1	Wednesday, 23 November 2011	1	"To the paper, the doorstep is routine. Others
2	(10.00 am)	2	might deem it the equivalent of blowing a giant
3	Discussion	3	raspberry at Lord Justice Leveson's Inquiry."
4	LORD JUSTICE LEVESON: Before we start, Mr Barr, Mr Caplar	ո 4	And they gone on to provide an image which I won't
5	asked me the other day about a ruling in relation to the	5	read out because it's slightly unpleasant and slightly
6	anonymity protocol. I think at some time yesterday we	6	surprising coming from the Guardian.
7	received yet further submissions from one of the core	7	Of more concern than the factual accuracy is that
8	participants. Although I have been ready to deliver	8	suggestion which follows it, and I would like to assure
9	a judgment, courtesy requires that I give those	9	the Inquiry that the Sun and my instructing clients in
10	submissions consideration, and therefore I'm afraid that	10	general are taking this Inquiry extremely seriously and,
11	it will have to be deferred slightly.	11	in case that's not clear as well, with great respect.
12	MR CAPLAN: Yes my Lord. Sir, I presume the consequence of	12	That is indeed within my own knowledge.
13	that, if any core participant was minded to take it	13	There is in fact a piece about the Inquiry in the
14	further, would be that the 14 days will run from the	14	Sun this morning, and we'd be more than happy to be
15	ruling you next deliver?	15	judged on that. That's all I wanted to say.
16	LORD JUSTICE LEVESON: I wouldn't necessarily say that,	16	LORD JUSTICE LEVESON: Right. Thank you very much.
17	Mr Caplan, because the ruling that I've given covers the	17	I haven't seen the Guardian this morning. Might I just
18	principle.	18	have a look at it?
19	MR CAPLAN: Very well.	19	MR DAVIES: Yes, of course. It's the bottom half of the
20	LORD JUSTICE LEVESON: I can say that I'm not prepared to	20	second column of that article on the front page.
21	revisit the principle, although some of the submissions	21	(Handed).
22	have invited me to, so if there had been a challenge to	22	LORD JUSTICE LEVESON: Thank you very much indeed. (Pause)
23	the principle, I would have expected it to be made.	23	All right.
24	MR CAPLAN: Yes, I understand.	24	MR DAVIES: That's all I wanted to say, sir.
25	LORD JUSTICE LEVESON: As regards the detail as to how we'll	25	LORD JUSTICE LEVESON: Does the Guardian want to say
	Page 1		Page 3
1	proceed, of course somebody can always challenge	1	anything about this?
2	a decision of mine, it's perfectly appropriate, and	2	MS PHILLIPS: The Guardian has only just been made aware
3	I don't take it at all personally, but I would expect	3	that there's a complaint about it. I don't have any
4	that we'd probably need to work out on a case-by-case	4	instructions but I'll see what I can find out and report
5	basis how it bit in any case. So whether there is	5	back by lunchtime.
6	anything sufficiently generic to justify troubling the	6	LORD JUSTICE LEVESON: Right, thank you very much. I would
7	Administrative Court will be a matter for you. I'm not	7	have thought there are enough issues that concern this
8	commenting one way or the other.	8	Inquiry without descending into the personnel who are
9	MR CAPLAN: Thank you very much.	9	trying their best and working extremely hard to ensure
10	MR DAVIES: I wonder if I might raise something.	10	that they are fair to everyone.
11	LORD JUSTICE LEVESON: Yes, please.	11	All right. Now you had something else to talk to me
12	MR DAVIES: I apologise for starting the day with the press	12	about, Mr Barr?
13	again, but there is a report in the Guardian this	13	MR BARR: Yes, sir. Today's witnesses.
14	morning on the front page which says that if you want to	14	LORD JUSTICE LEVESON: Yes.
15	know how deeply the self-reproach is running over at	15	MR BARR: The order for today will be first of all Mr Mark
16	News International, do be advised that the Sun yesterday	16	Lewis, secondly Mrs Sheryl Gascoigne, thirdly,
17	sent a reporter to doorstep Ms Patry Hoskins, who is of	17	Mr Tom Rowland, and then this afternoon, Mr and
18	course junior counsel to the Tribunal.	18	Mrs McCann.
19	It goes on in language I'll come to in a moment, but	19	LORD JUSTICE LEVESON: Or Dr And Dr McCann.
20	first of all can I say that Ms Hoskins has not been	20	MR BARR: Indeed, I am sorry.
21	doorstepped by the Sun, and furthermore, that the Sun	21	LORD JUSTICE LEVESON: No.
22	did not send anybody to doorstep her, so the article is	22	MR BARR: Might I call perhaps I should say before I do,
23	inaccurate to that extent.	23	I should address you as to the scope of Mr Lewis's
24	Of more concern is the inference which is then drawn	24	evidence today.
25	by the author in the Guardian to the following effect:	25	LORD JUSTICE LEVESON: Yes. I've now seen a supplementary
L	Page 2		Page 4

1 chest, and I could understand that, but there are other 1 witness statement prepared by Mr Lewis dated the day 2 2 before yesterday, which deals with allegations that have issues at play here. 3 certainly been ventilated widely in the press but which 3 MR SHERBORNE: Sir, I understand. Clearly this is very 4 4 are clearly extremely recent. The supplementary important evidence, not just, obviously, for Mr Lewis, 5 statement deals with them, and clearly raises a number 5 but for this Inquiry for the very reasons that you've 6 6 given, and Mr Lewis understands that. It's evidence of quite complex issues, not least the extent to which 7 7 which Mr Davies' clients will need to give very serious it's appropriate to look at these matters, firstly 8 8 consideration to. They know about it, but that means because of how the information came to Mr Lewis, in 9 9 also they need time to deal with it. So we understand other words from the police; secondly, because of 10 10 serious Article 8 issues; and thirdly, because of the the approach, sir, that you are taking. 11 11 I'm entirely in your hands as to how you wish to significance that might be attached in the context of 12 12 the custom, practices and ethics of the press to recent deal with this. 13 13 LORD JUSTICE LEVESON: Yes, that's absolutely right, you events. 14 14 I understand that there is some more evidence still 15 15 MR SHERBORNE: I recognise that. to come on this topic in the form of another statement. 16 Is that what the Inquiry team understand? 16 LORD JUSTICE LEVESON: All right. 17 MR SHERBORNE: There will be further evidence, sir, as 17 MR BARR: It's certainly likely to be the case that there is 18 18 Mr Barr says. There is another witness who will want to going to be another witness speaking to more or less the 19 19 same matters, and there may be, I put it no higher than come and give their evidence. 20 that, there may be some further evidence from Mr Lewis 20 LORD JUSTICE LEVESON: I understand that. Of course, that's 21 21 not decisive, but having regard to the subject matter, about a separate matter. 22 LORD JUSTICE LEVESON: All right. Thank you. 22 I think it's important that all the evidence on the 23 Mr Sherborne, these are clearly very important 23 topic is available because this isn't historic. 24 24 issues, not merely in the chronology of the continuing MR SHERBORNE: No, it's very fresh indeed. 25 LORD JUSTICE LEVESON: All right. Let me suggest what I'm litigation between some of your clients and Page 5 Page 7 1 presently thinking of. I've not heard Mr Rhodri Davies 1 News International, but also because they may, and 2 2 I apprehend that Mr Lewis will suggest that they do, and I'm deliberately doing this without hearing him --3 cast light on the very subject matter of the Inquiry. 3 I will in a moment. It's a second limb of evidence 4 MR SHERBORNE: Yes, sir. 4 which isn't specifically linked into the first, it's 5 LORD JUSTICE LEVESON: If that is so, and I'm minded to 5 because of the chronology. I would wonder whether it's 6 6 think it is, it strikes me that we ought to proceed with not appropriate to ask Mr Lewis to deal with all that is a degree of caution, and I'll explain why I say that. 7 7 contained in his original statement now, for which 8 These events are still happening. We've not got all the 8 everybody is prepared, I hope, and then review and find 9 statements in. I assume that Mr Rhodri Davies has seen 9 some other time to deal with the second statement. 10 10 the statement, but I apprehend that there's That's going to require a degree of care because of 11 11 a confidential exhibit which he may not have seen, and the Article 8 issues and the extent to which it's 12 the question is where that should go and to what extent 12 appropriate to investigate publicly that which is 13 13 it could be redacted. It may be that it's a document contained within the document that I have seen. I make 14 14 that won't require a great deal of attention from him it abundantly clear, as I've said to all, that there is 15 for other reasons, although it might be from him, 15 absolutely no intention of mine to ventilate or give 16 whether it does for his clients, and you know exactly 16 currency to what is or may be a breach of Article 8 of 17 what I mean. 17 the Convention. MR SHERBORNE: Yes, sir. MR SHERBORNE: I understand. 18 LORD JUSTICE LEVESON: So that requires a rather delicate 19 LORD JUSTICE LEVESON: But given the way in which this 19 20 Inquiry is being conducted, namely my general ruling 20 line to be run between what should be available and what 21 21 that all questions should be asked through the Inquiry should be kept out of the public domain, which won't 22 22 team, I am concerned about the extent to which it's necessarily mean that it won't be important at least for 23 23 appropriate to develop this aspect of Mr Lewis's Mr Davies to see where the lines are being drawn, 24 evidence at this stage. 24 because as we investigate this issue, I will want to 25 25 I appreciate that he may want to get this off his make sure that I am being fair to your client and to Page 6 Page 8

1	Mr Lewis and to all the others who might be affected by	1	themselves to the police.
2	this evidence, and you will work out who I mean, and	2	LORD JUSTICE LEVESON: Yes. Then they only need to know
3	I apologise to everybody else for being comparatively	3	what documents are comprised within it. I'm not ruling
4	cryptic, but equally fair to ensure that	4	on this at the moment.
5	News International can put the case on this document	5	MR SHERBORNE: I understand.
6	that they wish to advance.	6	LORD JUSTICE LEVESON: I am going to make one ruling and
7	MR SHERBORNE: Sir, yes.	7	that is to extend Mr Barr to other members of the
8	LORD JUSTICE LEVESON: Right.	8	Inquiry team, in particular to leading counsel. This
9	MR SHERBORNE: I'm grateful.	9	has become rather more significant, not in any way
10	LORD JUSTICE LEVESON: Do you have any observations to that	10	diminishing the abilities of Mr Barr, but I think this
11	proposed plan of action?	11	ought to be seen slightly wider.
12	MR SHERBORNE: I don't, and neither does Mr Lewis.	12	MR SHERBORNE: I understand that, sir. I'm sure there's no
13	LORD JUSTICE LEVESON: I can see that. Thank you very much	. 13	objection to that.
14	MR SHERBORNE: I'm very grateful.	14	
15	LORD JUSTICE LEVESON: Right, Mr Rhodri Davies. Some of	15	be a discussion about how to proceed. That can be done
16	this will come as a surprise, perhaps.	16	outside this room, and outside the inevitable publicity
17	MR DAVIES: Yes.	17	that these hearings tend to command.
18	LORD JUSTICE LEVESON: But you've seen the supplementary	18	MR SHERBORNE: Sir, yes.
19	statement, so not entirely.	19	LORD JUSTICE LEVESON: Thank you. Right, let's crack on.
20	MR DAVIES: Yes, indeed. I received the supplemental	20	Yes, Mr Barr.
21	statement about 4.30 yesterday, without the exhibit. At	21	MR BARR: Thank you, sir. Mr Lewis, please.
22	least some of the documents referred to in it are	22	MR MARK LEWIS (affirmed)
23	available within News International, but I haven't had	23	LORD JUSTICE LEVESON: Mr Lewis, I extend exactly the same
24	time to read them yet, so I was going to ask you not to	24	courtesy to you. It's not different just because you're
25	deal with that material today because we haven't had	25	a solicitor. Please sit down. If you want a break at
	Page 9		Page 11
1	4: 44 4 F:4	1	The base for the
1	time to get on top of it.	1	any stage, don't hesitate to say so. Thank you for the
2	LORD JUSTICE LEVESON: I'm just half a step ahead of you.	2	statement. I appreciate that coming back to have
2 3	LORD JUSTICE LEVESON: I'm just half a step ahead of you. MR DAVIES: You are indeed.	2 3	statement. I appreciate that coming back to have a second bite at the particular cherry may not be what
2 3 4	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	2 3 , 4	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
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1 background. You are now a partner in the firm A. Correct. 1 2 Taylor Hampton? Q. "It was suggested even at the time (before anyone knew 3 A. Correct. 3 about the phone hacking scandal) that it was a curious 4 Q. And you specialise in defamation and privacy law? 4 coincidence that the second girl 'D' should have been 5 A. That's correct. 5 approached by a journalist." Q. You've become known for your phone hacking work? 6 And now the sentence which I think you want to say 7 7 A. Almost too well-known for it. something about. You continue: 8 8 Q. And I should emphasise here that's in the capacity of "Obviously the journalist could not have told her of 9 9 Garry Flitcroft's case as that would have involved representing people, not hacking phones. 10 10 A. Well, sadly it might be both, but certainly for a breach of an injunction." 11 11 A. Yes. What -- if I can explain, one, why I said that, representing people. 12 Q. I'm meaning not hacking phones yourself. 12 and two, why I'm prepared to accept that it needs to be A. Well, I haven't hacked phones, but I might be a victim. 13 explored further, is initially the case -- the Flitcroft 14 Q. You've been a witness to the Select Committees --14 case was known as A, which was Garry Flitcroft, B, which 15 A. Yes. 15 was Sunday People, and C, who was a girl who was 16 Q. -- on the issue of phone hacking, and you had conduct of 16 a nursery nurse who apparently had sold her story, some of the very first civil litigation arising out of 17 17 seemingly voluntarily. 18 the phone hacking issue? 18 Later on in that case, the initial injunction was 19 19 A. Yes, that's correct. obtained, an ex parte injunction by Mr Justice Jack was 20 Q. Can I now take you back a decade to 2001. At that stage 20 obtained in a case A v B and C. There then followed 21 21 it's right, isn't it, that you joined George Davies, girl D, who was joined, because one became aware of the 22 a Manchester firm of solicitors, as a partner? 22 willingness of girl D to sell her story. 23 A. That's correct, 2 January 2001. 23 What I was getting at in my statement was this 24 24 Q. At that firm, the work that you did included work for curious coincidence, which we didn't realise at the 25 the Professional Footballers' Association? 25 time, that girl D was also someone who would suddenly Page 13 Page 15 A. I would say at that time probably 40 per cent of my work decide to sell her story to the Sunday People at the 1 2 was for the PFA. 2 same time -- it wasn't a published story -- but at the 3 Q. You amongst other things acted for Mr Garry Flitcroft? 3 same time as girl C had curiously also picked the A. That's correct. 4 Sunday People. The explanation that was offered by the Q. And we heard from Mr Flitcroft yesterday about the 5 Sunday People at the time was that a journalist 6 litigation which he brought. 6 unfortunately called Aycock -- because it now strikes me 7 A. Yes. 7 as a cock and bull story -- went to girl D, who she 8 Q. You tell us in your witness statement, if I might 8 knew, and said a story has been sold about 9 paraphrase it, that you thought that the Court of 9 Garry Flitcroft, and wasn't he having a relationship 10 Appeal's decision in that case is out of kilter with 10 with you? 11 later decisions. Is that a fair summary of your 11 That was not examined, although I have first-hand 12 opinion? 12 experience of having dealt with the case, it was the 13 A. With the greatest of respect, I think the Court of 13 Sunday People, through their lawyers, in-house lawyers, Appeal were wrong at that time. Notwithstanding 14 14 Marcus Partington, were demanding the telephone records 15 Lord Justice Leveson. 15 at that time. I spent a lot of time, and my ex-wife had 16 LORD JUSTICE LEVESON: No, no, no, it would be surprising if 16 to do it, redacting documents to cross out telephone 17 you didn't, considering you were involved in the case. 17 numbers. It now looks as though a further explanation 18 I'm afraid the court can never please everybody, and 18 has to be given to the curious coincidence and also 19 rarely pleases anybody. 19 because of the journalists who were involved in this 20 MR BARR: And then you deal with that litigation and the 20 story at the time. 21 case generally in paragraph 5 of your witness statement, 21 Q. I see. So that's the point you were intending to make? 22 and you say at the bottom of paragraph 5: 22 A. Yes. 23 "Hindsight has led to investigations being commenced 23 Q. Now to the second part, what you actually said: 24 as to how this story was obtained." 24 "Obviously the journalist could not have told her of 25 25 That's the story about Mr Flitcroft, isn't it? Garry Flitcroft's case as that would have involved Page 14 Page 16

Day 6 - AM Leveson Inquiry 1 a breach of an injunction." 1 2 It might be said, mightn't it, that the journalist 2 3 must have spoken to woman D before the injunction 3 4 4 because the injunction was to prohibit the publication 5 of what woman D had said to the journalist? Do you 5 6 6 7 7 A. It's a possible explanation as to what might have 8 happened, so I accept that. 8 9 Q. I see. Thank you. We can move on now to the middle of 9 10 10 the last decade, and there came a point in time, didn't 11 11 there, where you represented a lady called 12 Joanne Armstrong? 12 13 A. That's correct. 13 14 Q. And you tell us in your witness statement that 14 15 Joanne Armstrong was photographed having lunch with 15 16 Mr Gordon Taylor? 16 17 A. Correct. 17 18 Q. And that you took action on her behalf to threaten to 18 19 19 apply for an injunction? 20 A. That's correct. 20 21 21 Q. To prevent publication of any photograph? 22 A. The photographer had been confronted at the time and had 22 23 indicated that he was taking photographs for the 23 24 24 News of the World. There followed an altercation and 25 I sent a letter to the News of the World saying, "Do not 25 Page 17 1 publish -- we act for Joanne Armstrong, do not publish 1 2 2 a story about her, she is a private individual against 3 whom you have no right to publish her story, and also it

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 3 added 2 and 2 and made 84. They couldn't possibly 4 conceive of any other explanation. If it wouldn't have 5 been so sad, it would have been funny. 6 Q. If I just stop you there. So that is the position as 7 you believe it to be, and as I mention, I think that 8 might have to be a matter properly for part 2 of the 9 Inquiry, but if I can pick up on your mention of the 10 convictions of Glenn Mulcaire and Clive Goodman, it was 11 at that stage, wasn't it, as you say, that you had 12 a eureka moment, and one of the victims was 13 Mr Gordon Taylor. 14 Is it right that as a result of learning about the 15 convictions, that Mr Taylor took advice from you and

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 10 been obtained through proper journalistic inquiries. Is that what he told you? 12 A. That's correct. That was sent in a letter. The 13 explanation for that was because not only had 14 I requested that the story didn't get published, but I'd also asked for my costs and some damages, and the 16 rejection of my claim or my client's claim for costs and damages was because this was a proper journalistic 18 inquiry and therefore they said, or Tom Crone had said, "You're not entitled to costs or damages". 20 Q. A detailed investigation of this issue may properly be a subject for part 2 of this Inquiry, but the question 22 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

Page 18

seems that the story you're intending to publish just

16 from counsel? 17 A. My firm had been acting for the PFA for probably 50 18 years. We had a standing retainer, and therefore 19 I reported back to say, look, I think I know where they 20 got the Gordon Taylor story from, and therefore I also 21 think that there is a civil claim that will follow from 22 it, whether invasion of privacy or now in the vernacular 23 it's known as phone hacking, but to say they obtained 24 this story through an illegal or unlawful source. 25 Q. I see, so it came to pass, didn't it, that Mr Taylor Page 20

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isn't true."

- 1 initiated a claim against News Group News?
- 2 A. Yes.
- 3 Q. And he in due course commenced proceedings?
- 4 A. Just to correct you, he commenced a case against
- 5 News Group Newspaper and against Glenn Mulcaire,
- 6 secondly.
- 7 Q. The result of commencing those proceedings was that
- 8 whilst denying liability, the News of the World wanted
- 9 to talk to you?
- 10 A. Yes. Initially the letter before action was virtually
- ignored, and then proceedings were issued and that's --
- 12 after the proceedings were issued, they wanted to have
- 13 a conversation.
- 14 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
- 17 matter. Is that correct?
- 18 A. That's correct.
- 19 Q. Did that surprise you?
- 20 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
- 24 had never been to see me, he'd never come to Manchester,
- and all of a sudden -- I mean, the whole thing could
  - Page 21

- did you think it was worth £250,000?
- 2 A. On a breach of privacy basis, if there was -- it wasn't
- a published story. If there had have been a Part 36
- 4 offer, and Part 36, you understand --
- 5 Q. We'll come to that.
  - A. If there had been a Part 36 offer of £20,000, I'd have
- 7 had no alternative but to advise my client to accept it
- 8 because the risk would have been so high.
- 9 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 --
- 12 News International served a defence?
- 13 A. Yes, that's correct.
- 14 Q. And that denied liability?
- 15 A. It not only denied liability, but it was served
- 16 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,
- 20 "This is what you've definitely done", there were just
- lots of inferences and we had to build up an inferential
- 22 case to sort of get over the threshold of the balance of
- 23 probabilities.
- 24 Q. An inferential case to connect Glenn Mulcaire to the
- News of the World?

- 1 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,
- 4 now go away."
- 5 But the fact he was coming to see me suggested that
- 6 they had something to hide.
- 7 Q. You tell us in your statement that you were asked how
- 8 much Mr Taylor would accept to settle the case?
- 9 A. Yes
- 10 Q. And you put the figure of £250,000 to him; is that
- 11 right?
- 12 A. That's correct.
- 13 Q. What was his reaction?
- 14 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.
- 17 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
- 21 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.
- 24 Q. In terms of what you thought the case might be worth if
- 25 Mr Taylor had pursued it to trial and been successful,
  - Page 22

- 1 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
- 4 have been instructing Glenn Mulcaire if they had
- 5 instructed.
- 6 Q. I understand. And for those who -- well, perhaps
- 7 I could ask you this. Who signed the statement of
- 8 truth?
- 9 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
- 14 refused as a request.
- 15 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
- 19 Crown Prosecution Service?
- 20 A. That's correct. And actually the case had gone quiet as
- 21 far as Farrers were concerned. I'm sure they thought
- that it had all gone away and nothing was happening and
- 23 we'd started a case with some bluster and then done
- nothing, but we were seeking nonparty disclosure from
  people.

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- 1 Q. You tell us in your statement about a conversation which
- 2 occurred outside court with a Mr Maberly of the
- 3 Metropolitan Police and your recollection of the
- 4 conversation is:
- 5 "You are not having everything, but we will give you enough to hang them."
- 7 And said there were something like 6,000 victims?
- 8 A. That's correct. What had happened was we were applying
- 9 for disclosure from the Metropolitan Police because at
- that time it was known that there were a handful, 10 or
- 11 12 victims of phone hacking, so the application for
- nonparty disclosure had asked for everything that the
- 13 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
- 16 saying, "Look ..."
- 17 LORD JUSTICE LEVESON: Mr Lewis, for the lawyers present 17
- this is fascinating, and I understand its relevance and
- it is contained in your statement, but I think for those
- 20 concerned about the particular issues that I have to
- solve, it's perhaps not quite as significant.
- 22 MR BARR: We can deal with it in this way, can't we,
- 23 Mr Lewis: the conversation that you had outside court
- 24 with Mr Maberly is the subject of a dispute?
- 25 A. It is the subject of a dispute.

#### Page 25

- 1 Q. And that is ongoing and it's not a matter that we need
- 2 to go into in any more detail. What is more important
- 3 is the result of your various disclosure efforts was
- 4 that you received, didn't you, an email which has become
- 5 known as the "for Neville" email?
- 6 A. That's correct. It wasn't known as the "for Neville"
- 7 email at the time, it was the "we've got them" email.
- 8 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
- 11 claim?

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- 12 A. It undermined the credibility of the denial that News
- 13 had put forward.
- 14 Q. You also tell us that you received a compact disc which
- had the recording of a conversation between
- 16 Glenn Mulcaire and a person who we're not going to name
- in these proceedings, but the gist of what the
- 18 conversation was was that Mr Mulcaire was teaching this
- 19 person how to hack a mobile phone.
- 20 A. Correct.
- 21 Q. And without naming the person, who was that person
- working for, to the best of your knowledge?
- 23 A. Well, at that time what was important was at that time
- 24 I didn't know.
- 25 O. I don't mind --

# Page 26

- 1 A. Subsequently --
- 2 Q. I don't mind here about when you knew, but --
- 3 A. Subsequently, he was working for a newspaper which at
- 4 that time belonged to the Associated Group.
- 6 Q. If we resume the course of Mr Taylor's litigation, you
- 7 provided the "for Neville" email, amongst other
- 8 documents, to News International's News Group News'
  - solicitors, didn't you? Did that have an effect on the
- 10 course of the negotiations?
- 11 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
- 15 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
- 19 listening who are not lawyers, I'd like to ask you
- a little bit about Part 36. In broad terms, what are
- 21 the consequences of turning down an offer made under
- 22 Part 36 and then going on to recover less than, in this
- 23 case, £50,000, at trial?
- 24 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
- 5 a Part 36 offer of, say, £50,000, if you get £50,000 or
- 6 less awarded to you at trial, then you will end up
- 7 having to pay the other side's costs, even though you've
- 8 won, from 21 days after the date, and your own costs.
- 9 So the effect is that whilst you might have won £50,000,
- the costs in legal cases are triangular, they start from
- a small point and broaden out, that the victory would be
- that you might get £50,000 damages and get landed with
- a bill for £500,000, so the other side would take great
- 14 credit from winning.
- 15 Q. You told the Inquiry not long ago that if you'd received
- a Part 36 offer for £20,000 early on in the litigation,
- 17 you would have advised your client to take it?
- 18 A. (Nods head).
- 19 Q. You now get a Part 36 offer for £50,000 but your client
- 20 didn't take it, did he?
- 21 A. No.
- 22 Q. Why not?
- 23 A. They were too busy negotiating before we had time to
- 24 reject offers.
- 25 Q. When you say negotiating, you mean offering you even Page 28

7 (Pages 25 to 28)

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at the time.

A. That's correct.

A. Every single penny.

from Mr Pike.

18 A. Correct.

Q. Can I --

legal costs; that's right, isn't it?

- 1 more money?
- 2 A. Farrers were in a spin. The News of the World had been
- 3 caught out, the £50,000 quickly went up, 100, it just
- 4 seemed such a flurry of activity from them that
- 5 culminated in a conversation between Julian Pike and
- 6 myself where they offered £250,000. He said, "All
- 7 right, you can have the figure that you asked for
- 8 initially, £250,000", and I had a smile on my face,
- 9 although it was over the telephone, to say, "No, that
- was before the case had started. Now we've got this
- evidence, we didn't have the evidence then", and they
- 12 carried on negotiating.
- 13 Q. Ultimately, the settlement figure was?
- 14 A. £425,000.
- 15 Q. That's £425,000 for damages?
- 16 A. For damages, plus costs. Now, the costs --
- 17 Q. Can we come to the costs in a moment? Just before we go
- there, I'd like to ask you about a particular
- 19 conversation that you mention at paragraph 25 of your
- witness statement, where you say that Mr Pike told you
- 21 that you were "negotiating with Murdoch". Did he tell
- you which Murdoch?
- 23 A. No, I had no idea which one. I thought he meant
- Rupert Murdoch because he only used the surname.
- 25 Q. Can you remember when this conversation took place? Page 29
- Julian -- it was said at the time that Julian Pike and
- 25 Tom Crone would like to meet me for lunch. He then Page 31

or not it went any further as to -- I couldn't give

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

LORD JUSTICE LEVESON: I don't think we need to go into

considers are reasonable, but here you got every penny?

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

A. Correct. They asked me when I was next in London, they

would like to take me for lunch, or he would like --

this. Normally your costs are assessed and they get

knocked down to what the assessor, the costs judge,

MR BARR: You tell us that after the case you got a call

15 LORD JUSTICE LEVESON: Right, thank you.

evidence as to what James Murdoch or Rupert Murdoch knew

- 1 A. I couldn't tell you the specific date, but around the
- 2 time just before the case had settled.
- 3 Q. Perhaps when you return to give evidence, you'll be able
- 4 to confirm exactly when you say that conversation took
- 5 place.
- 6 A. Yes.
- 7 Q. How sure are you that Mr Pike used the words
- 8 "negotiating with Murdoch"?
- 9 A. 100 per cent sure.
- 10 Q. Do you mean a direct quote, "negotiating with Murdoch",
- or something to that effect?
- 12 A. Sorry --
- 13 Q. Are you saying that "negotiating with Murdoch" is
- a direct quote? It's in quotations in your witness
- 15 statement.
- 16 A. Sorry, 100 per cent sure that he made the comment "with
- 17 Murdoch". Whether it was "negotiating" or "dealing with
- Murdoch", he said "with Murdoch". We had that
- 19 conversation. In hindsight, people are looking at it as
- 20 though Julian Pike and I are arch enemies, but at the
- 21 time we were talking on a friendly basis and it had gone
- so high in terms of negotiations that he was saying,
- 23 "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 Page 30

- 1 apologised that he wasn't able make it, so it was
- 2 Tom Crone and a friend of his.

Vino wine bar in Fleet Street?

- 3 Q. And so you go to the meeting and you went on for a meal
- 4 afterwards, and you tell us that you told him at that
- 5 stage that you were going to be acting for two further
- 6 phone hacking victims?
- 7 A. Basically the atmosphere was convivial, and then the
- 8 colleague friend had left and then it was Tom Crone and
- 9 myself and I said, "I have two other cases for you".
- 10 Q. Is it right then that after that, the approach of
- 11 News Group News to you was that they thought it was not
  - proper for you to act for any more phone hacking
- 13 victims?

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- 14 A. Yes. There has been a dispute as to who was at that
- lunch, whether Julian Pike was there. He wasn't there.
- 16 Tom Crone has now disputed it, so I do know the person
- 17 he was with. He also suggested we were downstairs at
- a bar having a drink. If anybody knows me, I can't
- 19 remember the last time I had a drink. I'm not teetotal,
- 20 but I forget to drink alcohol.
- 21 Q. That's not what I was asking, I was asking you about
- 22 News Group News' position --
- 23 A. That's what happened. Then News Group -- Julian Pike
- phoned me, I remember where I was, we had open plan
- 25 offices but had breakout rooms and I'd gone into a room Page 32

8 (Pages 29 to 32)

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- 1 to have a telephone conversation and Julian Pike told
- 2 me, "You can't act".
- 3 Q. And the ultimate culmination of that was a complaint was
- 4 made against you to the Solicitors Regulation
- 5 Authority --
- 6 A. No, sorry. I did act -- sorry, take it in stages.
- 7 Those two actions, one was for Joanne Armstrong, who I'd
- 8 acted for initially, and one was for a third person
- 9 who's never been named --
- 10 Q. I--
- 11 A. -- but there was no complaint, the --
- 12 Q. I know that it came some time later, and that you have
- 13 continued to act for phone hacking claimants --
- 14 A. Sorry, but there wasn't a complaint at all --
- 15 Q. Not at that time.
- 16 A. Sorry, there was a complaint over the telephone, it was
- 17 dealt with over the telephone, I said I could act, they
- 18 then agreed that I could act and I did act and I settled
- 19 case two and case three.
- 20 Q. But I'm asking you about much further down the line. Is
- 21 it right that ultimately a complaint was made against
- 22 you to the Solicitors Regulation Authority about the
- 23 issue of whether it's right for you to act for phone
- 24 hacking victims?
- 25 A. But not by Farrers or News.

#### Page 33

- 1 lawyer to act for me.
- 2 Q. At the time the story broke, you were still working in
  - Manchester?
- 4 A. Yes.
- 5 Q. And did the fact that you were attracting phone hacking
- clients cause difficulties for you at the partnership in 6
- 7 Manchester?
- 8 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
- 10 this had come up. I ended up flying back to -- I had
- 11 just got to Israel, I was on holiday in Israel, and
- 12 I was there for two days, came home to England, came to
- 13 London and went to see Max Clifford, and then
- 14 I telephoned my managing partner, Mark Hovell, on the
- 15 Sunday, and said, "I've just been instructed as a joint
- 16 instruction with another lawyer for Max Clifford", and
- 17 his reaction was to swear and say, "Oh, this is
- 18 a disaster", a matter that you have to take up with him.
- 19 But what had happened is after the story had come
- 20 out in the Guardian, Gordon Taylor had been on the phone 21 to me many times and I remember having conversations
- 22 with him on the Friday and on the -- the Friday evening
- 23 just near a bank, I was getting money out of a cash
- 24 machine to come back home, to look at it because of the
- 25 ramifications for him because of this story breaking.

## Page 35

- O. Indeed. 1
- 2 A. Yes.
- 3 Q. Who was that complaint made by?
- 4 A. That was by Gordon Taylor. Gordon Taylor had said that
- 5 I had entered into an agreement with him that I wouldn't
- 6 act for anybody else, sort of ever, on anything to do
- 7 with anything that he'd had to do with. It was
- 8 something that had never been discussed with
- 9 Gordon Taylor, I would never have agreed to this idea
- 10 that somehow -- it was a bit like acting for a driver in
- 11 a personal injury claim and then agreeing that you would
- 12 never act for any of the passengers on his bus.
- 13 Q. The ultimate outcome of the complaint was?
- 14 A. It was rejected in its entirety.
- 15 O. Can we now move to 2009. The Guardian break the story
- 16 about hacking and you tell us in your statement, if
- 17 I paraphrase, that the result of that was that you
- 18 started to get a lot more phone hacking clients?
- 19 A. Initially I was approached by one or two people, because
- 20 initially the five people who had been named in the
- 21 criminal prosecution were Gordon Taylor, Max Clifford,
- 22 Sky Andrews, Simon Hughes MP and Elle Macpherson, so
- 23 Max Clifford was the first one who had been on
- 24 Newsnight -- I had been away -- saying this is terrible,
- 25 I'm going to bring a claim. I want Gordon Taylor's Page 34

- Q. Indeed. I'm looking now at paragraph 34 of your witness 1
- 2 statement, Mr Lewis. Is it right that the upshot was
- 3 that you were expelled from the partnership in
- 4 Manchester?
- A. It was, but we had two provisions in the partnership
- 6 deed, one to be expelled as a good leaver, and one not
- 7 to be expelled as a good leaver. The good leaver
- 8 provision was to have expulsion without any reason, so
- 9 even though you'd done nothing -- even though I'd done
- 10 nothing wrong, the partners were able to expel me and
- 11 they chose to do so.
- 12 Q. You describe that graphically at paragraph 34 if I may 13 pick it up:

Mark Hovell. Rather than being pleased, he said that he

own. He responded that he would call me the next day

- 14 "After that meeting I called my managing partner,
- 16 did not want me to act. I said that I wanted to do this
- 17
- for me and my partners but if not I would do it on my
- 19 (13 July 2009). At 10 am that day I received an
- 20 ultimatum on my 'BlackBerry' to the effect that unless
- 21 by 11 am I gave an undertaking ..."
- 22 LORD JUSTICE LEVESON: Mr Barr, I don't think we need to
- 23 read this. The statement is available, everybody can
- 24 read it, and although it may be a consequence of some of
- 25 the work that Mr Lewis has done, it isn't at the very

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core of what I'm concerned with. 1 saying, "It is a very serious matter to mislead 2 2 MR BARR: I will move on then, sir, to over the page where a Parliamentary Inquiry", and then grinned. 3 you tell us that you've given evidence to the Select 3 Q. So it was that that led to you taking proceedings? 4 Committees and you tell us of the differences of opinion 4 A. It wasn't exactly the grin but it did help. 5 that have arisen between you and the police and 5 Q. I see. Can I move to the question of the reaction of 6 Baroness Buscombe and the PCC. I don't need to dwell on Associated News when you've been dealing with them, and 6 7 7 that in any detail, that's all set out in your I'm looking now at paragraph 49 of your witness 8 8 statement. statement. What has been the position of 9 And then you tell us more recently, under the 9 Associated News? 10 10 A. I received a telephone call from Liz Hartley, who is the heading "Further phone hacking developments" --11 LORD JUSTICE LEVESON: Just before you get there, here is 11 in-house solicitor or one of the in-house solicitors at 12 something that I think it's just worth asking Mr Lewis 12 Associated News. I'd dealt with her before when she was 13 to cope with. That is the reaction of the PCC to the 13 in private practice on a completely unrelated matter 14 concerns that were being expressed, and that is 14 for -- she was acting for another newspaper and I was 15 identified in your statement, and did itself lead to 15 acting for an individual, and certainly I think it was 16 libel proceedings and had other consequences that are 16 about 6 o'clock or something, I picked up my -- my 17 set out in your statement, which may be relevant when 17 direct line was ringing and she said effectively, "You 18 one considers the PCC. It may be you're going to come 18 remember me", and then I was told that, you know, 19 19 back to that. Paul Dacre wouldn't hesitate to sue me if I suggested 20 MR BARR: Yes, sir. 20 that the Daily Mail was involved in phone hacking. 21 You tell us about further developments, how you 21 Q. Was that in relation to a specific case or was that 22 picked up practice in London and have acted for phone 22 a general warning? 23 hacking victims here in London since then. 23 A. I think that was -- that was supposed to be a general 24 24 Moving to the question of the proceedings you warning. It related to a conversation I'd had with 25 brought against, amongst others, the PCC, it is right, 25 a journalist when I said that phone hacking wasn't Page 37 Page 39 isn't it, that those led to a public statement being 1 1 simply related to one newspaper. In a way, I feel sorry 2 2 for the News of the World, or certainly the made by the PCC? 3 3 News of the World's readers, because it was a much more A. The public statement on behalf of the PCC and on behalf 4 of Baroness Buscombe, who are second and third 4 widespread practice than just one newspaper. It was 5 5 defendants in libel proceedings I brought. just simply that their inquiry agent, Glenn Mulcaire, 6 6 Q. Perhaps you could tell us in a nutshell what you had written things down and kept the evidence. The fact 7 considered was the problem with the PCC's approach to 7 that evidence doesn't exist in written form doesn't mean 8 matters? 8 to say that the crime didn't happen. 9 9 LORD JUSTICE LEVESON: But is that your supposition, your A. Baroness Buscombe was the guest speaker that year at the 10 evidence-based conclusion? What is that? Society of Editors' annual dinner at their conference in 10 11 2009 and she delivered a speech very much like -- it's 11 A. Well, it's evidence-based conclusions on the basis --12 still available on the Internet -- very much like 12 certainly on a civil basis of what I'm being told by 13 13 clients and taking instructions from them as to whether Neville Chamberlain: I have in my hand almost a piece of 14 paper -- there was a clue -- what I needed to do, and 14 or not stories are written that could not have got to 15 some emails to confirm it, which is the modern take on 15 newspapers in any other way. 16 Chamberlain, effectively talking -- you've heard 16 I think it's important to understand the whole 17 17 nature of phone hacking, just as a sort of side issue, evidence about this conversation between 18 18 because people still have this misconception that Detective Sergeant Maberly and he then was and someone 19 19 a journalist could not have got the whole story from else, it was me, and basically we've heard from 20 Assistant Commissioner John Yates and that the truthful 20 phone hacking and therefore didn't get the story from 21 21 evidence was that which was given by John Yates, phone hacking. Phone hacking might only give two or 22 22 effectively saying that I was a liar. three parts of the jigsaw, but it might suggest that 23 23 She went on to finish her speech by saying I've done such-and-such a person will be at such an address, or 24 two things. I've reported this to John Whittingdale, so 24 such-and-such a person is speaking to somebody else, so 25 25 that they can correct records, and then finished by the journalist then knows which address to go to, or who

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- 1 they're speaking to or who they're having a relationship 2 with, or maybe even luckier, that they find a specific 3 quote of something. 4
- And what phone hacking -- voicemail -- simply remote 5 voicemail interception, what it enabled people to do was just to pry on things. It was too easy to do. I mean,
- 6 7 journalists found it too easy to do, and therefore
- 8 I don't think they necessarily thought of it as any
- 9 worse, certainly at the beginning, than driving at 35
- 10 miles an hour in a 30 mile an hour zone.
- 11 MR BARR: I understand your answer, but does that mean you
- 12 can't tell the Inquiry of any hard evidence?
- 13 A. It depends what is meant by hard evidence. People who
- 14 have provided information have said these are the
- 15 inferences. It's a question that I suppose until the
- 16 judge has decided that something is accepted, it's only
- 17 evidence and sometimes it might be inferential.
- 18 Q. I see. Can we move now to the treatment of you by the
- 19 Daily Mail, an Associated News title, in the press. I'm
- 20 looking at paragraph 57 of your statement. You tell us
- 21 that Amanda Platell has written about you in her column
- 22 in the Daily Mail on two occasions and you tell us that
- 23 the coverage is included describing you as having
- 24 a "sanctimonious face on the BBC"?
- 25 A. I didn't know whether she meant my face was only

## Page 41

- 1 sanctimonious when it was on the BBC or generally and
- 2 she just didn't like the BBC, but I suppose she couldn't
- 3 help herself but to put to the two -- to have an
- 4 anti-BBC jibe in there as well.
- 5 O. And you were accused, weren't you, of being a "greedy
- 6 lawyer" in relation to the Dowler settlement?
- 7 A. Absolutely. Actually, what happened, I telephoned --
- 8 after I found that out, I telephoned Dan Tench who is
- 9 a solicitor at Olswangs who was acting for News
- 10 International, who were negotiating the Dowler, or had
- 11 negotiated the Dowler settlement with me, to say, look,
- 12 the Daily Mail is writing an untrue article because the
- 13 gist of the article was that although £3 million had
- 14 been offered by News Group, the greedy lawyer, me, was
- 15 asking for more money, and that just wasn't true. It
- 16
- wasn't true.
- 17 The reason it wasn't being put out was because
- 18 theres were i's to dot and t's to cross in the agreement 19
- and the timing of the public announcement was in the 20 hands of News International to put out. But because of
- 21
- that, Amanda Platell just took it on herself to do a bit
- 22 of lawyer bashing.
- 23 Q. And the result, you tell us, of taking issue was the
- 24 story was taken down?
- A. When I telephoned the night lawyer at the Daily Mail and 25

# Page 42

- said, "Look, that's just not true", and they called me
- 2 back about ten minutes later and said, "It's been taken
  - off our website".
- 4 Q. Moving now to the News of the World and their treatment
- 5 of you, I'm now looking at paragraph 56 of your
  - statement, you tell us that you repeatedly called for
- 7 Rebekah Brooks to resign, and we know that she
- 8 eventually did do that. You say that during the time
  - you were calling for her resignation, you were:
- 10 "... warned by a newspaper source that Rebekah had 11 said she would get me back not in her newspaper (which 12 would be too obvious) but in a competitor."
- 13 You've mentioned the adverse coverage in the
- 14 Daily Mail. Did that come after you were told of this 15
  - comment or before?
- 16 A. I think that came after. There was a -- there were
- 17 a number of things that happened after that. I never
- 18 chose to be a public figure. I suddenly became a --
- 19 I acted for people who were the story, and suddenly
- 20 became part of the story myself. All of a sudden I got
- 21 approached by various newspapers that they were running
- 22 stories about this aspect of my private life or that
- 23 aspect of my private life, and I think the second Amanda
- 24 Platell one was certainly after the conversation. I'm
- 25 not sure if the first one just preceded slightly.

## Page 43

- Q. Do you know of any evidence which links the threat that 1
- 2 Rebekah would get you back to that coverage or not?
- 3 A. No. I have no direct -- no direct knowledge. I do know
- 4 Amanda Platell was, I think, the editor of the failed
- 5 newspaper Today, and therefore there would be reason to
- 6 think that she might have had some knowledge or
- 7 association with Rebekah Brooks.
- 8 Q. Your statement touches upon the issue of surveillance,
  - but I'm not going to deal with that today for the
- 10 reasons which were discussed at the outset of the 11
  - hearing.
- 12 Is there anything that you would like to say to
- 13 Lord Justice Leveson at this stage about what you would
- 14 like to see happen to regulation of the press as
- 15 a result of this Inquiry?
- 16 A. Well, I suppose there is. And it almost echos what
- 17 Lord Justice Leveson was saying at the start of this
- 18 Inquiry, because what is portrayed is a stark choice,
- 19 a black and white choice between state regulation and
- 20 self-regulation, and in fact everybody knows that we
- 21 must avoid state regulation in terms of this Trotskyite,
- 22 Stalinist, Nazi minister of propaganda that says
- 23 newspapers can --
- 24 LORD JUSTICE LEVESON: That covers a fair amount of
  - political geography.

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A. Yes, I was going to add Middle Eastern despots as well, 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.

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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

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 1 LORD JUSTICE LEVESON: Mr Lewis, this is obviously something

- you've thought about. And your experience acting in
- 3 these cases will obviously give you a particular
- 4 perspective. But there must be a balance between
- 5 freedom of expression and privacy, which is what you've
- 6 talked about earlier on in your evidence. Where do you
- 7 say that balance should be?
- 8 A. Well, I think it was rather helpful that I was almost
  - a defendants' lawyer, so I acted for the British
- 10 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.
- 13 Acting on CFAs for them, defending their right to speak
- 14 out. I've acted as advocate in the Court of Appeal for
- 15 Adakini Ntuli who sought the right to speak out,
- 16 effectively a story telling about her relationship.
- 17 There's always going to be a balance and there are
- always going to be difficult cases where that balance is
- 19 harder to see, but if you suggested that actually what
- 20 was happening was -- the same facts can give rise to
- 21 different legal situations. So, for example, if you
- 22 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
- 25 which is espousing family values, really what you're

- doing is exposing his hypocrisy, albeit that some of the
- 2 more popular newspapers might be more salacious in their
- details and talk about a Chelsea football strip that he
- 4 was allegedly wearing, although I understand he wasn't
- 5 actually wearing it, but it was a good story -- is
- 6 different, I would say, than, say, a proper footballer
- who has no public persona. You heard Garry Flitcroft
- 8 yesterday, no public persona at all, had never made any
- 9 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
- 12 curtains over something, those things that happen behind
- 13 curtains shouldn't be pried into unless there's a very
- 14 good reason to do so.
- 15 LORD JUSTICE LEVESON: But some of the things which have
- been exposed by the good work of the press have indeed
- 17 taken place behind curtains.
- 18 A. Well, they would come under the very good reason to do
- 19 so.
- 20 LORD JUSTICE LEVESON: And that leads on to another
- 21 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.
- 25 Have you thought about some alternative mechanism? And Page 48

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- 1 if so, where are you going to get the paragon of virtue 2 who is going to be able to decide those cases? 3 A. Well, I mean I have thought of it. Look, I have the
- 4 advantage of being a Manchester lawyer rather than 5 a London lawyer, and therefore -- and possibly not as 6 snobbish about the fact that libel cases or privacy 7 cases can only be decided in courts 13 and 14 in the 8

Queen's Bench Division.

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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 12 Manchester County Court if it was in Manchester, or wherever. If they defamed you in a small way or invaded 14 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

difficulty is that the present system gives this

- 2 high-option thing that says, well, if you want to sue
  - for -- you know, if you want to the sue for an invasion
- 4 of privacy, you have to be prepared to spend £500,000 or
- 5 £600,000, you will only recover £400,000 in costs and
- 6 you might recover damages of £100,000, so in order to
- 7 protect your privacy, you only have to lose £100,000.
- 8 The fact that anybody can say "You only have to lose
- 9 £100,000 in order to win a case" shows that the system

10 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

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- one of the big issues is really access to justice. You 1
- 2 know, we have a political move at the moment to abolish
- 3 CFAs in insurance. It might be that the base costs are
- 4 too high because of the work that has to be involved,
- 5 but simply abolishing conditional fee agreements and the
- 6 ability to have insurance, ultimately it leads to people
- 7 not being able to bring cases at all, and people need to
- 8 be able to -- you know, it goes back to the McLibel
- 9 case, the jurisprudence in Strasbourg, the judgment in
- 10 the European Court, talked about the equality of arms --
- 11 LORD JUSTICE LEVESON: But that might mean that one should 11
- 12 find some other mechanism to mediate some of these
- 13 claims without using the structures of the court.
- 14 A. Well, in every field of law, apart from reputation,
- 15 although even with -- I have mediated libel claims not
- 16 between newspapers, between -- I was acting for the
- 17 defendant for the National Health Service litigation
- 18 authority for a defamation claim, I was acting for
- 19 a defendant for a defamation claim brought by a doctor.
- 20 There was a mediation. I think the total costs on each
- 21 side was a four-figure sum. The claimant was persuaded
- 22 that he would drop his claim and the defendant agreed to
- 23 publish some sort of correction rather than apology as
- 24 to what had happened.
- 25 The formalisation of being able to do that -- the Page 50

- 1 it's for the very rich, or people who can get CFAs. And
- 2 the idea that we will then abolish -- we haven't
- 3 abolished CFAs, but we're in the process of abolishing
- 4
- 5 LORD JUSTICE LEVESON: Yes, I understand the arguments about
- CFAs and I understand the cost of litigation. What 6
- 7 I was really asking about was other mechanisms for the
- 8 resolution of these disputes, speedily, effectively, and
- 9 without the expense that is presently being incurred,
- 10 and you've given us --
  - A. I think I would just add the difficulty is this, as you
- 12 will see from this Inquiry. The difficulty is always
- 13 going to be that there is then an inequality. So that
- 14 if, for example, one of the national newspapers says
- 15 something about your client, your client decides that
- 16 he'll take this cheap option and represent himself,
- 17 there is nothing to stop the newspaper instructing
- 18 leading counsel to represent them, then it becomes an
- 19 inequality --
- 20 LORD JUSTICE LEVESON: It depends whether it follows the
- 21 adversarial model that we're all so used to.
- 22 A. No, I understand that, but then what happens inevitably
- 23 will be that there will be judicial reviews, et cetera,
- 24 and diversions into litigation that beat the claimant
- 25 up. I mean, the claimant -- see, one of the ways to

1 matters that arise from this. Two are very brief 1 avoid the huge cost of, say, defamation litigation would 2 2 reputational matters concerning Ms Elizabeth Hartley and be for the press not to defame people. 3 3 LORD JUSTICE LEVESON: Yes. Amanda Platell. I'm happy during the adjournment to 4 4 A. The way to avoid invasion of privacy is not to invade give the questions which I would respectfully ask that 5 their privacy. 5 Mr Barr puts to Mr Lewis. If not, I would wish to make LORD JUSTICE LEVESON: I understand that, Mr Lewis, but 6 an application to you under Rule 10. 6 7 there has to be a balance, hasn't there, because there LORD JUSTICE LEVESON: I think the first thing is you should 8 8 are always going to be difficult cases. There are have the chance to speak to Mr Barr. 9 always going to be issues of where the line is drawn, MR CAPLAN: Thank you. 10 LORD JUSTICE LEVESON: And see whether we can do that. and I recognise the problem. One way of utterly 10 MR CAPLAN: Thank you. 11 undermining and doing away with the need for complex 11 MR DAVIES: I'm afraid I have a similar point and I'll do 12 personal injury road traffic litigation is for people 12 13 not to have accidents, but that's not what happens in 13 the same thing. 14 life. 14 LORD JUSTICE LEVESON: Do the same thing, we'll have five 15 So I understand the ultimate aim, but I also 15 minutes now --16 recognise that in pursuing what may be very important 16 MR CAPLAN: Can I mention one other matter which doesn't 17 stories, there are judgments to be made and there has to 17 relate to questions? 18 be a mechanism whereby the judgment that is made by the 18 LORD JUSTICE LEVESON: Yes. 19 journalist or the press can be challenged, but that 19 MR CAPLAN: It's simply this, that Mr Lewis mentioned in his 20 doesn't mean that there hasn't got to be a judgment made 20 evidence that he had been given a copy of a CD in which 21 21 Glenn Mulcaire was coaching a Mr X, whose identity has in the first place. And if you always default and never 22 do anything that is even the remotest bit risky, then 22 not been made public, in relation to how to hack 23 you potentially get into --23 a mobile phone and Mr Lewis said that that individual A. No, I understand that, but -- I pursue libel reform, I'm 24 24 wan an employee at the time of Associated Newspapers. 25 a member of the Libel Reform Coalition because of people 25 LORD JUSTICE LEVESON: Yes. Page 53 Page 55 like Peter Wilmshurst who stand up to libel bullies and 1 MR CAPLAN: Can I just say I think at the time he was an 1 2 2 need to be represented. Now, there is a system where employee of the Evening Standard and I think the 3 3 people should be able to defend claims that are brought allegation is that he was being --4 against them, otherwise you have the chilling effect, as 4 LORD JUSTICE LEVESON: Mr Caplan, I understand the point. 5 5 it's known, but it can have the reverse chilling effect I am very keen to make sure that (a) the evidence is 6 6 if people can't afford to advance a claim to stop accurate, but (b) that nothing is done to create a risk 7 something that's being said about them. 7 of the type of which, if you consider it for a moment, 8 Sometimes litigation is the only way forward and it 8 you will readily appreciate. Could I ask you to just 9 has to be pursued. 9 have a word. 10 Of course, any alternative dispute resolution 10 MR CAPLAN: I will. LORD JUSTICE LEVESON: And let's find a mechanism to deal 11 schemes that work are to be welcomed, and if ADR can get 11 12 rid of 90 per cent of the claims -- it requires 12 with this issue that is appropriate and doesn't run any 13 a willingness on both sides of the fence. You know, the 13 risks. 14 14 MR CAPLAN: Indeed. It's just whether his name is in the newspapers -- for example, they talk about, oh, those 15 greedy lawyers, they pursue claims on a CFA and they're 15 public domain and whether or not the Tribunal sees it 16 looking for this 100 per cent uplift. If after a claim 16 fit to release it. It's just that if there is a slur on 17 is made to them they admit it because the merits support 17 other employees --18 their admission, then no 100 per cent uplift will ever LORD JUSTICE LEVESON: I understand that, I understand that 18 19 be awarded on a detailed assessment. The costs will be 19 I think the five minutes is going to be very well spent 20 a lot lower. Sometimes the newspapers fight and are 20 this morning. 21 21 entitled to fight on a matter of principle, but as are (11.30 am)22 22 the claimants, and that's why we have courts. (A short break)) 23 LORD JUSTICE LEVESON: Yes, I understand that. Thank you 23 (11.41 am) 24 Thank you very much. Further questions from MR BARR 25 MR BARR: The short adjournment was very useful and as 25 MR CAPLAN: I'm so sorry, but I'm afraid there are a few Page 54 Page 56

- 1 a result of it I think it's proper that I put a couple
- 2 of short questions to Mr Lewis.
- LORD JUSTICE LEVESON: Right.
- 4 MR BARR: Mr Lewis, first of all can I take you back to
- 5 paragraph 49 of your witness statement, which deals with
- 6 the conversation you had with Liz Hartley about the
- 7 statement to the effect that Paul Dacre was someone who
- 8 would sue you. Was the tone of that conversation
- 9 friendly or not?
- 10 A. Businesslike, I would describe it as. I certainly took
- 11 it as an attempted warning and that's why I made a file
- 12 note of it. If it would have just been a funny
- 13 chit-chat "be careful", I wouldn't have been bothered to
- 14 do that. That's why I have the date of the
- 15 conversation.
- 16 Q. I have been provided during the short adjournment with
- 17 a copy of an article which I shall in a moment pass to
- 18 you. It was published in the Daily Mail on 4 February
- 19 2006. Once you've had an opportunity to have a look at
- 20 it, the question that I would like you to answer is: was
- 21 this conversation to do specifically with this article?
- 22 (Handed)
- A. That was -- I can see from the headline it was a part to 23
- 24 do with that, and that's what I explained before. I'd
- 25 been having a conversation saying that Associated was Page 57
  - involved. That was not the only case, but it was one of
- 2 the cases in the conversation with that particular
- 3 journalist.

1

- 4 Q. And so that we are clear, was the statement that
- 5 "Paul Dacre is someone who will sue you if you suggest
- 6 that we were involved in hacking" a statement that was
- 7 related to that article or was it of more general
- 8 application?
- 9 A. I took it as more general, but that was certainly the
- 10 background. But ultimately, I'm the lawyer acting for
- 11 an individual who's instructed me, the subject matter of
- 12 that article. He'd instructed me to pursue it. I am
- 13 not -- I hadn't been aware, previously, of the idea that
- 14 what you do is you'd have a go at attacking the lawyer 15
  - rather than the client. Call me old-fashioned.
- Q. Can I move on to the second point that I would like to 16
- 17 raise with you. It arises from paragraphs 56 and 57 of
- 18 your statement. This is the paragraph that deals with
- 19 the suggestion that Rebekah Brooks had said that she
- 20 would get back at you, but in a different newspaper, and
- 21 subsequent coverage in the Daily Mail. You described
- 22 the coverage already.
- 23 I'm told that there might be some lack of clarity on
- 24 the transcript. Just so that we are clear, do you have
- 25 any evidence that there is a link between

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- 1 Rebekah Brooks, Amanda Platell and the publication of --
- A. Sorry, I didn't offer any direct evidence that either
- 3 linked them or linked that evidence.
- 4 LORD JUSTICE LEVESON: And I didn't read the evidence as
- 5 suggesting that.
- MR BARR: That was my understanding as well, Mr Lewis, but 6
- 7 thank you for confirming that.
- 8 Sir, those are the questions that as a result of the
  - short adjournment I wanted to ask but I should also say
- 10 that I've had a word with Mr Davies, and he would like
- 11 to not ask questions, but he would like to say
- 12 something, and it may be that that's the best way of
- 13 dealing with this.
- 14 MR DAVIES: Yes. I had a discussion with Mr Barr, and the
- 15 conclusion was that it was probably better if I said
- 16 something rather than try to do it through questions,
- 17 but if you disagree, sir, then --
- 18 LORD JUSTICE LEVESON: Until I know what you're going to
- 19 say, I can't tell you whether I agree or disagree. Say
- 20 it and I'll tell you.
- 21 MR DAVIES: I will carry on. As a matter of background, I'm
- 22 afraid it raises a further difficulty about redactions
- 23 and indeed about the speed with which things are going
- 24 on to the Inquiry's website. It concerns paragraph 23
- 25 of Mr Lewis's statement. Mr Barr did ask some questions Page 59
- 1 about this. What paragraph 23 says, and it's referring

2

- 3 MR GARNHAM: (overspeaking).
- LORD JUSTICE LEVESON: Just pause, Mr Davies.
- MR DAVIES: Yes.
- 6 LORD JUSTICE LEVESON: There are issues.

back to a statement in paragraph 21 --

- 7 MR DAVIES: There are, and I'm going to be careful.
- 8 LORD JUSTICE LEVESON: I understand the issues. I'm on top
- 9 of the issues. I will cope with them.
- 10 MR DAVIES: Yes.
- LORD JUSTICE LEVESON: But I would prefer it if this 11
- 12 particular exchange was redacted from the transcript.
- 13 MR DAVIES: The one we're about to have?
- 14 LORD JUSTICE LEVESON: The one we're not about to have.
- 15 MR DAVIES: Ah, I see.
- 16 LORD JUSTICE LEVESON: And the one we've started. I would
- 17 be grateful if you would talk, please, to Mr Jay about
- 18 this over the short adjournment and we will see if we
- 19 can't resolve it.
- 20 MR DAVIES: Yes, sir. Sorry, it's a little difficult for me
- 21 to respond to that. Can I just mention this? Some of
- 22 what I'm concerned about is already spreading through
- 23 what I might call the new media, so to a certain extent
- 24 time is of the essence and I know there are difficulties
- 25 about --

1	LODD HISTOR I EVESON. Bi-la What he aring a de inter-	1	and the state of t
	LORD JUSTICE LEVESON: Right. What I'm going to do is let you speak now.	1	preparing your statement and giving up the time to come and give evidence. Thank you.
2	MR DAVIES: I hope I'm not going to tread anywhere	2	•
3	I shouldn't.	3	Questions by MS PATRY HOSKINS  MS PATRY HOSKINS: Good morning. Could you please state
4	LORD JUSTICE LEVESON: I'll ask Mr Jay just to have a quick	4	your full name to the Inquiry.
5	word with you. I'll stay in court. Just have a quick	5	A. Sheryl Gascoigne.
7	word. (Pause)	6	Q. Now you provided a witness statement to this Inquiry,
8	MR JAY: First of all, I've been asked to say that the	8	which hopefully you have in front of you.
9	witness statement may be best removed from the screen.	9	A. Yes.
10	LORD JUSTICE LEVESON: Yes.	10	Q. We can see that on the screen at URN30982. Oh, it's
11	MR JAY: Secondly, I think we can proceed with the next	11	already there.
12	witness and I can have a conversation certainly with	12	Before I ask you any questions about your statement,
13	Mr Rhodri Davies. I don't know if the next witness	13	can you just confirm that the contents of it are true to
14	concerns his clients at all. If she does, we may have	14	the best of your knowledge and belief?
15	to rethink. It may be I have to involve two other	15	A. Absolutely.
16	people in that conversation.	16	Q. I am going to ask you a few questions first of all about
17	LORD JUSTICE LEVESON: All right. Well, Mr Rhodri Davies,		your background, if I can. I'm sure that you need no
18	are you concerned to be present to hear the next	18	introduction and you yourself put it succinctly at
19	witness?	19	paragraph 3 of your statement:
20	MR DAVIES: No, I'm content to step out for a moment.	20	"To the general public, I am the ex-wife of
21	LORD JUSTICE LEVESON: Right. We'll carry on and if	21	Paul Gascoigne, the retired English footballer."
22	necessary we'll revisit it.	22	You explain at paragraph 4 in relation to that
23	This actually alerts us to a risk of which I've	23	relationship that Paul and yourself met in 1990, you
24	always been aware and which we've tried to manage, and	24	began a relationship in the summer of 1991, you married
25	we might have to get rather cleverer about how we manage	25	in 1996, you divorced in 1998, you have a son together,
	Page 61		Page 63
1	it.	1	who was born in 1996, and you have two children from
1 2	it. MR DAVIES: Yes.	1 2	who was born in 1996, and you have two children from a previous relationship, Bianca and Mason. That's all
2	MR DAVIES: Yes.	2	a previous relationship, Bianca and Mason. That's all
2 3	MR DAVIES: Yes.  LORD JUSTICE LEVESON: So we'll carry on with the next	2 3	a previous relationship, Bianca and Mason. That's all correct?
2 3 4	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	2 3 4	<ul><li>a previous relationship, Bianca and Mason. That's all correct?</li><li>A. (Nods head).</li></ul>
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	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	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	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?

- 1 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
- 4 know, hopefully how they can change and move forward to
- 5 helping victims.
- 6 Q. Thank you. I'm going to turn to press conduct whilst
- 7 you were in the relationship with Mr Gascoigne. You say
- 8 at paragraph 5 of your statement, for those who have it,
- 9 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
- 13 now?
- 14 A. Yes, it's not as bad as it was back then, obviously, but
- yes, no, that's true.
- 16 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
- 20 interest?
- 21 A. Mm.
- 22 Q. He was a very famous footballer, obviously, but they
- were interested in his private life, which means by
- 24 definition they were interested in you; is that right?
- 25 A. Yes.

- 1 win, so you just don't do it.
- 2 Q. Who told you that?
- 3 A. Paul's advisers.
- 4 Q. Right. So you didn't take action during that time?
- 5 A. No, no.
- 6 Q. Can we look at some of the articles. They're in your
- 7 exhibits, which you should find slightly further on in
- 8 the bundle. For the benefit of the technician --
- 9 LORD JUSTICE LEVESON: Do we need to put some of these
- 10 things up?
- 11 MS PATRY HOSKINS: Maybe I should ask Ms Gascoigne that
- 12 question.
- 13 LORD JUSTICE LEVESON: Yes.
- 14 MS PATRY HOSKINS: You've put them in your exhibits. Would
- you rather that we didn't go through them again?
- 16 A. I don't mind. If it helps the Inquiry, then ask me.
- 17 Q. You made allegations that they contain untruthful and
- 18 hurtful allegations, and I only wanted to ask you so
- 19 that you would have the chance to comment on any
- allegations that you found to be particularly untruthful
- 21 or hurtful. Is there anything that you would like to
- draw to the Inquiry's attention?
- 23 A. It's just generally the fact that, you know, I was only
- 24 with him for the money. Are you just talking about the
- 25 early days before the marriage or --

- 1 Q. And you explain at paragraph 10, which you should find
- 2 just over the page, that right from the beginning, you
- felt that the press latched onto the idea that you were
- 4 some kind of money grabber who was at the heart of
- 5 Paul's problems. I'll go through some of the articles
- 6 that were written about you during that time in
- 7 a moment, but why do you think they alighted on this
- 8 issue as being representative of who you are or who you
- 9 were?
- 10 A. I don't know. You'd have to ask them. I have no idea
- why they would say that because you're in
- 12 a relationship. Maybe because I was a single mother
- 13 with two children, maybe it was just an easy -- I was an
- easy target.
- 15 Q. So what was the reality of your relationship with Paul?
- 16 A. I was very much in love with Paul.
- 17 Q. At paragraph 11 of your statement, just further down the
- page, you explain that until 2010, so for some 19 years,
- 19 you decided not to respond to the articles at all. You
- 20 explain that you didn't firstly feel in a position to do
- so, and you thought it might have made things worse. In
- 22 what way do you think that taking action at that stage
- 23 might have made things worse?
- 24 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

- 1 Q. No, the entire period that you were with him.
- 2 A. Yeah, that I only married him to get his money, and that
- 3 when we divorced, that, you know, the reports I got
- 4 millions, ranging from 10 to 17, sometimes it was only
- 5 8, but, you know, the reality was far, far from that.
- 6 So yeah, so that's just kind of what I've become
- 7 accustomed to being known as.
- 8 Q. Is your complaint that much of what was said was
- 9 untruthful or inaccurate?
- 10 A. Yes, untrue --
- 11 Q. And hurtful to you?
- 12 A. Obviously hurtful to me and my children, but yes,
- inaccurate and untrue.
- 14 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?
- 19 A. Rarely, rarely. But if they did and you didn't --
- 20 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
- 23 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

- 1 would be oh, she's had not -- he's not been anywhere
- 2 near, she's had no contact with him. It's almost like
- 3 you said that so you ended up saying nothing at all and
- 4 the old cliche, "I have no comment".
- 5 Q. Would it be your case that in most cases they would fail
- 6 to contact you or --
- 7 A. Yeah, no, most cases, especially in the ones that I took
- 8 the libel action on more recently.
- 9 Q. So still dealing with this period, this period when you
- 10 were with Paul, you tell us in your witness statement,
- 11 paragraph 13, that you did have one experience of making
- 12 a complaint to the Press Complaints Commission, the PCC? 12
- 13 A. Yeah.
- 14 Q. You say you can't remember in relation to which article
- 15 it was, but can you tell us a little bit about your
- 16 experience of making that complaint?
- 17 A. I didn't know that the PCC existed, I didn't know what
- 18 it was, and I was introduced to Guy Black when I --
- 19 I can't remember his position, but he was with the PCC
- 20 and I was -- someone brought my attention to it. So the
- 21 next time I felt really aggrieved by something, I took
- 22 it up with them and they just -- you know, it just
- 23 didn't go anywhere. It was just like, "We can't do
- 24 anything about it", so I kind of got that opinion from
- 25 a lot of people, that the PCC was a waste of time,
  - Page 69

- a neighbour said some comment about loving the holiday 2 pics, so I was just embarrassed, obviously. But again
- 3
  - I was told there was nothing we could do about it.
- 4 Q. You also say at paragraph 23 just over the page that
- 5 whilst you were in a relationship with Paul, the press 6
  - photographers followed your every movement?
- 7 A. Yeah.
- 8 Q. In particular you say freelance photographers used to
- 9 camp outside the house and follow you by car whenever
- 10 you left the house.
- 11 A. Mm-hm.
- Q. "It got so bad that I used to try and lose the
- 13 photographers by driving round roundabouts several times
- 14 or by driving into a housing estate so as to lose them."
- 15 The dates you indicate there are 1991 to 1998. Is
- 16 that the period when it was particularly bad or is that
- 17 the only period when that kind of behaviour was
- 18 occurring?
- 19 A. No, that's when it was particularly bad, obviously.
  - Q. You explain that you did report this to the police but
- 21 were told that they couldn't take much action?
- 22 A. I drove into the police station with one following me,
- 23 and all the time I was getting out the car I was
- 24 thinking what am I doing? They're going to have
- 25 a picture of me outside the police station. What story Page 71

- 1
- 2 Q. Can you remember, even though you can't remember what
- 3 article it relates to --
- 4 A. No, I can't.
- 5 Q. -- can you remember roughly what time period that
- 6 relates to?
- 7 A. It would have been pre my wedding. It was pre-1996.
- 8 And obviously when Mr Black was still there. I don't
- 9 know how long he -- he was there, or --
- 10 Q. Okay. That's helpful. It's not just the articles that
- 11 you refer to, of course, in your statement as being
- 12 relevant. It's also other types of press misconduct so
- 13 I'm going to ask you about that. You'll find your
- 14 statement deals with this at paragraph 22 onwards if we
- 15 turn back in the bundle. You take us through a number
- 16 of examples of conduct that you consider to be
- 17 unacceptable and intrusive and the first one is at
- 18 paragraph 22. You say -- well, over the years you find
- 19 that the press has a blatant disregard for privacy. One
- 20 example that sticks in your mind is in 1995 when the
- 21 press took pictures of you sunbathing topless on
- a private beach whilst you were on holiday with Paul. 23 What was your reaction to finding out that they had done
- 24

22

25 A. I obviously didn't know about it until I got back and Page 70

- 1 are they going to make up about the fact I'm in a police 2 station? But I was almost about to give birth then and
- 3 I said to them "Something bad is going to happen here".
- 4 Q. You were pregnant?
- 5 A. Yes. At that time they were following me constantly,
- 6 there was no let up. I think they were waiting for me
- 7 to hopefully give birth on a pavement or something but
- 8 I drove straight into a police station, said please you
- 9 have to do something, I'm taking risks, he's taking
- 10 risks, something's going to happen and I was told
- 11 there's nothing we can do unless he touches you.
- 12 Q. Okay. You say this, though. You say:
  - "I did notice a slight change after Princess Diana's
- 14 death in 1997."
- 15 What do you mean by a "slight change" and how long
- 16 did that last?

13

- 17 A. I think there was some ruling, I'm sure you all know
- 18 better than me, that they weren't allowed to follow you
- 19 as much or sit outside or come that close to your
- 20 vehicle if they were following you, or something like
- 21 that, so definitely it helped. I used to have them
- 22 outside the house, you know, where we lived at the time, 23 the children -- I lived -- they could just stand right
- 24 outside the front lawn and there was nothing I could do
- 25 about it. I mean, after the incident in 1996 at Page 72

18 (Pages 69 to 72)

- 1 Gleneagles, I was crawling around on my hands and knees,
- with my arm in a sling, just to avoid the photographers.
- 3 And I again called the police and asked them to -- just
- 4 asked them -- and they said, "There's nothing we can do,
- 5 it's a public land".
- 6 Q. So you were crawling around on your hands and knees so
- 7 they couldn't take pictures of you through the window?
- 8 A. Yeah, I'd bought a show home and the curtains didn't
- 9 close, so I couldn't actually close the curtains
- downstairs in the lounge.
- 11 Q. I'm still dealing with the time when you were in
- 12 a relationship with Paul, but you do say at paragraph 24
- that this kind of intrusion hasn't been limited to that
- period. You say that fairly recently a photographer
- followed you in your car all the way to a shopping
- centre and he stopped following you only after you
- contract and no stopped following you only after you
- 17 questioned what he was doing. How recently was that?
- 18 A. That's a couple of years ago, yeah, so not in the last
- 19 few months. A couple of years ago.
- 20 Q. I'm reminding you again that we're still dealing with
- 21 the time when you were with Paul. I've been asked to
- 22 ask you a number of questions, and the first one is
- obviously you got married to Paul in 1996 and it has
- been widely reported that you sold the rights to the
- 25 pictures of your wedding to Hello magazine.

- 1 MS PATRY HOSKINS: What was the impact -- we've talked about
- 2 the articles that were published, we've talked about the
- 3 cars that were following you, we've talked about people
- 4 trying to take pictures through the front windows of
- 5 your house. What was the impact on your children at the
- 6 time?
- 7 A. It was tough for them because we lived on a small
- 8 housing estate in a cul de sac where they were able to
- 9 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
- 15 you". So, you know, not a great position for them. And
- it was tough on them at school, especially my daughter,
- 17 being the eldest.
- 18 Q. Can you tell me about that? Why was it tough on them at
- 19 school?
- 20 A. Because people -- parents -- I'm sure the children don't
- 21 particularly read that many newspapers at that age, but
- 22 parents do and things are said, and so, you know,
- 23 children are told things and maybe say things that --
- you know, the children at school, and unfortunately for
- 25 them, how our life was being portrayed was obviously

#### Page 75

- 1 A. Yes.
- 2 Q. That's right?
- 3 A. Yes, yes, correct, yeah.
- 4 Q. Some might say that by selling an intimate private event
- 5 like a wedding means that you are basically putting your
- 6 private life out there, that you invite and/or condone
- 7 media interest in you. Do you have any views on that?
- 8 A. I agree to an extent of that, but our lives -- it was
- 9 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
- 12 anyway, so.
- 13 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 14
- 15 2002 and were paid money for that. Is that correct?
- 16 A. You'd have to show me. I don't know -- what ones are
- 17 they?
- 18 Q. I struggled to find them. We'll find them.
- 19 A. No, I don't know.
- 20 Q. Perhaps the relevant party will provide --
- 21 A. What, Paul or me?
- 22 Q. Despite extensive searching this morning, I was unable
- 23 to find them. Perhaps we can ask the relevant party to
- provide them, if they wish to do so.
- 25 LORD JUSTICE LEVESON: Yes.

Page 74

- 1 very different to how it was, and how -- for them how
- 2 Paul was being portrayed was very different to how he
- 3 was becoming.
- 4 Q. What about the impact on you? How did you feel about
- 5 the articles, being followed around at that time?
- 6 A. I always used to just say to the children, "We know the
  - truth, the people around us know us, know the truth",
- 8 and just to hold our head up high.
- 9 Q. I am now going to turn to the period since 2009. By
- 10 2009, you've been divorced for 11 years, and yet you say
- the media coverage of you continued?
- 12 A. Mm-hm.

7

15

- 13 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?
- 17 A. I think maybe people were obviously giving stories,
- inaccurate and untrue stories, so they are happy to
- 19 print it.
- 20 Q. I've been asked to ask you again about your book,
- 21 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
- 25 media attention again.

- 1 A. Yes.
- 2 O. Is that right?
- 3 A. Before -- no, not just because of the book. It's been
- 4 ongoing throughout, so I don't think the book -- it was
- 5 my way of being able to -- it was my right to reply on
- 6 I think it was Paul's third book, so the children and
- 7 I felt enough was enough and it was time to put our --
- 8 I was going to say our side, but it's hard to say our
- 9 side when it's the truth.
- 10~ Q. I've also been asked to ask you about appearing in the
- 11 television programme I'm a Celebrity ... Get Me Out of
- Here. Could that have fuelled the interest in you as
- 13 well?
- 14 A. As I said, the interest was still there.
- Q. Why did you decide to take part in that televisionprogramme?
- 17 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
- 20 my son rightly said, you know, that's a large amount of
- 21 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.
- 24 Q. But at about this time, 2009, when the book was
- published, you know that a number of articles were Page 77

- 1 take?
- 2 A. I just thought I need to do something and I was already
- 3 with Clintons, my lawyers, and they had all the factual
- 4 evidence there, so it just made sense to go to them and
- 5 say, look, I need to do something about it, you know
- 6 it's not true, you have it all here, can we do something
- 7 about it? So I was introduced to Roddy, my libel
- 8 lawyer, and the rest, as they say, is history.
- 9 Q. At that stage, did you ever consider making a complaint to the PCC or engaging with the PCC in any way?
- 11 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
- 14 nothing.
- 15 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
- 19 took action in relation to; is that right?
- 20 A. Yes.
- 21 Q. You tell us that in all of these actions --
- paragraph 17, I should say -- you tell us that in
- 23 relation to all of these actions, you were successful,
- 24 managing to obtain apologies in all but one of the
- 25 cases, a statement in court, costs and damages.

- 1 published that you were very concerned about, and you
- tell us in your witness statement, particularly at
- 3 paragraph 14 onwards, that you decided that this time
- 4 enough was enough, you weren't going to take the
- 5 previous course of action, which was just to keep
- 6 a dignified silence, you were going to do something
- 7 about it. Can I understand why you decided to do
- 8 something about it?
- 9 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
- 13 response was fantastic. So it gave -- probably gave me
- $14 \qquad \text{the strength and I thought, no, I can actually fight} \\$
- this, somebody will listen to what I've got to say and
- may hopefully believe me.
- 17 Q. You also say that your children were supportive of you
- 18 taking action.
- 19 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
- 21 them it was a relief.
- 22 Q. What did you decide to do in respect of the articles
- that had been published about you?
- 24 A. Sorry, say that again.
- Q. What did you decide to do, what action did you decide to Page 78

- 1 However, you say, the real remedy would have been for
- 2 them not to be published in the first place.
- 3 A. Of course.
- 4 Q. Can you tell the Inquiry, please, why an apology is
- 5 important to you and why a statement in open court is
- 6 important to you?
- 7 A. The statement in open court to me was more important
- 8 because I felt it was then out there and more people get
  - to see it because obviously the apologies that are
- printed are minute, so people don't really see what's
- in, you know, an apology that's printed, but for me the
- statement in court was really important and I pushed
- hard and in fact a couple of cases, when damages were
- offered, I took less so that I could have a statement in
- 15 open court.

9

- 16 Q. I understand. In relation to the apologies, you've
- already touched on that, but were you satisfied by the
- way in which the apologies were published in the
- relevant newspapers?
- 20 A. No, of course not. I mean, how can you be happy with,
- 21 you know, a double page spread in the centre and a front
- page, and your apology is on page 14? I'm sure you've
- heard it all before, but it's tiny. So of course not.
  - Why is it not given the same prominence? They actually say they'll give it similar prominence. It's nothing

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20 (Pages 77 to 80)

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A. Yes.

Is that correct?

- 1 like that.
- 2 Q. Is there anything you'd like to add on that? The judge
- 3 will be interested in your views as to what changes
- 4 could be made in respect of that issue. Do you have any
- 5 views on how apologies should be dealt with?
- 6 A. Why aren't they given the same prominence?
- 7 Q. Did taking legal action make a difference to the -- did
- 8 it actually mean that people, newspapers, published
- 9 fewer stories about you?
- 10 A. Yes. I think it -- apart from the Daily Star that in
- 11 the middle of taking action on two stories they then
- 12 printed a third halfway through our action, which seemed
- 13 crazy, so we just added that one on. I think since
- 14 then, yes, it's definitely -- I like to think it's made
- 15 them think, and I like to think that maybe now they're
- 16 beginning to realise that it's not true what they're
- 17 being fed or what they are being told or what they've
- 18 decided to write for all these years. You know, one of
- 19
- the cases against the Sunday Mirror that almost went to
- 20 court, the onus is on you as the victim to prove your
- 21 innocence. It's not the journalist's job to prove what
- 22 he's printed is true, it's your job then to prove that
- 23 that's not the case.
- 24 Q. Yes.
- 25 A. And our evidence went in and it was -- you know, we had 25 Page 81
  - a relationship with Rebekah Brooks? 1

having to find that sort of money.

- 2
- 3 Q. By relationship I mean a friendship.
- 4 A. Yes, absolutely.
- 5 O. How did that friendship come about?
- 6 A. When I left Italy -- when I moved to Italy with Paul, so

"It is important that the Inquiry understands that

taking legal action is not an easy decision. Pursuing

expensive [you tell us], time-consuming and stressful.

libel proceedings against a newspaper is extremely

In the most recent libel claim I pursued against the

Mirror I was ultimately successful but the case only

summer of 2010 (shortly before trial), I had to put my

house on the market in order to fund my legal costs."

Q. "Fortunately the case settled just before it was sold,

A. Absolutely. I had to put the house on the market.

I was told that I needed to come up with £200,000, you

that amount of money? All my money is in my home, so

know, to go into court. So where was I going to find

the only way I knew how to locate that was -- I think

hoping that, you know, a single parent with three

the way and would be scared off at the prospect of

Q. It's not in your statement, but your book, Stronger,

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indicates that you have had at least in the past

that's the problem. I think that the Sunday Mirror were

children wouldn't perhaps have the backbone to go all

but this demonstrates just what is at stake."

settled just before trial. In the meantime, in the

- 7 that would have been 1992, there were things going on
- 8 that people didn't know about and the reasons that
- 9 I left Italy are now known, but at the time no one knew
- 10 that reason and I think Paul's advisers were very keen
- 11 to keep that under wraps. There was a lot of
- 12 speculation, "Why has she come away from Italy?" This
- 13 I know from hindsight. At the time I was just going
- 14 along with it.
- 15 So they -- and I think one of Paul's advisers knew
- 16 Rebekah, who at the time was just working on a magazine
- 17 for the News of the World, I think, she was in the
- 18 Sunday part of it, and they set up and sold a story --
- 19 maybe that's the one you're talking about.
- 20 Q. Maybe. I'll ask Mr Davies in a moment.
- 21 A. So they set the story up to say why I'd left Italy, but
- 22 it was all: this is all still fine, we're still
- 23 together, and then I met Rebekah -- I met her at I think
- Heathrow, and that's the first time I met her, and then
- 25 we flew out over to Rome together and just hit it off Page 84

1 huge evidence from witnesses, evidence from, you know,

- 2 from the media, we had evidence from all sources, you
- 3 know, bank statements, lawyers' letters, everything, and
- 4 the only evidence they had that they gave back to me
- 5 were phone messages. You know, phone -- taped phone
- 6 conversations of the people that had fed them the story.
- 7 And absolutely not one ounce of evidence to back up any 8 of it.
- 9 Q. Can I ask you a little bit about how you felt about
- 10 having to take this action, legal action, and what
- 11 impact that had on you?
- 12 A. I was scared, because obviously I understood if any of
- 13 the cases went to court, that there would be a jury, and
- 14 having already felt I was on the back foot because my 15 public persona was not good because I'd been labelled
- 16 this money-grabbing awful person, that I kind of was up
- 17 against it before I even got in there. So it was hard 18
- then, you know, financially, you know, you don't win 19 even if you get damages. As we've heard, the costs,
- 20 you're lucky if you get 60 to 70 per cent, you're lucky 21 if you get 70 per cent of your costs.
- 22 People think, oh, you sue, you get lots of money.
- 23 It's far, far from the truth.
- 24 Q. While we're on that, can I ask you about paragraph 21 of 24 25
- your statement, which deals with costs. You say: Page 82

- 1 immediately. And we had a friendship and it was purely
- a friendship. It wasn't a situation where I sold
- 3 stories. It didn't even enter my head. We did have
- 4 a good friendship and I considered her a very close
- 5 friend.
- 6 Q. Are you still friends now?
- 7 A. I haven't seen her or spoken to her since about 2000,
- 8 2001. I think it might be 2000. But I would still --
- 9 I wouldn't have a bad word to say about her personally.
- 10 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
- 15 feel that all of this has impacted on both you and your
- 16 children?
- 17 A. Wherever I go and I meet people for the first time,
- 18 I always feel I have to -- not explain myself because
- that would be a bit weird, to walk up and start saying,
- 20 "This isn't really me", but I try to be over nice, to
- 21 get across as quick as I can maybe the interpretation
- 22 they have of me is not true and I want to get rid of any
- 23 preconceived ideas they may have of me within the first
- sort of, you know, however many minutes I can. So it's
- 25 difficult, and the children -- it's difficult for them,
  - Page 85

- 1 a matter of law, I think that they have to prove that
- what they've written, if it's defamatory of you, is
- 3 true.
- 4 A. I thinking if you asked any lawyers --
- 5 LORD JUSTICE LEVESON: But that's not to say that anybody
- 6 would go into a case without amassing their own
- 7 evidence.
- 8 A. They do, though.
- 9 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
- 17 clear, it's black and white, and for that, I don't think
- 18 I'm going to disagree with you. But there are cases
- 19 where there could be issues which have to find a way of
- 20 being resolved.
- 21 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
- 24 put your concerns in relation to each.
- 25 The first, which it seems to me is the most serious

- 1 and friends, because they feel they have to -- you feel
- 2 you're constantly defending yourself and for them as
- 3 well it's difficult because they're having to do the
- 4 same.
- 5 Q. I understand. I don't have any other questions but I do
- 6 want to give you the opportunity to say anything you
- 7 want to say or to complete anything you might have
- 8 started and wanted to finish. Is there anything you'd
- 9 like to add?
- 10 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,
- 17 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
- 20 they have to prove, like you have to prove as a victim,
- 21 that it's not true? Why don't they have to prove that
- what they are printing is true?
- 23 Questions from LORD JUSTICE LEVESON
- 24 LORD JUSTICE LEVESON: Actually, interestingly enough, as 24
- $\,\,25\,\,$  a matter of law, that is the wrong way around. As
  - Page 86

- 1 of what you've spoken about, but you tell me, is
- 2 accuracy.
- 3 A. Yes.
- 4 LORD JUSTICE LEVESON: That there is no excuse for
- 5 publishing about you material that is demonstrably
- 6 wrong, or which, on checking, could be established to be
- 7 wrong.
- 8 A. Well, exactly. You know, such things as I'm made out to
- 9 be a bad mother because I've stopped Paul having contact
- with his son because I've changed my telephone number.
- 11 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.
- 18 LORD JUSTICE LEVESON: I understand. That's the first
- 19 point, accuracy.
- 20 A. Mm-hm.
- 21 LORD JUSTICE LEVESON: I entirely agree with the proposition
- which I think you've said, but if you didn't, you
- 23 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.

A. Yes, and the remedy has to be such a big enough 1 privacy aspect, except where it becomes intrusive, the 2 deterrent that they think twice about it. Because the 2 photographers and the rest --3 profit margin, it doesn't affect them, what they have to 3 A. Mm-hm. 4 LORD JUSTICE LEVESON: -- it's the accuracy. 4 LORD JUSTICE LEVESON: I understand. The second point 5 5 A. It's the accuracy and, yeah, if they start -- it's you've made is about privacy. 6 difficult for me now because I don't have that which 7 A. Right. 7 I used to have. If you were asking me that five, six 8 LORD JUSTICE LEVESON: But you help me, Mrs Gascoigne, if 8 years ago, then yeah, it's awful to be followed every 9 you will. Reading between the lines of what you've 9 time you go anywhere and you're having to, you know, 10 said, and please correct me if I'm wrong, it's: 10 lose photographers. But it's kind of like I never 11 "I recognised what I was getting into before I got into 11 really complained too much about it because it kind of 12 it, and I recognised that a loss of privacy for a very, 12 went with the territory. 13 very high profile footballer was going to be 13 LORD JUSTICE LEVESON: And do you think it still goes with 14 a consequence". 14 the territory? A. Well, the fact that I'm sitting in here today, probably 15 A. Yes. 15 LORD JUSTICE LEVESON: "However, as his fortunes have waned 16 16 I am still asking for it. So I will have to deal with 17 and our path has diverged", you've been concerned that 17 it. But just if you're going to print anything about 18 the privacy once lost for that period should not be 18 me, just make sure it's factual before you ... 19 irrecoverable, in other words you should be able to 19 LORD JUSTICE LEVESON: Okay. Then the third point -- so 20 retain or obtain some privacy again as time has passed. 20 it's where you were on these three areas: accuracy, 21 21 Or do you -privacy, and then the third point is remedy. 22 A. We didn't really have any privacy then, though, did we? 22 A. Mm. LORD JUSTICE LEVESON: No, the point --23 23 LORD JUSTICE LEVESON: And the need for swifter, cheaper 24 A. That's not a huge thing for me. I think that if you're 24 more effective remedies, because the prospect of putting 25 25 in the public eye, it's something -- although I was your house on the market --Page 89 Page 91 attached to somebody that was in the public eye, is A. It has to be a huge deterrent, like it's been 1 1 2 something that you have to kind of deal with. 2 a deterrent for many people for years not to take 3 LORD JUSTICE LEVESON: That's what I've said. So that you 3 a libel case, because that's what I believed, it was 4 accepted that. 4 just not worth it, and there's been some horrific libel 5 5 A. Mm. cases that have been done, you know, Gillian Taylforth's 6 LORD JUSTICE LEVESON: With your relationship with your 6 case, I know one forgets how awful that must have been, 7 husband, but that I rather gather, I'm not expressing 7 but it puts people off. So that was a huge deterrent, 8 myself perhaps very well, that as your relationship with 8 I think, for a lot of people, and then -- but where's 9 Paul moved in different directions, however you might 9 the deterrent for them not to print libel and not to 10 10 have reacted with your book and with other things for print untruths? 11 LORD JUSTICE LEVESON: I understand. I understand the other reasons, you were entitled to regain some of the 11 12 privacy that you had lost when you had your relationship 12 point. So what I've tried to do in those three points 13 with Paul. Is that --13 was to summarise where you stood in relation to each, 14 14 A. I don't know whether that's really what -- whether I'm and I hope I've done that accurately. Is there anything 15 understanding you correctly. I don't really think 15 you want to say as a result of what I've asked you, or 16 that's what I -- I would just like things to be, if 16 indeed otherwise? 17 they're going to be reported, to be reported correctly, 17 A. No, I think just a deterrent has to be there, it has to 18 because I don't know how if you have -- like I've been 18 be, you know, costs should mean costs and not just --19 19 asked: if you sold your wedding, if I've written a book, I don't understand why, when you sue a paper and it's 20 if I have chosen to go onto a programme like I'm a 20 blatantly obvious that they don't have anything and they 21 21 Celebrity, then I am asking for it. You know, to be -completely fabricated a story, that you still are out of 22 22 for people to make comments about you. But why can't pocket. 23 they put them correctly? It's just not --23 LORD JUSTICE LEVESON: Okay. I understand that. You've 24 LORD JUSTICE LEVESON: This is the precise purpose of my 24 made the point that you're concerned, and I understand 25 25 asking you the question. So it's not so much the why, that coming along here might have consequences. Page 90 Page 92

1	A. Mm.	1	Discussion
2	LORD JUSTICE LEVESON: I hope you've heard that I've said	2	MR DAVIES: Mr Lewis gave evidence that a journalist, who
3	something about that.	3	I'm not going to name, had been instructed in how to
4	A. I know.	4	hack by Mr Mulcaire while that journalist was reporting
5	LORD JUSTICE LEVESON: And that's something which I will	5	to Mr Simon Greenberg at the Evening Standard. Mr Lewis
6	certainly keep an eye out for, so if there's anything	6	also said that Mr Greenberg went on to recruit that
7	that you find out, that you feel I ought to know about,	7	journalist to Times Newspapers Limited and Mr Greenberg
8	then you must make sure your solicitors know.	8	does now work for News International.
9	A. Okay. Thank you.	9	What I would like to say is simply this. First of
10	LORD JUSTICE LEVESON: Thank you very, very much for coming	10	all, Mr Greenberg left the Evening Standard in July
11	A. Thank you.	11	2004. We do not know when the teaching that Mr Lewis
12	LORD JUSTICE LEVESON: I understand the decision you had to	12	referred to happened, but we believe it to be after
13	make, and I am grateful to you.	13	that. Mr Greenberg did not work in the press but in the
14	A. Thank you.	14	football industry from July 2004 until January this
15	LORD JUSTICE LEVESON: Thank you.	15	year, 2011. He was not involved in the recruitment of
16	MS PATRY HOSKINS: Thank you very much indeed.	16	the journalist to Times Newspapers Limited. That
17	Sir, it's 12.30. I understand that we could fit in	17	journalist was recruited by Times Newspapers Limited,
18	the third witness before lunch, but you may well want to	18	started work and went on long-term sick leave before
19	deal with	19	Mr Greenberg arrived at News International.
20	LORD JUSTICE LEVESON: I don't know. I don't know whether	20	LORD JUSTICE LEVESON: Right.
21	I want to deal with anything else until I know what's	21	MR DAVIES: That is important, I should explain, because
22	been happening.	22	Mr Greenberg is a member of the Management and Standards
23	MS PATRY HOSKINS: Mr Jay isn't here.	23	Committee at News International, which is responsible
24	LORD JUSTICE LEVESON: Because my team aren't here to tell	24	for dealing with this Inquiry and the police.
25	me, although I'm perfectly happy to rely on anybody	25	LORD JUSTICE LEVESON: Thank you.
	Page 93		Page 95
1	else.	1	MR DAVIES: So his position is a matter of importance to us.
1 2	else.  MR DAVIES: I do have something to say, but I'm slightly	1 2	MR DAVIES: So his position is a matter of importance to us.  LORD JUSTICE LEVESON: I understand that.
2	MR DAVIES: I do have something to say, but I'm slightly	2	LORD JUSTICE LEVESON: I understand that.
2 3	MR DAVIES: I do have something to say, but I'm slightly reluctant to say it without Mr Jay here.		LORD JUSTICE LEVESON: I understand that.  MR DAVIES: That's all I wanted to say.
2 3 4	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	2 3 4	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's
2 3 4 5	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?	2 3 4 5	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's MR CAPLAN: If I can say three things. One is this in
2 3 4 5 6	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	2 3 4 5 6	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's MR CAPLAN: If I can say three things. One is this in relation to that matter. In relation to the journalist
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1 other matter that was raised this morning? 1 LORD JUSTICE LEVESON: Yes. LORD JUSTICE LEVESON: Yes. MR JAY: Who may or may not be able to complete before the 3 short adjournment, but there's no rush. It's Mr Tom 3 MS PHILLIPS: Further to what Mr Davies has told you, I can 4 Rowland. 4 confirm that the Guardian had a strongly worded 5 5 LORD JUSTICE LEVESON: Very good. complaint from the Sun about the front page. My 6 instructions are that the story about the Sun was 6 MR THOMAS HARDY ROWLAND (affirmed) 7 7 A. Can I take my jacket off? incorrect and we will be publishing an appropriate 8 8 MR JAY: Certainly, Mr Rowland. Please make yourself correction and apology, which will go up on the rolling 9 9 comfortable. I'm sure your glass of water is filled up, online corrections column as soon as agreed and will be 10 10 if you'd like some. Could you confirm your full name the lead correction in print tomorrow. We will also 11 11 remove the offending two paragraphs of Marina's sketch please. 12 12 A. Thomas Hardy Rowland. from the online version. MR JAY: Thank you very much. 13 As you'll be aware, it's a long-standing practice of 13 LORD JUSTICE LEVESON: Mr Rowland thank you also very much 14 my client to publish daily corrections and 14 15 clarifications in a corrections column, alongside the 15 As a journalist, I don't put you in quite the same 16 leader column. It's where readers expect to see 16 category as some of the other witnesses who have come --17 A. Quite right, sir, I don't deserve to be in the same 17 corrections and clarifications and is therefore 18 considered the appropriate place to publish the apology. 18 category. 19 19 LORD JUSTICE LEVESON: But I'm still grateful. We'd also like to apologise to the Inquiry for this 20 20 having had to take up their time this morning before Questions from MR JAY 21 21 MR JAY: Mr Rowland, it's probably my fault. I've only seen you. Thank you. 22 LORD JUSTICE LEVESON: Thank you very much. I'm pleased 22 a statement of yours in draft. Could you confirm, 23 that that's all happened. I suppose I might be forgiven 23 please, that there is a signed version of your witness 24 24 for saying -- or echoing some of the evidence that has statement? 25 been given this morning, that rather better than the 25 A. Yes, there is. Page 97 Page 99 Q. Could you provide us, please, with the date of the 1 very appropriate steps you're now taking would have been 1 2 if it hadn't been there in the first place. 2 signature? 3 MS PHILLIPS: Understood. 3 A. The 9th day of November 2011. LORD JUSTICE LEVESON: Thank you very much. 4 Q. I'm grateful, Mr Rowland. There's a statement of truth, MR GARNHAM: Can I just say in response to what Mr Caplan 5 so this is your evidence. Do you follow me? said that the Metropolitan Police would resist --6 6 A. Yes. Can I just say before we go any further that there 7 LORD JUSTICE LEVESON: I understand, I understand. 7 is actually a matter of fact that has changed in this. 8 Mr Jay, let's carry on. 8 Two days ago the Metropolitan Police Service released an 9 9 MR JAY: Yes. unredacted version of the call log from LORD JUSTICE LEVESON: But let me just add this: I am very 10 10 News International and the number of calls is actually conscious of the very careful line that we are trying to 11 11 100 and not 60, as it is written in this statement. 12 walk. 12 Q. We'll come to that as you give the narrative. It's not MR JAY: Yes. 13 13 a correction so much as an additional fact which has 14 LORD JUSTICE LEVESON: If not a tightrope from which we 14 come to your notice? 15 might fall. I hope that we can review our practices and A. Yes, but it does say in here that there were 60 and in 15 16 the practices that we have with our core participants to fact there were 100. 16 17 learn from the experiences that we've just had to try to 17 Q. Tell us first of all a little bit about yourself. We 18 make sure that this is a one-off and is not repeated. 18 know that you're a journalist. In a thumbnail sketch, MR JAY: Yes. 19 19 your career as a journalist? 20 LORD JUSTICE LEVESON: Thank you. 20 A. Yeah, I've been a journalist for 30 years, since the 21 MR JAY: Sir, that is noted and understood. The size of the 21 1980s. I started as a technology writer writing about 22 tightrope, though, is very, very slim and in some cases 22 computing and telecommunications. I was the chief 23 is almost a piece of cotton thread. 23 reporter on Electronics Times, which was the weekly 24 LORD JUSTICE LEVESON: Mr Jay, I never said it was easy. 24 newspaper covering the technology sector. I went on 25 after that to work for the Daily Telegraph. I was 25 MR JAY: May we move on to the next witness. Page 98 Page 100

- 1 a subeditor there, and a feature writer. I was then
- 2 appointed the property correspondent and I ran and
- edited the property section of the Daily Telegraph forseven years or so.
- 5 In 1997 I left to pursue a career in television.
- 6 I went to work for Basil Productions, which is the
- 7 company that later became Endemol. I wrote and
- 8 developed with them some formats for game shows and
- 9 I presented and I -- with both Lorraine Kelly and Davina
- 10 McCall shows that they put out.
- 11 Q. Yes.
- 12 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
- 17 for the Evening Standard, I wrote a column there for
- 18 a while.
- 19 I've written four books. One is about British
- 20 technology policy in the 1970s and 1980s called The
- 21 Inmos Saga, one is about the financing of the
- 22 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

- 1 believe that my voicemail had been intercepted, and then
- 2 subsequently by a letter from the Metropolitan Police.
- 3 O. Yes.
- 4 A. I decided that I needed some legal help, so I phoned
- 5 Chris Bryant, the MP, up, and asked him if he could
- 6 possibly tell me who his lawyers were, who knew
- 7 something about phone hacking, and from that I got into
- 8 this process and I was anxious to participate in this
- 9 Inquiry because I think I have some knowledge and
- insights that can help you.
- 11 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
- Versions of the Mulcane notebooks hisofal as
- related to you?
- 17 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
- 20 a redacted version.
- 21 Q. And what, in general terms, did those phone logs
- demonstrate, if anything?
- 23 A. Mr Jay, it might be helpful if we talked about the
- 24 unredacted ones that I got yesterday, because there's
- 25 a substantial and terribly important difference between Page 103
- 1 called Forward, and I set up a series of websites, the
- 2 most prominent of which is called Trains for Deal, which
- was a community-based campaign to get the high speed 1
- 4 train to stop in Deal and Sandwich in Kent, and that
- 5 campaign has been successful, the first fast train
- 6 stopped in Deal and Sandwich this year, so if I suppose
- 7 my daughter ever says, "Daddy, have you ever done
- 8 anything worthwhile in your life?" I can say at least
- 9 I made the trains run on time.
- 10 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,
- 13 please feel free.
- 14 A. Yes, indeed.
- $15\,$  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
- 18 next year.
- 19 A. Yes, that is the case.
- 20 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
- 23 circumstances in which you came to that knowledge?
- 24 A. Yes. I was informed by letter by first of all the
- 25 telephone company, T-Mobile, that they had reason to Page 102

- 1 the two.
- 2 Q. May I interrupt you, first of all, because I don't know
- 3 what you're going to say about the unredacted ones, it
- 4 may or may not cause a difficulty for others at this
- 5 Inquiry. First of all, in August 2011, you were shown
- 6 the redacted versions?
- 7 A. Yes, indeed.
- 8 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
- 11 versions?

- 12 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.
- 17 Q. Yes.
- 18 A. And that it was a very bizarre pattern. It was hard to
- 19 understand how anybody could make calls on the
- 20 regularity that had been made. There was nine in one
- 21 day.
- 22 Q. Yes.
- 23 A. I do remember that in your own very excellent
- introduction to these proceedings, you did point out
- 25 that on the cases that had been settled by

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- 1 News International, the most prolific piece of hacking 2 that had gone on was Mr Skylet Andrews, and I believe 3 you said there were 19 calls that were unsuccessful and 4 14 that were successful through to his voicemail. In 5 this case, when I saw the redacted version, it appeared 6 that there were 60 calls through, and 2 successful ones. 7 It now appears that there are 100, and 2 successful 8 ones. 9 I have to say that if you were the hacking manager 10 at News International or News of the World, you would 11 have to have a word with whoever did the hacking, on my 12
  - 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

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.

7 Now, it's always, in every single case, 100 cases, 8 it's the same number --

- Q. Yes, okay, you can tell us it's the same number but --
- 10 A. I'm not going to tell you what the number is --

11 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

17 number. And I have no evidence for this, but it is my 18

strong, strong suspicion that this evidence has been 19 tampered with. I do not believe the call log as it

20 exists there is at all credible. I think that my phone

21 was hacked but I think that a lot of those calls

22 actually were perfectly innocent calls to extensions --

23 or from extensions inside News International because

24 I was working for the Times a lot at the time, and

25 I think that what has happened is that somebody has Page 107

1 right?

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2 A. No, I mean these -- there were two specific events that 3 were highlighted by the Metropolitan Police Service, and 4 they said to me that these indicated the caller had gone 5 right the way through the mailbox and had got to the 6 point that somebody was listening through the calls and 7 they had specific evidence of that. I mean, you must

Page 105

8 ask them, ask officers of Operation Weeting exactly what 9 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 --

16 A. Can I interrupt you, actually? Can I just explain how 17 18 call logging works? I think it might be helpful to you 19 if I did so. A call logger is essentially an audit of 20 what an office telephone system does. It tells you 21 which extension inside a building or organisation a call

22 comes from, it tells you how long it is and it tells you

23 what the destination is. There might be other

24 information involved as well, but essentially those

25 three things are what you find on a call log. Page 106

tampered with the evidence, and I think that this 1 2

Inquiry needs to ask some very sharp questions about --

3 I'll go back a little. I think you have a silent 4 witness who you can legitimately ask to come here and

5 ask questions of, and that silent witness is that

6 computer, that telephone PBX, because you need to know

7 about its architecture, you need to know about its

8 maintenance, you need to know about the security codes

getting into it, you need to know about who had access

10 to it and you need to look at its audit records.

11 LORD JUSTICE LEVESON: I wonder whether that's actually

right, Mr Rowland, because at the moment I'm looking at

13 the mantra: culture, practices and ethics, and I'm not

14 looking at the specifics of who did what to whom and

15 when. If I go down the route you've suggested, aren't

16 I really trespassing on that territory, which at

17 present, at any rate, entirely falls within the remit of

18 the Metropolitan Police?

19 A. Well, I mean, I think you have a problem, sir, which

is -- which you've mentioned and alluded to many times,

21 which is that you're trying to have a very broad Inquiry

22 that is necessarily based on a very narrow evidential

23 base, and the evidential base is essentially the

24 Glenn Mulcaire diaries, of which there are 11,000 pages,

25 and these call logs --

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LORD JUSTICE LEVESON: I don't think that's right, you see. 2 I think it is much broader than that, because, as you've 3 been hearing, as you've been listening, I've been 4 dealing with many things besides --5 A. Indeed, but -- yes, I understand that, but in relation 6 to the actual phone hacking element, I mean when 7 Mr Grant was here, you, Mr Jay, were quite rightly 8 looking and picking him up on the difference between 9 supposition and fact, and the only facts that you have 10 in relation to phone hacking are the call log and the 11 diaries of Glenn Mulcaire, so in that sense it's quite 12 pertinent and it's quite key. The reason being that 13 what a call log should be able to tell you is exactly 14 where inside an organisation calls come from. It should 15 be able to tell you whether, for instance, the calls 16 come from the Sun's newsroom or the News of the World's 17 newsroom or some other place inside News International. 18 Now, it is my contention that quite a lot of those 19 100 calls actually were perfectly innocent calls, that 20 they were coming -- they were normal traffic that was 21 coming to me because I was working for the Times 22 newspaper, and that it was -- it appears that it's not 23 innocent because the originating phone number is always 24 the same, it's always this mobile number --LORD JUSTICE LEVESON: I've got the point. I've got the Page 109 1 point.

2 not innocent, the object was not to discover matters 3 relating to your private life but more to discover 4 matters which may bear on commercial confidences? Have 5 I correctly understood --6 A. Yes, Mr Jay, you have. In a nutshell, during 2002, 7 2003, I was working quite a lot for the Mail on Sunday, 8 I'm that shadowy beast, the Mail on Sunday freelancer 9 about which much is written and very little seen, quite 10 often. Because of the nature of -- they hired me 11 essentially to set up and to advise them on a property

in relation to the calls into your voicemail which were

supplement which they wanted to run. That necessarily involved talking to a lot of prominent and famous people, and, you know, when you stop doing something, people sometimes think you are still doing it, so it's possible that people were fishing, looking for leads relating to that.

During 2005, I wrote a long series of articles for

During 2005, I wrote a long series of articles for the Times newspaper which were about alternative investments and the alternative investments in motorcars through to wine through to expensive bars of gold and stamps that, you know, that people had decided to go into, and that again involved talking to a lot of quite well-known people.

I think it's relevant that the interview technique Page 111

2 A. Thank you. The reason I'd have a large amount of 3 perfectly ordinary, innocent traffic coming through is 4 that subeditors on the Times would quite properly and 5 naturally ring me up and ask me points of fact, whether 6 in fact you spelt Robert as in Robert Jay with an R or 7 with a W or whatever, and it's inevitable that 8 journalists make slips and, you know, there's matters of 9 consistency and it's important they find out this 10 information, so I could quite understand them contacting 11 me by mobile phone. Usually they would go through to my 12 office number, and if they didn't do that, they'd email 13 me, so I think more typically than coming to me by 14 a mobile phone, so there wouldn't be many of these, but 15 that stream should be in there somewhere and I think 16 that has happened is it actually has been confused with the more sinister pieces, and one wonders why. 17 LORD JUSTICE LEVESON: I understand that. I've got the 18 19 issue. It's certainly something that doubtless the 20 police will look at in the light of what you've said, 21 and we'll have to consider how far we can take it. 22 Thank you.

MR JAY: Can I hone in on what your evidence is about and

try and deal with it in this way, Mr Rowland. On my

understanding, what you're telling the Inquiry is that

Page 110

that I adopted then was not the usual "slash, burn and run" technique that many reporters adopt, in other words they go and see somebody, ask them some questions, rush off, write the piece and then duck and hope that the flak doesn't hit them. What I was doing was to write drafts of the pieces and then send them to people and ask for their comments, and I did that for two reasons. Firstly, because of the appalling culture of tabloid excesses, people are reluctant to actually talk to me at all and it was a way of getting them -- drawing them into the process. Secondly, I felt that some of the subjects I was being asked to write about, I wasn't wildly expert on, although I knew quite a lot about it, so there was a more chance, a more-than-usual chance that I was going to make factual errors, and it was as way of stopping that happening. And also, I wasn't giving them editorial control, I was asking them to engage in a process and a debate, and I found it quite productive to do that. However, it did mean that there was more phone

However, it did mean that there was more phone traffic going backwards and forwards between me than usually is the case, so messages were being left for me, and I was responding. So it was worthwhile for a fisherman to fish, in a phone hacking sense. There was something for them to look for.

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1	Then in 2006 I waste enother learners of the	
1	Then in 2006, I wrote another long series of stories	
2	for the Times, which was about if you recall, right	
3	at the beginning I said I had a background in technology	
4	writing in journalism, so I do have some expertise in	
5	that area, and I wrote a long series of pieces that were	
6	about the confluence of telecommunications and	
7	computing, and identity theft which seems somewhat	
8	ironic in retrospect, that whilst I was writing about	
9	identity theft, my own phone was being hacked, but that	
10	appears to be what was going on but that in itself	
11	was enough bait, I suppose, for me to have been of	
12	interest. So I think those were the reasons, without	
13	going on too much, about why it was that I was of	
14	interest.	
15	Q. Yes. One particular matter you draw attention to, there	
16	may have been interest in what high-worth individuals or	
17	celebrities were doing in relation to house purchases	
18	and you might be an easy source, as it were, of such	
19	information?	
20	A. Indeed, yes.	
21	Q. In paragraph 21 of your statement, you say you strongly	
22	suspect what the evidence points to, it's the culture of	
23	routine phone hacking by journalists working for the	
24	News of the World. That's an inference which you're	
25	inviting the Inquiry to make, having regard to your	
	Page 113	
1	evidence and a host of other evidence; is that correct?	
2	A. Yeah. I mean, Alan Rusbridger when he was here, the	
3	editor of the Guardian, was talking about how the	
4	culture of phone hacking was ingrained at the	
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5	Name at the World and you know the intelligence is	
6	News of the World, and you know, the intelligence is	
6	that that is not the case elsewhere. However, it now	
7	that that is not the case elsewhere. However, it now beggars believe that there was just one person doing it,	
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