## (10.00 am)

## Discussion

LORD JUSTICE LEVESON: Before we start, Mr Barr, Mr Caplan 4 asked me the other day about a ruling in relation to the anonymity protocol. I think at some time yesterday we received yet further submissions from one of the core participants. Although I have been ready to deliver a judgment, courtesy requires that I give those submissions consideration, and therefore I'm afraid that it will have to be deferred slightly.
MR CAPLAN: Yes my Lord. Sir, I presume the consequence of that, if any core participant was minded to take it further, would be that the 14 days will run from the ruling you next deliver?
LORD JUSTICE LEVESON: I wouldn't necessarily say that, Mr Caplan, because the ruling that I've given covers the principle.
MR CAPLAN: Very well.
LORD JUSTICE LEVESON: I can say that I'm not prepared to revisit the principle, although some of the submissions have invited me to, so if there had been a challenge to the principle, I would have expected it to be made.
MR CAPLAN: Yes, I understand.
LORD JUSTICE LEVESON: As regards the detail as to how we'll Page 1
proceed, of course somebody can always challenge a decision of mine, it's perfectly appropriate, and I don't take it at all personally, but I would expect that we'd probably need to work out on a case-by-case basis how it bit in any case. So whether there is anything sufficiently generic to justify troubling the Administrative Court will be a matter for you. I'm not commenting one way or the other.
MR CAPLAN: Thank you very much.
MR DAVIES: I wonder if I might raise something. LORD JUSTICE LEVESON: Yes, please.
MR DAVIES: I apologise for starting the day with the press again, but there is a report in the Guardian this morning on the front page which says that if you want to know how deeply the self-reproach is running over at News International, do be advised that the Sun yesterday sent a reporter to doorstep Ms Patry Hoskins, who is of course junior counsel to the Tribunal.

It goes on in language I'll come to in a moment, but first of all can I say that Ms Hoskins has not been doorstepped by the Sun, and furthermore, that the Sun did not send anybody to doorstep her, so the article is inaccurate to that extent.

Of more concern is the inference which is then drawn by the author in the Guardian to the following effect:

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"To the paper, the doorstep is routine. Others might deem it the equivalent of blowing a giant raspberry at Lord Justice Leveson's Inquiry."

And they gone on to provide an image which I won't read out because it's slightly unpleasant and slightly surprising coming from the Guardian.

Of more concern than the factual accuracy is that suggestion which follows it, and I would like to assure the Inquiry that the Sun and my instructing clients in general are taking this Inquiry extremely seriously and, in case that's not clear as well, with great respect. That is indeed within my own knowledge.

There is in fact a piece about the Inquiry in the Sun this morning, and we'd be more than happy to be judged on that. That's all I wanted to say.
LORD JUSTICE LEVESON: Right. Thank you very much. I haven't seen the Guardian this morning. Might I just have a look at it?
MR DAVIES: Yes, of course. It's the bottom half of the second column of that article on the front page.
(Handed).
LORD JUSTICE LEVESON: Thank you very much indeed. (Pause) All right.
MR DAVIES: That's all I wanted to say, sir.
LORD JUSTICE LEVESON: Does the Guardian want to say Page 3

## anything about this?

MS PHILLIPS: The Guardian has only just been made aware that there's a complaint about it. I don't have any instructions but I'll see what I can find out and report back by lunchtime.
LORD JUSTICE LEVESON: Right, thank you very much. I would have thought there are enough issues that concern this Inquiry without descending into the personnel who are trying their best and working extremely hard to ensure that they are fair to everyone.

All right. Now you had something else to talk to me about, Mr Barr?
MR BARR: Yes, sir. Today's witnesses.
LORD JUSTICE LEVESON: Yes.
MR BARR: The order for today will be first of all Mr Mark
Lewis, secondly Mrs Sheryl Gascoigne, thirdly,
Mr Tom Rowland, and then this afternoon, Mr and Mrs McCann.
LORD JUSTICE LEVESON: Or Dr And Dr McCann.
MR BARR: Indeed, I am sorry.
LORD JUSTICE LEVESON: No.
MR BARR: Might I call -- perhaps I should say before I do, I should address you as to the scope of Mr Lewis's evidence today.
LORD JUSTICE LEVESON: Yes. I've now seen a supplementary Page 4
witness statement prepared by Mr Lewis dated the day before yesterday, which deals with allegations that have certainly been ventilated widely in the press but which are clearly extremely recent. The supplementary statement deals with them, and clearly raises a number of quite complex issues, not least the extent to which it's appropriate to look at these matters, firstly because of how the information came to Mr Lewis, in other words from the police; secondly, because of serious Article 8 issues; and thirdly, because of the significance that might be attached in the context of the custom, practices and ethics of the press to recent events.

I understand that there is some more evidence still to come on this topic in the form of another statement. Is that what the Inquiry team understand?
MR BARR: It's certainly likely to be the case that there is going to be another witness speaking to more or less the same matters, and there may be, I put it no higher than that, there may be some further evidence from Mr Lewis about a separate matter.
LORD JUSTICE LEVESON: All right. Thank you.
Mr Sherborne, these are clearly very important issues, not merely in the chronology of the continuing litigation between some of your clients and Page 5

News International, but also because they may, and I apprehend that Mr Lewis will suggest that they do, cast light on the very subject matter of the Inquiry.
MR SHERBORNE: Yes, sir.
LORD JUSTICE LEVESON: If that is so, and I'm minded to think it is, it strikes me that we ought to proceed with a degree of caution, and I'll explain why I say that. These events are still happening. We've not got all the statements in. I assume that Mr Rhodri Davies has seen the statement, but I apprehend that there's a confidential exhibit which he may not have seen, and the question is where that should go and to what extent it could be redacted. It may be that it's a document that won't require a great deal of attention from him for other reasons, although it might be from him, whether it does for his clients, and you know exactly what I mean.
MR SHERBORNE: Yes, sir.
LORD JUSTICE LEVESON: But given the way in which this Inquiry is being conducted, namely my general ruling that all questions should be asked through the Inquiry team, I am concerned about the extent to which it's appropriate to develop this aspect of Mr Lewis's evidence at this stage.

I appreciate that he may want to get this off his
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chest, and I could understand that, but there are other issues at play here.
MR SHERBORNE: Sir, I understand. Clearly this is very important evidence, not just, obviously, for Mr Lewis, but for this Inquiry for the very reasons that you've given, and Mr Lewis understands that. It's evidence which Mr Davies' clients will need to give very serious consideration to. They know about it, but that means also they need time to deal with it. So we understand the approach, sir, that you are taking.

I'm entirely in your hands as to how you wish to deal with this.
LORD JUSTICE LEVESON: Yes, that's absolutely right, you are.
MR SHERBORNE: I recognise that.
LORD JUSTICE LEVESON: All right.
MR SHERBORNE: There will be further evidence, sir, as Mr Barr says. There is another witness who will want to come and give their evidence.
LORD JUSTICE LEVESON: I understand that. Of course, that's not decisive, but having regard to the subject matter, I think it's important that all the evidence on the topic is available because this isn't historic.
MR SHERBORNE: No, it's very fresh indeed.
LORD JUSTICE LEVESON: All right. Let me suggest what I'm Page 7
presently thinking of. I've not heard Mr Rhodri Davies and I'm deliberately doing this without hearing him -I will in a moment. It's a second limb of evidence which isn't specifically linked into the first, it's because of the chronology. I would wonder whether it's not appropriate to ask Mr Lewis to deal with all that is contained in his original statement now, for which everybody is prepared, I hope, and then review and find some other time to deal with the second statement.

That's going to require a degree of care because of the Article 8 issues and the extent to which it's appropriate to investigate publicly that which is contained within the document that I have seen. I make it abundantly clear, as I've said to all, that there is absolutely no intention of mine to ventilate or give currency to what is or may be a breach of Article 8 of the Convention.
MR SHERBORNE: I understand.
LORD JUSTICE LEVESON: So that requires a rather delicate line to be run between what should be available and what should be kept out of the public domain, which won't necessarily mean that it won't be important at least for Mr Davies to see where the lines are being drawn, because as we investigate this issue, I will want to make sure that I am being fair to your client and to

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LORD JUSTICE LEVESON: I'm just half a step ahead of you.
MR DAVIES: You are indeed.
LORD JUSTICE LEVESON: That sometimes happens. Not often, 4
but sometimes.
MR DAVIES: Frequently, I'm sure, but I don't think there's
anything else which I need say at the moment, so I'm
very happy for the Tribunal to proceed in the careful
fashion which you have indicated.
LORD JUSTICE LEVESON: All right. Exhibit ML2,
Mr Sherborne, is marked:
"This exhibit contains intrusive private,
confidential and privileged information and is to be
disclosed to Lord Justice Leveson and David Barr,
counsel to the Inquiry, only."
Of course the reason for Mr Barr is because he is
going to take Mr Lewis's evidence.
Subject to redaction within the confidentiality
wall, I would ask Collyer-Bristow to give some thought
to extending this. It's quite clear that somewhere
within News International this document is --
MR SHERBORNE: Sir, yes --
LORD JUSTICE LEVESON: -- known about.
MR SHERBORNE: The history, as I understand, is that some of
the documents were provided by News International
Page 10
themselves to the police.
LORD JUSTICE LEVESON: Yes. Then they only need to know what documents are comprised within it. I'm not ruling on this at the moment.
MR SHERBORNE: I understand.
LORD JUSTICE LEVESON: I am going to make one ruling and that is to extend Mr Barr to other members of the Inquiry team, in particular to leading counsel. This has become rather more significant, not in any way diminishing the abilities of Mr Barr, but I think this ought to be seen slightly wider.
MR SHERBORNE: I understand that, sir. I'm sure there's no objection to that.
LORD JUSTICE LEVESON: Yes. Right. I think there ought to be a discussion about how to proceed. That can be done outside this room, and outside the inevitable publicity that these hearings tend to command.
MR SHERBORNE: Sir, yes.
LORD JUSTICE LEVESON: Thank you. Right, let's crack on. Yes, Mr Barr.
MR BARR: Thank you, sir. Mr Lewis, please.

## MR MARK LEWIS (affirmed)

LORD JUSTICE LEVESON: Mr Lewis, I extend exactly the sam courtesy to you. It's not different just because you're a solicitor. Please sit down. If you want a break at Page 11
any stage, don't hesitate to say so. Thank you for the statement. I appreciate that coming back to have a second bite at the particular cherry may not be what you'd prefer, but I'm sure you understand the reasons for the view that I have formed.
A. Yes, sir.

LORD JUSTICE LEVESON: Thank you. Right. Questions from MR BARR
MR BARR: Mr Lewis, could you tell the Inquiry, please, your full name.
A. My full name is Mark Lewis.
Q. And you tell us in your statement that your professional address is Taylor Hampton Solicitors, 218 The Strand, London. Is that correct?
A. That's correct.
Q. You've provided the Inquiry with a first witness statement, which is dated 1 November of this year. I understand that you wish to say something about the last sentence in paragraph 5 of the statement. We can deal with that in due course when we get to it. But subject to that, are the contents of your witness statement true and correct to the best of your knowledge and belief?
A. Yes.
Q. You tell us early in your statement about your

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background. You are now a partner in the firm
Taylor Hampton?
A. Correct.
Q. And you specialise in defamation and privacy law?
A. That's correct.
Q. You've become known for your phone hacking work?
A. Almost too well-known for it.
Q. And I should emphasise here that's in the capacity of representing people, not hacking phones.
A. Well, sadly it might be both, but certainly for representing people.
Q. I'm meaning not hacking phones yourself.
A. Well, I haven't hacked phones, but I might be a victim.
Q. You've been a witness to the Select Committees --
A. Yes.
Q. -- on the issue of phone hacking, and you had conduct of some of the very first civil litigation arising out of the phone hacking issue?
A. Yes, that's correct.
Q. Can I now take you back a decade to 2001. At that stage it's right, isn't it, that you joined George Davies, a Manchester firm of solicitors, as a partner?
A. That's correct, 2 January 2001.
Q. At that firm, the work that you did included work for the Professional Footballers' Association?
A. I would say at that time probably 40 per cent of my work was for the PFA.
Q. You amongst other things acted for Mr Garry Flitcroft?
A. That's correct.
Q. And we heard from Mr Flitcroft yesterday about the litigation which he brought.
A. Yes.
Q. You tell us in your witness statement, if I might
paraphrase it, that you thought that the Court of Appeal's decision in that case is out of kilter with later decisions. Is that a fair summary of your opinion?
A. With the greatest of respect, I think the Court of Appeal were wrong at that time. Notwithstanding Lord Justice Leveson.
LORD JUSTICE LEVESON: No, no, no, it would be surprising if
you didn't, considering you were involved in the case. I'm afraid the court can never please everybody, and rarely pleases anybody.
MR BARR: And then you deal with that litigation and the case generally in paragraph 5 of your witness statement, and you say at the bottom of paragraph 5:
"Hindsight has led to investigations being commenced as to how this story was obtained."
That's the story about Mr Flitcroft, isn't it?
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A. Correct.
Q. "It was suggested even at the time (before anyone knew about the phone hacking scandal) that it was a curious coincidence that the second girl ' D ' should have been approached by a journalist."

And now the sentence which I think you want to say something about. You continue:
"Obviously the journalist could not have told her of Garry Flitcroft's case as that would have involved a breach of an injunction."
A. Yes. What -- if I can explain, one, why I said that, and two, why I'm prepared to accept that it needs to be explored further, is initially the case -- the Flitcroft case was known as A, which was Garry Flitcroft, B, which was Sunday People, and C, who was a girl who was a nursery nurse who apparently had sold her story, seemingly voluntarily.
Later on in that case, the initial injunction was obtained, an ex parte injunction by Mr Justice Jack was obtained in a case A v B and C. There then followed girl D, who was joined, because one became aware of the willingness of girl D to sell her story.

What I was getting at in my statement was this curious coincidence, which we didn't realise at the time, that girl D was also someone who would suddenly Page 15

1 decide to sell her story to the Sunday People at the same time -- it wasn't a published story -- but at the same time as girl C had curiously also picked the Sunday People. The explanation that was offered by the Sunday People at the time was that a journalist unfortunately called Aycock -- because it now strikes me as a cock and bull story -- went to girl D, who she knew, and said a story has been sold about Garry Flitcroft, and wasn't he having a relationship with you?
That was not examined, although I have first-hand experience of having dealt with the case, it was the Sunday People, through their lawyers, in-house lawyers, Marcus Partington, were demanding the telephone records at that time. I spent a lot of time, and my ex-wife had to do it, redacting documents to cross out telephone numbers. It now looks as though a further explanation has to be given to the curious coincidence and also because of the journalists who were involved in this story at the time.
Q. I see. So that's the point you were intending to make?
A. Yes.
Q. Now to the second part, what you actually said:
"Obviously the journalist could not have told her of Garry Flitcroft's case as that would have involved

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a breach of an injunction."
It might be said, mightn't it, that the journalist must have spoken to woman $D$ before the injunction because the injunction was to prohibit the publication of what woman D had said to the journalist? Do you accept --
A. It's a possible explanation as to what might have happened, so I accept that.
Q. I see. Thank you. We can move on now to the middle of the last decade, and there came a point in time, didn't there, where you represented a lady called Joanne Armstrong?
A. That's correct.
Q. And you tell us in your witness statement that Joanne Armstrong was photographed having lunch with Mr Gordon Taylor?
A. Correct.
Q. And that you took action on her behalf to threaten to apply for an injunction?
A. That's correct.
Q. To prevent publication of any photograph?
A. The photographer had been confronted at the time and had indicated that he was taking photographs for the News of the World. There followed an altercation and I sent a letter to the News of the World saying, "Do not Page 17
publish -- we act for Joanne Armstrong, do not publish a story about her, she is a private individual against whom you have no right to publish her story, and also it seems that the story you're intending to publish just isn't true."
Q. I see, and the photograph was not published. The explanation, you tell us, was provided by Mr Tom Crone, the lawyer at the time for the News of the World, who said that they wouldn't publish but that the story had been obtained through proper journalistic inquiries. Is that what he told you?
A. That's correct. That was sent in a letter. The explanation for that was because not only had I requested that the story didn't get published, but I'd also asked for my costs and some damages, and the rejection of my claim or my client's claim for costs and damages was because this was a proper journalistic inquiry and therefore they said, or Tom Crone had said, "You're not entitled to costs or damages".
Q. A detailed investigation of this issue may properly be a subject for part 2 of this Inquiry, but the question which you raise, if I am paraphrasing it correctly, is that in the light of what we now know about phone hacking, that you question whether or not the explanation you were given was a full and proper

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explanation?
A. It doesn't even have to be investigated. It just wasn't a proper legitimate investigation. It was a phone had been hacked in order to get that story. And that would take you on to the next part. I remember Tom Crone having said this was proper journalistic inquiries. I then just happened -- I know we're going further into -- I just happened to see the news, saw the picture of Gordon Taylor behind Glenn Mulcaire's having pleaded guilty to an offence of hacking into Gordon Taylor's phone, but it was only the royal correspondent that had been charged from the News of the World. He'd also pleaded guilty and what had to be done was linking -- as far as I was concerned, it was a lightbulb moment, a eureka moment, that's how he got that story, because the story just wasn't true. If the story would have had a modicum of truth, something like that would have made sense, but there was no truth in the story at all.

Actually it was quite a sad story because Joanne Armstrong's father had died and she'd left a message for Gordon Taylor saying -- because Gordan had spoken at the funeral and because her father had died, she hadn't been comfortable enough to speak to him, she was naturally very upset on the day, and the next day she left a message for him saying, "Thank you for Page 19
yesterday, you were wonderful."
The tabloid journalist who knew of that message added 2 and 2 and made 84. They couldn't possibly conceive of any other explanation. If it wouldn't have been so sad, it would have been funny.
Q. If I just stop you there. So that is the position as you believe it to be, and as I mention, I think that might have to be a matter properly for part 2 of the Inquiry, but if I can pick up on your mention of the convictions of Glenn Mulcaire and Clive Goodman, it was at that stage, wasn't it, as you say, that you had a eureka moment, and one of the victims was Mr Gordon Taylor.

Is it right that as a result of learning about the convictions, that Mr Taylor took advice from you and from counsel?
A. My firm had been acting for the PFA for probably 50 years. We had a standing retainer, and therefore I reported back to say, look, I think I know where they got the Gordon Taylor story from, and therefore I also think that there is a civil claim that will follow from it, whether invasion of privacy or now in the vernacular it's known as phone hacking, but to say they obtained this story through an illegal or unlawful source.
Q. I see, so it came to pass, didn't it, that Mr Taylor

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initiated a claim against News Group News?
A. Yes.
Q. And he in due course commenced proceedings?
A. Just to correct you, he commenced a case against News Group Newspaper and against Glenn Mulcaire, secondly.
Q. The result of commencing those proceedings was that whilst denying liability, the News of the World wanted to talk to you?
A. Yes. Initially the letter before action was virtually ignored, and then proceedings were issued and that's -after the proceedings were issued, they wanted to have a conversation.
Q. You tell us in your statement that Julian Pike, a partner in the firm Farrer \& Co, acting for News Group News, suggested that Mr Crone come to see you about the matter. Is that correct?
A. That's correct.
Q. Did that surprise you?
A. It was, one, a surprise, but it was also a very big give-away because I'd been acting for the PFA and before that I'd been acting for other people through other associations with sportspeople, et cetera, and Tom Crone had never been to see me, he'd never come to Manchester, and all of a sudden -- I mean, the whole thing could
have been dealt with, if one analysed it properly, one would have said "This is a privacy claim, we make no admissions without prejudice, et cetera, here's $£ 10,000$, now go away."

But the fact he was coming to see me suggested that they had something to hide.
Q. You tell us in your statement that you were asked how much Mr Taylor would accept to settle the case?
A. Yes.
Q. And you put the figure of $£ 250,000$ to him; is that right?
A. That's correct.
Q. What was his reaction?
A. He just got up and left. He just -- instead of making any -- the $£ 250,000$ offer that I made was really to initiate a negotiation, saying we'll set this high. Lawyers are always told not to horse trade, but I was planning to horse trade. He just got up and left and went back to London. I think he was in my office for 10 or 15 minutes, exchanged a few pleasantries, probably thought it was easier because I started off by agreeing with him, sort of led him into a false sense of security, and then he just upped and left.
Q. In terms of what you thought the case might be worth if Mr Taylor had pursued it to trial and been successful,

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did you think it was worth $£ 250,000$ ?
A. On a breach of privacy basis, if there was -- it wasn't a published story. If there had have been a Part 36 offer, and Part 36, you understand --
Q. We'll come to that.
A. If there had been a Part 36 offer of $£ 20,000$, I'd have had no alternative but to advise my client to accept it because the risk would have been so high.
Q. And then you tell us that what happens is that News International -- I won't use that precise legal title, but everyone understands who I mean -News International served a defence?
A. Yes, that's correct.
Q. And that denied liability?
A. It not only denied liability, but it was served expressly without prejudice to our application to strike out the -- because our case was based on an inference that this was an unlawful activity, et cetera. There was no -- we didn't have the smoking gun that would say, "This is what you've definitely done", there were just lots of inferences and we had to build up an inferential case to sort of get over the threshold of the balance of probabilities.
Q. An inferential case to connect Glenn Mulcaire to the News of the World?

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A. The starting point was that Clive Goodman was the royal correspondent. Gordon Taylor wasn't King Gordon, so therefore somebody else at the News of the World would have been instructing Glenn Mulcaire if they had instructed.
Q. I understand. And for those who -- well, perhaps I could ask you this. Who signed the statement of truth?
A. It was signed by Julian Pike. That became relevant later on, I'm sure you're going there, because it was an amended defence that was served and I specifically asked that a member of their client signed the statement of truth rather than a solicitor from Farrers. It was refused as a request.
Q. And then you tell us in your statement that various applications were made by Mr Taylor for the disclosure of documents from various parties, from the Metropolitan Police and the Information Commissioner and from the Crown Prosecution Service?
A. That's correct. And actually the case had gone quiet as far as Farrers were concerned. I'm sure they thought that it had all gone away and nothing was happening and we'd started a case with some bluster and then done nothing, but we were seeking nonparty disclosure from people.

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Q. You tell us in your statement about a conversation which
occurred outside court with a Mr Maberly of the
Metropolitan Police and your recollection of the
conversation is:
"You are not having everything, but we will give you
enough to hang them."
And said there were something like 6,000 victims?
A. That's correct. What had happened was we were applying
for disclosure from the Metropolitan Police because at
that time it was known that there were a handful, 10 or
12 victims of phone hacking, so the application for
nonparty disclosure had asked for everything that the
Metropolitan Police had. And it was in that context we
went before the Master at the hearing and the Master --
the submissions were made on behalf of the police
saying, "Look ..."

LORD JUSTICE LEVESON: Mr Lewis, for the lawyers present this is fascinating, and I understand its relevance and it is contained in your statement, but I think for those concerned about the particular issues that I have to solve, it's perhaps not quite as significant.
MR BARR: We can deal with it in this way, can't we, Mr Lewis: the conversation that you had outside court with Mr Maberly is the subject of a dispute?
A. It is the subject of a dispute.
Q. And that is ongoing and it's not a matter that we need to go into in any more detail. What is more important is the result of your various disclosure efforts was that you received, didn't you, an email which has become known as the "for Neville" email?
A. That's correct. It wasn't known as the "for Neville" email at the time, it was the "we've got them" email.
Q. Indeed. And the significance of that email was that it made the causal link that you were looking for and very significantly increased the strength of Mr Taylor's claim?
A. It undermined the credibility of the denial that News had put forward.
Q. You also tell us that you received a compact disc which had the recording of a conversation between Glenn Mulcaire and a person who we're not going to name in these proceedings, but the gist of what the conversation was was that Mr Mulcaire was teaching this person how to hack a mobile phone.
A. Correct.
Q. And without naming the person, who was that person working for, to the best of your knowledge?
A. Well, at that time what was important was at that time I didn't know.
Q. I don't mind --

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A. Subsequently --
Q. I don't mind here about when you knew, but --
A. Subsequently, he was working for a newspaper which at that time belonged to the Associated Group.
Q. If we resume the course of Mr Taylor's litigation, you provided the "for Neville" email, amongst other documents, to News International's News Group News' solicitors, didn't you? Did that have an effect on the course of the negotiations?
A. That's when the negotiations started. After -- it was one of those occasions where you actually do have the smoking gun and you can say to somebody, "Look, this is the information", and it was odd because the position had gone from a denial to an admission, effectively, to show what is happening, and they wanted to negotiate.
Q. You tell us that they made a $£ 50,000$ offer using a procedure known as Part 36. For those people who are listening who are not lawyers, I'd like to ask you a little bit about Part 36. In broad terms, what are the consequences of turning down an offer made under Part 36 and then going on to recover less than, in this case, $£ 50,000$, at trial?
A. Less than or equal to. So what it meant was that if -the explanation I would have given to Gordon Taylor, and Page 27

1 the explanation I gave to my clients, it might be that 2 I worked too long in the world of football, was to say 3 that whilst you can't move the goalposts, in litigation 4 you can move the goalposts, so that if there is
A. They were too busy negotiating before we had time to reject offers.
Q. When you say negotiating, you mean offering you even

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A. I couldn't tell you the specific date, but around the time just before the case had settled.
Q. Perhaps when you return to give evidence, you'll be able to confirm exactly when you say that conversation took place.
A. Yes.
Q. How sure are you that Mr Pike used the words "negotiating with Murdoch"?
A. 100 per cent sure.
Q. Do you mean a direct quote, "negotiating with Murdoch", or something to that effect?
A. Sorry --
Q. Are you saying that "negotiating with Murdoch" is a direct quote? It's in quotations in your witness statement.
A. Sorry, 100 per cent sure that he made the comment "with Murdoch". Whether it was "negotiating" or "dealing with Murdoch", he said "with Murdoch". We had that conversation. In hindsight, people are looking at it as though Julian Pike and I are arch enemies, but at the time we were talking on a friendly basis and it had gone so high in terms of negotiations that he was saying, "You're negotiating, you're dealing with Murdoch". Obviously I wasn't face to face with any Murdoch, otherwise I'd have known which one it was, and whether

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or not it went any further as to -- I couldn't give evidence as to what James Murdoch or Rupert Murdoch knew at the time.
Q. If I just stop you there because I diverted you from the question of costs. So as well as paying $£ 425,000$, the settlement involved News Group News paying Mr Taylor's legal costs; that's right, isn't it?
A. That's correct.
Q. Can I --

LORD JUSTICE LEVESON: I don't think we need to go into this. Normally your costs are assessed and they get knocked down to what the assessor, the costs judge, considers are reasonable, but here you got every penny?
A. Every single penny.

LORD JUSTICE LEVESON: Right, thank you.
MR BARR: You tell us that after the case you got a call from Mr Pike.
A. Correct.
Q. And he said that Mr Crone wanted to meet you and you say that you went to meet Mr Crone and a friend of his at El Vino wine bar in Fleet Street?
A. Correct. They asked me when I was next in London, they would like to take me for lunch, or he would like -Julian -- it was said at the time that Julian Pike and Tom Crone would like to meet me for lunch. He then Page 31
apologised that he wasn't able make it, so it was Tom Crone and a friend of his.
Q. And so you go to the meeting and you went on for a meal afterwards, and you tell us that you told him at that stage that you were going to be acting for two further phone hacking victims?
A. Basically the atmosphere was convivial, and then the colleague friend had left and then it was Tom Crone and myself and I said, "I have two other cases for you".
Q. Is it right then that after that, the approach of News Group News to you was that they thought it was not proper for you to act for any more phone hacking victims?
A. Yes. There has been a dispute as to who was at that lunch, whether Julian Pike was there. He wasn't there. Tom Crone has now disputed it, so I do know the person he was with. He also suggested we were downstairs at a bar having a drink. If anybody knows me, I can't remember the last time I had a drink. I'm not teetotal, but I forget to drink alcohol.
Q. That's not what I was asking, I was asking you about News Group News' position --
A. That's what happened. Then News Group -- Julian Pike phoned me, I remember where I was, we had open plan offices but had breakout rooms and I'd gone into a room

Page 32
A. But not by Farrers or News.

Page 33
Q. Indeed.
A. Yes.
Q. Who was that complaint made by?
A. That was by Gordon Taylor. Gordon Taylor had said that I had entered into an agreement with him that I wouldn't act for anybody else, sort of ever, on anything to do with anything that he'd had to do with. It was something that had never been discussed with Gordon Taylor, I would never have agreed to this idea that somehow -- it was a bit like acting for a driver in a personal injury claim and then agreeing that you would never act for any of the passengers on his bus.
Q. The ultimate outcome of the complaint was?
A. It was rejected in its entirety.
Q. Can we now move to 2009. The Guardian break the story
about hacking and you tell us in your statement, if I paraphrase, that the result of that was that you started to get a lot more phone hacking clients?
A. Initially I was approached by one or two people, because initially the five people who had been named in the criminal prosecution were Gordon Taylor, Max Clifford, Sky Andrews, Simon Hughes MP and Elle Macpherson, so Max Clifford was the first one who had been on Newsnight -- I had been away -- saying this is terrible, I'm going to bring a claim. I want Gordon Taylor's

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lawyer to act for me.
Q. At the time the story broke, you were still working in Manchester?
A. Yes.
Q. And did the fact that you were attracting phone hacking clients cause difficulties for you at the partnership in Manchester?
A. Well, I was actually on holiday and I never went back to my firm. I was away, I got phone calls that said that this had come up. I ended up flying back to -- I had just got to Israel, I was on holiday in Israel, and I was there for two days, came home to England, came to London and went to see Max Clifford, and then I telephoned my managing partner, Mark Hovell, on the Sunday, and said, "I've just been instructed as a joint instruction with another lawyer for Max Clifford", and his reaction was to swear and say, "Oh, this is a disaster", a matter that you have to take up with him.
But what had happened is after the story had come out in the Guardian, Gordon Taylor had been on the phone to me many times and I remember having conversations with him on the Friday and on the -- the Friday evening just near a bank, I was getting money out of a cash machine to come back home, to look at it because of the ramifications for him because of this story breaking.

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Q. Indeed. I'm looking now at paragraph 34 of your witness statement, Mr Lewis. Is it right that the upshot was that you were expelled from the partnership in Manchester?
A. It was, but we had two provisions in the partnership deed, one to be expelled as a good leaver, and one not to be expelled as a good leaver. The good leaver provision was to have expulsion without any reason, so even though you'd done nothing -- even though I'd done nothing wrong, the partners were able to expel me and they chose to do so.
Q. You describe that graphically at paragraph 34 if I may pick it up:
"After that meeting I called my managing partner, Mark Hovell. Rather than being pleased, he said that he did not want me to act. I said that I wanted to do this for me and my partners but if not I would do it on my own. He responded that he would call me the next day (13 July 2009). At 10 am that day I received an ultimatum on my 'BlackBerry' to the effect that unless by 11 am I gave an undertaking ..."
LORD JUSTICE LEVESON: Mr Barr, I don't think we need to read this. The statement is available, everybody can read it, and although it may be a consequence of some of the work that Mr Lewis has done, it isn't at the very

Page 36
core of what I'm concerned with.
MR BARR: I will move on then, sir, to over the page where you tell us that you've given evidence to the Select Committees and you tell us of the differences of opinion that have arisen between you and the police and Baroness Buscombe and the PCC. I don't need to dwell on that in any detail, that's all set out in your statement.

And then you tell us more recently, under the heading "Further phone hacking developments" --
LORD JUSTICE LEVESON: Just before you get there, here is something that I think it's just worth asking Mr Lewis to cope with. That is the reaction of the PCC to the concerns that were being expressed, and that is identified in your statement, and did itself lead to libel proceedings and had other consequences that are set out in your statement, which may be relevant when one considers the PCC. It may be you're going to come back to that.
MR BARR: Yes, sir.
You tell us about further developments, how you picked up practice in London and have acted for phone hacking victims here in London since then.

Moving to the question of the proceedings you brought against, amongst others, the PCC, it is right, Page 37
isn't it, that those led to a public statement being made by the PCC?
A. The public statement on behalf of the PCC and on behalf of Baroness Buscombe, who are second and third defendants in libel proceedings I brought.
Q. Perhaps you could tell us in a nutshell what you considered was the problem with the PCC's approach to matters?
A. Baroness Buscombe was the guest speaker that year at the

Society of Editors' annual dinner at their conference in 2009 and she delivered a speech very much like -- it's still available on the Internet -- very much like Neville Chamberlain: I have in my hand almost a piece of paper -- there was a clue -- what I needed to do, and some emails to confirm it, which is the modern take on Chamberlain, effectively talking -- you've heard evidence about this conversation between Detective Sergeant Maberly and he then was and someone else, it was me, and basically we've heard from Assistant Commissioner John Yates and that the truthful evidence was that which was given by John Yates, effectively saying that I was a liar.

She went on to finish her speech by saying I've done two things. I've reported this to John Whittingdale, so that they can correct records, and then finished by

Page 38
saying, "It is a very serious matter to mislead
a Parliamentary Inquiry", and then grinned.
Q. So it was that that led to you taking proceedings?
A. It wasn't exactly the grin but it did help.
Q. I see. Can I move to the question of the reaction of Associated News when you've been dealing with them, and I'm looking now at paragraph 49 of your witness statement. What has been the position of Associated News?
A. I received a telephone call from Liz Hartley, who is the in-house solicitor or one of the in-house solicitors at Associated News. I'd dealt with her before when she was in private practice on a completely unrelated matter for -- she was acting for another newspaper and I was acting for an individual, and certainly I think it was about 6 o'clock or something, I picked up my -- my direct line was ringing and she said effectively, "You remember me", and then I was told that, you know, Paul Dacre wouldn't hesitate to sue me if I suggested that the Daily Mail was involved in phone hacking.
Q. Was that in relation to a specific case or was that a general warning?
A. I think that was -- that was supposed to be a general warning. It related to a conversation I'd had with a journalist when I said that phone hacking wasn't Page 39
simply related to one newspaper. In a way, I feel sorry for the News of the World, or certainly the News of the World's readers, because it was a much more widespread practice than just one newspaper. It was just simply that their inquiry agent, Glenn Mulcaire, had written things down and kept the evidence. The fact that evidence doesn't exist in written form doesn't mean to say that the crime didn't happen.
LORD JUSTICE LEVESON: But is that your supposition, your evidence-based conclusion? What is that?
A. Well, it's evidence-based conclusions on the basis -certainly on a civil basis of what I'm being told by clients and taking instructions from them as to whether or not stories are written that could not have got to newspapers in any other way.

I think it's important to understand the whole nature of phone hacking, just as a sort of side issue, because people still have this misconception that a journalist could not have got the whole story from phone hacking and therefore didn't get the story from phone hacking. Phone hacking might only give two or three parts of the jigsaw, but it might suggest that such-and-such a person will be at such an address, or such-and-such a person is speaking to somebody else, so the journalist then knows which address to go to, or who

Page 40
they're speaking to or who they're having a relationship with, or maybe even luckier, that they find a specific quote of something.

And what phone hacking -- voicemail -- simply remote voicemail interception, what it enabled people to do was just to pry on things. It was too easy to do. I mean, journalists found it too easy to do, and therefore I don't think they necessarily thought of it as any worse, certainly at the beginning, than driving at 35 miles an hour in a 30 mile an hour zone.
MR BARR: I understand your answer, but does that mean you can't tell the Inquiry of any hard evidence?
A. It depends what is meant by hard evidence. People who have provided information have said these are the inferences. It's a question that I suppose until the judge has decided that something is accepted, it's only evidence and sometimes it might be inferential.
Q. I see. Can we move now to the treatment of you by the Daily Mail, an Associated News title, in the press. I'm looking at paragraph 57 of your statement. You tell us that Amanda Platell has written about you in her column in the Daily Mail on two occasions and you tell us that the coverage is included describing you as having a "sanctimonious face on the BBC"?
A. I didn't know whether she meant my face was only Page 41
sanctimonious when it was on the BBC or generally and she just didn't like the BBC, but I suppose she couldn't help herself but to put to the two -- to have an anti-BBC jibe in there as well.
Q. And you were accused, weren't you, of being a "greedy lawyer" in relation to the Dowler settlement?
A. Absolutely. Actually, what happened, I telephoned -after I found that out, I telephoned Dan Tench who is a solicitor at Olswangs who was acting for News International, who were negotiating the Dowler, or had negotiated the Dowler settlement with me, to say, look, the Daily Mail is writing an untrue article because the gist of the article was that although $£ 3$ million had been offered by News Group, the greedy lawyer, me, was asking for more money, and that just wasn't true. It wasn't true.

The reason it wasn't being put out was because theres were i's to dot and t's to cross in the agreement and the timing of the public announcement was in the hands of News International to put out. But because of that, Amanda Platell just took it on herself to do a bit of lawyer bashing.
Q. And the result, you tell us, of taking issue was the story was taken down?
A. When I telephoned the night lawyer at the Daily Mail and

Page 42
said, "Look, that's just not true", and they called me back about ten minutes later and said, "It's been taken off our website".
Q. Moving now to the News of the World and their treatment of you, I'm now looking at paragraph 56 of your statement, you tell us that you repeatedly called for Rebekah Brooks to resign, and we know that she eventually did do that. You say that during the time you were calling for her resignation, you were:
"... warned by a newspaper source that Rebekah had said she would get me back not in her newspaper (which would be too obvious) but in a competitor."

You've mentioned the adverse coverage in the Daily Mail. Did that come after you were told of this comment or before?
A. I think that came after. There was a -- there were a number of things that happened after that. I never chose to be a public figure. I suddenly became a -I acted for people who were the story, and suddenly became part of the story myself. All of a sudden I got approached by various newspapers that they were running stories about this aspect of my private life or that aspect of my private life, and I think the second Amanda Platell one was certainly after the conversation. I'm not sure if the first one just preceded slightly. Page 43
Q. Do you know of any evidence which links the threat that Rebekah would get you back to that coverage or not?
A. No. I have no direct -- no direct knowledge. I do know Amanda Platell was, I think, the editor of the failed newspaper Today, and therefore there would be reason to think that she might have had some knowledge or association with Rebekah Brooks.
Q. Your statement touches upon the issue of surveillance, but I'm not going to deal with that today for the reasons which were discussed at the outset of the hearing.

Is there anything that you would like to say to Lord Justice Leveson at this stage about what you would like to see happen to regulation of the press as a result of this Inquiry?
A. Well, I suppose there is. And it almost echos what Lord Justice Leveson was saying at the start of this Inquiry, because what is portrayed is a stark choice, a black and white choice between state regulation and self-regulation, and in fact everybody knows that we must avoid state regulation in terms of this Trotskyite, Stalinist, Nazi minister of propaganda that says newspapers can --
LORD JUSTICE LEVESON: That covers a fair amount of political geography.

Page 44
A. Yes, I was going to add Middle Eastern despots as well, 1 but there you go. One understands that that has to be avoided, but that's how state regulation is portrayed by the newspapers, that's what it inexorably leads to, we have state regulation as state control.

Yet they talk about self-regulation. If you stop and think, self-regulation should be what journalists do and newspapers do themselves, not the PCC or any third party, because there ought to be a code that journalists think: you know what? This is what we can do, this is what we can't do. So it's a secondary form of regulation.

The Press Complaints Commission, in the words of Lord Hunt, who is now the Chairman of the Press Complaints Commission, is not a regulator, so in fact the preservation of the status quo by the press is the preservation of no regulation at all. And the consequence of no regulation is that on Sunday, people will not be able to read the News of the World because it was the absence of regulation that allowed this Inquiry to happen, it allowed the News of the World to go, it allowed the readers of the News of the World -I mean, whether one agreed with everything they put in and wanted to take issue, it was an absolute consequence because parts of the newspaper industry, not all the Page 45
newspaper industry, were completely unregulated and out of control.

They were happy enough -- people talk about -journalists talk about freedom of the press, but it's not really freedom of the press that they want. They want freedom to be able to do what they like. You know, none of us have total freedom. We have to drive at certain speeds, we have to obey certain rules, we can't go around murdering people, we can't go around stealing from people, and the press seem to -- a certain sector of the press seem to believe that they could do whatever they like, almost as if they were above the law.

And what they do is characterise that any attack on that is actually an attack on the freedom of the press so that what we have as good journalism, which exposes corruption, a fourth estate exposing corruption in Parliament, the MPs' expenses scandal, or going back, exposing thalidomide or in America exposing Watergate, good journalism, or even sort of more minor but interesting things, should get brushed away into the fact that now you said we're not allowed to break the law, we can't do any of this. Terrible.
MR BARR: Thank you. I don't have any more questions for you.

Questions from LORD JUSTICE LEVESON Page 46

LORD JUSTICE LEVESON: Mr Lewis, this is obviously something
you've thought about. And your experience acting in these cases will obviously give you a particular perspective. But there must be a balance between freedom of expression and privacy, which is what you've talked about earlier on in your evidence. Where do you say that balance should be?
A. Well, I think it was rather helpful that I was almost a defendants' lawyer, so I acted for the British cardiologist Peter Wilmshurst who is being sued by the American company. I acted for the Sheffield Wednesday fans who were subject to libel bullying by their club. Acting on CFAs for them, defending their right to speak out. I've acted as advocate in the Court of Appeal for Adakini Ntuli who sought the right to speak out, effectively a story telling about her relationship.

There's always going to be a balance and there are always going to be difficult cases where that balance is harder to see, but if you suggested that actually what was happening was -- the same facts can give rise to different legal situations. So, for example, if you have the David Mellor situation with Antonia de Sancha, where it's exposing that you have a minister who is engaged in something while he's part of a government which is espousing family values, really what you're Page 47
doing is exposing his hypocrisy, albeit that some of the more popular newspapers might be more salacious in their details and talk about a Chelsea football strip that he was allegedly wearing, although I understand he wasn't actually wearing it, but it was a good story -- is different, I would say, than, say, a proper footballer who has no public persona. You heard Garry Flitcroft yesterday, no public persona at all, had never made any expression to people about what was right or what was wrong. There is no reason for that to go out.

I suppose that if you were to apply metaphoric curtains over something, those things that happen behind curtains shouldn't be pried into unless there's a very good reason to do so.
LORD JUSTICE LEVESON: But some of the things which have been exposed by the good work of the press have indeed taken place behind curtains.
A. Well, they would come under the very good reason to do so.
LORD JUSTICE LEVESON: And that leads on to another question. I appreciate that you make your living using the courts and the law, but as everybody has made very clear, that's extremely expensive, very time-consuming, takes a lot of mental energy as well as physical energy. Have you thought about some alternative mechanism? And Page 48
if so, where are you going to get the paragon of virtue who is going to be able to decide those cases?
A. Well, I mean I have thought of it. Look, I have the advantage of being a Manchester lawyer rather than a London lawyer, and therefore -- and possibly not as snobbish about the fact that libel cases or privacy cases can only be decided in courts 13 and 14 in the Queen's Bench Division.

There is an oddity that reputation cases are always assigned to the multi-track, whereas any other -- if a van that was delivering a newspaper ran you over and caused you $£ 10,000$ of damages, you might pursue that in Manchester County Court if it was in Manchester, or wherever. If they defamed you in a small way or invaded your privacy in a small way, I actually don't see a reason why you couldn't want to pursue that claim in the Manchester County Court, and that would lead to a lowering of costs.

There is a perception, which is right in some respects, that it's only the lawyers who win out of cases because the costs are completely disproportionate to the amount awarded in damages.

There are all sorts of claims that ought to be dealt with. I don't think it has to move out of the system. I think the court system has to be more accessible. And Page 49
one of the big issues is really access to justice. You know, we have a political move at the moment to abolish CFAs in insurance. It might be that the base costs are too high because of the work that has to be involved, but simply abolishing conditional fee agreements and the ability to have insurance, ultimately it leads to people not being able to bring cases at all, and people need to be able to -- you know, it goes back to the McLibel case, the jurisprudence in Strasbourg, the judgment in the European Court, talked about the equality of arms --
LORD JUSTICE LEVESON: But that might mean that one should find some other mechanism to mediate some of these claims without using the structures of the court.
A. Well, in every field of law, apart from reputation, although even with -- I have mediated libel claims not between newspapers, between -- I was acting for the defendant for the National Health Service litigation authority for a defamation claim, I was acting for a defendant for a defamation claim brought by a doctor. There was a mediation. I think the total costs on each side was a four-figure sum. The claimant was persuaded that he would drop his claim and the defendant agreed to publish some sort of correction rather than apology as to what had happened.

The formalisation of being able to do that -- the
Page 50
difficulty is that the present system gives this high-option thing that says, well, if you want to sue for -- you know, if you want to the sue for an invasion of privacy, you have to be prepared to spend $£ 500,000$ or $£ 600,000$, you will only recover $£ 400,000$ in costs and you might recover damages of $£ 100,000$, so in order to protect your privacy, you only have to lose $£ 100,000$. The fact that anybody can say "You only have to lose $£ 100,000$ in order to win a case" shows that the system is not working and it's out of kilter.

One of the ways to deal with that, obviously as a lawyer, is raise the damages and then people wouldn't lose. But the claimants approach things from a different perspective. If they are defamed, or if their privacy has been infringed, they want it to be corrected. And ultimately, the position is that they need to be able to take action.

You see, again it's difficult when your Lordship, when you're talking about regulation of the press, the regulation of the press will only go so far because it can only deal with what is printed. It doesn't deal with what is not printed. So people will always have a need for lawyers and the law ought to be accessible to everybody, not just the -- when I was an undergraduate, libel law was regarded as something for the rich. Now Page 51
it's for the very rich, or people who can get CFAs. And the idea that we will then abolish -- we haven't abolished CFAs, but we're in the process of abolishing insurance --
LORD JUSTICE LEVESON: Yes, I understand the arguments about CFAs and I understand the cost of litigation. What I was really asking about was other mechanisms for the resolution of these disputes, speedily, effectively, and without the expense that is presently being incurred, and you've given us --
A. I think I would just add the difficulty is this, as you will see from this Inquiry. The difficulty is always going to be that there is then an inequality. So that if, for example, one of the national newspapers says something about your client, your client decides that he'll take this cheap option and represent himself, there is nothing to stop the newspaper instructing leading counsel to represent them, then it becomes an inequality --
LORD JUSTICE LEVESON: It depends whether it follows the adversarial model that we're all so used to.
A. No, I understand that, but then what happens inevitably will be that there will be judicial reviews, et cetera, and diversions into litigation that beat the claimant up. I mean, the claimant -- see, one of the ways to

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matters that arise from this. Two are very brief reputational matters concerning Ms Elizabeth Hartley and Amanda Platell. I'm happy during the adjournment to give the questions which I would respectfully ask that Mr Barr puts to Mr Lewis. If not, I would wish to make an application to you under Rule 10.
LORD JUSTICE LEVESON: I think the first thing is you should have the chance to speak to Mr Barr.
MR CAPLAN: Thank you.
LORD JUSTICE LEVESON: And see whether we can do that.
MR CAPLAN: Thank you.
MR DAVIES: I'm afraid I have a similar point and I'll do the same thing.
LORD JUSTICE LEVESON: Do the same thing, we'll have five minutes now --
MR CAPLAN: Can I mention one other matter which doesn't relate to questions?
LORD JUSTICE LEVESON: Yes.
MR CAPLAN: It's simply this, that Mr Lewis mentioned in his evidence that he had been given a copy of a CD in which Glenn Mulcaire was coaching a Mr X, whose identity has not been made public, in relation to how to hack a mobile phone and Mr Lewis said that that individual wan an employee at the time of Associated Newspapers.
LORD JUSTICE LEVESON: Yes. Page 55

MR CAPLAN: Can I just say I think at the time he was an employee of the Evening Standard and I think the allegation is that he was being --
LORD JUSTICE LEVESON: Mr Caplan, I understand the point. I am very keen to make sure that (a) the evidence is accurate, but (b) that nothing is done to create a risk of the type of which, if you consider it for a moment, you will readily appreciate. Could I ask you to just have a word.
MR CAPLAN: I will.
LORD JUSTICE LEVESON: And let's find a mechanism to deal with this issue that is appropriate and doesn't run any risks.
MR CAPLAN: Indeed. It's just whether his name is in the public domain and whether or not the Tribunal sees it fit to release it. It's just that if there is a slur on other employees --
LORD JUSTICE LEVESON: I understand that, I understand that I think the five minutes is going to be very well spent this morning.
(11.30 am)

> (A short break))
(11.41 am)

Further questions from MR BARR
MR BARR: The short adjournment was very useful and as
a result of it I think it's proper that I put a couple of short questions to Mr Lewis.
LORD JUSTICE LEVESON: Right.
MR BARR: Mr Lewis, first of all can I take you back to paragraph 49 of your witness statement, which deals with the conversation you had with Liz Hartley about the statement to the effect that Paul Dacre was someone who would sue you. Was the tone of that conversation friendly or not?
A. Businesslike, I would describe it as. I certainly took it as an attempted warning and that's why I made a file note of it. If it would have just been a funny chit-chat "be careful", I wouldn't have been bothered to do that. That's why I have the date of the conversation.
Q. I have been provided during the short adjournment with a copy of an article which I shall in a moment pass to you. It was published in the Daily Mail on 4 February 2006. Once you've had an opportunity to have a look at it, the question that I would like you to answer is: was this conversation to do specifically with this article? (Handed)
A. That was -- I can see from the headline it was a part to do with that, and that's what I explained before. I'd been having a conversation saying that Associated was Page 57
involved. That was not the only case, but it was one of the cases in the conversation with that particular journalist.
Q. And so that we are clear, was the statement that
"Paul Dacre is someone who will sue you if you suggest that we were involved in hacking" a statement that was related to that article or was it of more general application?
A. I took it as more general, but that was certainly the background. But ultimately, I'm the lawyer acting for an individual who's instructed me, the subject matter of that article. He'd instructed me to pursue it. I am not -- I hadn't been aware, previously, of the idea that what you do is you'd have a go at attacking the lawyer rather than the client. Call me old-fashioned.
Q. Can I move on to the second point that I would like to raise with you. It arises from paragraphs 56 and 57 of your statement. This is the paragraph that deals with the suggestion that Rebekah Brooks had said that she would get back at you, but in a different newspaper, and subsequent coverage in the Daily Mail. You described the coverage already.

I'm told that there might be some lack of clarity on the transcript. Just so that we are clear, do you have any evidence that there is a link between

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Rebekah Brooks, Amanda Platell and the publication of --
A. Sorry, I didn't offer any direct evidence that either linked them or linked that evidence.
LORD JUSTICE LEVESON: And I didn't read the evidence as suggesting that.
MR BARR: That was my understanding as well, Mr Lewis, but thank you for confirming that.

Sir, those are the questions that as a result of the short adjournment I wanted to ask but I should also say that I've had a word with Mr Davies, and he would like to not ask questions, but he would like to say something, and it may be that that's the best way of dealing with this.
MR DAVIES: Yes. I had a discussion with Mr Barr, and the conclusion was that it was probably better if I said something rather than try to do it through questions, but if you disagree, sir, then --
LORD JUSTICE LEVESON: Until I know what you're going to say, I can't tell you whether I agree or disagree. Say it and I'll tell you.
MR DAVIES: I will carry on. As a matter of background, I'm afraid it raises a further difficulty about redactions and indeed about the speed with which things are going on to the Inquiry's website. It concerns paragraph 23 of Mr Lewis's statement. Mr Barr did ask some questions Page 59
about this. What paragraph 23 says, and it's referring back to a statement in paragraph 21 --
MR GARNHAM: (overspeaking).
LORD JUSTICE LEVESON: Just pause, Mr Davies.
MR DAVIES: Yes.
LORD JUSTICE LEVESON: There are issues.
MR DAVIES: There are, and I'm going to be careful.
LORD JUSTICE LEVESON: I understand the issues. I'm on top of the issues. I will cope with them.
MR DAVIES: Yes.
LORD JUSTICE LEVESON: But I would prefer it if this particular exchange was redacted from the transcript.
MR DAVIES: The one we're about to have?
LORD JUSTICE LEVESON: The one we're not about to have.
MR DAVIES: Ah, I see.
LORD JUSTICE LEVESON: And the one we've started. I would be grateful if you would talk, please, to Mr Jay about this over the short adjournment and we will see if we can't resolve it.
MR DAVIES: Yes, sir. Sorry, it's a little difficult for me to respond to that. Can I just mention this? Some of what I'm concerned about is already spreading through what I might call the new media, so to a certain extent time is of the essence and I know there are difficulties about --

LORD JUSTICE LEVESON: Right. What I'm going to do is let you speak now.
MR DAVIES: I hope I'm not going to tread anywhere I shouldn't.
LORD JUSTICE LEVESON: I'll ask Mr Jay just to have a quick word with you. I'll stay in court. Just have a quick word. (Pause)
MR JAY: First of all, I've been asked to say that the witness statement may be best removed from the screen.
LORD JUSTICE LEVESON: Yes.
MR JAY: Secondly, I think we can proceed with the next witness and I can have a conversation certainly with Mr Rhodri Davies. I don't know if the next witness concerns his clients at all. If she does, we may have to rethink. It may be I have to involve two other people in that conversation.
LORD JUSTICE LEVESON: All right. Well, Mr Rhodri Davies, are you concerned to be present to hear the next witness?
MR DAVIES: No, I'm content to step out for a moment.
LORD JUSTICE LEVESON: Right. We'll carry on and if necessary we'll revisit it.

This actually alerts us to a risk of which I've always been aware and which we've tried to manage, and we might have to get rather cleverer about how we manage Page 61
it.
MR DAVIES: Yes.
LORD JUSTICE LEVESON: So we'll carry on with the next witness and you can resolve this and we'll decide how we're going to deal with it.

Thank you very much, Mr Lewis.
THE WITNESS: Might I just ask one thing, that I'm not in purdah until the next time I give evidence?

LORD JUSTICE LEVESON: No, you're not. Good criminal law experience.

Yes.
MS PATRY HOSKINS: Sir, the next witness is Sheryl Gascoigne, so if I could ask her to come up.

LORD JUSTICE LEVESON: Thank you very much.
MS SHERYL GASCOIGNE (sworn)
LORD JUSTICE LEVESON: Mrs Gascoigne, you've probably heard me say to others that I'm very grateful to you and to them for coming. You're volunteers. You're going to talk about things which are personal to you and which by definition are matters which you've been concerned to keep away from the public eye, so I understand how difficult that is, but it is important for the purposes of the Inquiry that we try to get to the bottom of what's happening and where, therefore, we should go, if we go anywhere, so I'm very grateful to you for

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preparing your statement and giving up the time to come and give evidence. Thank you.

## Questions by MS PATRY HOSKINS

MS PATRY HOSKINS: Good morning. Could you please state your full name to the Inquiry.
A. Sheryl Gascoigne.
Q. Now you provided a witness statement to this Inquiry, which hopefully you have in front of you.
A. Yes.
Q. We can see that on the screen at URN30982. Oh, it's already there.

Before I ask you any questions about your statement, can you just confirm that the contents of it are true to the best of your knowledge and belief?
A. Absolutely.
Q. I am going to ask you a few questions first of all about your background, if I can. I'm sure that you need no introduction and you yourself put it succinctly at paragraph 3 of your statement:
"To the general public, I am the ex-wife of Paul Gascoigne, the retired English footballer."

You explain at paragraph 4 in relation to that relationship that Paul and yourself met in 1990, you began a relationship in the summer of 1991, you married in 1996, you divorced in 1998, you have a son together, Page 63
who was born in 1996, and you have two children from a previous relationship, Bianca and Mason. That's all correct?
A. (Nods head).
Q. It's also very well documented, Mrs Gascoigne, that you were the victim of domestic violence during the course of your relationship with Paul. Indeed, you've published a book, which I'll hold up, this one, which is called Stronger, which in the introduction indicates that the book is written not to lift the lid, so to speak, on Paul Gascoigne or your time with him, really, but is written for other victims of domestic violence. Is that right?
A. Yes, it is, yeah.
Q. Could you tell us a little bit about the work that you do, the charity work you do in respect of domestic violence issues?
A. My work with a domestic violence charity, mainly Refuge, started back in 1998, 1999. I was involved with them before that, they were helping me, but then I was asked to head a campaign that they were running in the Sun, and that was 1999.
Q. Have you continued to work with Refuge?
A. Yes, I worked with them all the time and I --
Q. You still do that work now?

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A. Yes, I'm still a huge supporter and help them out where I can. I've also been involved with the Metropolitan Police, they've asked me to come and give talks on, you know, hopefully how they can change and move forward to helping victims.
Q. Thank you. I'm going to turn to press conduct whilst you were in the relationship with Mr Gascoigne. You say at paragraph 5 of your statement, for those who have it, that as soon as you started your relationship with Paul in 1991, you and your children's lives were thrust into the public eye and your lives have now been scrutinised over a period of some 17 years and that still continues now?
A. Yes, it's not as bad as it was back then, obviously, but yes, no, that's true.
Q. Just for the moment, I'm going to concentrate on the time when you were with Paul, if I can. You say yourself in your statement that the focus of the press was clearly mainly on Paul, he was the subject of the interest?
A. Mm .
Q. He was a very famous footballer, obviously, but they were interested in his private life, which means by definition they were interested in you; is that right?
A. Yes.

## Page 65

Q. And you explain at paragraph 10, which you should find just over the page, that right from the beginning, you felt that the press latched onto the idea that you were some kind of money grabber who was at the heart of Paul's problems. I'll go through some of the articles that were written about you during that time in a moment, but why do you think they alighted on this issue as being representative of who you are or who you were?
A. I don't know. You'd have to ask them. I have no idea why they would say that because you're in a relationship. Maybe because I was a single mother with two children, maybe it was just an easy -- I was an easy target.
Q. So what was the reality of your relationship with Paul?
A. I was very much in love with Paul.
Q. At paragraph 11 of your statement, just further down the page, you explain that until 2010, so for some 19 years, you decided not to respond to the articles at all. You explain that you didn't firstly feel in a position to do so, and you thought it might have made things worse. In what way do you think that taking action at that stage might have made things worse?
A. I was led to believe that -- by certain people that, you know, you didn't take action on newspapers, you'd never Page 66
win, so you just don't do it.
Q. Who told you that?
A. Paul's advisers.
Q. Right. So you didn't take action during that time?
A. No, no.
Q. Can we look at some of the articles. They're in your exhibits, which you should find slightly further on in the bundle. For the benefit of the technician --
LORD JUSTICE LEVESON: Do we need to put some of these things up?
MS PATRY HOSKINS: Maybe I should ask Ms Gascoigne that question.
LORD JUSTICE LEVESON: Yes.
MS PATRY HOSKINS: You've put them in your exhibits. Would you rather that we didn't go through them again?
A. I don't mind. If it helps the Inquiry, then ask me.
Q. You made allegations that they contain untruthful and hurtful allegations, and I only wanted to ask you so that you would have the chance to comment on any allegations that you found to be particularly untruthful or hurtful. Is there anything that you would like to draw to the Inquiry's attention?
A. It's just generally the fact that, you know, I was only with him for the money. Are you just talking about the early days before the marriage or --
Q. No, the entire period that you were with him.
A. Yeah, that I only married him to get his money, and that when we divorced, that, you know, the reports I got millions, ranging from 10 to 17 , sometimes it was only 8, but, you know, the reality was far, far from that. So yeah, so that's just kind of what I've become accustomed to being known as.
Q. Is your complaint that much of what was said was untruthful or inaccurate?
A. Yes, untrue --
Q. And hurtful to you?
A. Obviously hurtful to me and my children, but yes, inaccurate and untrue.
Q. And you actually tell us in your statement, of course, that one of the things you found most difficult was the sheer failure to check facts with you. Can you tell us about that. Did they ever contact you to check facts before an article was published?
A. Rarely, rarely. But if they did and you didn't -you're very conscious that if you said something, you know, some simple question, you said "yes" or "no", it then became a headline that you have actually said the question that they've said, "Oh, look, she says" ... I don't know, "she hasn't seen" -- they say have you been in contact with Paul and you say no, the headline Page 68
Q. Can you remember, even though you can't remember what article it relates to --
A. No, I can't.
Q. -- can you remember roughly what time period that relates to?
A. It would have been pre my wedding. It was pre-1996. And obviously when Mr Black was still there. I don't know how long he -- he was there, or --
Q. Okay. That's helpful. It's not just the articles that you refer to, of course, in your statement as being relevant. It's also other types of press misconduct so I'm going to ask you about that. You'll find your statement deals with this at paragraph 22 onwards if we turn back in the bundle. You take us through a number of examples of conduct that you consider to be unacceptable and intrusive and the first one is at paragraph 22. You say -- well, over the years you find that the press has a blatant disregard for privacy. One example that sticks in your mind is in 1995 when the press took pictures of you sunbathing topless on a private beach whilst you were on holiday with Paul. What was your reaction to finding out that they had done that?
A. I obviously didn't know about it until I got back and

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a neighbour said some comment about loving the holiday pics, so I was just embarrassed, obviously. But again I was told there was nothing we could do about it.
Q. You also say at paragraph 23 just over the page that whilst you were in a relationship with Paul, the press photographers followed your every movement?
A. Yeah.
Q. In particular you say freelance photographers used to camp outside the house and follow you by car whenever you left the house.

## A. Mm-hm.

Q. "It got so bad that I used to try and lose the photographers by driving round roundabouts several times or by driving into a housing estate so as to lose them."

The dates you indicate there are 1991 to 1998. Is that the period when it was particularly bad or is that the only period when that kind of behaviour was occurring?
A. No, that's when it was particularly bad, obviously.
Q. You explain that you did report this to the police but were told that they couldn't take much action?
A. I drove into the police station with one following me, and all the time I was getting out the car I was thinking what am I doing? They're going to have a picture of me outside the police station. What story Page 71
are they going to make up about the fact I'm in a police station? But I was almost about to give birth then and I said to them "Something bad is going to happen here".
Q. You were pregnant?
A. Yes. At that time they were following me constantly, there was no let up. I think they were waiting for me to hopefully give birth on a pavement or something but I drove straight into a police station, said please you have to do something, I'm taking risks, he's taking risks, something's going to happen and I was told there's nothing we can do unless he touches you.
Q. Okay. You say this, though. You say:
"I did notice a slight change after Princess Diana's death in 1997."

What do you mean by a "slight change" and how long did that last?
A. I think there was some ruling, I'm sure you all know better than me, that they weren't allowed to follow you as much or sit outside or come that close to your vehicle if they were following you, or something like that, so definitely it helped. I used to have them outside the house, you know, where we lived at the time, the children -- I lived -- they could just stand right outside the front lawn and there was nothing I could do about it. I mean, after the incident in 1996 at

Page 72
A. Yes.
Q. That's right?
A. Yes, yes, correct, yeah.
Q. Some might say that by selling an intimate private event like a wedding means that you are basically putting your private life out there, that you invite and/or condone media interest in you. Do you have any views on that?
A. I agree to an extent of that, but our lives -- it was out of my hands anyway, but I'm not saying I wouldn't have agreed to do it, it was organised by Paul's advisers, but our life was already in the public eye anyway, so.
Q. I understand. I've also been asked to put to you that you gave interviews to the News of the World in 2001 and 2002 and were paid money for that. Is that correct?
A. You'd have to show me. I don't know -- what ones are they?
Q. I struggled to find them. We'll find them.
A. No, I don't know.
Q. Perhaps the relevant party will provide --
A. What, Paul or me?
Q. Despite extensive searching this morning, I was unable to find them. Perhaps we can ask the relevant party to provide them, if they wish to do so.
LORD JUSTICE LEVESON: Yes.

MS PATRY HOSKINS: What was the impact -- we've talked abou the articles that were published, we've talked about the cars that were following you, we've talked about people trying to take pictures through the front windows of your house. What was the impact on your children at the time?
A. It was tough for them because we lived on a small housing estate in a cul de sac where they were able to go out, the elder two, obviously, and play, and it was such that I would have to try and say to them, "Please don't go out today, there's lots out there", so that was unfair on them. And other times when I needed to go out, they would say, "Right, mum, you go and we'll kind of ride our bikes so that they can't all then follow you". So, you know, not a great position for them. And it was tough on them at school, especially my daughter, being the eldest.
Q. Can you tell me about that? Why was it tough on them at school?
A. Because people -- parents -- I'm sure the children don't particularly read that many newspapers at that age, but parents do and things are said, and so, you know, children are told things and maybe say things that -you know, the children at school, and unfortunately for them, how our life was being portrayed was obviously Page 75
very different to how it was, and how -- for them how Paul was being portrayed was very different to how he was becoming.
Q. What about the impact on you? How did you feel about the articles, being followed around at that time?
A. I always used to just say to the children, "We know the truth, the people around us know us, know the truth", and just to hold our head up high.
Q. I am now going to turn to the period since 2009. By 2009, you've been divorced for 11 years, and yet you say the media coverage of you continued?
A. Mm-hm.
Q. Why, in your view, did it continue long after you divorced and presumably also, on some occasions, some time after you'd stopped being in a relationship with Paul? Do you have any views on that?
A. I think maybe people were obviously giving stories, inaccurate and untrue stories, so they are happy to print it.
Q. I've been asked to ask you again about your book, Stronger. It's been said that during this time -- it could be said that by doing this, by publishing a book, you were putting your private life into the public domain again and that's what attracted the new sort of media attention again.

Page 76
A. Yes.
Q. Is that right?
A. Before -- no, not just because of the book. It's been ongoing throughout, so I don't think the book -- it was my way of being able to -- it was my right to reply on I think it was Paul's third book, so the children and I felt enough was enough and it was time to put our -I was going to say our side, but it's hard to say our side when it's the truth.
Q. I've also been asked to ask you about appearing in the television programme I'm a Celebrity ... Get Me Out of Here. Could that have fuelled the interest in you as well?
A. As I said, the interest was still there.
Q. Why did you decide to take part in that television programme?
A. Because the children were very much behind it, and I don't do everything my children tell me but I am very much led by them, and the offer amount was large and, as my son rightly said, you know, that's a large amount of money for three weeks' work, and it was a chance for everyone to get you to know you as you, rather than the person that everyone's been led to believe you are.
Q. But at about this time, 2009, when the book was published, you know that a number of articles were Page 77
published that you were very concerned about, and you tell us in your witness statement, particularly at paragraph 14 onwards, that you decided that this time enough was enough, you weren't going to take the previous course of action, which was just to keep a dignified silence, you were going to do something about it. Can I understand why you decided to do something about it?
A. On the back of the book, I realised that not everyone was against me, which is what I believed, and I think there still are many out there that wouldn't give me the time of day, but after writing the book, you know, the response was fantastic. So it gave -- probably gave me the strength and I thought, no, I can actually fight this, somebody will listen to what I've got to say and may hopefully believe me.
Q. You also say that your children were supportive of you taking action.
A. Yeah, I mean many times they've said to me I should do something about it and I've just always said no, so for them it was a relief.
Q. What did you decide to do in respect of the articles that had been published about you?
A. Sorry, say that again.
Q. What did you decide to do, what action did you decide to

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take?
A. I just thought I need to do something and I was already with Clintons, my lawyers, and they had all the factual evidence there, so it just made sense to go to them and say, look, I need to do something about it, you know it's not true, you have it all here, can we do something about it? So I was introduced to Roddy, my libel lawyer, and the rest, as they say, is history.
Q. At that stage, did you ever consider making a complaint to the PCC or engaging with the PCC in any way?
A. No. Because, I mean, my experience previously and it's kind of common knowledge if you're in the public eye, what are the PCC going to do about it? Absolutely nothing.
Q. At paragraph 16 of your statement, you give us a list of articles which you were complaining about during this period. I'm not going to turn any of them up but they were the ones that you complained about and that you took action in relation to; is that right?
A. Yes.
Q. You tell us that in all of these actions --
paragraph 17, I should say -- you tell us that in relation to all of these actions, you were successful, managing to obtain apologies in all but one of the cases, a statement in court, costs and damages.

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like that.
Q. Is there anything you'd like to add on that? The judge will be interested in your views as to what changes could be made in respect of that issue. Do you have any views on how apologies should be dealt with?
A. Why aren't they given the same prominence?
Q. Did taking legal action make a difference to the -- did it actually mean that people, newspapers, published fewer stories about you?
A. Yes. I think it -- apart from the Daily Star that in the middle of taking action on two stories they then printed a third halfway through our action, which seemed crazy, so we just added that one on. I think since then, yes, it's definitely -- I like to think it's made them think, and I like to think that maybe now they're beginning to realise that it's not true what they're being fed or what they are being told or what they've decided to write for all these years. You know, one of the cases against the Sunday Mirror that almost went to court, the onus is on you as the victim to prove your innocence. It's not the journalist's job to prove what he's printed is true, it's your job then to prove that that's not the case.
Q. Yes.
A. And our evidence went in and it was -- you know, we had Page 81
huge evidence from witnesses, evidence from, you know, from the media, we had evidence from all sources, you know, bank statements, lawyers' letters, everything, and the only evidence they had that they gave back to me were phone messages. You know, phone -- taped phone conversations of the people that had fed them the story. And absolutely not one ounce of evidence to back up any of it.
Q. Can I ask you a little bit about how you felt about having to take this action, legal action, and what impact that had on you?
A. I was scared, because obviously I understood if any of the cases went to court, that there would be a jury, and having already felt I was on the back foot because my public persona was not good because I'd been labelled this money-grabbing awful person, that I kind of was up against it before I even got in there. So it was hard then, you know, financially, you know, you don't win even if you get damages. As we've heard, the costs, you're lucky if you get 60 to 70 per cent, you're lucky if you get 70 per cent of your costs.

People think, oh, you sue, you get lots of money. It's far, far from the truth.
Q. While we're on that, can I ask you about paragraph 21 of your statement, which deals with costs. You say:

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"It is important that the Inquiry understands that taking legal action is not an easy decision. Pursuing libel proceedings against a newspaper is extremely expensive [you tell us], time-consuming and stressful. In the most recent libel claim I pursued against the Mirror I was ultimately successful but the case only settled just before trial. In the meantime, in the summer of 2010 (shortly before trial), I had to put my house on the market in order to fund my legal costs."
A. Yes.
Q. "Fortunately the case settled just before it was sold, but this demonstrates just what is at stake."

Is that correct?
A. Absolutely. I had to put the house on the market. I was told that I needed to come up with $£ 200,000$, you know, to go into court. So where was I going to find that amount of money? All my money is in my home, so the only way I knew how to locate that was -- I think that's the problem. I think that the Sunday Mirror were hoping that, you know, a single parent with three children wouldn't perhaps have the backbone to go all the way and would be scared off at the prospect of having to find that sort of money.
Q. It's not in your statement, but your book, Stronger, indicates that you have had at least in the past

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a relationship with Rebekah Brooks?
A. Yes.
Q. By relationship I mean a friendship.
A. Yes, absolutely.
Q. How did that friendship come about?
A. When I left Italy -- when I moved to Italy with Paul, so that would have been 1992, there were things going on that people didn't know about and the reasons that I left Italy are now known, but at the time no one knew that reason and I think Paul's advisers were very keen to keep that under wraps. There was a lot of speculation, "Why has she come away from Italy?" This I know from hindsight. At the time I was just going along with it.

So they -- and I think one of Paul's advisers knew Rebekah, who at the time was just working on a magazine for the News of the World, I think, she was in the Sunday part of it, and they set up and sold a story -maybe that's the one you're talking about.
Q. Maybe. I'll ask Mr Davies in a moment.
A. So they set the story up to say why I'd left Italy, but it was all: this is all still fine, we're still together, and then I met Rebekah -- I met her at I think Heathrow, and that's the first time I met her, and then we flew out over to Rome together and just hit it off Page 84
immediately. And we had a friendship and it was purely a friendship. It wasn't a situation where I sold stories. It didn't even enter my head. We did have a good friendship and I considered her a very close friend.
Q. Are you still friends now?
A. I haven't seen her or spoken to her since about 2000, 2001. I think it might be 2000. But I would still -I wouldn't have a bad word to say about her personally. Q. All right. I asked you earlier about the impact on your children and on yourself of the period when you were still with Paul and the media intrusion that you suffered at that time. Looking back over the last 20 years, can you tell the Inquiry in a nutshell how you feel that all of this has impacted on both you and your children?
A. Wherever I go and I meet people for the first time, I always feel I have to -- not explain myself because that would be a bit weird, to walk up and start saying, "This isn't really me", but I try to be over nice, to get across as quick as I can maybe the interpretation they have of me is not true and I want to get rid of any preconceived ideas they may have of me within the first sort of, you know, however many minutes I can. So it's difficult, and the children -- it's difficult for them, Page 85
and friends, because they feel they have to -- you feel you're constantly defending yourself and for them as well it's difficult because they're having to do the same.
Q. I understand. I don't have any other questions but I do want to give you the opportunity to say anything you want to say or to complete anything you might have started and wanted to finish. Is there anything you'd like to add?
A. No. It's not been easy to be here today. I just hope that because you're scared -- I am scared of repercussions, I'm scared of repercussions on my family, because that has been my, you know, experience in all of this, and I just think that a question that you were saying to Mr Lewis earlier, when he said to you that maybe if they didn't defame people in the first place, that there wouldn't be this issue of, you know, taking it to court, and you were like, well, that's never going to happen, but why shouldn't that happen? Why shouldn't they have to prove, like you have to prove as a victim, that it's not true? Why don't they have to prove that what they are printing is true?

Questions from LORD JUSTICE LEVESON
LORD JUSTICE LEVESON: Actually, interestingly enough, as a matter of law, that is the wrong way around. As

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a matter of law, I think that they have to prove that what they've written, if it's defamatory of you, is true.
A. I thinking if you asked any lawyers --

LORD JUSTICE LEVESON: But that's not to say that anybody would go into a case without amassing their own evidence.
A. They do, though.

LORD JUSTICE LEVESON: I understand that, I understand that But it's not that I'm suggesting, and I wasn't suggesting to Mr Lewis that it was okay for people to be defamed. What I'm saying is that there are grey areas, there are always going to be two different perspectives, so there has to be a way of solving it. There has to be a way of resolving issues where they're not black and white. The stuff you're talking about you say is quite clear, it's black and white, and for that, I don't think I'm going to disagree with you. But there are cases where there could be issues which have to find a way of being resolved.

But actually, if I just pick up on that and say it strikes me there are three things you've spoken about, and I'd be very grateful if you could elaborate, how you put your concerns in relation to each.

The first, which it seems to me is the most serious Page 87
of what you've spoken about, but you tell me, is accuracy.
A. Yes.

LORD JUSTICE LEVESON: That there is no excuse for publishing about you material that is demonstrably wrong, or which, on checking, could be established to be wrong.
A. Well, exactly. You know, such things as I'm made out to be a bad mother because I've stopped Paul having contact with his son because I've changed my telephone number. My telephone number has never changed. How difficult can that be and how hurtful -- you know, to find that out, for one, and how hurtful is that for my son when his father doesn't have any contact with him through his own choice, solely, that it's printed that, oh, his dad wants to get in contact but because he's changed his phone, he can't.
LORD JUSTICE LEVESON: I understand. That's the first point, accuracy.
A. Mm-hm.

LORD JUSTICE LEVESON: I entirely agree with the proposition which I think you've said, but if you didn't, you certainly would, namely that it's much better that they don't publish stuff that's inaccurate, than there is a remedy if they do.

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A. Yes, and the remedy has to be such a big enough
    deterrent that they think twice about it. Because the
    profit margin, it doesn't affect them, what they have to
    pay out.
LORD JUSTICE LEVESON: I understand. The second point
    you've made is about privacy.
A. Right.
LORD JUSTICE LEVESON: But you help me, Mrs Gascoigne, if
    you will. Reading between the lines of what you've
    said, and please correct me if I'm wrong, it's:
    "I recognised what I was getting into before I got into
    it, and I recognised that a loss of privacy for a very,
    very high profile footballer was going to be
    a consequence".
A. Yes.
LORD JUSTICE LEVESON: "However, as his fortunes have wane
    and our path has diverged", you've been concerned that
    the privacy once lost for that period should not be
    irrecoverable, in other words you should be able to
    retain or obtain some privacy again as time has passed.
    Or do you --
A. We didn't really have any privacy then, though, did we?
LORD JUSTICE LEVESON: No, the point --
A. That's not a huge thing for me. I think that if you're
    in the public eye, it's something -- although I was
Page }8
    attached to somebody that was in the public eye, is
    something that you have to kind of deal with.
LORD JUSTICE LEVESON:That's what I've said. So that you
    accepted that.
A. Mm.
LORD JUSTICE LEVESON:With your relationship with your
    husband, but that I rather gather, I'm not expressing
    myself perhaps very well, that as your relationship with
    Paul moved in different directions, however you might
    have reacted with your book and with other things for
    other reasons, you were entitled to regain some of the
    privacy that you had lost when you had your relationship
    with Paul. Is that --
A. I don't know whether that's really what -- whether I'm
    understanding you correctly. I don't really think
    that's what I -- I would just like things to be, if
    they're going to be reported, to be reported correctly,
    because I don't know how if you have -- like I've been
    asked: if you sold your wedding, if I've written a book,
    if I have chosen to go onto a programme like I'm a
    Celebrity, then I am asking for it. You know, to be --
        for people to make comments about you. But why can't
        they put them correctly? It's just not --
LORD JUSTICE LEVESON: This is the precise purpose of my
    asking you the question. So it's not so much the
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    Page 90
    privacy aspect, except where it becomes intrusive, the photographers and the rest --
A. Mm-hm.

LORD JUSTICE LEVESON: -- it's the accuracy.
A. It's the accuracy and, yeah, if they start -- it's difficult for me now because I don't have that which I used to have. If you were asking me that five, six years ago, then yeah, it's awful to be followed every time you go anywhere and you're having to, you know, lose photographers. But it's kind of like I never really complained too much about it because it kind of went with the territory.
LORD JUSTICE LEVESON: And do you think it still goes with the territory?
A. Well, the fact that I'm sitting in here today, probably I am still asking for it. So I will have to deal with it. But just if you're going to print anything about me, just make sure it's factual before you ...
LORD JUSTICE LEVESON: Okay. Then the third point -- so it's where you were on these three areas: accuracy, privacy, and then the third point is remedy.
A. Mm.

LORD JUSTICE LEVESON: And the need for swifter, cheaper, more effective remedies, because the prospect of putting your house on the market --

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A. It has to be a huge deterrent, like it's been a deterrent for many people for years not to take a libel case, because that's what I believed, it was just not worth it, and there's been some horrific libel cases that have been done, you know, Gillian Taylforth's case, I know one forgets how awful that must have been, but it puts people off. So that was a huge deterrent, I think, for a lot of people, and then -- but where's the deterrent for them not to print libel and not to print untruths?
LORD JUSTICE LEVESON: I understand. I understand the point. So what I've tried to do in those three points was to summarise where you stood in relation to each, and I hope I've done that accurately. Is there anything you want to say as a result of what I've asked you, or indeed otherwise?
A. No, I think just a deterrent has to be there, it has to be, you know, costs should mean costs and not just -I don't understand why, when you sue a paper and it's blatantly obvious that they don't have anything and they completely fabricated a story, that you still are out of pocket.
LORD JUSTICE LEVESON: Okay. I understand that. You've made the point that you're concerned, and I understand why, that coming along here might have consequences.

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A. Mm.
LORD JUSTICE LEVESON: I hope you've heard that I've said
    something about that.
A. I know.
LORD JUSTICE LEVESON: And that's something which I will
    certainly keep an eye out for, so if there's anything
    that you find out, that you feel I ought to know about,
    then you must make sure your solicitors know.
A. Okay. Thank you.
LORD JUSTICE LEVESON:Thank you very, very much for coming. }1
A. Thank you.
LORD JUSTICE LEVESON: I understand the decision you had to
    make, and I am grateful to you.
A. Thank you.
LORD JUSTICE LEVESON:Thank you.
MS PATRY HOSKINS:Thank you very much indeed.
        Sir, it's 12.30. I understand that we could fit in
        the third witness before lunch, but you may well want to
        deal with --
LORD JUSTICE LEVESON: I don't know. I don't know whether
    I want to deal with anything else until I know what's
    been happening.
MS PATRY HOSKINS: Mr Jay isn't here.
LORD JUSTICE LEVESON: Because my team aren't here to tell
    me, although I'm perfectly happy to rely on anybody
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                                    Page 93
        else.
    MR DAVIES: I do have something to say, but I'm slightly
reluctant to say it without Mr Jay here.
LORD JUSTICE LEVESON: Yes, I agree. Perhaps somebody
could -- could you please see if Mr Jay is about?
MS PATRY HOSKINS: Mr Jay is also dealing with the third
witness, so unfortunately ...
LORD JUSTICE LEVESON: I know, I know.
MS PATRY HOSKINS: We're struggling very slightly.
LORD JUSTICE LEVESON: He's likely to return if I ask him to.
MS PATRY HOSKINS: I'm sure that's right. (Pause)
LORD JUSTICE LEVESON: Now, Mr Jay, on the issue that was
being raised before, is there anything I need to know at
this stage?
MR JAY: I think Mr Rhodri Davies has a submission to make,
but whether you need to hear that submission now or at
2 o'clock depends on how urgent he feels it is --
LORD JUSTICE LEVESON: It depends how urgent he feels it is. 1
MR JAY: Yes.
MR DAVIES: I feel it is urgent.
LORD JUSTICE LEVESON: Then you'd better make it.
MR DAVIES: It's not a submission, it's a matter of
clarification for Mr Lewis's evidence.
LORD JUSTICE LEVESON: All right.
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## Discussion

MR DAVIES: Mr Lewis gave evidence that a journalist, who I'm not going to name, had been instructed in how to hack by Mr Mulcaire while that journalist was reporting to Mr Simon Greenberg at the Evening Standard. Mr Lewis also said that Mr Greenberg went on to recruit that journalist to Times Newspapers Limited and Mr Greenberg does now work for News International.

What I would like to say is simply this. First of all, Mr Greenberg left the Evening Standard in July 2004. We do not know when the teaching that Mr Lewis referred to happened, but we believe it to be after that. Mr Greenberg did not work in the press but in the football industry from July 2004 until January this year, 2011. He was not involved in the recruitment of the journalist to Times Newspapers Limited. That journalist was recruited by Times Newspapers Limited, started work and went on long-term sick leave before Mr Greenberg arrived at News International.
LORD JUSTICE LEVESON: Right.
MR DAVIES: That is important, I should explain, because Mr Greenberg is a member of the Management and Standards Committee at News International, which is responsible for dealing with this Inquiry and the police.
LORD JUSTICE LEVESON: Thank you. Page 95

MR DAVIES: So his position is a matter of importance to us.
LORD JUSTICE LEVESON: I understand that.
MR DAVIES: That's all I wanted to say.
LORD JUSTICE LEVESON: Thank you very much. Yes, Mr Caplan
MR CAPLAN: If I can say three things. One is this in relation to that matter. In relation to the journalist involved, I'm just seeing what information is in the public domain. It may be that we'll make an application. I think it would be better and certainly would be in the interests of clarity if his name could be published. I think it will be a matter for you, but we're seeing what material there is about that individual in the public domain or not.

LORD JUSTICE LEVESON: Right. I understand the point. MR CAPLAN: Also as a matter of clarification, Ms Platell's name was mentioned this morning in the context of some relationship with Rebekah Brooks and being asked to write an article to settle an old score. Might I just say that that is absolutely refuted.

LORD JUSTICE LEVESON: Yes. I didn't draw the inference, as I think I made clear in your presence earlier today. I didn't link the two points.

MR CAPLAN: Thank you.
LORD JUSTICE LEVESON: Right.
MS PHILLIPS: Sir, could I possibly update you about the
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other matter that was raised this morning?
confirm that the Guardian had a strongly worded complaint from the Sun about the front page. My instructions are that the story about the Sun was incorrect and we will be publishing an appropriate correction and apology, which will go up on the rolling online corrections column as soon as agreed and will be the lead correction in print tomorrow. We will also remove the offending two paragraphs of Marina's sketch from the online version.

As you'll be aware, it's a long-standing practice of my client to publish daily corrections and clarifications in a corrections column, alongside the leader column. It's where readers expect to see corrections and clarifications and is therefore considered the appropriate place to publish the apology.
We'd also like to apologise to the Inquiry for this having had to take up their time this morning before you. Thank you.
LORD JUSTICE LEVESON: Thank you very much. I'm pleased
that that's all happened. I suppose I might be forgiven for saying -- or echoing some of the evidence that has been given this morning, that rather better than the

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very appropriate steps you're now taking would have been if it hadn't been there in the first place.
MS PHILLIPS: Understood.
LORD JUSTICE LEVESON: Thank you very much.
MR GARNHAM: Can I just say in response to what Mr Caplan said that the Metropolitan Police would resist --
LORD JUSTICE LEVESON: I understand, I understand. Mr Jay, let's carry on.
MR JAY: Yes.
LORD JUSTICE LEVESON: But let me just add this: I am very conscious of the very careful line that we are trying to walk.
MR JAY: Yes.
LORD JUSTICE LEVESON: If not a tightrope from which we might fall. I hope that we can review our practices and the practices that we have with our core participants to learn from the experiences that we've just had to try to make sure that this is a one-off and is not repeated.
MR JAY: Yes.
LORD JUSTICE LEVESON: Thank you.
MR JAY: Sir, that is noted and understood. The size of the tightrope, though, is very, very slim and in some cases is almost a piece of cotton thread.
LORD JUSTICE LEVESON: Mr Jay, I never said it was easy.
MR JAY: May we move on to the next witness.

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LORD JUSTICE LEVESON: Yes.
MR JAY: Who may or may not be able to complete before the
    short adjournment, but there's no rush. It's Mr Tom
    Rowland.
LORD JUSTICE LEVESON: Very good.
            MR THOMAS HARDY ROWLAND (affirmed)
A. Can I take my jacket off?
MR JAY:Certainly, Mr Rowland. Please make yourself
    comfortable. I'm sure your glass of water is filled up,
    if you'd like some. Could you confirm your full name
    please.
A. Thomas Hardy Rowland.
MR JAY: Thank you very much.
LORD JUSTICE LEVESON: Mr Rowland thank you also very much.
        As a journalist, I don't put you in quite the same
        category as some of the other witnesses who have come --
    A. Quite right, sir, I don't deserve to be in the same
        category.
LORD JUSTICE LEVESON: But I'm still grateful.
                Questions from MR JAY
MR JAY: Mr Rowland, it's probably my fault. I've only seen
        a statement of yours in draft. Could you confirm,
        please, that there is a signed version of your witness
        statement?
A. Yes, there is.
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Q. Could you provide us, please, with the date of the signature?
A. The 9th day of November 2011.
Q. I'm grateful, Mr Rowland. There's a statement of truth, so this is your evidence. Do you follow me?
A. Yes. Can I just say before we go any further that there is actually a matter of fact that has changed in this. Two days ago the Metropolitan Police Service released an unredacted version of the call log from News International and the number of calls is actually 100 and not 60 , as it is written in this statement.
Q. We'll come to that as you give the narrative. It's not a correction so much as an additional fact which has come to your notice?
A. Yes, but it does say in here that there were 60 and in fact there were 100.
Q. Tell us first of all a little bit about yourself. We know that you're a journalist. In a thumbnail sketch, your career as a journalist?
A. Yeah, I've been a journalist for 30 years, since the 1980s. I started as a technology writer writing about computing and telecommunications. I was the chief reporter on Electronics Times, which was the weekly newspaper covering the technology sector. I went on after that to work for the Daily Telegraph. I was

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a subeditor there, and a feature writer. I was then appointed the property correspondent and I ran and edited the property section of the Daily Telegraph for seven years or so.

In 1997 I left to pursue a career in television. I went to work for Basil Productions, which is the company that later became Endemol. I wrote and developed with them some formats for game shows and I presented and I -- with both Lorraine Kelly and Davina McCall shows that they put out.
Q. Yes.
A. And I then became the chief executive -- I was offered the job of being the chief executive of an Internet company, and then about 2001, I went back to journalism and I -- freelance, principally for magazines, for the Times, for the Sunday Times, for the Mail on Sunday and for the Evening Standard, I wrote a column there for a while.

I've written four books. One is about British technology policy in the 1970s and 1980s called The Inmos Saga, one is about the financing of the Channel Tunnel, called How to Sink a Fortune, one is a guide on building houses for yourself and one is a book about living in France.

Two years ago, I started a campaigning organisation Page 101
called Forward, and I set up a series of websites, the most prominent of which is called Trains for Deal, which was a community-based campaign to get the high speed 1 train to stop in Deal and Sandwich in Kent, and that campaign has been successful, the first fast train stopped in Deal and Sandwich this year, so if I suppose my daughter ever says, "Daddy, have you ever done anything worthwhile in your life?" I can say at least I made the trains run on time.
Q. You're in danger of travelling a little outside the parameters of this Inquiry, but if there's anything else you'd like to say which is germane to what we're doing, please feel free.
A. Yes, indeed.
Q. In terms of the background it is right to say that you are a claimant in the voicemail interception litigation which is due to be heard by Mr Justice Vos in January of next year.
A. Yes, that is the case.
Q. You discovered, I think, quite recently that your voicemail may well have been be hacked. That was in August of this year. Could you tell us, please, the circumstances in which you came to that knowledge?
A. Yes. I was informed by letter by first of all the telephone company, T-Mobile, that they had reason to Page 102
believe that my voicemail had been intercepted, and then subsequently by a letter from the Metropolitan Police.
Q. Yes.
A. I decided that I needed some legal help, so I phoned Chris Bryant, the MP, up, and asked him if he could possibly tell me who his lawyers were, who knew something about phone hacking, and from that I got into this process and I was anxious to participate in this Inquiry because I think I have some knowledge and insights that can help you.
Q. So in late August, there was a meeting, I understand, involving members of Operation Weeting and your solicitor. May I ask you, please, whether during the course of that meeting you saw redacted or unredacted versions of the Mulcaire notebooks insofar as they related to you?
A. No. I didn't. I saw the phone logs of

News International, which were referred to as the phone logs of the News of the World at the time, but it was a redacted version.
Q. And what, in general terms, did those phone logs demonstrate, if anything?
A. Mr Jay, it might be helpful if we talked about the unredacted ones that I got yesterday, because there's a substantial and terribly important difference between Page 103

## the two.

Q. May I interrupt you, first of all, because I don't know what you're going to say about the unredacted ones, it may or may not cause a difficulty for others at this Inquiry. First of all, in August 2011, you were shown the redacted versions?
A. Yes, indeed.
Q. And ignoring what you may have learnt since looking at the unredacted versions, what information or deductions did you draw at the time from looking at the redacted versions?
A. That there was a long series of telephone calls that started in 2005 and went through to mid-2006 that went through to my voicemail, that went through to the code that got through to speaking -- or listening to the actual calls there.
Q. Yes.
A. And that it was a very bizarre pattern. It was hard to understand how anybody could make calls on the regularity that had been made. There was nine in one day.
Q. Yes.
A. I do remember that in your own very excellent introduction to these proceedings, you did point out that on the cases that had been settled by

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News International, the most prolific piece of hacking that had gone on was Mr Skylet Andrews, and I believe you said there were 19 calls that were unsuccessful and 14 that were successful through to his voicemail. In this case, when I saw the redacted version, it appeared that there were 60 calls through, and 2 successful ones. It now appears that there are 100 , and 2 successful ones.

I have to say that if you were the hacking manager at News International or News of the World, you would have to have a word with whoever did the hacking, on my phone because the productivity rate is abysmally low, he's making 50 calls for every successful one, compared to two calls for every successful one in the case of Mr Skylet Andrews, and it made me very suspicious about what was going on, and when I saw the unredacted version, those suspicions became very much larger.
Q. In terms of clarifying that piece of evidence, the reference to a successful call, is it going to the length of the call that you can deduce that it wasn't merely just phoning into the voicemail to see whether there were messages, which might just take a few seconds; because of the length of the call you can reasonably infer that whoever is carrying out the call is listening to a substantive message? Do I have that Page 105

## right?

A. No, I mean these -- there were two specific events that were highlighted by the Metropolitan Police Service, and they said to me that these indicated the caller had gone right the way through the mailbox and had got to the point that somebody was listening through the calls and they had specific evidence of that. I mean, you must ask them, ask officers of Operation Weeting exactly what they mean by that, but that is what I understood and that is what my solicitor understood.
Q. Thank you. You've carefully confined your evidence to what your understanding was. I'm grateful for that.

I'm going to tread carefully here. In relation to what you've learnt more recently, you've looked at unredacted material. I don't want to know the substance of that term, but what it demonstrates --
A. Can I interrupt you, actually? Can I just explain how call logging works? I think it might be helpful to you if I did so. A call logger is essentially an audit of what an office telephone system does. It tells you which extension inside a building or organisation a call comes from, it tells you how long it is and it tells you what the destination is. There might be other information involved as well, but essentially those three things are what you find on a call log.

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The piece of information that had been redacted was the originating number. When I saw the redacted version, the number that all these calls had come from was not there, we couldn't see that on the log. When it was sent through by the Metropolitan Police, that had been added.
Now, it's always, in every single case, 100 cases, it's the same number --
Q. Yes, okay, you can tell us it's the same number but --
A. I'm not going to tell you what the number is --
Q. Thank you.
A. -- but it is the same number and it's a mobile number, which is quite because the technology exists to add a mobile phone to an office PBX system -- PBX stands for private branch exchange, it's the technical term for what's going on here -- but it's always exactly the same number. And I have no evidence for this, but it is my strong, strong suspicion that this evidence has been tampered with. I do not believe the call $\log$ as it exists there is at all credible. I think that my phone was hacked but I think that a lot of those calls actually were perfectly innocent calls to extensions -or from extensions inside News International because I was working for the Times a lot at the time, and I think that what has happened is that somebody has Page 107
tampered with the evidence, and I think that this Inquiry needs to ask some very sharp questions about --

I'll go back a little. I think you have a silent witness who you can legitimately ask to come here and ask questions of, and that silent witness is that computer, that telephone PBX, because you need to know about its architecture, you need to know about its maintenance, you need to know about the security codes getting into it, you need to know about who had access to it and you need to look at its audit records.
LORD JUSTICE LEVESON: I wonder whether that's actually right, Mr Rowland, because at the moment I'm looking at the mantra: culture, practices and ethics, and I'm not looking at the specifics of who did what to whom and when. If I go down the route you've suggested, aren't I really trespassing on that territory, which at present, at any rate, entirely falls within the remit of the Metropolitan Police?
A. Well, I mean, I think you have a problem, sir, which is -- which you've mentioned and alluded to many times, which is that you're trying to have a very broad Inquiry that is necessarily based on a very narrow evidential base, and the evidential base is essentially the Glenn Mulcaire diaries, of which there are 11,000 pages, and these call logs --

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| LORD JUSTICE LEVESON: I don't think that's right, you <br> I think it is much broader than that, because, as you've been hearing, as you've been listening, I've been dealing with many things besides -- | 1 2 3 4 | not innocent, the object was not to discover matters relating to your private life but more to discover matters which may bear on commercial confidences? Have |
| :---: | :---: | :---: |
| A. Indeed, but -- yes, I understand that, but in relation | 5 |  |
| to the actual phone hackin | 6 | A. Yes, Mr Jay, you hav |
| Mr Grant was here, you, Mr Jay, were quite rightl | 7 | 2003, I was working quite a lot for the Mail on Sunda |
| looking and picking him up on the difference betwee | 8 | I'm that shadowy beast, the Mail on Sunday freelancer |
| s | 9 |  |
| in rel | 10 |  |
| diar | 11 | essentially to set up and to advise them on a property |
| pertinent and it's q | 12 | supplement which they wanted to run. That necessarily |
| w | 3 | involved talking to a lot of prominent and famous |
| where inside | 4 | g, |
|  | 15 | people sometimes think you are still doing it, so it's |
| come fr | 16 | ead |
| newsroom or some other | 17 | , |
| Now, it is my contention that quite a lot of those | 18 | During 2005, I wrote a long series of articles for |
| 100 calls actually were perfectly innocent calls, that | 19 | the Times newspaper which were about alternative |
| they | 20 | and the alternative investments in motorc |
| c | 21 | d |
| newspap | 22 | that, you know, that people had decided to g |
|  | 23 | and that again involved talking to a lot of quite |
|  | 24 |  |
| LORD JUSTICE LEVESON: I've got the point. I've go Page 109 | 25 | I think it's relevant that the interview technique Page 111 |
| p | 1 | at I adopted then was n |
| A. Than | 2 | n" technique that many reporters adopt, in other wor |
| perfec | 3 | o and see somebody, ask them some questions, rush |
| that subeditors on the Times would quite properly and | 4 | write the piece and then duck and hope that |
| naturally ring me up and ask me points of fact, whethe | 5 | doesn't hit them. What I was doing was to writ |
| in fact you spelt Robert as in Robert Jay with | 6 | fts of the pieces and then send them to people and |
| with a W or | 7 | for their comments, and I did that for two reasons. |
| journalists make slips and, you know, there's matters | 8 | rstly, because of the appalling culture of tablo |
| consistency and it's important they find out thi | 9 | esses, people are reluctant to actually talk to me at |
| information, so I could quite understand them contacting | 10 | nd it was a way of getting them -- drawing them |
| me by mobile phone. Usually they would go through to my | 11 | into the process. Secondly, I felt that some of the |
| office number, and if they didn't do that, they | 12 | bjects I was being asked to write about, I wasn't |
| me, so I think more typically than coming to me by | 13 | wildly expert on, although I knew quite a lot about it, |
| a mobile phone, so there wouldn't be many of these, | 14 | there was a more chance, a more-than-usual chance |
| that stream should be in there somewhere and I think | 15 | that I was going to make factual errors, and it was as |
| that has happened is | 16 | ay of stopping that happening. And also, I wasn't |
| the more sinister pieces, and one wonders why. | 17 | giving them editorial control, I was asking them to |
| LORD JUSTICE LEVESON: I understand that. I've got the | 18 | engage in a process and a debate, and I found it quite |
| issue. It | 19 | roductive to do that. |
| police will look at in the ligh | 20 | as more phon |
| and we'll have to consider how far we can take | 21 | ing backwards and forwards between me than |
|  | 22 | usually is the case, so messages were being left for me, |
| MR JAY: Can I hone in on what your evidence is about and | 23 | and I was responding. So it was worthwhile for |
| try and deal with it in this way, Mr Rowland. On my | 24 | a fisherman to fish, in a phone hacking sense. There |
| understanding, what you're telling the Inquiry is that | 25 | was something for them to look for. |
| Page 110 |  |  |

28 (Pages 109 to 112)

Then in 2006, I wrote another long series of stories for the Times, which was about -- if you recall, right at the beginning I said I had a background in technology writing in journalism, so I do have some expertise in that area, and I wrote a long series of pieces that were about the confluence of telecommunications and computing, and identity theft -- which seems somewhat ironic in retrospect, that whilst I was writing about identity theft, my own phone was being hacked, but that appears to be what was going on -- but that in itself was enough bait, I suppose, for me to have been of interest. So I think those were the reasons, without going on too much, about why it was that I was of interest.
Q. Yes. One particular matter you draw attention to, there may have been interest in what high-worth individuals or celebrities were doing in relation to house purchases and you might be an easy source, as it were, of such information?
A. Indeed, yes.
Q. In paragraph 21 of your statement, you say you strongly suspect what the evidence points to, it's the culture of routine phone hacking by journalists working for the News of the World. That's an inference which you're inviting the Inquiry to make, having regard to your Page 113
evidence and a host of other evidence; is that correct?
A. Yeah. I mean, Alan Rusbridger when he was here, the editor of the Guardian, was talking about how the culture of phone hacking was ingrained at the News of the World, and you know, the intelligence is that that is not the case elsewhere. However, it now beggars believe that there was just one person doing it, so it appears that it was widespread there.
Q. I think you're striking at an issue of fact and then of inference, which it is part and parcel of what this Inquiry is seeking to explore. It's not for me to comment on that. You have focused on a point and plainly that will have to be considered in the light of all the other evidence.
A. Mm .
Q. I'm interested in what you say in paragraph 22 --

LORD JUSTICE LEVESON: That's moving on to impact, isn't it? MR JAY: Yes.
LORD JUSTICE LEVESON: We have impact and regulation to do so we'll do that at 2 o'clock. Thank you very much indeed.
( 1.01 pm )
(The luncheon adjournment)

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