understand that what we ended up doing by having an international campaign was unprecedented, but we did send a very clear signal, as the attention focused more and more on Kate and myself, that the focus should be on Madeleine and we fully expected, around mid-June, for the British media to leave. We decided we had to stay in Portugal to be close to Madeleine, to be close to the investigation, and certainly didn't feel capable of leaving at that point, so it did surprise us that there was so much ongoing interest when there really wasn't very much happening.
Q. In terms of the advice you were getting or not getting, I'm going to put to one side the issue of the PCC into a later sequence in your evidence, but you tell us in your witness statement that there were two resources available to you. Paragraph 21, first of all, someone from Bell Pottinger who gave you assistance. Tell us a little bit about that please and the value that person

Page 17
was able to provide to you.
A. Yes, so Alex Woolfall who works for Bell Pottinger was brought out really to deal with the media crisis management specialist on behalf of Mark Warner, and at that point he was leading the engagement with the media who were present in Praia da Luz, and he was very helpful. He just gave us some simple tips, which we've tried to stick to, and that was: if you interact, what's your objective, should be the question you ask yourself. And how is it going to help? And obviously our objective is to find Madeleine, and that's something that we have tried to apply when we interact with the media. Today is one of the exceptions, where it's not the primary purpose of our engagement.
Q. Thank you. And you also mentioned someone called Clarence Mitchell, who was seconded to the FCO as part of the media liaison in Praia da Luz.?
A. Yes.
Q. And you fairly say that person's help was invaluable. Is there anything you would wish to add in relation to the assistance that person gave you?
A. I think at times we've been criticised for having somebody to deal with the media, but the volume of requests was incredible, both nationally and internationally, and it was almost -- well, I don't know

Page 18
how Clarence managed it in May and early June 2007, but it was a full-time job just dealing with those requests and it's been very important. As I said, we had no prior media experience, but in terms of just shielding us from the inquiries which were constant.
MRS McCANN: Gave us a little bit of protection, really.
MR McCANN: And obviously we were working very hard behind the scenes, and let us spend some time with our family, as well.
Q. In paragraph 24 of your statement, Dr McCann, you deal with the suggestion, well, here you are dealing with the press and then in parentheses, on your own terms, that almost allows the press open season to deal with you on their terms. Maybe I'm slightly over-exaggerating the point, but in your own words, please, what is your view about that suggestion?
A. Well, it has been argued on many occasions that by engaging then it was more or less open season, and I think it's crass and insensitive to suggest that by engaging with a view to trying to find your daughter, that the press can write whatever they want about you without punishment.
Q. The next section of your statement deals with accuracy of reporting and you point out that after a period of time, there was little new news to report.

Page 19

## A. Yes.

Q. It may be at that point that the agenda started to morph and in paragraph 27 you state "clearly it didn't take long before innuendo started to creep in". Are you able to elaborate on that, if you were to wish to?
A. Yeah, I mean I think there were two elements. The reporting quickly became highly speculative, and often stories -- for example, there must have been "McCann fury" on the front page of many newspapers over that summer that would quote an unnamed source or friends, and unless our phones were hacked, which I don't think they were, then these were made up because they were simply not true.

So there was clearly pressure to produce a story. The reporters who were based in Praia da Luz, first thing they did each day was get the Portuguese press, get it translated, and decide what they were going to write about, and I don't think any of it was helpful.
Q. The date you give for the shift of the emphasis of the media reporting is about June 2007, is it, but then you feel the mood may have been moving or turning a bit in the British press? Or perhaps a bit later than that?
A. Yeah, I mean obviously I think we've realised that if you're in the spotlight for anything, then not everything that's going to be written about you is

Page 20
either going to be sympathetic or supportive, so we quickly saw that what we thought may be a good thing to do would be criticised. Whether it would be our decision to go to Rome or not was criticised in certain quarters. Even at the time for us it was very important to us. So there was that element, and then there were more sinister elements were starting to creep into the reporting.

Firstly, the first really bad thing was an article that was written in a Portuguese paper which was entitled, "Pact of silence", and it was starting to refer that there was some sort of sinister agreement between us and our friends to cover up what had happened, and I thought that was rather ludicrous, considering that we were all acting under judicial secrecy and couldn't speak about the details of the event. But that -- it was probably towards the end of June 2007, and slowly deteriorated through July, culminating in September 2007.
Q. The real spate of offensive and objectionable material, if I can be forgiven for using those epithets, starts in September 2007 and runs on to January 2008, and we'll be looking at those in a moment.

In paragraph 32, you make the general point that UK press articles were often based on bits and pieces Page 21
picked up from Portuguese articles, transmuted from supposition into fact; is that right?
A. Yeah, absolutely. And I think one of the articles that springs to mind actually was a piece in a Portuguese newspaper where somebody was talking to the prosecutor and was asking what he thought had happened and there was a quote saying he didn't know whether Madeleine was alive or dead, and I think the following line was "probably dead", and that translated into the front page of the Daily Mirror with a photograph of Madeleine with a headline, "She's dead", which we saw at 11 o'clock at night, we were trying to go to bed. Obviously that was one of the most distressing headlines, it was presented as if it's factual, and it was just taken from that supposition, I don't know, probability. It's incredible.
Q. One key event in this narrative is you becoming, if I pronounce it right, arguido, under Portuguese law, which occurred on 7 September 2007, and this is paragraph 34 of your witness statement. To be clear about it, and you'll correct me if I'm wrong because you know more about this than me, arguido does not mean "suspect", it means "person of interest"; is that correct?
A. That's what we were advised was the closest correlation

Page 22
or translation within UK law at the time, and I think it is probably important to emphasise that as a witness in Portugal at that time you were not entitled to any legal representation. So if the police wanted to ask any question, which your answer may give incriminating evidence, then they must declare you arguido, then you were entitled to have a lawyer there. And in many ways you could argue that all parents of a missing child, certainly those who would have been the last to see them, could have to answer questions like that. So being labelled arguido was not necessarily such a bad thing.
However, I will acknowledge that there were leaks by elements of the investigation team which clearly were trying to portray that there was strong evidence that Madeleine was dead and that we were involved.
Q. Maybe there are two points here. The first point is the obvious one that needs to be stated. There isn't an equivalent concept of arguido in English law?
A. No. And I think the aspect on that is we've never been arrested, we've never been charged with anything. We've never stood trial.
Q. Do you happen to know whether under Portuguese law they have a category of suspect?
A. I think it is loosely used, but you could have multiple Page 23
arguidos within any investigation, and at that time, the title "arguido" stayed with those involved until the file was closed.
Q. Do you think, rightly or wrongly, the British press somehow interpreted "arguido" as equivalent to "suspect", which carried with it, therefore, its own connotations?
A. Yes. I mean clearly the word was used that way almost exclusively.
Q. At this point we are in the late summer, obviously, or early autumn of 2007. If I can move you forward to paragraph 39 of your statement. You're making the point that the story in terms of objective fact is beginning to run dry and reporters now are thrashing around for something new.
A. I think it's probably worth just clarifying that within ten days of being made arguidos, the prosecutor made an announcement that all lines of inquiry, including the abduction of Madeleine, were open and no charges were being brought at that time, but that didn't stop the continued reporting of inaccurate, untruthful and incredibly damaging reports.
Q. From the perspective of the newspaper and the sort of economic calculation they may wish to conduct -- you deal with this in paragraph 39 -- but you have evidence

Page 24
that this story was, at least in the opinion of those running one of the newspapers, boosting their circulation figures. Is that right?
A. I think that's clear, and Peter Ellis testified that to the Parliamentary Select Committee.
Q. The specific tone of the articles changes in September 2007. We're going to look at that particularly in a moment. In paragraph 40, however, you refer to one piece in the Evening Standard, which is I think the very day you were declared arguidos, 7 September 2007:
"Police believe mother killed Maddie."
A. Mm.
Q. Was that the first time that point was made so baldly and so falsely?
A. There's been so many headlines of similar gravity that I can't tell you honestly whether that was the first time.
MRS McCANN: I think that may have been the first time it was in a headline. In August 2007, we were told by a BBC journalist, in fact he stopped us and said, "Have you seen what's getting reported? They're saying there's blood in the apartment, they're saying that you were involved. Madeleine's been killed and you were involved." So actually it was stirring up in August 2007, but I think the headlines like that became very Page 25
prominent once we were made arguidos.
Q. Then you refer to two articles in the Daily Mail which, unless I've missed something, we don't have available today, but the first one published in September 2007 you summarise in paragraph 41, the subheading:
"I pray the Portuguese police are careering down the wrong track, but from the start a terrible nagging doubt has refused to leave me."

That, for what it's worth, was corrected by another piece as late as 4 May 2009, which you deal with in paragraph 43 ; is that correct?
MR McCANN: It is. I should probably clarify that paragraph 41 refers to Kate rather than myself, but yes, that's correct.
Q. In paragraph 46, you deal with a theme which you're not the first to address, namely presence of photographers. We know, of course, that you came home at a certain point, I can't remember precisely when it was, but once you're home, you then have photographers outside your home. Can you just tell us a little bit about that, and in particular the impact that had on you?
A. I think the first thing probably to say is it started when we said we were leaving Portugal, which we'd already told the police we were going to leave before we were declared arguidos, and the journey to the airport where they would bang on the windows, sometimes with the Page 27
camera lenses, and Amelie said to me several times, "Mummy, I'm scared."
MR McCANN: I'd like to point out the twins at that time were still only two and a half years old. Very frightened.
Q. You deal with two further matters, perhaps less serious than this, because what you've told us of course is a plain breach of the code, that we may come to in due course.

There was a photograph of you, Dr Gerald McCann, on the golf course, which obviously is a private place, and then the distortion of photographs of you, Dr Kate McCann, to present, no doubt, a certain image. Often coupled with the adjectives "frail" or "fragile", which you've told us about.

In terms of the effect on you, you described it, and of course it will be obvious to us, but looking more broadly, the effect on the continuing investigation, which after all is your primary focus then, as it is now, are you able to quantify that for us and describe it?
A. Well, I think from -- reputational aspects aside, the distress that was caused to us was the clear message that was going out nationally throughout Europe and internationally was that there was very strong evidence

Page 28

|  | how | 1 | sed |
| :---: | :---: | :---: | :---: |
| 2 | plicated in her disappearance, and we knew that if | 2 | estershire police to write to the broadcasters and |
| 3 | opl | 3 | ere's a letter from Matt Baggott, who was |
| 4 | eaningful | 4 | Chief Constable at that time, urging restraint and |
| 5 | pects of campaigning for a search with what happened | 5 | saying there was very inaccurate reporting. |
| 6 | nd | 6 | gs with Angu |
| 7 | mp | 7 | and Clarence, who then came back to work for us later on |
| 8 |  | 8 | I |
| 9 | MRS McCANN: These were desperate times. You know, we were | 9 | er, |
| 10 | having to try and find our daughter ourselves. We | 10 | my memory - |
|  | needed all the help we could get, and we were faced |  | LORD JUSTICE LEVESON: 8 October. |
| 12 | ps | 12 | A. Thank you. Faile |
| 13 | in the car"; I don't know how many times I read "Body | 13 | JAY: 17 Septembe |
| 1 | ids i | 14 | re done because the |
| 15 | becomes fact. There were no body fluids. We | 15 | erage was continuing such a bad way. |
| 16 | desperately wanted to shout out "It's not true, it's not | 16 | ing |
|  |  | 17 | at this quite carefully in a moment, amongst the |
| 18 | media, it just doesn't have a weight. We wer | 18 | xpress Group newspapers, which included the Daily Star |
| 19 | desperately shouting out internally "Please stop, wh | 19 | the Daily Express, the Sunday Express and the |
| 20 | g | 20 | Sunday Star? |
| 21 | you're stopping our chances of finding her". |  | A. Yes |
| 22 | MR McCANN: The point being, which I alluded to earlier, is that we were told in no uncertain terms that if we disclosed anything publicly which we knew to be in the judicial file, ie the results which had been shown to Page 29 | 22 | ur |
| 23 |  | 23 | wyers in the context of possible claims in defamation, |
| 2 |  | 24 | by which I mean libel? |
| 25 |  | 25 | Yes. Kingsley Napley had written to the Express Group Page 31 |
| 1 | us, which we knew were not what was being repo | 1 | twice, explicitly, telling them that they were on |
| 2 | DNA, then we were threatened with a two-year | 2 | ice, that we felt that the content of the articles |
| 3 | imprisonment for breaking judicial secrecy, so we were | 3 | ibellous, and we reserved the right to take actio |
| 4 | being tried by the media and unable to defend ourselves adequately. | 4 | gra |
| 5 |  | 5 | es of articles produced in January 2008 ov |
| 6 | Q. You tell us in your statement a series of steps which | 6 | very short period of time, rehashing largely, but with |
| 7 | were taken to try and abate this flood. Can I try and | 7 | her things come on, and I think it's important to |
| 8 | summarise it in this way? First of all, a meeting is | 8 | mphasise we had met with Adam Tudor from Carter Ruck |
| 9 | organised with the editors of the major UK tabloid | 9 |  |
| 10 | newspapers. That's in September 2007, when a clear | 10 | way |
| 11 | message was put out to them, and you tell us that had a | 11 | sort. We felt we had a more important battle to |
| 12 | transient effect. It's paragraph 53 of your witnes | 12 | aughter, but we felt th |
| 13 | statement. | 13 | ourse of action open to us at that |
| 14 | A. Sure. I think there's two elements. Within the first | 14 | ul |
| 15 | week of being back, we had appointed solicitors, | 15 | RS McCANN: And I think it's important to emphasise, again, |
| 16 | Kingsley Napley, and Angus McBride, who is one of the | 16 | nes that we faced. They were |
| 17 | solicitors who represented us at that time, he though | 17 | nt. And they're not just slight inaccuracies. |
| 18 | it was very important that he would -- we should try and | 18 | in parents' hire |
| 19 | modify the content of the press articles, and he went | 19 | Totally untrue. |
| 20 | with Justine McGuinness, who was campaign manager at | 20 | Q. Let's look at some of these articles, please. What I'm |
|  | that point, and met with all the editors from the major | 21 | g to do is invite your attention first of all to |
| 22 | newspapers and emphasised to them that it was his strong | 22 | M2, which is a schedule you have prepared, with |
| 2 | belief that there was no evidence to support what they | 23 | nderneath it articles in the Daily Express |
| 24 | were reporting. But it seemed to have very little | 24 | y. These run from 27 September 2007 to |
| 25 | effect. | 25 | 22 January 2008. The ones you have specifically |
|  |  |  | Page 32 |

identified in paragraph 66 of your witness statement we can look at, but first of all, we can get the flavour of some of the headlines.
9 October 2007: "DNA puts parents in frame.
British experts insist their tests are valid".
17 October 2007: "Parents' hire car hid a corpse. It was under carpet in boot, say police".

Then "Priest: I was deceived".
I haven't counted them up, but there are probably about 25 similar pieces running over a three or four-month period.
Let's just look at some of them, if you don't mind.
MR McCANN: Sure.
Q. We're in GM2, and the first of them --

LORD JUSTICE LEVESON: We're not intending to put these or the website, are we, Mr Jay?
MR JAY: Well, if there's a problem, we won't. I didn't understand there to be, but at the moment these are not on any website, no.
LORD JUSTICE LEVESON: No. I just don't particularly want to give greater prominence or currency to articles that have caused enough distress in their time.
MR JAY: Yes.
LORD JUSTICE LEVESON: By all means refer to them and that
can be part of the evidence, but it seems to me that's
Page 33

## sufficient.

Are you content with that approach?
A. Obviously the articles themselves have been pulled, but they are -- their contents have been widely disseminated through many blogs, as you're probably well aware, but we have no issue with discussing the content.
MR JAY: Yes. I think the best thing to do, unless someone says I should adopt a different course, is I'm not going to ask for the articles to be put on the screen, but I'm just going to refer to the articles and we can bring out maybe one or two points. If at any point you tell me no, you don't want me to proceed down a particular road --
A. Sure.
Q. -- of course I won't. So I'll do this as quickly and as lightly as I can, Dr McCann, just to give the flavour.

If you look, please, at the internal numbering, it's page 10 of GM2.
A. Yes.
Q. There's an article:
"It was her blood in parents' hire car, new DNA tests report".

The overall flavour or thrust of this article was that there was DNA evidence which linked your daughter with a hire car. What do you say about that? I'm sure Page 34
you have a lot to say about it, but in a nutshell --
A. The first thing to say is it's simply untrue.

Madeleine's DNA was not uncovered from the hire car, that's the first thing.
Q. Yes.
A. The inference from this is, and I think the public who think that DNA is a very strong evidence in cases would take this to mean, absolutely, that Madeleine was in the hire car that we hired more than three weeks after she disappeared. It's incredible.
LORD JUSTICE LEVESON: Interestingly enough, what they're doing is reporting a newspaper as saying that, so that's how it comes out. A Portuguese newspaper.
A. Well, often you'll find that there would be something down in the article. They weren't published in the prominence that they were in these papers. And no way of checking the source, which is a recurring theme. These are all sources, unnamed sources in the original articles.
MR JAY: If we move, please, to page 15 , the headline reads:
"Madeleine: McCanns are main suspects, say police."
Was that correct?
A. Well, the police weren't speaking to the media under judicial law, and we haven't had any of the police identified who have given these statements. I would Page 35
like to know who they are. Perhaps they could face contempt of court proceedings.
Q. Okay. Page 17, this is another headline you refer to in paragraph 66:
"Priest 'bans' Madeleine. He takes down posters as Praia da Luz" and then I think this should be open inverted commas "wipes her from its memory."

What's the innuendo there? It's pretty obvious.
A. It is, and I think the key thing here is obviously that the Church community in Praia da Luz were incredibly supportive to Kate and I spiritually.
MRS McCANN: And still are.
MR McCANN: And at that point they continued to hold a weekly vigil for Madeleine, so obviously saying that the town and the Portuguese locals had turned their back on us was a clear innuendo from this article, which again was not true.
Q. In GM3, if we can quickly navigate our way through that, this is another schedule of articles; this time, however, we're looking at the Daily Star and the Daily Star Sunday. There's a similar number of articles, really. No, it's more. Maybe about 50 of them. What is similar is the broad dates, from 27 September 2007 to 22 January 2008.

Two of the articles you specifically referred to in Page 36
your evidence, we can just quickly alight on them. Look
at page 117, please, Dr McCann. An article in the Daily Star on 26 November 2007:
"Maddie 'sold' by hard-up McCanns."
This is the article you do refer to, the selling into white slavery allegation. Probably you don't want to dignify that with a comment?
A. That's nothing short of disgusting.

MRS McCANN: I think this same journalist, if memory serves right, also said we stored her body in a freezer. I mean, we just ...
Q. The final one, I've read all of these, Dr McCann, last night. We could look at all of them. These are representative.
LORD JUSTICE LEVESON: Just to make the comment, there's absolutely no source for that assertion in that article.
MR McCANN: No.
MR JAY: There's a generic reference to a bombshell new police theory, but completely non-attributed.
LORD JUSTICE LEVESON: Yes. Sorry.
MR JAY: Probably entirely made up.
Page 132. In capitals:
"She did die in hol [short for holiday probably] flat; blood traces [in capitals] are Maddie's, car fluids [again in capitals] are from corpse" and then
"-- cops: body had been moved."
And then there's a reference to a possible grilling by the British police, they have sensational new evidence. Are you going to dignify this with a comment or not?
A. I mean, you can, I hope, understand why we felt we had to take proceedings from the severity and consistency of the allegations being made.
Q. Can we deal now with the proceedings? If you want me to go further through the schedule, through the articles, please let me know. I detect you probably don't. We have enough of a flavour; is that right, Dr McCann?
A. Mm .
Q. But what happened next, your solicitors have become involved, letters before action had been sent. To pick up the story at paragraph 68, you say that on 7 February your solicitors were contacted by the Express, and they proposed some sort of deal with you. Can you tell us about their proposal?
A. It was pretty much said because we were arguidos, they couldn't agree to our complaint, but they did suggest that we did an interview with OK magazine, which we found rather breath-taking.
Q. Right. It goes without saying that that offer was not accepted and matters proceeded. Paragraph 69, the

Express by now had taken expert advice and they now indicated that their articles were defamatory; is that right?
A. Yes.
Q. Could you give us a sense of the timescale here? The first offer from the Express was 7 February, this was the Hello magazine offer, but when did the admission of wrongdoing, as it were, come in?
A. It did drag out a bit. I can't give you the exact dates. I do have it on file. But there was an acknowledgment that they might be prepared to make an apology and also consider damages. We wanted to make sure that those damages reflected the seriousness of what they had published and it was -- to be honest, the damages for us were a secondary consideration. It was more about getting a front page apology to send a clear message that we wouldn't tolerate these ongoing allegations in other newspapers either.
Q. The statement in open court was read out on 19 March 2008.
A. Mm.
Q. $£ 550,000$ was paid to Madeleine's Fund, and there was also an apology on the front page, is this right, both of the Express and of the Star? Or is it just the Express?

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A. No, both.

LORD JUSTICE LEVESON: Express Newspapers, and given tha we've gone into it, it's probably sensible just to read that:
"In addition to the allegations referred to above, the Daily Star published further articles under the headlines which sought to allege that Mr and Mrs McCann had sold their daughter in order to ease their financial burdens. A further article alleged that Mr and Mrs McCann were involved in swinging or wife swapping. As the defendant now acknowledges, all of these allegations were and remain entirely untrue. In particular, there is no evidence whatsoever to suggest that Mr and Mrs McCann were responsible for the death of their daughter, they were involved in any sort of cover-up and there was no basis for Express Newspapers to allege otherwise.
"Equally, the allegations that Mr and Mrs McCann may have sold Madeleine or were involved in swinging or wife swapping were entirely baseless. Naturally the repeated publication of these utterly false and defamatory allegations have caused untold distress to Mr and Mrs McCann. Indeed, it is difficult to conceive of a more serious allegation."

That just provides some context.
Page 40
A. Thank you.

MR JAY: What may be worthy of consideration though is the possible rapidity of change of stance. On the one hand, they were maintaining their articles, they get leading counsel's advice, then all of a sudden they say it's all entirely wrong and maybe it's worth a consideration how and why that volte face occurs.
LORD JUSTICE LEVESON: Could you tell me this. They presumably published something as well. Where was it published?
A. The apologies?

LORD JUSTICE LEVESON: Yes.
A. They were on the front page. We insisted. And we would have gone to court to get that.
LORD JUSTICE LEVESON: Do we have that?
MR JAY: I don't think we have the text of the apologies on the front page, do we?
A. Not the full apology.

LORD JUSTICE LEVESON: All right.
MR JAY: We can look at those, if necessary.
You deal with the issue of exemplary damages, punitive damages in paragraph 71.
A. Yes.
Q. But you decided in the end not to pursue those; is that correct?

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A. It is. We were told that we had, after taking counsel's advice, that we would be very likely to be successful in such a claim, and my understanding of that was that there would be a very strong argument that Express Group Newspapers knew that the allegations, or many of them, were unfounded or certainly couldn't prove any of them, and despite the steps we had taken from September 2007 through to issuing proceedings made it very clear there was no evidence to back it up, that we could only assume they were acting for profit.
Q. After these matters -- we're now in March of 2008 -- the answer to the question may be fairly obvious, but were there any further objectionable articles in the British press?
A. There was certainly a dramatic sea change within Express Group Newspapers and I think largely the coverage has been much more responsible and balanced. It doesn't mean that there hasn't been articles published which are untruthful. They may not be libellous or defamatory, some of them, and we've had to have certain articles pulled, but there was a clear change. With hindsight, I wish we'd taken action earlier.
Q. In paragraph 76, you deal with related litigation involving your friends, I believe, who were with you on holiday. Can I take this point quite shortly, that they

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too recovered damages?
A. Yes.
Q. I think in total the amount was $£ 375,000$.
A. That's correct.
Q. But so it's clear, I've been asked to draw this from you, that the defendant to the proceedings brought by your friends was again Express Newspapers?
A. That's correcting.
Q. Or their publishers. The Sun reported it, although the Sun themselves, to be absolutely clear, were not the defendants, they hadn't defamed you. They reported those settlements, I'm told, at page 25, and there were similar reports in the Daily Mirror. But so there's no doubt about it, the Sun and the Daily Mirror are not the defamers. They are reporting what's happened in relation to proceedings brought by other organs of the press.

Paragraph 78 to 80, Associated Newspapers, please. You made a further libel complaint in July of 2008 in relation to coverage in the Daily Mail and the Evening Standard. Can we be clear which articles these relate to, since you don't specify it in paragraph 79? Do I have this right? Are you referring back to the article at paragraph 40 of your witness statement, Dr McCann?

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A. There had been a large number of articles, similar tone to the ones that we had complained of previously, so it was more again about DNA, blood, suspects, Madeleine being killed, et cetera, rather than anything else. Paragraph 40 --
Q. You identify one article in the Evening Standard published on 7 September 2007.
A. Sure. There were many similar articles like that, particularly in the Evening Standard at that time.
MRS McCANN: The corpse in the car was the Evening Standard I think.
Q. In a nutshell, what was the outcome of these libel proceedings?
MR McCANN: We did settle. They paid damages and there was an apology published in the Evening Standard. The Daily Mail did not publish an apology.
Q. One point you make, these libel proceedings were brought with the benefit of conditional fee agreements; is that correct?
A. Yes. I think it's very important, given the scale of the task that faced us, and we were given -- we made our decisions after being fully informed of the pathway, and I think that's very important. It was a last resort. And at the time, given our circumstances, I do not believe we would have had the resource to go down that

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path if it wasn't for a CFA being in place.
LORD JUSTICE LEVESON: This is going to be your choice. It won't happen to anybody else, but it will be your choice. If you'd like a break for five minutes, we'll have it. If you prefer to carry on, we'll carry on.
A. I'm happy to carry on.

LORD JUSTICE LEVESON: Right. I ought to say, I've confirmed it with the shorthand writer.
MR JAY: There's a fair bit more, I don't want to rush this, but we'll see how we get on.

Paragraph 82, the first anniversary. You explain that you agreed to an interview with Hello magazine. Just tell us a bit, please, about why you did that?
A. I think the first thing to say, it was very specific and we had -- clearly we've talked about our prime objective, which is finding Madeleine, and what we've hoped is that some good would come out of what happened to us. And one of the things, through our own research and having been to the National Centre for Missing and Exploited Children in the USA, was to talk about AMBER Alert, and we decided that we would start campaigning for a joined-up alert system for missing children within Europe, particularly on the continent of Europe.

For that very specific reason, because Hello is Page 45
distributed, I think, in 14 European countries, they did approach us and said that they would promote the campaign, and at the time we were lobbying MEPs to sign declarations supporting an alert system, so we agreed to do an interview on that basis, which, just for clarity, of course, we were not paid for.
MRS McCANN: Many of the media outlets didn't really want to run with the work we were doing for the child rescue alert, which in itself is disappointing because it is important but obviously it's not as exciting, or whatever the word is, when it comes to headlines and stories. So we saw this as an opportunity of improving things for the greater good really.
Q. One rival however wasn't best pleased and you touch on this in paragraph 84. Maybe this is quite understandable, but tell us a little bit about the call you received from the then editor of the News of the World.
MR McCANN: I think it would be fair to say that Mr Myler was irate when he learned of the publication which happened and was berating us for not doing an interview with the News of the World and told us how supportive the newspaper had been, the news and rewards, and a time of stress for us on the first anniversary, where we were actually launching a new campaign, we were still
arguidos at the time, a new call number for people to come forward so we could continue the search for our daughter, and we were interacting with the media to get that message out.

He basically beat us into submission, verbally, and we agreed to do an interview the day after.
MRS McCANN: Can I just emphasise, this is at an extremely stressful time. It was the run-up to one year of not having our daughter with us. Emotionally as well as logistically, everything we were trying to do, it was incredibly hard. So to get a call like this, and you actually almost feel guilty, you know, because they're saying, "We helped you, we got a reward", and you almost say, "I'm sorry", and it's almost like somebody won't help you unless you give something back.
MR McCANN: And of course we were trying to make the distinction between interacting with the media for what we thought was something helpful for the search, and simply doing an interview, which we knew would focus on the human interest aspects and not necessarily the search for Madeleine.
Q. The News of the World come into the narrative a few months later, as you rightly say at paragraph 86. It may be that Dr Kate McCann would like to deal with this, but I'm in your hands. Out of the blue, 14 September Page 47

2008, transcripts from your personal diary appear or purport to appear in the News of the World. Can you tell us a bit about that, please?
MRS McCANN: You're right, this was totally out of the blue. It was Sunday lunchtime, we'd just got back from church and I got the text message from Gail, who works in the nursery where Madeleine, Sean and Amelie went, and it just said, "Saw your diary in the newspapers. Heartbreaking. I hope you're all right." And it was totally out of the blue, and I had that horrible panicky feeling, confusion and, you know, what's she on about? I didn't have a clue. We rapidly found out, it was the News of the World. I went and looked at it online, which was five pages, including the front page. I got my original handwritten copy of my diary out and sat there, and it was lifted in its entirety and put in the newspaper without my knowledge. Apart from the odd word, which was -- I think it was a translational error, that had obviously been taken -- translated into Portuguese, and then a Portuguese copy had then been translated back to English, which was slightly different from the original, but pretty verbatim and it had been put there.

I felt totally violated. I'd written these words and thoughts at the most desperate time in my life, most

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people won't have to experience that, and it was my only way of communicating with Madeleine, and for me, you know, there was absolutely no respect shown for me as a grieving mother or as a human being or for my daughter, and it made me feel very vulnerable and small and I just couldn't believe it.

It didn't stop there. It's not just a one-day thing. That whole week was incredibly traumatic and every time I thought about it, I just couldn't believe the injustice. I actually just recently read through my diary entries at that point at that week and I talk about climbing into a hole and not coming out because I just felt so worthless that we'd been treated like this.
Q. Can we be clear as to the provenance of the diary. You mentioned a Portuguese translation, which may be a clear indication of provenance but perhaps I can take this quite shortly, that the judicial or police authorities in Portugal had obtained or had seized a copy of your diary, or perhaps it was the original, in August 2007; is that right?
MRS McCANN: Yes, it was --
Q. We're talking about a hard copy, manuscript document?

MRS McCANN: It was just handwritten. They'd come and said they had taken clothes from the villa and we had to Page 49
leave, and when we got back later that day, they said they'd also taken my diaries as well, which I have to say was a little bit of a shock, but it did come back to me about 24,48 hours later, so I obtained the original copy. Obviously, photocopies were taken during that period.
Q. Yes. It wasn't clear from your statement, but it now is. It was within quite a short space of time that the original was returned to you, you believe by order of a Portuguese judge, so it sounds as if the initial seizure had been a step too far, or whatever. But a copy of the original must have been taken by someone, presumably someone within the Portuguese police or judicial authorities; is that correct?
MR McCANN: I think it's clear that the police had copied the journal and had it translated, and of course at the time we didn't understand why the journal could have been relevant because Kate only started keeping it a couple of weeks after Madeleine was taken, so we didn't know there was a copy until the file was released the following summer, but within the file, the Portuguese judicial file, there is an order from the judge, who's read the translation and says, "This is of no interest to the investigation, it's Kate's personal thoughts and should not ..." and he actually used the

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    word "violation".
MRS McCANN: He used the word "violation". He said use of
    which would be a violation of its author.
MR McCANN: And ordered that any copies be destroyed.
LORD JUSTICE LEVESON:And further investigation of that has
    revealed, if anything? To unpick where this came from?
MR McCANN: I would like further investigation as to where
    it came from.
MRS McCANN: An investigation.
MR McCANN: Because clearly it was an illegal copy.
MR JAY: I think what it relevant, and I think this has
    already come out from Dr Kate McCann's evidence, is that
    one or two things were lost in the translation, or
    changed, which indicates that the piece in the
    News of the World was a translation from the Portuguese.
MR McCANN: Yes.
Q. Because had it been precisely verbatim, it might have
led us --
MRS McCANN: Very subtle changes but things like where
    I said I was "really upset", it says I was "fed up". It
    does change the meaning slightly.
Q. It may be we can investigate that or it may be that we
    will receive an admission as to --
LORD JUSTICE LEVESON: I'd like to know whether there is a
        byline.
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MRS McCANN: It would be nice to know the source.
LORD JUSTICE LEVESON: Is there a byline on the article?
MR JAY: It says "in her own words".
LORD JUSTICE LEVESON: Yes, yes, yes, I understand that, bu is there a reporter's name associated with it?

MR JAY: Pardon me, yes, there is.
LORD JUSTICE LEVESON: There you are, there's a potential line of inquiry.

MR JAY: It's a point I'd like to think can be dealt with very quickly by someone. It can be confirmed, because it's pointless denying it really. There's only one reasonable inference here.

You do refer in paragraph 93 to a conversation which was reported to you from Clarence with the deputy editor of the News of the World as he then was, Mr Ian Edmondson. Can you tell us a little bit about that?
MR McCANN: I think the first thing to say is that Clarence would speak to Ian Edmondson, who was deputy editor and was probably responsible for most of the stories about Madeleine at that time. So Clarence spoke to Ian on a regular basis and one or two of the News of the World reporters. Clarence had mentioned it to me, just saying that the News of the World had indicated that they would do a supportive story, mainly attacking the Portuguese police, but generally supportive. That was it. There

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was no mention of having a copy of Kate's diary, no mention that they were intending to publish it verbatim.

So as Kate has already said, it was a complete shock when we heard that it was printed.
Q. Yes. They have breached a number of tortious obligations which it's not necessary to spell out. It culminated in a complaint, the possibility of litigation, but that was avoided by an apology from the News of the World and the payment of a further donation to the fund for the search for Madeleine; is that correct?
A. Mm .
Q. I'm just going to touch upon the section continuing the relationship with the press. I am not going to cover paragraph 97 unless I'm asked to specifically. If you wish me to I will, but I wasn't minded to. I was going to ask you though about paragraph 100.
A. I mean, I think 97's probably important.
Q. Okay, well tell us about it in your own words.
A. For one of the stories that was not published and isn't libellous, not defamatory, but we were alerted to it and it was done by a freelance journalist who has written many inaccurate stories, and had submitted it, I think it was to the People, if I'm right, the People on Sunday, and the editor or the deputy editor called Page 53

Clarence just to say they were running this, this was on the evening of the Saturday, and Clarence phoned us and it was complete nonsense, but it was basically saying that we were undergoing IVF treatment with a view to getting a new baby to replace Madeleine.
MRS McCANN: I think the important thing, this demonstrates
it's not just the articles that have been published that have been a problem. We've had many weekends destroyed because we've had to try and stop articles like this from actually ending up in the press. And weekends are important for Gerry, that's our only family time. We've had to involve lawyers on --
MR McCANN: Friday nights. Another example there which I don't think is in our evidence, but again it transpired on a Friday evening, is journalists had gone to speak to my mum, I think they said even -- you know, Clarence said it was okay and my mum let them in and a lady journalist took a copy of an unpublished photograph of Kate, myself and Madeleine when we lived in Amsterdam that was very special to us and they were going to publish it in a Scottish newspaper on the Sunday and we had to involve Adam and Isabel from Carter Ruck to get that stopped.
I think the only way we managed to get a very stroppy interaction with the editor was that we own the
copyright of the picture and they were not in the least apologetic.
MRS McCANN: They were fighting it, actually, saying, "We've got the picture". It was like, "It's our daughter."
Incredible.
MR McCANN: The impact that these things have in what should be a little bit of respite, but there have been several occasions where we've gone behind the scenes at the eleventh hour.
Q. Thank you. Then paragraph 100 , you deal with a piece in the Daily Mail, quite recently, July of this year, about an alleged reported sighting in India. What are your feelings about that, please?
A. It's probably one of the most recent examples of what I would say is the contempt for Madeleine and her safety. There was no check. This sighting had been reported to the police, I think we were actually on holiday. They emailed us a photograph and we quickly indicated that it was not Madeleine, and as far as we were concerned, it was dealt with. And then a day or two later, it's published and the newspaper on that occasion have chosen to publish it and they may want to justify why, but from our point of view, they don't know whether it's true, they haven't contacted us, and additionally we have the issue that if this really was Page 55
a genuine sighting of Madeleine, then her captors may be alerted and move her.

So the story has precedence over the safety of our child. And that's clear. And that has been done by, I think, every single newspaper, as well as similar instances of amateur sleuthing and details about the investigation which should only be known to the witnesses and the potential to contaminate evidence by having read something that you shouldn't really know about, and all of the newspapers and broadcasters have been guilty of it.
Q. Thank you. Out of sequence, I'm then going to come back to the PCC because it's a more general point, I think, under the heading "Kate's book", paragraph 111. It may be in your hands as to which of you would like to deal with this piece of evidence.
A. Sure.
Q. Book published in May of 2011, so we're at the fourth anniversary, it was to mark that, to coincide with that. Obviously a difficult decision. Do you want to tell us a little bit about that?
MRS McCANN: You're right, it was a very difficult decision for obvious reasons, for all the reasons we've been discussing. But ultimately we are responsible for conducting and funding the search to find our daughter.

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Q. Yes.

MRS McCANN: And ultimately I had to make the decision, we needed to raise money, I knew this was something that I could do that could maintain the search and possibly help us find our daughter, and that's why I took the decision then to do it. Obviously in the ideal world, you wouldn't choose to do anything like that.
Q. There was serialisation of your book in two

News International titles, the Sun and the Sunday Times?
MR McCANN: Yes.
Q. You talk about a meeting with Rebekah Brooks, which led to a review of your case, a formal review. Just to assist us a little bit with that, can you recall when that was?
A. I think it's probably worth just elaborating a little bit because it's quite a complex decision-making process in terms of agreeing to serialise the book.

News International actually bid for the rights to the book, along with Harper Collins, and one of their pitches was the fact that they would serialise the book across all of their titles, and we were somewhat horrified at the prospect of that, given the way we'd been treated in the past, and the deal was actually done with the publishers, Transworld, that excluded serialisation.

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Now, we were subsequently approached by News International and Associated to serialise the book, and after much deliberation, we had a couple of meetings with the general manager and -- Will Lewis and Rebekah Brooks and others, and what swung the decision to serialise was News International committed to backing the campaign and the search for Madeleine. And that passed our test of how it could help, and we had been lobbying behind the scenes for two and a half years, with successive Home Secretaries, to try and get a review of Madeleine's case, and we felt that having News International helping in that, and ultimately where I think the media have helped in this situation, of galvanising the public, having them reengaged with us and Madeleine, is what tipped the balance.
Q. Her intervention was successful?
A. It was.
Q. There may not be a module three issue.

LORD JUSTICE LEVESON: Yes.
MR JAY: It's right to say in terms of the sequence of events, I think the Prime Minister was involved just a bit before, and then the Home Office the day after?
A. Yes, I think --
Q. The same day announced --
A. We had written to the Home Secretary saying that we'd be Page 58
launching the book, and asking her to update us on where they had got, and we got one letter which really didn't say very much, and then we did the open letter to the Prime Minister, which was published on the front page of the Sun.
Q. Turn back to the issue of the involvement of the PCC.

This is covered both in your witness statement and in evidence you gave, Dr Gerald McCann, to the Culture, Media and Sports Select Committee in 2009, and then it was picked up in the second report, I think, of that committee. There's a whole section of the report that goes to that issue.

The position I think is -- I'm back in your statement, paragraph 101 -- the PCC's position is that at an early stage they put a message out that they were ready, willing and able to assist you. This was in May 2007. Do you follow me?
A. Yes.
Q. I think your evidence is, well, you never got that message. Was that right?
A. If I did, it was lost in the time when we were obviously dealing with lots of things, and I would say probably similar to Mrs Gascoigne who gave evidence earlier this morning, that I was only vaguely aware of the PCC at that time.

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Q. In paragraph 103 you say:
"We have on a number of occasions had cause to contact the PCC. The PCC was extremely helpful in dealing with the unwanted intrusion into the privacy of our twins."

Are you referring there to the business with the paparazzi taking photographs when you're back in the United Kingdom?
A. Yes.

MRS McCANN: That's right.
MR McCANN: I think we had also indicated earlier in the summer of 2007 that although we tacitly agreed to having photographs of us taken in Praia da Luz, largely because we felt that we couldn't stop it, particularly with international media being there, that as the situation dragged on over months, we didn't want continued photographs of Sean and Amelie to be published, and we were obviously concerned at the time, they were just 2 , but as they got older, they could be recognised. So there was an agreement -- and I can't remember exactly if the PCC were involved in that, but we asked the media not to publish photographs of Sean and Amelie, and that was adhered to with pixelation up until we arrived back in the UK and then it went out the window again.
Q. In terms of the PCC assisting you in relation to the

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wider issue of inaccurate, unfair and sensationalist reporting, it may well be that there isn't a factual dispute between you and the PCC at that time, of course, speaking through Sir Christopher Meyer. If you kindly look under tab 9, Dr McCann, you'll see relevant extracts from the report of the Culture, Media and Sports Select Committee published on 9 February 2010. I invite your attention -- the pagination is working -on the top right-hand side of each page, to page 87.
A. Yes.
Q. You should find a heading, "The role of the PCC", I hope, and then paragraph 354. There we deal with the message which they say they gave to you and you've told us really, well, you don't recollect it, and of course a lot was going on, but there was a meeting, and this is 355, on 13 July 2007 --
LORD JUSTICE LEVESON: That was just accidental. MR JAY: Yes.

The general thrust of what you were told by Sir Christopher Meyer during the course of an informal conversation, is this correct, is that if you wanted to deal with the issue of libel, well, then the route was legal recourse, legal action. But if you wanted to deal with it in some other way, then the PCC might be able to help?

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A. Yes.
Q. Does that capture the sense of that meeting?
A. It's probably fair to put in there that I had a number of conversations with Sir Christopher, primarily because we became friendly with his wife, Lady Catherine, through her work with PACT, so on that first occasion I met Sir Christopher and he broadly asked, "How are the media treating you?" and we were very open and at that point we said, "Considering the interest, not too bad", and we didn't really have too much in the way of specific complaints.

I did have further informal conversations and they also dealt with correspondence from Kingsley Napley over the period, but the gist of the conversations, and most of my dialogue with him, informal rather than written, was that we agreed with our legal advice and we took the best legal advice we could get, that the way to stop this was to take legal action and not to go to the PCC, and I think Sir Christopher agreed with that.
Q. That's a fair summary, Dr McCann. It's what the committee think as well, although Paul Dacre expressed disappointment that you didn't make a formal complaint to the PCC, although Sir Christopher disagreed with Paul Dacre so we have two views --
A. I think the ultimate thing was we discussed a course of Page 62
action and our advice, which was given in no uncertain terms, this is legal advice, was that the PCC were not fit to deal with the accusations, the nature of them, the number of them and the severity.
Q. The Inquiry will note, but it's not necessary for me to read it out, the conclusions of the Select Committee on these issues. They start at paragraph 364 and 365 in bold. And the direct criticism is made by the Select Committee of the PCC that the press were beginning to ignore the requirement of the code and the PCC remained silent.

Then under the heading "Lessons learnt", they review your case. They rightly point out that this was a very unusual case. They state that the coverage was
"freakish", and then their conclusions are set out at paragraphs 373 and 375 .

Perhaps I should read those out?
LORD JUSTICE LEVESON: The word "freakish" is the committe saying it's far from clear that the McCann coverage was really so freakish.
MR JAY: Paragraph 373:
"The newspaper industry's assertion that the McCann case is a one-off event shows that it is in denial about the scale and gravity of what went wrong and about the need to learn from those mistakes. In any other

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industry suffering such a collective breakdown, as for example in the banking sector now, any regulator worth its salt would have instigated an inquiry. The press indeed would have been clamouring for it to do so. It's an indictment on the PCC's record that it signally failed to do so.
"The industry's words and actions suggest a desire to bury the affair without confronting its serious implications, the kind of avoidance which newspapers would criticise mercilessly and rightly if it occurred in any other part of society. The PCC, by failing to take firm action, let slip an opportunity to prevent or at least mitigate some of the most damaging aspects of this episode and in so doing lent credence to the view that it lacks teeth and is slow to challenge the newspaper industry."

Is there anything you wish to add or subtract from that?
A. I think I would agree with it, and it's probably for others to decide whether the PCC could have changed it. I think that's a moot point.
Q. Can I deal now with some general points, including the four general points you made at the start? But before I deal with those four points, I'm back to your witness statement at paragraph 116.

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You refer to the or a culture change which is required. May I invite you, please, to put that in your own words, both to identify the existing culture and then the change which you think is required?
A. I think we can speak with experience about how powerful the media are, and how much damage they can do. We've already said how many good things that they have done as well, so there is power, there is no doubt about it. But what we see on a daily basis are front page tabloid headlines in particular, sometimes followed by a clamour with 24-hour news channels and Internet and a blurring of the media, of stories which appear to have no factual basis, or exaggerated, or distorted.

You've heard about several of hundreds that were written about us, but we see them, I walk into the shop in the hospital every day and I see front page headlines, whether it's about Chris Jefferies who is going to give evidence, or contestants on the X Factor, and I think information has been written and lives are being harmed by these stories, and something has to change. A commercial imperative is not acceptable.
Q. Thank you. The four specific headings you've given us, in one sense you've largely covered these but it's helpful if we can bring the strands together.

The first is libel. Might it be said, and can Page 65

I just invite you to deal with this, well, this in fact is an example, your case, of the system working to the extent that you decide at a certain point that enough is enough. Obviously as professional people you're not going to put your house on the line to fund legal action, but conditional fee arrangements were available, you took advantage of that.

Within a reasonably swift timeframe, and it's for others to decide whether it was quick enough or whatever, the position of Express Newspapers changes, they admit liability, they make a statement in open court, they pay $£ 550,000$, which in the scale of things is a significant amount of money with modern libel awards, and there's a front-page apology. Is that an example of the system working or do you have a different take on what I've just said?
A. I think it is an example of the system working in part, however we would much rather we weren't awarded any damages and the stories had not been published, and I think it's very important to emphasise that we have experienced long-lasting damage as a result of the headlines and the media coverage, including recent trips to Holland and Spain where our taxi driver said, "Oh, you're the parents who are accused of killing your own daughter, what happened?" and secondly in Spain where

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1 this jurisdiction.
A. No.
Q. Hence your experiences in Spain and the Netherlands.
A. Correct.
Q. That's a helpful observation. What about your second heading, which was privacy laws? Could you help us a bit more with that, please?
A. Yeah. I think it's something obviously we probably hadn't thought too much about before we found ourselves in the situation that we are. You take your anonymity for granted. What I find disturbing, clearly, when you're being followed, you're being put in danger by either reporters' or photographers' behaviour and secondly I think it is probably an anomaly within the legal system that a commercial organisation can take a photograph of you, use it in their product, which they sell and make a profit without your consent, and I think that should be remedied.

I think if I'm here, I know I'm in public, I'm giving evidence, I understand that images will be used, I fully understand that and I'm implicitly consenting to it, but whether it's us going for a run or driving out of our front drive, and particularly with children, I don't think it should be allowed. I think you should not be allowed to publish photographs of private

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individuals going about their private business without their explicit consent, signed.
Q. The existing PCC Editors' Code speaks of either a private place or a public place where there's a reasonable expectation of privacy. I think your evidence is suggesting that that latter concept is quite a difficult one to understand and in particular to apply.
A. Mm-hm.
Q. So that indeed further thought need be given to that.

The third issue we may or may not have brought out adequately but please expand it if you wish to. Contempt for the judicial process, namely the secrecy implications of the Portuguese law, I think, and for your child's safety.
A. Yes.
Q. You have addressed that issue, but is there anything you would like to expand, bring any strands together?
A. Yes, it wouldn't be explicit to judicial secrecy in Portugal, and by judicial I meant the whole process which in Portugal is obviously overseen by a judge. So you have information. We were told we were under judicial secrecy not to give details of events. What became very apparent was, you know, the media were trying to create a timeline of what happened, and we had Page 69
obviously created a timeline and given it to the police and tried to narrow down to the closest minutes when we think Madeleine was taken to help the investigation.

But when that information goes into the public domain and the abductor shouldn't know it, or the only person who should know it were the people who were there, then that's a concern. It can contaminate evidence. You could incriminate yourself by knowing something that you shouldn't have known.

So that's the first process, and I think clearly, as again I'm not a lawyer and I may be speaking out of turn, but it's probably clear when there is a court case on in the United Kingdom, about what's to be reported and what not, and the police are very careful about which information they give to the media in this country, but for me there was contempt about that whole investigative process. There was no regard for the outcome. It was much more important for the media outlets to have the detail or perhaps to have the contradictions, and the salacious aspects that followed it.

And then the point about Madeleine has never been raised, I think, before, and clearly every outlet, I think, has been guilty of this, about reporting sightings, suspicious people, without giving it to the

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proper authorities. And that is of grave concern, and obviously our concern and focus is Madeleine, but it applies to other cases as well.
Q. Your fourth heading is quite a broad one: acceptable standards.
A. Yes. I did have a quick look at the National Union of Journalist's submission and there are standards, but there are no penalties for not sticking to them, and whatever your profession is, particularly in this country, then there is fairly strong regulation which we have to abide to, and I have seen no individual journalist or editor brought to account over the stories, be it within Express Newspapers Group or Associated or any of the other groups and I think if there are repeated offenders, then they should lose their privilege of practising as a journalist.
LORD JUSTICE LEVESON: Quite difficult, that. I understand exactly why you're saying that, but just let me share with you the difficulty, that what journalists do is exercise the right of free speech, and whereas you as doctors require licence to practise medicine, and if you are taken to the GMC then the GMC have all sorts of sanctions available, it's quite difficult in relation to the exercise of free speech.

That's not to say that there shouldn't be penalties, Page 71
there shouldn't be some mechanism whereby there's a holding to account for what you've done.
A. Sure.

LORD JUSTICE LEVESON: But --
A. Thank you, sir. I would like to emphasise that I strongly believe in freedom of speech, but where you have people who are repeatedly carrying out inaccuracies and have been shown to do so, then they should be held to account. That is the issue. I don't have a problem with somebody purporting a theory, writing fiction, suggestions, but clearly we've got to a stage where substandard reporting and sources, unnamed, made-up, non-verifiable, are a daily occurrence.
LORD JUSTICE LEVESON: Yes. I wasn't criticising you at all, but I was simply seeking to explain why that particular remedy may be very difficult to apply in this context. But it's not to say there shouldn't be something. Now, I'm not saying what, because that's part of what I'm here for, if anything, I say immediately, but you've doubtless read that different people have been suggesting different models.
A. Sure.

LORD JUSTICE LEVESON: And it's actually that question which is the burning part of the job that I have to do, which only underlines how extremely valuable your experience

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has been, and how very grateful I am for you sharing it
with us.
A. Sure.
MR JAY: I have no more questions, Dr McCann, Dr McCann. Is
    there anything you want to add? Maybe Mr Sherborne has
    a point, but that concludes all I have to ask.
A. No, I think we've covered all our points, thank you.
LORD JUSTICE LEVESON: Thank you very much. Mr Sherborne.
    did you want to ask something?
MR SHERBORNE: Sir, I realise that we all need time properly
    to digest the very uncomfortable evidence that the
    McCanns have given. As I mentioned last week, we say
    it's nothing short of a national scandal, but there's
    one point I do formally want to raise. It was touched
    on earlier.
        We've seen representatives of the media
        organisations stand up very quickly to respond to the
        criticism of their newspapers --
LORD JUSTICE LEVESON: Is there going to be a question,
    Mr Sherborne?
MR SHERBORNE: There is.
LORD JUSTICE LEVESON: Then I'd like to hear the question.
MR SHERBORNE: It's not a question. I raise this. It was
    mentioned by the McCanns and you mentioned it as well,
    and that is in relation to News International, and what
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                                    Page 73
    we do ask is they provide a response, sir, as you
    mentioned, in relation to the publication of Kate
    McCann's diary --
    LORD JUSTICE LEVESON: Mr Sherborne, I think that is
a speech. We can discuss what we should do, and of
course I'm in a position to do something about it,
because if there's a name, then I can issue a request,
and I put the word "request" in inverted commas, under
Section 21 of the 2005 Act, and I can find out.
MR SHERBORNE: Sir, I understand that. It's not just the
byline, if I may say, with respect, because that's the
person who wrote the story. There is also the question,
which I'm sure the McCanns would like to be dealt with,
if possible, which is who obtained and in what
circumstances they obtained the diary from the
Portuguese police.
LORD JUSTICE LEVESON: I understand.
MR SHERBORNE: That's a decision at a higher level.
LORD JUSTICE LEVESON: That's a thread, and I'm absolutely
alert to the point. I really am.
MR SHERBORNE: I'm very grateful.
LORD JUSTICE LEVESON: Thank you.
Dr McCann, Dr McCann, thank you very much indeed.
I can only wish you everything well in your continuing
search for Madeleine.

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MR McCANN: Thank you.
MRS McCANN: Thank you.
LORD JUSTICE LEVESON: Thank you.
MR JAY: Sir, I've been handed something I'm not sure I can ingest immediately. It's probably something that can be dealt with as between two of the core participants in the first instance, rather than troubling you, and if it can't, we'll come back to it tomorrow morning.
LORD JUSTICE LEVESON: All right. Is there anything else that I can deal with now?

Discussion re procedure
MR JAY: There are two issues. First of all, there's HJK for tomorrow, and I'm going to leave Mr Barr to deal with that.
LORD JUSTICE LEVESON: Yes.
MR JAY: Secondly, over lunch I've heard various proposed additional redactions from Mr Garnham in relation, I think, to at least two witnesses' evidence tomorrow. To be clear, the core participants have seen witness statements in unredacted form, so they know what the maximum scope of the evidence is going to be and they can provide lines of questioning to us.
Mr Garnham has various concerns, which I hadn't been able to apply my mind to in any detail since I was thinking about other things over the short adjournment, Page 75
in particular the evidence we have just heard.
I imagine his concern is what is the final version of the witness statement which is going to be placed in the public domain and on the screens here tomorrow morning? If we spend time discussing it or negotiating the contents of the proposed redactions, we are likely to run into a cul de sac, but on the other hand this is a public Inquiry and I don't wish to stifle the presentation and production of evidence which should be provided.

I think what I would propose on this occasion, because I don't really want to spend time debating this, there is really quite a lot else to do overnight, is that if the other core participants agree, and they don't even know what the proposed redactions are, we live with the redactions Mr Garnham has proposed.

Those, therefore, or rather the witness statement goes on the screen in line with those redactions, but then if there's an objection by anyone tomorrow morning that the proposed redactions go too far or are not substantiated, we then address the objections on that basis.
LORD JUSTICE LEVESON: Yes.
MR JAY: That, in my submission, will be quicker. However, what I'm not suggesting is some sort of procedure which Page 76
goes back to thinking about what truly would potentially prejudice a criminal investigation or prosecution.
MR JAY: Yes.
LORD JUSTICE LEVESON: In the very unusual circumstances of this case, where there is in fact a great deal already in the public domain, and one knows that if there is to be a criminal prosecution, it's a long way down the track. But I understand Mr Garnham's point, I understand your approach, I am content to follow it, but we have to devise a mechanism whereby these concerns about redactions are provided perhaps rather sooner or dealt with rather sooner so that we're not in the position of adopting this approach. Right?
MR JAY: The whole issue of redactions is beginning to cause us concern that we have to prioritise a number of things. The main priority is to ensure that the evidence comes out clearly, that lines of questioning from the core participants are accommodated, and we give proper thought to the evidence, since that is the public face of the Inquiry. We spend hours on redactions each day that will divert us from --
LORD JUSTICE LEVESON: Redactions should be the exception rather than the rule.
MR JAY: Yes indeed they should.
LORD JUSTICE LEVESON: Those preparing the statements know

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ordinarily applies, namely the default position is that which the MPS would desire, because that is not right, without further submission.
LORD JUSTICE LEVESON: It's not what I've said. Indeed, quite the reverse.
MR JAY: Yes.
LORD JUSTICE LEVESON: I've said the opposite.
MR JAY: Precisely.
I am proposing with a degree of reluctance a pragmatic solution which will speed things up, but I'm not endorsing a procedure which is going to apply more generally. Anybody can turn up tomorrow morning and say no, that redaction is inappropriate, we should lift it, or indeed, the more effective way of dealing with it is that we'll just hear the evidence and then the witness statement can be put in a different form online a little bit later.

It's not as if the public nature of the Inquiry is going to be disrupted save for a short period of time, but I really don't want to spend time now involving other core participants and discussing the precise text of redactions. I will live with what Mr Garnham has proposed, with reluctance, and then we'll have to think of a way forward for the future. discussing, the question of interception. Is that right?
MR BARR: That absolutely right, sir. An open application was made by HJK, it's been circulated to the core participants. It sets out at paragraph 5 a number of protective measures which are sought. I'm not going to read them out verbatim unless you invite me to but I can summarise what their effect would be.

It would be essentially that the public would be excluded from this room whilst HJK gives evidence. There will be no video or audio broadcast of HJK's evidence, and confirmation will be sought that the equipment is off before HJK enters the room. A live transcript will also be turned off. A transcript of the evidence, though, will be promulgated by the Inquiry after he has given evidence and those who represent him have been able to confirm that to put out the transcript will not violate the witness's right to privacy.
LORD JUSTICE LEVESON: We'll all know at the time when it happens, won't we, because the real point is that HJK's concern is that in the anxiety of giving evidence, and

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| I have no doubt there are some people in the room today | 1 |
| :--- | :--- |
| who will understand that, that he will say something | 2 |
| that he didn't mean to say and that would therefore | 3 |
| compromise the privacy that he is seeking to protect. | 4 |
| But the idea is that the core participants, their | 5 |
| lawyers should be here, and they will actually see HJK | 6 |
| and hear him, but that it will have no wider | 7 |
| promulgation, although immediately after his evidence is | 8 |
| concluded, and I emphasise that word, his transcript | 9 |
| will be made available. | 10 |
| MR BARR: That's right, sir. The final matter is that he's | 11 |
| submitted a confidential annex and unsurprisingly the | 12 |
| application is that that confidential annex will not be | 13 |
| referred to during evidence. | 14 |
| LORD JUSTICE LEVESON: He explains why he seeks the relief | 15 |
| that he seeks. | 16 |
| MR BARR: The information in the confidential annex combined | 17 |
| with the closed application does precisely that, sir. | 18 |
| And could I submit that these are appropriate measures | 19 |
| which are a proportionate way of safeguarding this | 20 |
| witness's privacy. | 21 |
| LORD JUSTICE LEVESON: All right. Thank you very much. | 22 |
| I make it clear that I do not intend to use HJK as | 23 |
| a template. I don't think it's got any relevance at all | 24 |
| to the issues of anonymity that are raised in relation | 25 | Page 81

to journalists. I don't believe he will be giving any evidence specifically touching a named person or taking any further that which we already know in relation to interception.

Does anybody have any observations to make about the application that's been made?

Right, thank you. I make orders accordingly, and possibly they could be drawn up in appropriate form so that I have complied with the terms of the legislation.
MR BARR: Sir, I'm sure that that could be done.
LORD JUSTICE LEVESON: Thank you very much. So it's important to underline that first thing tomorrow morning we will be closed. I don't apprehend it will take very long, but for the public and the press, save for those who are core participants and attending as core participants, they will have the unenviable problem of just having to wait for us.

Right. Is there anything else?
MR JAY: I have now ingested this correspondence and I'm going to be quite short about it. One core participant is complaining about another core participant's media blog regarding evidence we heard this morning. They can sort it out between themselves.
LORD JUSTICE LEVESON: Thank you very much. If anybody wants to bring anything to my attention because they
feel it's necessary, then they can do so, but they'd
better have a pretty good reason.
Has the position that was being discussed just
before lunch been resolved?
MR JAY: I'm not sure. I think it depended a bit on Mr Caplan, but --
MR CAPLAN: Can I say this, we're not pursuing that matter at the moment.
LORD JUSTICE LEVESON: Right, thank you very much indeed. Thank you very much indeed.
( 4.10 pm )
(The hearing adjourned until 10 o'clock the following day)

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