

1 Thursday, 24 November 2011 2 (10.00 am) 3 (Proceedings delayed) 4 (10.10 am) 5 LORD JUSTICE LEVESON: Can we confirm that there is no 6 external feed to the marquee? I'm told that that is 7 correct. 8 MR BARR: Good morning, sir. Pursuant to the order which 9 you made yesterday, the next witness is giving evidence 10 anonymously. A consequence of that is that some 11 redactions have been made to his witness statement. The 12 statement names a number of newspaper titles and 13 a newspaper company, which are not News International 14 titles. They are being redacted as a matter of fairness 15 because those titles -- 16 LORD JUSTICE LEVESON: I entirely agree. 17 MR BARR: Against that background, I'd like to call HJK. 18 HJK (affirmed) 19 LORD JUSTICE LEVESON: So that it is clear, I have in fact 20 been informed of your name and I've been informed of the 21 circumstances in which you wish to give evidence 22 anonymously and I have made orders ensuring that there 23 is in place appropriate protection for your identity. 24 I'm grateful to you for coming and for taking the 25 important step of giving evidence in this Inquiry. If Page 1	1 had not developed; but for the events we're going to 2 come to, it might have done? 3 A. Yes. 4 Q. Now that we move on to what in fact happened, it might 5 be useful in your case for us to keep track of the 6 different ways in which the media sought to obtain 7 information. 8 At paragraph 4, you tell us about a telephone call 9 that you received in April 2006. 10 A. Yes. 11 Q. Could you tell us a little bit about that, please? 12 A. That was very early April 2006, and basically I was 13 working, so it was during working hours, and an 14 individual called me and claimed to be from the Royal 15 Mail and said that they had a parcel for me coming from 16 Europe and that the label has been -- had been torn 17 away, torn off, and as a consequence they could not 18 deliver the parcel, but amazingly my mobile number was 19 on it, so they were enquiring where they should deliver 20 the parcel. 21 Although at the moment I felt the request was rather 22 strange, the story didn't ring very good, but 23 I volunteered my address without thinking, really, 24 because I probably thought it was someone from my family 25 who probably did this, and I just hung up. But the Page 3
1 there is anything that you need during the course of 2 your I hope not too long experience, please say so. 3 A. Thank you, sir. 4 Questions from MR BARR 5 MR BARR: For obvious reasons I won't ask you your name, but 6 I can say a contact address has been provided to the 7 Inquiry. You've provided the Inquiry with an open 8 witness statement, which is what we will be dealing 9 today. Could you confirm, please, that the contents of 10 this witness statement are true and correct to the best 11 of your knowledge and belief? 12 A. They are, yes. 13 Q. You tell us that you were the victim of phone hacking in 14 circumstances which we will come on to, that as a result 15 you brought civil proceedings against News Group 16 Newspapers and you've also judicially reviewed or are 17 seeking to judicially review the Metropolitan Police 18 Service; is that right? 19 A. That is all correct, yes. 20 Q. Can I take you now back to 2006? 21 A. Yes. 22 Q. You tell us that you at that time met a well-known 23 individual, who we will call X. 24 A. Yes. 25 Q. And that you began dating with X, that a relationship Page 2	1 way -- the individual said thank you, and the way he 2 said it was suspiciously jubilant, given a Royal Mail 3 employee, and it sounded like he had a victory out of 4 that call. 5 Q. And at the time you tell us you simply thought it was 6 very strange? 7 A. Yes. 8 Q. Would it be right to conclude that you now think that 9 that was a means by which someone blagged your address? 10 A. Absolutely, yeah. 11 Q. Because you go on to tell us that a Saturday later, in 12 the same month, your doorbell rang in the morning and 13 a journalist was there and confronted you with the 14 question, "Are you in a relationship with X?" 15 A. Yes, that was end of April, and it was indeed the case, 16 yeah. 17 Q. And you explain in the statement what you said. Those 18 who read your statement in due course can read that for 19 themselves. 20 A. Yes. 21 Q. What I would like to ask you is: how did you feel when 22 that occurred? 23 A. First of all, I felt extremely harassed, because you 24 have to understand when we talked about dating this 25 person that I was in an embryonic relationship with this Page 4

1 person, we'd just had a few dates, really, so I was 2 surprised of the short amount of time it took for 3 someone to be at my doorstep and doorstepping me from 4 a newspaper, so I was shocked, harassed and very 5 surprised. But I felt extremely also -- if you want, 6 I felt under observation from that point onwards. 7 Another statement he made was that X was living with 8 me, and that just baffled me because I could not 9 understand how he could have come to that conclusion. 10 Q. I see. So you tell us that what you did next was you 11 called X? 12 A. I called a friend of mine to seek advice, and, yes, my 13 first reaction was to call X immediately, saying, "There 14 is a problem". 15 Q. There came a point in time when you called X? 16 A. Yeah. 17 Q. Could you describe to the Inquiry what the upshot of 18 that call was on the developing relationship between you 19 and X? 20 A. It put a stop to it straight away. But for many 21 reasons. You know, I don't blame X whatsoever, we're 22 still friends. Just -- I can imagine how, from X's 23 perspective, the fact that someone X has been just 24 dating, after three weeks of various dates, all of 25 a sudden calls X up with a story saying a journalist has Page 5	1 that's point number one. 2 Second point, during that conversation he was trying 3 to make me talk and he said an arrangement, and it was 4 very clear he was proposing money. 5 Q. Chequebook journalism? 6 A. Yeah, clearly. I said to him I wasn't interested in 7 talking to him and he kept on talking and talking and 8 I had to literally close the conversation saying 9 "Listen, I'm not interested to talk so can we move on 10 and thank you very much". He said, "You've got my 11 number", and I think sarcastically I said "Yes, I think 12 I do". 13 Q. I see. Then you tell us that you tried to contact X, 14 and eventually you were successful because X called you 15 back. 16 A. Yeah. 17 Q. Without mentioning the title, what did X tell you? 18 A. Sorry, I don't understand. 19 Q. I'm looking at paragraph 11 -- 20 LORD JUSTICE LEVESON: Lead it, Mr Barr. 21 MR BARR: I will, sir. Thank you. 22 X told you, didn't X, that the newspaper was going 23 to publish a story the following morning? 24 A. Yes, 7.30 pm, yeah. That's a call at 7.30 pm. X 25 basically had been warned by a friend which actually Page 7
1 been at my doorstep, that sounds like a someone who is 2 going to do a kiss-and-tell story on that person. And 3 it was very clear that X -- to me, X denied the 4 relationship existed, which made me feel really weird 5 about it, yeah, but clearly X just put a stop to it, to 6 a burgeoning relationship, and I think in all fairness, 7 because you have to understand also the perspective of 8 famous individuals, being under such a pressure of the 9 media, it leads to, you know, reactions of that nature 10 on X's side, and from my side it just made me feel like, 11 well, if my life is going to be trashed on the 12 newspapers straight away, I'm also very concerned of 13 that, just after three weeks of dating someone. That's 14 quite traumatic. 15 Q. I see, thank you. You then tell us that after being 16 doorstepped by a journalist, you go on in paragraph 10 17 to tell us that that journalist called you on your 18 mobile telephone later on and proposed an arrangement to 19 you? 20 A. Yeah. 21 Q. What did you understand that arrangement to be? 22 A. It was a long conversation. He was trying to make me 23 talk, it was very clear. First of all, I want to say 24 that I was very surprised he had my mobile phone number 25 because I never gave him my mobile phone number. So Page 6	1 amazingly was also working for the press, but a regional 2 newspaper, who was just a friend, who had received 3 a phone call from another newspaper I cannot name 4 mentioning that the story was going to be published and 5 my name was available, and clearly that X had a courtesy 6 call via this person to inform X that this story would 7 be published the next day. 8 Q. Can I pause there to explore how that made you feel? 9 A. I really felt after, you know, the 9 o'clock phone 10 call -- the 9 o'clock call at my door, the, you know, 11 middle of the afternoon telephone call and this, by that 12 stage I was panicking, I was absolutely panicking. 13 Q. You go on to tell us that you made the decision that you 14 had better contact your employers before the story was 15 published? 16 A. Yes. 17 Q. When you explained what you thought was going to happen 18 to your employer, what was your employer's reaction? 19 A. It was pretty dry and unsympathetic, to be honest, 20 because I had to explain quite a lot of details which 21 I had not shared about my personal situation with this 22 employer and it was very much saying, "Well, we'll have 23 to manage, won't we?" That sort of reaction. 24 Q. I see. And then you tell us that in fact, after all 25 that, the story wasn't published? Page 8

1 A. No. 2 Q. But that was not the end of the matter for you, and 3 I want to ask you now about your workplace, which you 4 deal with at paragraph 14 of your statement. You 5 describe there a problem that you had with a client as 6 a result of a deleted voicemail; is that right? 7 A. Yeah. It's in paragraph 14? Yes, okay. So yes, but 8 there's two points in paragraph 14, but yeah. 9 Q. Deal with that one first, please. 10 A. The voicemail of the client, this was a very important 11 deal for the company and at that point I was under sheer 12 pressure from my boss to get hold of this customer. 13 I had attempted for, I think, two weeks to reach him and 14 he was not calling me back and I finally got hold of him 15 and I said to him, because we had quite a relationship, 16 well-established, "I'm a bit disappointed, given the 17 urgency of the matter, that you hadn't called me back" 18 and he said to me, "But I called you back and I left 19 a message on your voicemail" and I said, "No you didn't, 20 did you?" and he said, "Have you checked your 21 voicemail?" and there was a bit of a heated argument -- 22 not argument but a bit of a heated discussion and I said 23 "Okay, I'll look through it", we went through the 24 conversation; he said, "I left you the message and it 25 was okay, don't you worry about, we will do it", I said Page 9	1 Q. I see. You then go on to tell us that there came a 2 point in time when your mobile phone company contacted 3 you to tell you that your account had been compromised? 4 A. Yes. 5 Q. And that it was at that point that you put two and two 6 together and worked out what had in fact happened? 7 A. Yes, absolutely. 8 Q. Just to be clear, in your mind, is there any other 9 credible explanation for what happened other than phone 10 hacking? 11 A. None at all. 12 Q. You were asked whether you wanted to be put in touch 13 with the police? 14 A. Yes. 15 Q. And you said that you did? 16 A. Yes, I did. 17 Q. And then in fact they never got back to you? 18 A. It's worse than that, because at the initial call they 19 offered me to, "Would you like your name to be mentioned 20 to the police?" and I said "Please, yes, do", because 21 I have a business card of that journalist that had 22 doorstepped me end of April, and I want to share that 23 with the police because I know exactly who has been 24 responsible for this. 25 So I was abroad when they contacted me, O2, and on Page 11
1 "Okay, that's fine". 2 I hung up and I checked my voicemail. I had a bad 3 habit, with hindsight, that was to keep my voicemails 4 packing up into my voicemail box, which we know 5 afterwards was a bad suggestion. 6 Q. I see. So apart from problems with -- 7 A. And it was there, the message was there, and clearly 8 I had never heard this message from him, ever. So it 9 had been listened to, but at the time I didn't realise 10 what was going on. 11 Q. No, of course. So apart from the problems that were 12 caused by a deleted voicemail, you also tell us that 13 your employer was rather unsympathetic? 14 A. Yeah. Well, I think the awareness of -- as he had been 15 aware of what was going to be published and the nature 16 of my personal life, a pattern of bullying and 17 victimisation started appearing, especially in public, 18 never in private, always in public, which started to 19 make me very uncomfortable, and it lasted for the best 20 part of July, August and September. It led me to 21 actually contact ACAS out of concern and worry, because, 22 you know, searching online I realised that there 23 probably were a piece of advice I could get, and they 24 advised me to keep a diary of the events, should it go 25 any further, which I did keep. Page 10	1 my return I called them back to say "I haven't heard 2 anything from the police, have you mentioned my name?" 3 The lady said "I have mentioned your name. They said 4 they would call you back". 5 In the absence of them calling me back, I kept 6 calling throughout the month of July, I think, and my 7 recollection -- and please bear in mind because it's 8 five years -- but at least three times I called them and 9 the last time is when I threatened them to go to 10 Channel 4 News. 11 Q. Yes, and you explain that at that time you were told 12 that arrests were imminent. 13 A. Which I found surprising, to be honest, that they would 14 have been so open. 15 Q. And then, as we know, Mr Mulcaire and Mr Goodman were 16 subsequently arrested? 17 A. Yes. 18 Q. Can I move on to what happened to you next. I'm looking 19 at paragraph 18 of your witness statement and you say 20 that on a number of further occasions during 2006 you 21 were photographed by press photographers? 22 A. Yes. This became the pattern of anxiety building, which 23 repeated itself through 2006, really. After the 24 harrowing experience to have to confront my boss in 25 September 2006 about his bullying and victimisation, Page 12

1 around September, October, there was a photographer on 2 the other side of the pavement as I was going jogging on 3 early morning, I think about 9 o'clock, it would have 4 been on Saturday, and he was just pacing up and down 5 clearly just on the other side of the pavement from my 6 place. That was instance number one. 7 Amazingly, I crossed the road and I went for 8 a beeline for him as he was walking away from me and he 9 turned around and I was in front of him and I think 10 I gave him quite a shock because I think he thought 11 I was coming for him, basically. It was very clear to 12 me he was very uncomfortable that I was in front of him 13 without him having noticed me. That was instance number 14 one that I was aware of. 15 Then the second instance happened in December 2006 16 and it's about two weeks after I was in hospital after 17 having been diagnosed with a serious illness. All of 18 a sudden I was with a member of my family and escorting 19 this person out of the train with a suitcase and this 20 photographer popped in front of us, took a picture of 21 us, and obviously being both of us anonymous members of 22 the public and not looking like Hugh Grant or anybody 23 else, we just found the experience a bit strange. 24 We both turned around and this person walks quite 25 slowly so the train had emptied and there was nobody Page 13	1 private number, passwords and information about me and 2 X." 3 A. Yes. 4 Q. "It also contained a note of the amount of text and call 5 traffic between me and X. There were also a number of 6 transcripts of messages that X left on my voicemail." 7 Could you give the Inquiry, please, an indication of 8 how you felt as you were shown those documents? 9 A. Well, two things. The first thing, in a way I felt 10 strangely relieved that I hadn't dreamed this story, 11 because I had been told of the hacking and the evidence 12 was in front of me, but I was absolutely disgusted by 13 it, by the sheer invasion of my privacy. They had all 14 my, you know, home, work numbers, which were in the same 15 flat because I was working from home, and I just felt 16 absolutely violated in my privacy. The amount of 17 messages being hacked and the transcripts of personal 18 conversations were just, you know, despicable, really. 19 MR BARR: Thank you. Finally, is there anything that you 20 would like to say to Lord Justice Leveson about what 21 changes you think might be made for the future 22 regulation of the press to help prevent other people 23 from becoming victims in the way that you did? 24 Questions from LORD JUSTICE LEVESON 25 LORD JUSTICE LEVESON: It's not compulsory. Page 15
1 behind us, and actually this person was quite distressed 2 saying, "This person just took a picture of me, why did 3 they take a picture of me?" And I sort of put the two 4 and two together, and that's absolute speculation on my 5 part, that somehow my medical information had been 6 accessed and now they were hunting more for pictures and 7 they were still digging my life, and I just didn't know 8 what to think. 9 Q. For the reasons we've discussed, we won't go into -- 10 A. No. 11 Q. -- which newspaper any of these information-gathering 12 approaches might have come from. 13 A. Sorry, could -- 14 Q. But I would like to move now to paragraph 19. 15 A. Could I mention that in these instances I didn't know 16 who the newspapers was, no, so I can't say. 17 Q. If we move now to paragraph 19 of your statement, where 18 you tell us that you were then finding out, as a result 19 of bringing legal proceedings, what documents the police 20 had found concerning you, and you tell us towards the 21 bottom of the page: 22 "The documents reveal transcripts of messages 23 between me and X, call records from Mulcaire's number to 24 mine and notes from Mulcaire's notebook with my details, 25 including address, telephone numbers, work, mobile and Page 14	1 A. Oh. I'm sure you have a tough job here. I think one of 2 the elements which was critical for me was the threat of 3 publication, I realise now, was meant to shake us, the 4 individual X as well as myself, stress us out, to test 5 who was going to eventually come out with a statement. 6 So the threat of a publication to an ordinary member of 7 the public should be something used as a formal 8 notification, not as a part of a weaponry of tools to 9 press people to make a statement. I think that would be 10 one important bit. 11 The other important bit is, and I don't know what 12 the mechanics in the future should be, but I would not 13 have been able to bring any action that I'm bringing, 14 either in the JR or in the civil claim, without 15 a conditional fee agreement, and I think that it would 16 have been -- I would have been prevented to seek justice 17 in any way, shape or form if that mechanics was not 18 available to me. 19 LORD JUSTICE LEVESON: Unless there's some other way of 20 going about it that doesn't involve the whole panoply of 21 High Court proceedings. 22 A. Yes. I think it's about being able to choose who your 23 legal representation would be and the funding of it. 24 The mechanics, you know, might be something else. But 25 at least the ability to finance ordinary members of the Page 16

1 public is crucial, otherwise the press might have a free 2 rein on anybody like me in the future who won't be able 3 to seek justice whatsoever. 4 MR BARR: I have no more questions for this witness. The 5 arrangement is that the transcript is going to be 6 checked to ensure that it can properly be put out into 7 the public domain. There may need to be some slight 8 redactions, there may be some slight delay in that 9 happening, but that is what we are going to do. 10 LORD JUSTICE LEVESON: The statement also has been redacted, 11 has it? 12 MR BARR: There is going to be a redaction of the newspaper 13 titles, and I've made it clear that that document is not 14 going to be put into the public domain until those 15 affected are content that it's in a proper format to be 16 published. 17 LORD JUSTICE LEVESON: That's fine. I have one more 18 question for HJK, if you don't mind. 19 I think it's clear from your evidence, but I want 20 there to be no doubt: you do not consider yourself 21 a public figure of any sort? 22 A. None whatsoever. 23 LORD JUSTICE LEVESON: You have no public profile or public 24 position of any sort? 25 A. No. No. Page 17	1 how it was going to work because obviously we'll want to 2 continue with giving the evidence. 3 LORD JUSTICE LEVESON: We are going to continue giving the 4 evidence. 5 MR SHERBORNE: Exactly. 6 LORD JUSTICE LEVESON: Is there anything that has been said 7 that had caused you concern? 8 MR SHERBORNE: Well, I've risen. There is one matter. It's 9 something that can be easily dealt with and I don't want 10 to explain it here. 11 LORD JUSTICE LEVESON: No, all right. 12 MR SHERBORNE: But it is one point that I picked up and 13 I understand exactly why it crept in, because it's very 14 difficult to keep using cyphers. I'm not saying it's 15 anything that's particularly worrying, but I can deal 16 with that. I'm really talking timings. I don't know 17 whether, sir, you want to give us 15 minutes break so 18 that I can deal with that point and we can then get the 19 transcript of HJK's evidence available -- 20 LORD JUSTICE LEVESON: No, don't. I want to crack on. We 21 have a lot of witnesses to deal with. We'll get it 22 printed quite quickly and if you want to alert the 23 shorthand writer to the point you can do so in the next 24 few minutes while we reconstitute the room, and in that 25 way we'll not lose any time. Page 19
1 LORD JUSTICE LEVESON: That's not to demean you, it's meant 2 to provide the context within which you are giving 3 evidence. 4 A. Context, absolutely. If I may just have a conclusion 5 about this, I felt very harassed for the best part of 6 nine months, and I witnessed my life goings up in flames 7 around me for something that people would claim to be 8 the public interest and I would challenge that very 9 thoroughly because I don't think, if there was any 10 public interest, we would have known about it because 11 there would have been publication. 12 LORD JUSTICE LEVESON: All right. Thank you very much 13 indeed. 14 A. Thank you, sir. 15 LORD JUSTICE LEVESON: What I intend to do is to rise so 16 that we can reconstitute the Inquiry, that we can admit 17 the public, that we reconnect the equipment so that the 18 transcript is visible to all and the audio and 19 television aid available both in the marquee and online. 20 MR BARR: Thank you, sir. 21 MR SHERBORNE: I was just going to rise about the mechanics 22 of the transcript. I know, sir, that you're keen for 23 the evidence to be available as soon as possible for 24 obvious reasons. I understand the process that will be 25 involved and I was just wondering in terms of timings Page 18	1 MR SHERBORNE: Sir, I'm entirely in your hands as to how you 2 wish to deal with this. 3 LORD JUSTICE LEVESON: I know. I'm not suggesting you're 4 not. But I'm just conscious that we have a number of 5 witnesses to get through today. 6 MR SHERBORNE: Of course. 7 (10.38 pm) 8 (A short break) 9 (10.45 am) 10 LORD JUSTICE LEVESON: Could we confirm that this is now 11 live into the marquee? It is, is it? Thank you. 12 MR BARR: Sir, for the benefit of those who are now just 13 joining us, the order of witnesses that we're going to 14 hear from today is Miss Sienna Miller, Mr Mark Thomson 15 and then Mr Mosley and JK Rowling. 16 LORD JUSTICE LEVESON: Okay. 17 MR BARR: The first witness is Miss Miller. I call 18 Miss Miller. 19 MISS SIENNA MILLER (affirmed) 20 MR BARR: Good morning. 21 A. Good morning. 22 Q. Could you confirm to the Inquiry, please, your full 23 name? 24 A. Yes, my name is Sienna Rose Diana Miller. 25 Q. You've provided a contact address through your Page 20

1 solicitors? 2 A. Yes. 3 Q. And you've voluntarily provided the Inquiry with 4 a witness statement? 5 A. Yes. 6 Q. Are you familiar with the contents of your witness 7 statement? 8 A. I am. 9 Q. And are the contents of your witness statement true and 10 correct to the best of your knowledge and belief? 11 A. Yes, they are. 12 LORD JUSTICE LEVESON: Miss Miller, I've said to almost all 13 of the people who've given evidence to me before how 14 grateful I am to you for being prepared to take part in 15 this exercise. I'm very conscious that you have strong 16 views about privacy and that the very act of coming to 17 give evidence to me exposes you and means that you're 18 talking about things which actually you're quite keen 19 not to want to talk about. 20 A. Yes. 21 LORD JUSTICE LEVESON: So I understand the difficult choice 22 you had to make, and I'm very grateful. Thank you very 23 much. 24 A. Thank you. 25 MR BARR: Before I ask you questions, I understand that Page 21	1 strong a reaction as possible, so -- you know, as other 2 people have mentioned, but being jumped out at, when you 3 get a shock, or saying things to kind of get some 4 emotional reaction. They seemed to go to any lengths to 5 try to upset you, which is really difficult to deal 6 with. 7 Q. You've given some examples about being spat at and 8 abused to get a certain type of photograph, I think as 9 Kate McCann said, with a certain type of caption added 10 to it. 11 A. Yeah. 12 Q. We've heard a lot about driving. Have you had any 13 experiences of dangerous driving around you? 14 A. Yeah, highly illegal driving, overtaking, undertaking. 15 There was an near incident that the police were informed 16 of where a pregnant lady was nearly knocked down. But 17 this was a daily occurrence, people riding in 18 motorcycles alongside a vehicle while taking 19 photographs, and at high speed, and it causes you to 20 drive dangerously and them to drive dangerously with 21 really very little regard for anyone else on the road 22 and it's all in pursuit of relatively little. Often 23 these people have taken a photograph of you and they are 24 just desperate to kind of find out where you're going 25 next, regardless of whether it's a meeting or some kind Page 23
1 Mr Sherborne would like to ask you -- is that right? 2 MR SHERBORNE: It is, sir, with your permission. 3 Questions from MR SHERBORNE 4 MR SHERBORNE: Good morning, Miss Miller. 5 A. Good morning. 6 Q. We've heard from a large number of witnesses who have 7 already given evidence to this Inquiry about the 8 experiences they've had with press photographers and 9 paparazzi, people such as the McCanns, the Dowlers, 10 Hugh Grant, Steve Coogan and a number of others, and 11 people who gave examples of such things as photographers 12 camped outside their homes, being stalked wherever they 13 go, jumping out at them without warning and driving 14 dangerously and so on. 15 Are these examples which are familiar to you in 16 terms of your experiences? 17 A. Yes, they are. 18 Q. Can you give the Inquiry just a little bit of an idea of 19 what you have personally experienced in that regard? 20 A. Yes. At the time I actually now have an order against 21 paparazzi, so my life has changed dramatically, but for 22 a number of years I was relentlessly pursued by about 10 23 to 15 men almost daily, pretty much daily and, you know, 24 anything from being spat at or verbally abused. 25 I think that the incentive is really to get as Page 22	1 of inane event. It's just pursued. I think there's 2 something about the pursuit which is very exciting for 3 paparazzi photographers. 4 Q. It may sound a bit of a silly question but for those 5 who've not actually experienced it first-hand, can you 6 give us a little idea of what it feels like to be the 7 victim of that kind of pursuit? 8 A. You know, it's really terrifying. It's terrifying not 9 only for the person experiencing it but for friends who 10 are with me, family members who are with me, for the 11 people driving the cars. 12 I would often find myself -- I was 21 -- at midnight 13 running down a dark street on my own with ten big men 14 chasing me and the fact that they had cameras in their 15 hands meant that that was legal, but if you take away 16 the cameras, what have you got? You've got a pack of 17 men chasing a woman and obviously that's a very 18 intimidating situation to be in. 19 Q. Thank you. You've explained that what you did about it 20 was you got an order from the court. I think that was 21 in -- I should know -- that was in the summer of 2008? 22 A. Yes. 23 Q. What happened, if anything, as a result of getting that 24 order? 25 A. It went from having 20 people outside my house every day Page 24

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1 to zero, so I can now lead a relatively private and 2 normal life, which was -- which is fantastic, but it was 3 a long and arduous and exhausting struggle to get there. 4 Q. Can I move on then to another topic, again just dealing 5 with it very briefly. It's obviously a matter now of 6 record that you obtained judgment, I know it's been 7 referred to as a settlement, but you obtained judgment 8 against News Group Newspapers in your action? 9 A. Yes. 10 Q. And we've heard from, for example, Sally and Bob Dowler 11 earlier this week about the fact that you having brought 12 this action and a few other people having brought this 13 action right at the outset is what led to them being 14 told themselves. 15 Was it an easy decision to take, to bring an action 16 against News Group Newspapers? 17 A. No, not at all. I was very nervous of taking on an 18 empire that was richer and far more powerful than I will 19 ever be, but then I saw the evidence that I obtained 20 from the police and felt that I couldn't not do 21 something about it, but it was very daunting. 22 Q. Can I just ask this: given that understandably you've 23 had your fill of having to instruct lawyers, can you 24 explain why it is that you're giving evidence to this 25 Inquiry? Page 25	1 A. Well, initially -- you know, I'm very lucky, I have 2 a very tight group of friends and a very supportive 3 family and to this date no one has ever sold a story on 4 me, regardless of the fact that several people, even 5 acquaintances, have been offered large sums of money to 6 do so, so I felt very protected. But it was baffling 7 how certain pieces of information kept coming out, and 8 the first initial steps I took were to change my mobile 9 number and then I changed it again and again and I ended 10 up changing it three times in three months, and stories 11 still continued to come out with very private 12 information that only a select group of people knew 13 about. So naturally, having changed my number and being 14 pretty convinced it couldn't have been as a result of 15 hacking, even though that was my suspicion, horribly 16 I accused my friends and family of selling stories, and 17 they accused each other as well. 18 Q. That paragraph links with the same theme which you pick 19 up again at paragraph 7 of your witness statement, where 20 you describe one occasion where you sat down your family 21 and friends in a room and accused them of leaking 22 stories to the press. 23 A. Yes. 24 Q. Because a story had come out that only they knew about. 25 A. Yeah, there was one particular very private piece of Page 27
1 A. Because you made me? 2 Q. I hope you don't blame me afterwards. What do you hope 3 to achieve? 4 A. No, I hope that some form of change comes to our media. 5 There are very respectable and fantastic journalists in 6 this country and they're all bracketed under the same 7 name of the press and I think that's not fair, given the 8 grand differences between publications. So I hope that 9 some change can come, and therefore I am actually very 10 happy to be giving evidence. 11 MR SHERBORNE: Thank you very much. Mr Barr has some 12 questions for you. 13 Questions from MR BARR 14 MR BARR: Thank you. Miss Miller, you've explained very 15 eloquently what the consequences of being an 16 accomplished actress were for you back in 2005 and 2006 17 in terms of media intrusion. Could I take you to 18 paragraph 4 of your witness statement, please. 19 A. Yes. 20 Q. Where you describe that during this period, almost every 21 week, extremely personal matters were being published, 22 including parts of private conversations. 23 A. Mm. 24 Q. My question to you is: how did that make you feel about 25 those around you? Page 26	1 information that four people knew about, and I had been 2 very careful to only tell my mother, my sister and two 3 of my closest friends, and a journalist had phoned up 4 saying that they knew about this, and so yes, I accused 5 my family and people who would never dream of selling 6 any sort of information on me, I accused them, someone 7 in that room, of selling a story. 8 Q. We now know that in fact your phones were being hacked. 9 A. Yes. This was -- the fact that they had this piece of 10 information was as a result of accessing my phone 11 messages and those of people around me. 12 Q. So how does it make you feel now, knowing that you were 13 driven to make the accusations against your friends and 14 family as a result of phone hacking? 15 A. Understandably really angry and I feel terrible that 16 I would even consider accusing people of betraying me 17 like that, especially people who I know would rather die 18 than betray me, but it just seemed so intensely paranoid 19 to assume that your house is bugged or you're being 20 listened to somehow. It just seemed so extreme, 21 especially considering that I'd changed my number so 22 many times, and it still happened, that I couldn't think 23 of an alternative, but it's really upsetting for them 24 and for myself that I accused them. 25 Q. What would you say to those who did this? Page 28

7 (Pages 25 to 28)

1 A. I don't think -- I don't think it would be appropriate 2 in court. 3 Q. I won't press you then. 4 A. I would -- you know, I think it's understandable. It's 5 just outrageous. It's kind of unfathomable to feel like 6 you are justifiable in behaving that way, I think, and 7 the ramifications on people's lives are very rarely 8 considered by the people doing it, I think. The effect 9 that it had on my life was really damaging to me and to 10 my family and friends. 11 Q. Thank you. That takes us perhaps rather neatly to 12 paragraph 5 of your witness statement, where you 13 describe some of the other intrusions into your privacy. 14 In particular, you talk about journalists and 15 photographers would often turn up in meeting places that 16 you'd arranged on the phone and nobody else knew about. 17 That you had men sitting outside your house and you were 18 convinced that they were somehow listening to your 19 private conversations. 20 A. Mm. 21 Q. Mr Sherborne has touched upon this a little already, but 22 could I ask you perhaps to develop on just the scale of 23 the impact on your life that these events had? 24 A. To be honest, it made it very difficult to leave the 25 house. I did feel constantly very scared, and intensely Page 29	1 understand how they knew, but I felt like I was living 2 in some sort of video game and people kind of 3 pre-empting every move I made, obviously as a result of 4 accessing my private information. 5 Q. Thank you. Moving on now more broadly to the question 6 of photography, were photographs taken of you published 7 accurately, or were they altered? I understand there's 8 a particular example that you'd like to tell the Inquiry 9 about? 10 A. I mean, there are several examples of -- I think a story 11 can really tell a picture, but often -- can tell -- 12 sorry, that didn't make sense. 13 LORD JUSTICE LEVESON: The other way around. 14 A. Yes, thank you. 15 MR SHERBORNE: If it helps, I do have a copy of the article 16 that Miss Miller is referring to, which I can hand up. 17 MR BARR: Sir, we were notified of this in advance and the 18 publication in question has already been given advance 19 notice of this, so I have no objection to a copy of it 20 being circulated. 21 LORD JUSTICE LEVESON: You're going down uncharted 22 territory for me. Does the relevant -- well if 23 everybody's agreed, then so be it. Let me see it. It's 24 not how I would prefer it to happen. Thank you. 25 A. Yes, in this particular situation I'm the ambassador of Page 31
1 paranoid. I've kind of touched on it all, really, but, 2 you know, to the degree I had -- with my publicist we 3 had a separate number that we would only speak to each 4 other on that number, and subsequently I found out that 5 Glenn Mulcaire had that number as well. So every area 6 of my life was under constant surveillance and 7 instinctively I felt that and felt very violated and 8 very paranoid and anxious, constantly. 9 Q. You tell us, moving to paragraph 8, that you found 10 "photographers and journalists turning up at places 11 where I thought I could avoid media intrusion"? 12 A. Yes. 13 Q. Presumably as a very famous actress, you were well used 14 to being photographed in certain circumstances? 15 A. Yes. 16 Q. But are we here talking about circumstances in which you 17 were hoping to have some privacy? 18 A. I think there wasn't a circumstance that existed where 19 I wasn't hoping to have some form of privacy but 20 obviously in certain situations that was impossible. 21 I think what was more baffling was the fact that 22 people found out before I'd even arrived where I was 23 going and so that feeling of people knowing absolutely 24 everything about you was, as I said before, really 25 intimidating and scary and confusing. I didn't Page 30	1 a children's charity for terminally and seriously ill 2 children and I was at their annual fundraising ball 3 where many of the children were and many people who were 4 donating money, raising money, et cetera, and there was 5 a very sick child that I was playing with in a corner of 6 the room who was pretending to shoot me and I was 7 pretending to die, which was -- you know, we were 8 playing a game. And somebody took a photograph and the 9 Mirror cut the boy out of the photograph and said that 10 I was drunk. And obviously, looking at these 11 photographs, they look -- you know, it's almost amusing. 12 It looks awful. It looks shocking. And they were aware 13 at the time of the situation, the real situation that 14 I was in. 15 And so I complained, I sued, I won, they printed an 16 apology that was miniscule and sort of irrelevant a few 17 days later, but by that point the damage is done. If 18 anybody in my line of work sees this photograph and 19 hears that I was behaving as they suggested at a charity 20 event, it's just detrimental to my career, to my 21 reputation, and I think this is sort of the problem. 22 You know, the fact that they knew that they would be 23 sued and have to pay damages was really not enough of 24 a deterrent in certain situations within the media. You 25 know, this was -- Page 32

1 LORD JUSTICE LEVESON: This article should not go on the 2 website. There is absolutely no reason to do it, and 3 I'm not prepared to republicise that which has happened. 4 A. Thank you. 5 MR BARR: It may suffice if I read the apology that was 6 later given by the newspaper in question. It's 7 entitled: 8 "Sorry, Sienna. On Saturday, 12 March, we printed 9 pictures of Sienna Miller, who is an ambassador for the 10 Starlight Children's Foundation charity, at the 11 Starlight Ball for terminally ill children. We said 12 that Sienna's boozy antics had shocked guests at the 13 event and thereby suggested that she had behaved in an 14 unprofessional manner. We are happy to make clear that 15 Sienna was not drunk and did not behave 16 unprofessionally. In fact in the pictures Sienna was on 17 the floor playing with a seriously ill six-year-old 18 child. We have apologised to Sienna." 19 If I can move from photography back to the question 20 of phone hacking and to bylines and to the way also in 21 which sources were portrayed, you say at paragraph 9 of 22 your witness statement that the intrusive pieces about 23 your private life, often sourced to "pals or close 24 friends", appeared to be closely linked to what you 25 remember was being said to you by your family and Page 33	1 Q. How did you feel when you found out that the intrusion 2 had gone beyond you to those around you? 3 A. I felt terrible. I mean, these were people who had 4 never done anything remotely public, who had been under 5 constant surveillance by this man. And it just seemed 6 very crude, looking at the notes, his hand-written -- 7 having initially been told there was no evidence and 8 then receiving a stack of evidence, hand-written notes 9 with dates referring to very personal things within my 10 life. 11 All my telephone numbers, the three that I changed 12 in three months, my access numbers, PIN numbers, my 13 passwords for my email that was used to later hack my 14 email in 2008, was on these notes. And then, as you 15 said, you know, a number of my friends, I think about 10 16 phone numbers in total. So there was just this web of 17 surveillance, which obviously makes it very easy to 18 understand how they were getting all of this 19 information. Everyone close to me was being monitored 20 and electronically listened to. 21 Q. I see. Could I ask you now about the litigation itself, 22 just a few questions. First of all, what was your aim 23 in taking action against the media? News International 24 in particular, News Group News. Were you seeking 25 financial compensation or did you have some other Page 35
1 friends. Did the fact that these articles were being 2 attributed to "pals and close friends" fuel the 3 suspicions about your friends that you've described 4 earlier? 5 A. Of course. Especially when the information coming out 6 was very similar to that which I'd said to specific 7 people. 8 Q. And to those who wrote these articles, under whose 9 bylines they appear, do you think that it is ethical to 10 give a false attribution to a story? 11 A. No. Absolutely not. 12 LORD JUSTICE LEVESON: Not a difficult question to answer 13 MR BARR: No, sir. 14 A. But often journalists -- they would be written by 15 anonymous journalists, they wouldn't print their names, 16 which was almost an admission from their part that it 17 was unethical. 18 Q. I hope I'm bowling the straightest of balls. 19 If I can move on now to the time when you found out 20 that you had been hacked and at paragraph 12 of your 21 witness statement you say that you discovered that it 22 wasn't only you, that lots of people close to you had 23 been put under surveillance, and that Mr Mulcaire had 24 created a project under your name? 25 A. Yes. Page 34	1 purpose? 2 A. No, it was not about financial compensation. I would 3 rather have not gone through any of the litigation that 4 I've had to go through. No, not for financial gain. 5 I wanted to understand the extent of the information 6 that they had on me. I wanted to know who knew -- who 7 knew about all of this information, who had access to my 8 telephone numbers, who had been listening to me. 9 I mean, it's that feeling of knowing people are talking 10 about you behind your back or watching you and not being 11 able to confront it. It's very frustrating. So 12 I wanted to get to the bottom of it. 13 Q. Your civil claim was successful, and did you think that 14 the court procedures provided an adequate remedy for 15 you? 16 A. No. I'm still waiting for the full disclosure, which is 17 the only thing I really want, from News International, 18 and so far it's been very unsatisfactory what I have 19 received. I will continue to wait for it, but it's been 20 a long process so far. 21 Q. Although this is strictly a matter between you and 22 News Group News, it may be right that I tell you I've 23 been told by counsel, Mr Rhodri Davies, that that order 24 is going to be complied with. 25 Can we perhaps look at what it was that was admitted Page 36

1 in the litigation that you brought? Could we have up, 2 please, the document, the reference number which ends -- 3 it starts at 31105 and I'm looking at paragraph 8 on the 4 second page, please. That must be a wrong reference. 5 LORD JUSTICE LEVESON: No, I don't think so. I think that's 6 what you want. 7 MR BARR: Yes, that's exactly what I want. Thank you. 8 We see there then this is what was admitted in 9 a nutshell in the civil proceedings. Perhaps I can 10 read: 11 "This meant that News Group accepted that 12 confidential and private information had been obtained 13 by the unlawful access of the claimant's voicemail 14 messages, that confidential and private information had 15 been published as a result, and that there had been an 16 invasion of her privacy, breaches of confidence and 17 a campaign of harassment for over 12 months. News Group 18 accepted that these activities should not have taken 19 place and that the articles should not have been 20 published." 21 So there we have it in a nutshell. 22 Could I take you now, please, finally to the end of 23 your statement, and paragraph 18. In the conclusion to 24 your witness statement, amongst other things, you make 25 the point that the actions of the News of the World made Page 37	1 MR BARR: Thank you. Those were all my questions. 2 A. Okay. 3 Questions from LORD JUSTICE LEVESON 4 LORD JUSTICE LEVESON: What you could put -- it is this way, 5 is it, that it is important to identify who has done 6 wrong, but it is equally important to exonerate all 7 those who have done absolutely no wrong? 8 A. Yes. 9 LORD JUSTICE LEVESON: Yes, I understand. Thank you very 10 much indeed for coming. I know you have a busy life and 11 I'm very grateful. 12 A. Thank you. 13 MR CAPLAN: Sir, can I make one matter clear? I think it 14 was a slip of a tongue by Mr Barr, but he was asking 15 Miss Miller: "The proceedings you brought against the 16 media and News International in particular" in the 17 context of phone hacking. I think it's quite clear that 18 Miss Miller's evidence is in relation to bringing 19 proceedings solely against News of the World. 20 LORD JUSTICE LEVESON: I think that's absolutely right. 21 Thank you very much. 22 A. Thank you. 23 MR BARR: Sir, the next witness is Mr Thomson. Do you want 24 to move straight to Mr Thomson or have a short break? 25 LORD JUSTICE LEVESON: We'll carry on. Page 39
1 your life hell and damaged a lot of your relationships, 2 making you nervous and paranoid. I don't want you to go 3 into anything private that you don't want to say in 4 public, but are you able to give us some insight about 5 the type of damage that was done? 6 A. It's really hard to kind of quantify in words. It's 7 more -- it's more the state of mind that you're in as 8 a result of that level of intrusion and surveillance and 9 interception, which is just complete anxiety and 10 paranoia. I realised, having watched the testimonies of 11 people this week, that there are far more severe cases 12 of this with the Dowlers and the McCanns and it's 13 alarming what's happened. Comparative to my life, this 14 was too much to deal with and I've had to fight tooth 15 and nail constantly to gain the freedom which I've 16 managed to acquire now. 17 The relationships that were damaged, just this kind 18 of breeding of mistrust amongst all of us. It wasn't 19 just me accusing people, it was my mother accusing 20 people, nobody could understand how this information was 21 coming up, so everybody was very upset and confused and 22 felt very violated by this constant barrage of 23 information that was being published. It was impossible 24 to lead any kind of normal life at that time, and that 25 was really difficult for a young girl. Page 38	1 His statement is actually provided in the main 2 commentary; is that right? 3 MR BARR: It is, sir, but what I was proposing to do was to 4 try and exploit the benefit of Mr Thomson's long 5 experience as a media lawyer and to ask him some 6 questions about the functioning of the system. 7 LORD JUSTICE LEVESON: That's absolutely fine. I'm not 8 challenging his giving evidence. I'm merely putting it 9 in a slightly different box to the evidence that 10 essentially we've been hearing to date. 11 MR BARR: Indeed, sir, it's going to be of a rather 12 different nature. 13 LORD JUSTICE LEVESON: Thank you. 14 MR MARK THOMSON (sworn) 15 Questions from MR BARR 16 MR BARR: Mr Thomson, could you give us your full name, 17 please? 18 A. Mark Walter Harold Thomson. 19 Q. And your professional address? 20 A. 41, Maiden Lane. 21 Q. You voluntarily provided the Inquiry with a witness 22 statement, which is signed and dated 7 November 2011. 23 Are the contents of the statement true and correct to 24 the best of your knowledge and belief? 25 A. Yes. Page 40

1 Q. The statement is going to be taken as read, Mr Thomson, 2 so we don't need to go to all of it. But you set out in 3 the introductory section your professional credentials 4 as a media lawyer? 5 A. Yes. 6 Q. It's right, isn't it, you've been practising media law 7 for something in excess of 20 years? 8 A. Yes. 9 Q. And that you have acted, if I can put it this way, for 10 both sides, but most recently predominantly against 11 tabloids in the popular press? 12 A. Yes. 13 Q. And that you also have experience of media-related 14 regulatory work? 15 A. Yes. 16 Q. You're an author in the field and you also have had 17 recently a particular interest in representing the 18 victims of voicemail interception? 19 A. Yes, that's right. 20 Q. You go on in your witness statement to deal with breach 21 of confidence actions. You give as an example a case in 22 which you acted for Hugh Grant in 1996 and 1997, 23 concerning information emanating from a hospital. 24 You say that at paragraph 12 after supremely lengthy 25 and unsatisfactory dealings with the PCC, legal Page 41	1 about the PCC. Can you tell us in a nutshell what you 2 consider to be the problems with the current PCC set-up? 3 A. They wear too many hats. They appear to represent the 4 media at times, such as in the Parliament, they appear 5 to be speaking as their trade union spokesman. The 6 other times they're trying to adjudicate as independent 7 persons, and then they try and mediate at the same time, 8 and I think that in small part they're effective. 9 Notification of harassment is -- 10 Q. If I just stop you there and we'll pick up on that point 11 of independence. What do you think can be done about 12 that? 13 A. Well, I really don't think that just a few adjustments 14 to the PCC will work. I think my view, having done 15 a lot of broadcasting work, is the only way -- if 16 Parliament and everyone wants proper regulation, it has 17 to be something like the ITC, an independent regulator 18 with power to investigate, and that means power to call 19 for evidence, draft articles, emails, the powers to 20 fine, so that newspapers are actually -- take it 21 seriously, and powers to order corrections or -- not 22 apologies, necessarily, because that has to be 23 voluntary, but powers to order corrections on the same 24 page as they appeared. And unless that happens, a PCC 25 with a few extra teeth isn't going to work, in my view. Page 43
1 proceedings were issued? 2 LORD JUSTICE LEVESON: Are these the proceedings which 3 Mr Grant told us about? 4 A. That's right, yes. 5 LORD JUSTICE LEVESON: The incident, so we can bring it to 6 mind. 7 A. The hospital, yes, exactly. 8 LORD JUSTICE LEVESON: Yes, right. 9 MR BARR: Could I ask you, from your perspective as 10 a professional media lawyer, what was unsatisfactory 11 about the PCC's handling of this case? 12 A. They were slow and their concern and I think the 13 Mirror's concern was the impact of an adjudication on 14 possible future proceedings. So the jurisdictional 15 question was, I think they were trying to suggest that 16 Mr Grant ought to waive legal claims before the Mirror 17 adjudicated. He wasn't prepared to. I think there was 18 over six months', maybe nine months' delay before they 19 finally adjudicated in the form we've seen. It was 20 a very short adjudication and it didn't deter the 21 Mirror, because when we issued proceedings, they 22 defended initially the claim for breach of confidence, 23 so it had no effect apart from delay. 24 Q. Moving from that particular example to the general, at 25 various places in your witness statement you tell us Page 42	1 LORD JUSTICE LEVESON: You'd better explain for those that 2 don't understand something about the background of the 3 ITC. 4 A. There's been a number of regulatory bodies in 5 broadcasting, but the ITC was a precursor to Ofcom, and 6 the ITC were the regulator for commercial stations. 7 They derived from one of the many broadcasting acts, but 8 they had considerable power to investigate of their own 9 motion without necessarily a complaint being made, to 10 order corrections, statements about whether there's been 11 an intrusion, and when -- I know, because I acted for 12 Carlton TV, when you get a notice from the ITC, you take 13 it seriously. 14 On the investigation that the ITC did for Carlton, 15 they asked for hundreds of hours of background tape 16 recordings of the programmes in question. It took nine 17 months to investigate, and I had thousands of hours of 18 tape recordings in my room, but they did a complete and 19 thorough investigation. They asked searching questions, 20 asked for documents, and they adjudicated Carlton were 21 not in breach and it was a great relief, but the 22 broadcasters took it seriously because they could be 23 fined. 24 Carlton had been fined two or three years before, 25 I think £1 or £2 million in relation to another Page 44

1 programme, so they knew the effect, and Carlton took it 2 seriously and it was dealt with seriously and other 3 broadcasters I know, because I at times acted for them, 4 thought the ITC were effective. My view is that in 5 private, most newspapers don't think the PCC are 6 effective, but that's how they want it. 7 Q. Picking up on the question of being taken seriously, you 8 do make clear in your statement, and you've just 9 repeated it now, that you don't think that the media 10 take the PCC warnings seriously. I'd like to ask you, 11 are you referring across the board or to a particular 12 section of the media or to a particular title? 13 A. I think it's across the board, really, but mainly 14 non-broadsheet newspapers, so red top and tabloid 15 newspapers. They don't want the PCC to be effective, in 16 my view. They're quite happy with it as it is. They 17 may say they want a few more tweaks to make it tougher, 18 but as long as the PCC exists, this current activity 19 will continue. 20 Q. Whilst you are, I think, on balance very critical of the 21 PCC in your statement, it's right to say, isn't it, that 22 you do point out that there are some things that they 23 have done successfully. Could you tell us, and having 24 told us about the bad, could you tell us about the good, 25 please? Page 45	1 just ask you about in relation to what you've just said. 2 The first is that the PCC's reach was wide enough to 3 extend to photographing -- photographers and their 4 organisations, in the sense that they gave out the 5 notice to them. 6 A. Well, it wasn't, it is voluntary, and this is the point, 7 that they have -- I mean I've had conversations with 8 them. It's not part of their remit, but -- so 9 technically they don't regulate photographers, and I've 10 spoken to agencies as well. They don't have power to 11 regulate independent agencies or news agencies, it's 12 just publishers, and this is a problem. 13 A lot of the product that newspapers produce comes 14 from freelancers, freelance journalists, freelance 15 photographers, but what they thought, even though they 16 don't have the power or the reach, is that we will at 17 least notify the agencies, and that's a good idea, but 18 their constitution doesn't allow for it, which is why in 19 my view the PCC plus won't work. Any new proper 20 regulator has to deal with not just the publishers, but 21 the independent agencies, photographic agencies and 22 freelancers. 23 LORD JUSTICE LEVESON: How can you define that? I'm not 24 asking you necessarily to do it off the top of your 25 head, but if you've given some thought to this issue, Page 47
1 A. Yes. They've developed -- they occasionally do get 2 involved pre-publication, it used to be they only 3 covered what was published but now they've changed their 4 rules, they do get involved in pre-publication 5 situations into news gathering and in particular 6 harassment. 7 So what we did in the Hugh Grant matter, and it 8 worked to a limited degree, was I sent them an email, we 9 asked them -- this is the Tinglan Hong harassment, but 10 I've used this process before. I sent an email 11 expressing concern about a media siege of Tinglan Hong's 12 house, and they passed it on to the media and also 13 recently, it's a good development, they've contacted 14 picture agencies as well. So they pass on the message 15 and endorse it, saying, "This is unacceptable", and it's 16 a good way to circulate notices, but ultimately, if the 17 media and the paparazzi agencies want to do it they will 18 do it anyway, which is why we had to get a court order 19 later. 20 Q. I see. Could I move away from the PCC to the question 21 of prior notification -- 22 LORD JUSTICE LEVESON: No, before you go there, can I just 23 come in on that? 24 A. Yes. 25 LORD JUSTICE LEVESON: There are two things that I want to Page 46	1 how you might define that group is not unimportant. 2 A. Well, photo journalists, journalist agencies, people 3 involved in producing stories for the media. This is 4 why I think the PCC can't -- it structurally can't work 5 in the sense that the structure is just about the 6 newspapers, whereas in reality some of the worst -- 7 Sienna Miller's explained some of the worst activities 8 in relation to photographic agencies, and they're 9 independent, and in reality the PCC can't regulate that 10 and the newspapers turn a blind eye on how they got the 11 material. As long as they have great photographs of 12 someone getting angry or crying, they'll publish the 13 photograph. 14 So my view is the regulator -- an effective 15 regulator has to deal with news-gathering persons 16 wherever they're from in this country, so whether it's a 17 paparazzi freelancer, an employed paparazzi or news 18 agencies, that has to be dealt with and that's the only 19 way it will be effective. 20 LORD JUSTICE LEVESON: Then you have to be able to identify 21 them. 22 A. A lot of them have NUJ cards, even paparazzis. They 23 sometimes say, "I have an NUJ card". It's relatively 24 easy in my view to work out -- 25 LORD JUSTICE LEVESON: So you could create a list, could Page 48

1 you? 2 A. Yes, I could. 3 LORD JUSTICE LEVESON: You might like to think about doing 4 that. 5 A. Yes. 6 LORD JUSTICE LEVESON: The other question that I wanted to 7 ask before you go on to the topic Mr Barr wanted to 8 cover was the way in which this would ever work in 9 relation to publications that aren't traditional 10 periodicals, whether they be magazines or newspapers, 11 and more particularly, more specifically, the Internet. 12 A. Well, I mean the Internet is difficult, and there's 13 convergence, which means that the BBC now compete online 14 with the Daily Mail and it is an issue. In reality, the 15 Ofcom regulations don't cover the BBC online, but only 16 cover BBC on radio, so the regulations are a complete 17 mess in my view and need to be sorted out across the 18 board. 19 I think in the list that I could provide you with, 20 the most damaging publications are the publications of 21 traditional news websites, so whether it's the BBC or 22 Daily Mail or the Mirror, the online publications have 23 significant effect, whereas minor websites -- minor 24 websites are probably beyond regulation. But that 25 doesn't mean that regulation shouldn't take place, Page 49	1 you what you say about the trend that you've observed 2 with prior notification. You describe that now there's 3 rather less prior notification given than there used to 4 be. 5 A. Yes. 6 Q. Can you perhaps give us some detail about that? Has 7 this been a progressive decline or a sudden decline? 8 A. It's a progressive decline. I've got to make 9 a distinction. Although I've had many disputes with 10 Associated, and quite a lot of my work is against them, 11 in fact, oddly or not, they tend to notify almost all 12 their stories. You do tend to get the Friday afternoon 13 email from Associated much more often than any other 14 newsgroup. But the other, the red tops tend less and 15 less to notify on bigger stories, and as someone said 16 before here, the bigger the story, and perhaps the more 17 intrusive the photograph, the less likelihood there is. 18 The photographs are generally potentially more 19 intrusive, and the media groups recognise that and hence 20 the reason not to notify, because if they say, "And 21 there's an intrusive photograph of someone in their 22 garden or semi-naked", it's pretty obvious that a lawyer 23 may well advise to instruct counsel to apply to court 24 immediately. They want to sell newspapers, they don't 25 want to be injunctioned, they don't notify. Page 51
1 because the real damage occurs to the traditional 2 newspapers and broadcasters who make money off those 3 news platforms. So it's workable. You can do that. 4 LORD JUSTICE LEVESON: It's not just minor websites. It's 5 also bloggers and the rest of them. 6 A. Yes, that's an issue as well. There are ways. I mean 7 there's an issue about when someone's blogging about 8 you, whether strategically a complaint ought to take 9 action -- bring attention to someone whose following is 10 100 or 150. In fact in reality whether it's a legal 11 complaint or a regulatory complaint, possibly 12 complaining about a blogger is self-defeating because 13 you bring attention to something which is best ignored. 14 My view is that on those small websites, best ignored 15 until they reach a critical mass of attention in 16 a newspaper. 17 If you run around trying to worry about every single 18 blog on the Internet, you'll end up sort of paranoid and 19 mad, and that's not worth it. 20 LORD JUSTICE LEVESON: I don't want to get myself into that 21 position. All right, thank you. Yes? 22 MR BARR: Indeed putting some clear blue water between 23 paranoia and madness, can we move on to prior 24 notification and you tell us a little bit about that in 25 your statement. I'd particularly like to explore with Page 50	1 Q. Have I understood you correctly that you think the 2 motive that is driving this is a desire to prevent 3 injunctions -- 4 A. Yes, it was admitted in the Mosley case, but yes, it's 5 quite clear. They don't want to be stopped. They 6 rather -- and for clients who've seen -- if there's an 7 intrusive story that has been published, you don't get 8 notification, many clients say, "It's out now, I have to 9 deal with it, I have to explain to everyone about it", 10 they'd rather not take action about something that's 11 come out, and that's a calculation. The media don't 12 want to be stopped, but they realise that to sue on 13 something that's private is going to be difficult, it's 14 going to be embarrassing, it involves people talking 15 about their private life to some extent, and the media 16 win by not notifying. 17 Q. So is there a gradation then? Is there any pattern? Is 18 it on the more intrusive stories that you tend not to 19 get a notice? 20 A. Yes, the more intrusive stories. My experience of the 21 tabloids, and I include the Daily Mail in that, although 22 they strictly are not, is that it's the intrusive 23 stories that are of great concern. The Daily Mail does 24 tend to notify. The others tend not to notify, more and 25 more so, and it's the intrusive photographs of the Page 52

1 intrusive stories. We can all spot something really 2 intrusive. It's what they would want on the front page 3 of a Sunday newspaper. The more intrusive it is, the 4 less likelihood it is -- or even if they do notify, they 5 might notify at the last possible moment on Saturday 6 afternoon when someone's shopping or not available, so 7 they choose their time well, if they do notify, but it's 8 less so now than it used to be. 9 In the 1990s, I said in my statement, in the 1990s, 10 you would always get notification. You would or would 11 not get injunctions, but you would -- it was unheard of 12 not to get notification. But then around about 2001, 13 2002, when the Human Rights Act came in, maybe they were 14 worried about it, it became less and less. 15 Q. I see. I'm getting the impression that your evidence on 16 this issue is the problem particularly with the tabloid 17 end -- 18 A. The red tops, yes. 19 Q. Can I take it it's not a problem with the broadsheets? 20 A. Yes, I don't think -- I think I've only sued the 21 broadsheets once or twice in the last 20 years, but -- 22 for confidence or invasion of privacy. 23 Q. I'm going to move from that now because I think we may 24 hear more about prior notice this afternoon, and I'm 25 going to take an excursion away from the regulatory Page 53	1 the pursuits are dangerous and I have recommended 2 clients video it or film what happens and I've seen some 3 of these car pursuit videos and they are frightening, 4 and the paparazzi who are not regulated, they frequently 5 jump red lights and endanger themselves and others, and 6 for Lily Allen, they crashed into her when they went 7 through a red light a few years ago and we had to get an 8 injunction to protect her as well. 9 Q. Would it be fair to say that the lessons which it would 10 have been thought might have been learned after an 11 inquest which was conducted in this very court have not 12 been learnt? 13 A. Exactly. 14 Q. Can I move now to a second topic arising out of your 15 section on harrasment and it's at the top of page 6 of 16 your statement, where you explain that Sienna Miller 17 became well-known for enforcing her rights legally, so 18 the press largely moved on to another less risky target. 19 That seems to me to raise a question for potential 20 claimants: fight or ignore. Is that a real issue for 21 victimses of harassment as to how to deal with it? 22 A. Yes. I mean I think I've said this many times, I'm not 23 waiving privilege, but when Sienna couldn't take living 24 in England any more, she said "I can't face it any 25 more", I said, you've got two choices. Ignore, fight or Page 55
1 theme to pick up on paragraph 16 of your witness 2 statement, which is in the section "Media and paparazzi 3 harassment, Sienna Miller". 4 A. Yes. 5 Q. We've just heard from Sienna Miller, but you say that 6 you've personally witnessed a number of car chases when 7 photographers have jumped red lights or driven 8 dangerously to pursue her, and that it is terrifying? 9 A. Yes. 10 Q. How common an occurrence is this sort of law breaking in 11 order to get a story or a photograph? 12 A. My view, it was very common, especially for 13 Sienna Miller, but I was meeting her at her home or at 14 one time I was going to court with her and I saw the mob 15 of photographers outside and at one stage I think she 16 was just going to the GP for tablets or something, they 17 ran -- they raced across -- I think it was -- vivid 18 memory, they had a Porsche and they raced across a zebra 19 crossing with that woman with a pram, or a pregnant 20 woman, and it was really frightening. I think 21 I notified the police and they couldn't get evidence of 22 it. 23 But it is truly frightening to see a sort of news 24 mob in pursuit. It's certainly intimidating and 25 frightening when they surround you at a restaurant, but Page 54	1 move to Paris. Those were the only options. And in 2 reality she had only one option, which was take action. 3 Q. If we expand that a little, obviously there are some 4 people who have the means to fight -- 5 A. Yes. 6 Q. -- in these circumstances. How can those without means 7 be protected? How can they fight, if that's what they 8 elect to do? 9 A. It is difficult, because a lot of the time you're -- 10 insofar as -- a lot of the time you're dealing with 11 photographers, you don't know their names. You might 12 have their number plates, have pictures of them, you 13 don't know their names. Insofar as no win no fee 14 arrangements are available to protect, and they 15 theoretically would be, if you're suing unknown people, 16 which is what Tinglan Hong's action is, against "unknown 17 photographers", no lawyer will acting on a CFA against 18 an unknown defendant because you're never ever going to 19 get paid. So in reality, unless there's a proper 20 regulator, there is no protection from paparazzi at all 21 unless you're wealthy, which is wrong. 22 Q. If there was a -- 23 LORD JUSTICE LEVESON: Hang on, you could also find 24 a different way of doing it. 25 A. Move to Paris? Page 56

1 LORD JUSTICE LEVESON: No, no, no, you misunderstand me. 2 You could find a different way of obtaining a remedy 3 that is short of the panoply of High Court proceedings. 4 A. Yes, undoubtedly, and one of the -- I mean, this is why 5 I think an effective regulator, and this is the European 6 Court decisions on this, <i>Peck v UK</i>, but an effective 7 regulator should provide effective remedy, which means 8 an injunction -- possibly compensation, that may be left 9 to courts -- but an injunction to stop those people 10 governed by that regulator would be effective, and it 11 would be cost-effective. So that's a solution, but 12 I think there'll be a lot of hostility by all those 13 affected by allowing another body, not a court, to grant 14 injunctions. 15 It's quite complex. They may then end up with 16 jurisdiction disputes about who should grant an 17 injunction, should you have to go to a high court judge 18 or should you go to the regulator. But if a regulator 19 could stop this activity, effectively at no cost, it 20 would work and the media would scream and howl about it, 21 mainly because it would work. 22 MR BARR: I'm going to move on now to another topic. It's 23 on the same page of your witness statement, 24 paragraph 22. 25 A. Yes. Page 57	1 if newspapers choose not to notify, and it's not in the 2 public interest, then that should trigger an 3 availability for exemplaries. It may well be that one 4 can formulate a condition for exemplaries. If the means 5 of acquisition is unlawful and they choose not to notify 6 and there is no public interest, then exemplaries ought 7 to be available and that may deter newspapers from 8 taking these steps. 9 Q. One of the other themes of your witness statement is the 10 ways in which you believe that the media are getting 11 around the laws that undoubtedly exist, and I'm now 12 looking at page 8 of your witness statement, 13 paragraph 28. 14 A. Yes. 15 Q. You say that the problem recently appears to be that 16 having failed to lobby for immunity from the Human 17 Rights Act, the media has sought to get around privacy 18 laws by a number of other means ranging from simply 19 denigrating privacy claimants and it's there I want to 20 pause. You give some examples, but could you give us 21 some idea of the scale of the problem, in your 22 experience, of the press denigrating people who take 23 them on? 24 A. Well, you have to look at the Daily Mail attack on 25 Hugh Grant. It's pretty clear that they're attacking Page 59
1 Q. Where you talk about exemplary damages and you explain 2 that you've had a change of mind and you now think that 3 exemplary damages in actions for invasion of privacy and 4 breach of confidence are appropriate and necessary in 5 exceptional circumstances. Of course, the answer to 6 that question lies in the hands of the senior judiciary 7 as a matter of law, unless there's legislation, but can 8 I give you the opportunity to explain why you think that 9 should be the case? 10 A. Because of this calculation. I mean, this calculation 11 that they make. If in fact in extreme circumstances 12 a newspaper is obtaining confidential information by 13 unlawful means such as phone hacking, deciding cynically 14 not to notify, therefore taking the opportunity to stop 15 it away from the victim, and if they're making 16 a calculation that, well, we're going to make £50,000 17 out of that headline anyway, then if they make that 18 calculation and they intrude permanently into someone's 19 privacy, which can't really be remedied, then they 20 should pay for that. They make the cynical, unlawful 21 calculation, they should pay. 22 In fact, it's not just me, in fact the suggestion to 23 this, or the -- it was reminded me by Jack Straw in his 24 speech I've exhibited, but he suggested, when he was 25 talking about the origin of the Human Rights Act, that Page 58	1 him because of his -- 2 Q. That might perhaps be a single incident, but my question 3 is about the scale. Is it common or not? 4 A. Yes, I believe it is. I acted for Loreena McKennitt in 5 her privacy action which went up to the Court of Appeal 6 and was successful, and the House of Lords, and she was 7 not only attacked frequently in columns of broadsheets 8 and tabloids, but they misdescribed her, the nature of 9 her action, critically misdescribed it. 10 In fact, it's quite interesting, if you look at all 11 the attacks on Loreena McKennitt, they had the same 12 critical error running throughout. It's Paul Dacre's 13 speech, articles in the Independent, they had the 14 same -- it's like it was written by someone and 15 regurgitated repeatedly. The same mistake was there in 16 the trenchant criticism of my client's action. 17 Max Mosley can speak for himself -- 18 LORD JUSTICE LEVESON: What was s that mistake? 19 A. They suggested that Loreena McKennitt had complained 20 about a biography, about all these matters which were 21 true and accurate, and in fact one of the most important 22 parts of this judgment in the Court of Appeal was that 23 the court said and accepted and it was decided at trial 24 that a number of these facts in the biography were 25 untrue, and so this started, if you like, the doctrine Page 60

15 (Pages 57 to 60)

1 of false privacy. 2 You can claim -- it's just as intrusive to complain 3 about an allegation that's private and true as private 4 and false. So if someone is saying that an actor has 5 cancer, in the old days if it's untrue you'd have real 6 problems in trying to stop it. It wouldn't be 7 defamatory, it's rather sad. But newspapers sometimes 8 would, and in one case of mine they said, well, because 9 it's not true, you can't injunct for invasion of 10 privacy. Well, this case made it clear for the first 11 time that you can injunct for false private information, 12 which is critical, but that was glossed over by the 13 newspapers in their criticism -- in their rush to 14 criticise Loreena McKennitt, and it's a really important 15 point. 16 LORD JUSTICE LEVESON: Yes. 17 MR BARR: If I could ask you then from your experience to 18 put a subjective quantification on the scale of 19 denigration. Would you describe it as common, frequent, 20 standard practice? Or uncommon? Where on the scale 21 does it lie? 22 A. It's invariable. I've acted for Naomi Campbell, 23 Loreena McKennitt, Sienna Miller at the time she was 24 complaining she was chastised for complaining, for 25 whingeing about her privacy. Max Mosley was -- every Page 61	1 A. Of course they can comment on the judicial process in 2 the sense of, "Oh, well, I don't think that injunction 3 should have been granted", but -- this is my opinion, my 4 suspicion is: well, if they go to law, we'll give them 5 a good trashing and it will deter other people from 6 doing the same. That's my view about the strategy 7 behind it because it happens, as I said, almost 8 invariably. Let's make it difficult for them, let's 9 deter others, let's trash them and maybe other people 10 will think long and hard about doing it in future. 11 LORD JUSTICE LEVESON: Yes. 12 MR BARR: The second point that you develop in paragraph 28 13 of your witness statement, Mr Thomson, concerns the use 14 of the social media and the Internet to break stories or 15 to frustrate injunctions by disclosing identities. You 16 described it in terms of the media using the social 17 media and the Internet to achieve these ends. 18 A. Yes. 19 Q. What I'd like to ask you is do you have any firm 20 evidence that injunctions have been frustrated at the 21 instigation of the news media, or not? 22 A. I have firm evidence and inferences and anecdotal 23 evidence from other lawyers, but if I go into the 24 details of it, I break injunctions and people's privacy. 25 Q. I'm not going to ask you to -- Page 63
1 possible claimant, whether it's a footballer, they have 2 all been chastised for complaining, for going to law to 3 get remedies, and it's a sort of tactic to undermine 4 their vindication by trashing the claimant. 5 Q. Is it a problem which is confined to a certain section 6 of the media or not? 7 A. Less -- it's less so some broadsheets, but generally 8 it's universal, this sort of sniping: how dare someone 9 complain about their privacy? I've seen it in the 10 Independent, in the Times, a little bit in the Guardian. 11 It's more so in the Mail, the Mirror and the Sun, 12 et cetera. 13 Q. It's a question of degree? 14 A. Yes, there's a degree. 15 Q. The second part of paragraph 28 of your witness 16 statement develops another -- 17 LORD LEVESON: Sorry, I'm just thinking that last answer 18 through. Of course, there has to be a balance, because 19 ultimately they're entitled to take a different view. 20 A. Yes. 21 LORD JUSTICE LEVESON: Even from the courts, and frequently 22 do. 23 A. Yes. 24 LORD JUSTICE LEVESON: So it has to reach a certain level, 25 hasn't it? Page 62	1 A. Can I give examples without going into details that 2 identify the private information? On one client, 3 a story was laundered. It went -- it was planted in 4 America. The newspaper, having been granted -- having 5 offered undertakings with a public domain proviso, 6 exported the story to America and then reported it 7 a week later, saying, "Aha, the US press have reported 8 this, we can now report it". That's what I call story 9 laundering. "We can't do it, but let's get the 10 Americans to do it". 11 Then there are other examples where an anonymisation 12 order is granted, so the judge makes a decision to give 13 the reasons for his judgment so there can be debate 14 about why the injunction was granted, but he'll 15 anonymise the person, so that the information is given 16 as to the reasoning but not the person. So then the 17 newspaper will have an article about the decision saying 18 it's a scandal, and they will put a picture of the 19 footballer next door, talking about something, and it 20 will be nudge nudge, wink wink, this is the person who's 21 doing it. 22 Sometimes they might use social media. This is 23 inference -- when we're talking about concrete evidence 24 in these cases, it's always inference based on facts, so 25 there are examples where Twitter has been used to Page 64

1 identify the names of anonymised claimants and then 2 other people have suddenly jumped up and said, "Look, 3 it's on Twitter", and I think there has been in some 4 cases evidence brought before the court that this is the 5 sort of campaign of identification by jigsaw. So I have 6 concrete examples, but I can't give you the details. 7 I know of other examples from other lawyers, and they 8 have put evidence before the court, but it's not -- 9 Q. Not direct evidence, it's inferential? 10 A. It's inferential evidence, yes. 11 LORD JUSTICE LEVESON: Of course, all that's very difficult 12 to prove. To give you the American example. 13 A. Well, yes, the American example, but in fact -- an 14 American film producer rang me and told me that's what 15 happened because he spoke to the American newspaper and 16 they said -- I can't go into full detail -- it is really 17 difficult. 18 LORD JUSTICE LEVESON: I'm actually thinking ahead because 19 throughout this exercise I'm not only taking what you're 20 saying, but trying to think of ways that could be 21 devised without impacting on freedom of speech or 22 freedom of expression let alone -- 23 A. No, this is the most difficult area. This is -- I mean, 24 the Internet to some extent, parts of the Internet are 25 the Wild West, and we all know that, and America, unlike Page 65	1 or would you like it? 2 THE TECHNICIAN: I don't have copies of those documents. 3 MR BARR: You don't have copies. Perhaps it's best left 4 that people can read your statement in this regard when 5 it's posted onto the Internet. 6 Can I pick up on one particular topic, and that is 7 where you say at the bottom of page 10, you start 8 talking about phone hacking activity not being confined 9 to one newspaper and one newspaper group, but you say 10 "common industry practice". 11 I just want to explore the basis for this assertion. 12 You first of all cite what Mr McMullen has said, and 13 we'll be hearing from him in due course. You've heard 14 my learned friend Mr Jay's opening when he referred to 15 there being corner names in the Mulcaire document naming 16 the Sun and the Mirror. Is that the basis for your 17 assertion or does it go further than that? 18 A. Yes, it does. I have to be careful because some of 19 the -- I don't want to trespass on the police area, so 20 I'm going to talk slowly to make sure I don't trip up. 21 In addition to the corner names and McMullen, of 22 course Piers Morgan has spoken about this a lot. I have 23 the GQ article here, can I read it out? It's in his 24 words. 25 Q. We're going to be hearing from Mr Morgan in due course. Page 67
1 any other country, has a very different legal situation, 2 so it is quite common and easy to post -- get things on 3 a website in America, or use Twitter or use Facebook, 4 which all these social media websites, the servers are 5 in America, so it is really difficult, but as, 6 I think -- there have been some decisions, I think it's 7 JAH or CTB, I can't remember which anonymised initials, 8 where a number of judges have said, "Just because it's 9 on Twitter doesn't mean I'm going to undo this 10 injunction", but this is a difficult area, as we've seen 11 in the sort of so-called superinjunction scandal a few 12 months ago. It is very difficult and there's no easy 13 solution. 14 MR BARR: That's an answer we're getting all too frequently. 15 If I move on now to the next section of your witness 16 statement, which deals with phone hacking. 17 A. Yes. 18 Q. Because you represent a number of claimants in the 19 voicemail interception litigation, you have an opinion 20 on what the evidence shows and you set out that at 21 paragraph 32 of your witness statement, don't you? 22 A. Yes, that's right. 23 Q. It may be the easier thing to do is to ask the 24 technician to bring up on the screen page 9 of your 25 witness statement. I think the technician has the URN Page 66	1 If you're talking about material which is in the public 2 domain -- 3 A. It is, GQ. 4 Q. Then I think that's a matter which the Inquiry can take. 5 A. Right. 6 LORD JUSTICE LEVESON: So you send me to a GQ article -- 7 A. He interviewed Naomi Campbell and halfway through he 8 said, "Have you got any questions?" and she asked him 9 about phone hacking. 10 LORD JUSTICE LEVESON: We'll ask him and he'll explain 11 himself then. 12 A. Yes. So that's another bit that he's made generalised 13 statements that it was widespread. The next point is 14 Heather Mills has said -- she's my client -- has said to 15 Newsnight and confirmed to me that a person other than 16 Piers Morgan admitted to her at the Mirror Group that 17 her phone had been accessed. 18 LORD JUSTICE LEVESON: I wonder whether we shouldn't do 19 this. If you have a list of -- 20 A. I have quite a long list. 21 LORD JUSTICE LEVESON: -- bits of evidence, I just wonder -- 22 and I want to be as full and forthcoming about all this. 23 A. Yes. 24 LORD JUSTICE LEVESON: Equally I have to be rather careful 25 to be fair. Page 68

1 A. No, I'm trying to be -- 2 LORD JUSTICE LEVESON: I understand why you're being 3 cautious, but if you have areas where -- because of what 4 you've been told by your clients or otherwise, then what 5 I think I would prefer you to do is to provide that to 6 the Inquiry. 7 A. Yes. 8 LORD JUSTICE LEVESON: And enquire whether your clients are 9 themselves prepared to give some evidence. 10 My problem is -- 11 A. That specific point has already been aired on Newsnight, 12 so it's public domain, but what I can do is I can give 13 you the basis of my opinion in a document on that 14 paragraph 36. I can give you further and better 15 particulars of it. 16 LORD JUSTICE LEVESON: I think that would be better. 17 A. Yes. 18 LORD JUSTICE LEVESON: And then whatever I can bring into 19 the public domain, I would. 20 A. Yes, I agree. 21 LORD JUSTICE LEVESON: What I'm anxious to avoid is you 22 saying what somebody said and then -- 23 A. I agree. 24 LORD JUSTICE LEVESON: You understand the point? 25 A. Yes, I prefer that. Page 69	1 MR JAY: The next witness it is Mr Max Mosley, please. 2 MR MAX MOSLEY (sworn) 3 Questions from MR JAY 4 MR JAY: Make yourself comfortable, please, Mr Mosley and 5 your full name for the record. 6 A. Is Max Rufus Mosley. 7 LORD JUSTICE LEVESON: Mr Mosley can I thank you as well for 8 the effort you've put into assisting the Inquiry. You 9 must be heartily sick of lawyers, even if you are one 10 yourself. But I'm very grateful. 11 A. Thank you. 12 MR JAY: Mr Mosley, there is a lengthy witness statement 13 which you have signed. I'm going to ask you, please, to 14 turn it up in that large forbidding bundle in front of 15 you under tab 1 and confirm, please, on the 29th page, 16 that that is your signature that bears the date 17 31 October this year, and that you have signed 18 a statement of truth; is that correct? 19 A. Yes, I have. 20 Q. In relation to yourself, you were born in 1940, you are 21 fluent in French and German, you went to Christchurch, 22 Oxford, to read physics and you then qualified as 23 a barrister? 24 A. That is correct. 25 Q. In terms of your professional career, you didn't in fact Page 71
1 LORD JUSTICE LEVESON: Very good. 2 MR BARR: We've found a solution and the good news continues 3 because my next question is, finally: is there anything 4 further you'd like to say to Lord Justice Leveson about 5 future regulation of the media? 6 A. No. It's covered in my statement. 7 LORD JUSTICE LEVESON: It's not only in your statement, but 8 in a large number of articles that you've attached to 9 your statement, public domain material. 10 A. Yes. 11 LORD JUSTICE LEVESON: In which you've explained your views 12 not only in a book but also in evidence that you've 13 given. 14 A. Yes. 15 LORD JUSTICE LEVESON: And I'm very grateful to you for 16 taking the trouble to put it all together. 17 A. Thank you very much. 18 LORD JUSTICE LEVESON: Thank you. 19 MR BARR: Sir, it would now be a convenient moment for 20 a break. 21 LORD JUSTICE LEVESON: Yes. 22 (11.59 am) 23 (A short break) 24 (12.05 pm) 25 LORD JUSTICE LEVESON: Yes, Mr Jay. Page 70	1 practice full-time in the Bar, you did something else 2 altogether, Formula 1. Tell us a little bit about that. 3 A. While I was at the Bar, I used to race in club races as 4 a sort of hobby and that grew and eventually I moved up 5 into Formula 2, which is just the category below 6 Formula 1, and met people I'd been at Oxford with and we 7 decided to start a company making racing cars, so I gave 8 up the Bar after five years and entered the world of 9 motor racing. 10 Q. What happened, to cut a very long story short, because 11 it was a very distinguished career, is that at one point 12 you were president of FISA, which is part of the FIA, 13 but then in 1993, you were elected present of the FIA, 14 which is the Federation Internationale de l'Automobile, 15 the governing body of Formula 1? 16 A. That is correct. 17 Q. And you remained in that role until your retirement in 18 2009. Please give us a thumbnail sketch of what might 19 be said were your achievements in that role. 20 A. Obviously the FIA is known because of motorsport, 21 because it particularly governs Formula 1, but it is 22 actually the world federation of all the big motoring 23 clubs, and so during the time I was there, we expanded 24 enormously the amount of activity concerning ordinary 25 motoring, and I had a great deal of activity, Page 72

1 particularly in Brussels, to do with road safety and the 2 environment, and the main thing I did was I started, 3 with other people, the European new car assessment 4 programme, which was a crash test programme to improve 5 the safety of vehicles, and that led to really what can 6 be called a revolution in the safety of road vehicles, 7 and I think has contributed to saving a very great 8 number of lives, hundreds in this country, thousands in 9 Europe. 10 Of course it wasn't just me, it was the organisation 11 which I headed, but it's the side of it that nobody 12 talks about, they talk more about Formula 1 motorsport, 13 but it was actually the road safety plus the 14 environmental things, things like improving the 15 emissions legislation so it was more effective. There 16 was an endless list of things to do. 17 LORD JUSTICE LEVESON: This is road safety across the piece 18 nothing to do with trying to drive fast, but simply 19 trying to drive safely on the roads of countries 20 throughout Europe? 21 A. Exactly, sir, yes. It was -- deaths on the roads for 22 example in this country has halved in the last 15 years 23 and about 30 per cent of that, according to Transport 24 Research Laboratory, is due to improved vehicle safety, 25 and I think what we did is probably responsible for Page 73	1 around talking about the list of people, and somebody 2 said, "Mosley, Max Mosley, he must be some relation of 3 Alf Mosley the coach builder from Leicester", and 4 I thought I'd found a world where things are slightly 5 different. 6 Q. Thank you. I'm going to move straight to paragraph 10 7 of your witness statement, and the date is 30 March 8 2008, Mr Mosley. It's an article published in the 9 News of the World. I'm just going to give the heading, 10 we're not going to look at the text, I'm going to 11 paraphrase one matter, and we're certainly not going to 12 look further than that. 13 LORD JUSTICE LEVESON: And there's no question of this 14 article appearing -- 15 MR JAY: No. 16 LORD JUSTICE LEVESON: -- Anywhere. Good. 17 MR JAY: "Formula 1 boss has sick Nazi orgy with five 18 hookers." 19 The article itself links you with your father, 20 doesn't it? 21 A. It does. 22 Q. The article appeared on the front page and then on pages 23 4 and 5 of the newspaper, and photographs appear which 24 were the result of I think a covert camera in the lapel 25 of Woman E, as she was called; is that correct? Page 75
1 most, if not all, of that. So it's significant. 2 MR JAY: The world of Formula 1, of course, is a glamorous 3 world. Would you say that you were someone who courted 4 publicity, Mr Mosley? 5 A. No, never. I tried to get on and do my job. I felt 6 that if you're running something like Formula 1, it's 7 a bit like running a hotel. If it's done properly, you 8 never see the manager. The people who were the stars 9 and the publicity were the drivers. My job really was 10 to try and run it and make sure first of all that nobody 11 got killed and secondly that it was run as fairly as it 12 possibly could be in a very, very difficult 13 technological environment. 14 Q. We should note that you received a Legion d'honneur in 15 Paris, the only public function, I think, that your wife 16 attended; is that correct? 17 A. It is correct. That was entirely to do with road safety 18 rather than Formula 1. 19 Q. One might be forgiven for observing on a personal note 20 that this world is a long way removed from the world 21 which your parents inhabited. Is that a fair way of 22 describing it? 23 A. It is. There was an element of deliberateness about 24 that. The first time that I took part in a club race 25 and got somewhere up the grid, people were standing Page 74	1 A. That is correct. 2 Q. Can you tell us, please, about the timing? The article 3 was not in the first edition of the News of the World, 4 it was in the second edition. Why do you think that was 5 the case? 6 A. I think that was to avoid any danger of me finding out 7 about the article and asking for an injunction to stop 8 it being published. 9 Q. So it's implicit in what you've said that the first you 10 knew about the article is when it was drawn to your 11 attention, you were given no forewarning by anyone? 12 A. That is correct. I first learnt of it about 10 o'clock 13 on the Sunday morning. 14 Q. The article had two aspects. There was a personal 15 aspect, it goes without saying, but then overlaid on 16 that there was the Nazi theme aspect. 17 A. Yes. 18 Q. And both must have caused you concern, but the Nazi 19 theme was particularly damaging; is that right? 20 A. Well, yes. I mean the other theme was a straightforward 21 invasion of privacy, which I thought was outrageous and 22 illegal, but the Nazi allegation was completely untrue 23 and to me, particularly, enormously damaging. And I was 24 outraged by that. 25 Q. Yes. What happened, tell me if I've got this right, on Page 76

1 the News of the World website, video footage was placed? 2 A. That's correct. 3 Q. Was it put there in a way in which it could be copied by 4 others, to your knowledge, or not? 5 A. Yes, my understanding is that there is software which 6 prevents videos being copied, but they did not, for 7 whatever reason, employ that software, so the video was 8 then copied all over the world. 9 Q. I think initially the video footage was removed by the 10 News of the World at the request of your lawyers. 11 However they then notified you that they were going to 12 put it back online, and that prompted you to apply for 13 an emergency injunction; have I got that right? 14 A. I think that's right, from memory. We asked them to 15 take it down, and then we applied for an injunction, but 16 they put it up again I think over the weekend, even. 17 Q. Just moving ahead a little bit, Mr Mosley, the precise 18 chronology is that the application for an emergency 19 injunction was heard by Mr Justice Eady the Friday 20 afternoon, which was 4 April? 21 A. Correct. 22 Q. And his Lordship indicated that he would reserve his 23 judgment over the weekend, and presumably deliver it on 24 Monday morning. Do I have that right? 25 A. That's correct. Page 77	1 MR JAY: The second article is over that weekend, on 2 6 April, and you told us the circumstances in which it 3 was published and the evidence, inverted commas, on 4 which it was based. In other words, no evidence at all. 5 A. No. I mean what happened subsequently is that the woman 6 who was supposed to have given the interview appeared on 7 Sky Television and said that there was no truth in the 8 Nazi allegation at all. I should have said that the 9 main purpose of the story on 6 April was to try and 10 stand up the Nazi allegation, but she actually first of 11 all didn't turn up to give evidence at the trial because 12 she wasn't prepared to perjure herself, and secondly 13 actually went on, as I say, television and said that 14 there was no truth whatever in the story. 15 LORD JUSTICE LEVESON: Hang on, I'm losing the chronology 16 because the trial is much later on. 17 A. Indeed, sir, yes. 18 LORD JUSTICE LEVESON: But the Sky News, was that -- 19 A. Sky News -- I'm sorry, I've made a muddle there. The 20 Sky News came after the trial. I'm so sorry. 21 LORD JUSTICE LEVESON: No, no. 22 A. She didn't turn up at the trial and then -- 23 LORD JUSTICE LEVESON: The facts are very much in your mind 24 and I have them, I think, but I just want to be clear. 25 A. Even I'm getting a bit muddled. It's three years ago. Page 79
1 Q. But what happened over the weekend in relation to the 2 footage? 3 A. As I understand it, they then -- well, they then 4 published a second story on 6 April. 5 Q. Yes. 6 A. Which purported to be an interview with Woman E, the one 7 who had worn the camera, but we found out subsequently 8 at the trial that Mr Thurlbeck who wrote the article had 9 written it beforehand, took it up to her at Milton 10 Keynes and said "I want you to sign this, here's £8,000" 11 and intimated that if she didn't sign it, her picture 12 would be published unpixelated. 13 LORD JUSTICE LEVESON: So let me understand this. The 14 article is the previous weekend. 15 A. Yes, sir. 16 LORD JUSTICE LEVESON: It comes on for an injunction before 17 Mr Justice Eady on the Friday. 18 A. Yes. 19 LORD JUSTICE LEVESON: He reserves without granting relief 20 over the weekend; is that right? 21 A. Yes, that is right. 22 LORD JUSTICE LEVESON: And that is when you learned of these 23 other activities? 24 A. Yes. 25 LORD JUSTICE LEVESON: Thank you. Page 78	1 MR JAY: Let's take it slowly because it's important to keep 2 the chronology in mind and not rush too far ahead to the 3 next bend or chicane -- 4 LORD JUSTICE LEVESON: I think we can do without that, 5 Mr Jay. 6 MR JAY: One aspect of the second article which you draw 7 attention to in paragraph 15 of your witness statement 8 at the end -- we don't have the article available even 9 to us -- made it clear that the tape was being sent to 10 Formula 1 chiefs; is that correct? 11 A. That's correct. 12 Q. Your feeling was, and you develop this in paragraph 16, 13 that the purpose of the second article was to threaten 14 you; is that correct? 15 A. That is correct. 16 Q. The judgment was given by Mr Justice Eady on 9 April, 17 which I think must have been the Wednesday. 18 A. Yes. 19 Q. It doesn't matter, but in terms of summarising its 20 outcome, you were unsuccessful principally because the 21 material was already so far into the public domain that 22 there was no practical purpose, Mr Justice Eady felt, in 23 granting future injunctive relief. Is that a fair 24 summary? 25 A. He said the dam had burst and in another place he said Page 80

1 he didn't want to be King Canute, but he was really 2 saying there was no point giving the injunction, it was 3 everywhere. 4 Q. What he did order was that there should be an expedited 5 trial of your privacy claim; is that correct? 6 A. That's correct. 7 Q. And the matter was very considerably expedited because 8 the trial itself -- 9 LORD JUSTICE LEVESON: You're going a bit too fast, Mr Jay 10 Let me just understand it. Mr Justice Eady took the 11 view that there was no point in coping with something 12 that had already happened, and therefore he refused you 13 relief, but he did, as I understand your evidence, 14 observe there was no legitimate interest, element of 15 public interest which would be served by the additional 16 disclosure of the edited footage at this stage? 17 A. That's correct. 18 LORD JUSTICE LEVESON: But he didn't grant relief in 19 relation to that, but as I understand what you've said, 20 that didn't stop the News of the World just reposting 21 everything again? 22 A. Yes. That's exactly correct. 23 LORD JUSTICE LEVESON: Then -- 24 MR JAY: That's paragraph 36 of the judgment. 25 LORD JUSTICE LEVESON: Paragraph 36. Page 81	1 A. Yes. 2 Q. Were you given any idea -- I'm not going to ask you to 3 talk about what you advised in terms of whether you 4 would win or lose, but were you given any idea about how 5 much the litigation might cost before you embarked on 6 it? 7 A. Yes. I mean, when I had my first meeting with counsel, 8 they explained to me very carefully that first of all 9 there's no such thing as certainty in litigation, which 10 I was already aware of, obviously. That if I lost, it 11 would cost £1 million or more. If I won, it would still 12 cost tens of thousands of pounds. By taking the matter 13 to court, the entire private information which I was 14 complaining about would be rehearsed again in public, 15 with all the press there, with the benefit of absolute 16 privilege for anything that was said, and that at the 17 end of all of that, no judge could remove the private 18 information from the public mind. Indeed, by going to 19 court, I was augmenting the degree to which the public 20 were aware of it. 21 But taking all that into account, I thought what 22 they'd done was so outrageous I wanted to get these 23 people into the witness box and demonstrate that they 24 were liars. And the only way to do that was to put up 25 with this extremely risky and unpleasant process, which Page 83
1 MR JAY: On the internal numbering, page 11. On the longer 2 number, 31208. His Lordship made precisely those 3 points. 4 LORD JUSTICE LEVESON: Right. So then he orders an 5 expedited trial. 6 MR JAY: The hearing dates -- it took place over five days, 7 7 to 10 and 14 July 2008. 8 A. Yes. 9 Q. Judgment itself was handed down on 24 July 2008. 10 A. Yes. 11 Q. We know that from page 14, which is the judgment, to 12 which I will come in a moment. So this was all 13 happening very rapidly in terms of the usual course of 14 litigation, if I can so describe it. Can I deal with 15 one point, though. Was it explained to you that if you 16 decided to take defamation proceedings rather than 17 proceedings in breach of privacy or breach of 18 confidence, that the legal process would be much longer? 19 A. It was. I was told that would be about 18 months, and 20 that for me would have been really then academic, 21 because what I needed to do was to establish very, very 22 quickly that the Nazi allegation was completely untrue. 23 Q. In terms of the choices which were available to you, on 24 the one hand you were facing expensive litigation, that 25 is obvious. Page 82	1 I then decided to do. 2 Q. The only other choice was to pack up your tent and beat 3 a retreat, presumably? 4 A. Indeed, and of course first of all I felt that was the 5 wrong thing to do, because even if I went to some 6 obscure village in the Andes, within a week or two 7 people would know about it, thanks to the 8 News of the World putting it on the Internet, but I also 9 felt that this was typical of some of the things they 10 do, and I was somebody who fortunately had the means and 11 a little bit of legal knowledge, and within 18 months 12 would be free to concentrate anyway. I felt if I don't 13 do it, I don't know who's going to, because the number 14 of people they pick on with a really bad case who have 15 the means to fight it is infinitesimally small. It 16 really -- one of the terrible things is that unless 17 you're very fortunate and happen to have a bit of money, 18 you simply can't take this on, as things stand at the 19 moment. 20 Q. I'll deal with a number of contextual points before we 21 come to the proceedings. The first point is the breadth 22 of dissemination around the world with the Internet. Of 23 course it's obvious but you touch on this in 24 paragraph 22 of your witness statement. Indeed, you 25 point out, is that right, in terms of the print media Page 84

1 alone, there were 790 separate articles written in 2 various UK newspapers and online between 30 March 2008 3 and 3 June 2008, so these articles were all commenting 4 on the underlying substratum article in the 5 News of the World, presumably? 6 A. Indeed. And, of course, on the Internet it was even 7 more extensive. I mean, one example, I have a very good 8 and energetic lawyer in Germany, and I think they've so 9 far shut down 193 different sites which were repeating 10 the News of the World story. Not shut down the sites, 11 but got it removed from the site, I should say. 12 Q. And the matter itself is obviously of interest to the 13 FIA, but they commissioned a report from distinguished 14 leading counsel here, Mr Anthony Scrivener, and his 15 report, as you made clear in your evidence, exonerated 16 you? 17 A. Yes, he said there was no basis whatever for the Nazi 18 allegation. 19 Q. One matter however I would like to deal with -- this is 20 paragraph 25 -- is that an edited video or copy of it 21 was sent to the president of the FIA senate? 22 A. Yes. 23 Q. By solicitors acting for the News of the World on their 24 instructions; is that correct? 25 A. It's correct. They sent this and that was a matter for Page 85	1 Q. In relation to the evidence adduced at the civil 2 trial -- 3 LORD JUSTICE LEVESON: Before you go on to that new topic, 4 Mr Jay, can I just ask a question arising out of 5 something you said two minutes ago, Mr Mosley. You said 6 your energetic lawyers in Germany had shut down 193 7 different stories on different sites. 8 A. Yes. 9 LORD JUSTICE LEVESON: Is it only in Germany you've taken 10 such action? 11 A. No, sir, I've done it in a number of different 12 countries. I think we have litigation going on in 22 or 13 23 countries at the moment, and it's just an ongoing 14 process because -- I mean I'm trying to do everything 15 I can to get this material removed from the web and it's 16 not easy, it's ongoing, it's very expensive, but Germany 17 is actually the number one example. Because of the Nazi 18 thing, it got very much picked up in Germany. 19 LORD JUSTICE LEVESON: How many sites have you been able to 20 close down? If you don't know exactly -- I'm just 21 trying to get a feel for the size of the exercise. 22 A. It's in the hundreds. My lawyers would probably produce 23 an exact figure. One of the difficulties is that Google 24 have these automatic search machines so if somebody puts 25 something up somewhere, if you Google my name, it will Page 87
1 complaint actually in the French courts at a certain 2 point because it was potentially criminal, what they 3 did. But they sent the -- deliberately sent the entire 4 video, inviting the FIA to show it to all the members. 5 Q. And the inference which may be drawn is that they were 6 putting some sort of political or other pressure on the 7 FIA to vote you off, is that what you're saying? 8 A. Absolutely. I had the impression from the outset that 9 as soon as I challenged the original story, that the 10 entire resources of News International, News Group 11 Newspapers, were then deployed effectively to try and 12 destroy me, and obviously one way of attacking would be 13 to send this thing to the FIA and try and get them all 14 to look at it and hope that they get rid of me. 15 Q. There was a vote of confidence, but you won it? 16 A. Yes. One of the things I did at the outset was 17 I suggested to the body that deals with these things 18 that we should have an extraordinary general assembly 19 and invite the membership to vote, because it seemed to 20 me they'd voted me into the position and they were the 21 ones who were entitled to tell me I should resign or 22 I shouldn't resign, and so I called a general assembly, 23 everybody who wanted to say something was allowed to do 24 so. At the end of it they voted and I won by 25 a substantial majority. Page 86	1 appear. We've been saying to Google, you shouldn't do 2 this, this material is illegal, these pictures have been 3 ruled illegal in the English High Court. They say we're 4 not obliged to police the web and we don't want to 5 police the web, so we have brought proceedings against 6 them in France and Germany where the jurisprudence is 7 favourable. We're also considering bringing proceedings 8 against them in California. 9 But the fundamental point is that Google could stop 10 this material appearing, but they don't, or they won't 11 as a matter of principle. My position is that if the 12 search engines -- if somebody were to stop the search 13 engines producing the material, the actual sites don't 14 really matter because without a search engine, nobody 15 will find it, it would be just a few friends of the 16 person who posts it. The really dangerous thing are the 17 search engines. 18 LORD JUSTICE LEVESON: Yes. Well, that's part of the 19 problem. 20 A. Indeed. 21 LORD JUSTICE LEVESON: Yes. 22 MR JAY: The evidence before Mr Justice Eady -- of course, 23 this is quite complicated and I'm going to just, if 24 I may, identify some highlights, otherwise there's 25 a danger we'll get bogged down in detail which people Page 88

1 will not understand because they haven't pre-read your 2 witness statement. There are just a number of points 3 I'd like to bring out. The first point is the hidden 4 pinhead camera, which was on the lapel of Woman E. Had 5 she been given any instructions by the News of the World 6 which you can assist us about, please, Mr Mosley? 7 A. Well, she was, because they had a rehearsal where 8 Thurlbeck showed her how to fit it and wear it and this 9 rehearsal was recorded on the tape. I don't think they 10 knew this, to be fair to them. The beginning of the 11 tape is Thurlbeck saying to her, "When you get him to do 12 the sieg heil, get him to stand back about 3 metres so 13 you get it in the shot". It was quite clear to me when 14 I saw this that Thurlbeck was trying to set the whole 15 thing up from the beginning as a Nazi episode. She, of 16 course, never mentioned anything to do with Nazi. She 17 knew that had she done so, everyone would have been 18 horrified. Particularly the German girl, because being 19 a modern German person, she would have been horrified. 20 But it's absolutely clearly there, Thurlbeck telling her 21 to try and get me doing a sieg heil. 22 Q. To be clear about it, you obtain a copy of the video 23 footage as part and parcel of the disclosure in the 24 civil proceedings? 25 A. Indeed. Page 89	1 A. I think that's right. I think they realised that 2 publishing this article was completely illegal, and 3 therefore if I found out about it and went to a judge, 4 it would be stopped. But, therefore, knowing it was 5 illegal, they took elaborate precautions, including the 6 spoof first edition, which you mentioned earlier, to 7 make sure that nobody in my camp, as it were, would find 8 out. 9 Q. The last evidential point I'd like to deal with, and 10 this is quite a detailed point, but it's under the 11 heading "Blackmail", and I'm afraid it does relate to 12 Mr Thurlbeck. Could you tell us about this in your own 13 words? Maybe we can start, I'll read it out, with an 14 email which was sent on 2 April 2008, which is three or 15 four days after the publication of the first article. 16 The email reads: 17 "I hope you're well. I'm Neville Thurlbeck, the 18 chief reporter at the News of the World, the journalist 19 who wrote the story about Max Mosley's party with you 20 and your girls on Friday. Please take a breath before 21 you get angry with me! I did ensure that all your faces 22 were blocked out to spare you any grief, and soon the 23 story will become history, as life and the news agenda 24 move on very quickly. There's a substantial sum of 25 money available to you or any of the girls in return for Page 91
1 Q. Then the second point, and you've already dealt with 2 this, Mr Mosley, this is paragraph 33, and this relates 3 to the second article on 6 April, the follow-up article, 4 Woman E was offered some more money, £8,000, you told 5 us. So we understand it in sequence, what is the 6 significance of this point? What are you driving at 7 here? 8 A. What to me at least is significant is that they wanted 9 a follow-up article because I'd said that this was 10 untrue, they wanted to really, really put the boot in, 11 and so they wrote this article purporting to be by the 12 lady and completely composed by Thurlbeck, got her to 13 sign it, then went back and rewrote parts of it. 14 During the trial, he was saying this was the result 15 of numerous telephone conversations with her, which 16 I don't think anybody really believes. The judge asked 17 him if he'd kept a note, which of course he hadn't. 18 It's not surprising, I don't think the conversations 19 ever took place. He simply invented the entire article. 20 Q. In paragraphs 34 and 35, you explain that within the 21 News of the World this story was very tightly kept, in 22 other words to a limited number of people to avoid the 23 possibility of leaks, because the risk of leaks would 24 obviously cause a consequent risk that you might take 25 proceedings for an injunction; is that right? Page 90	1 an exclusive interview with us. The interview can be 2 done anonymously and your face can be blacked out too. 3 So it's pretty straightforward. Shall we meet/talk?" 4 Will you comment on that? But before you do, can 5 I read out the email which was sent the following day, 6 paragraph 37 of your witness statement: 7 "I'm just about to send you a series of pictures 8 which will form the basis of our article this week. We 9 want to reveal the identities of the girls involved in 10 the orgy with Max, as this is the only follow-up we have 11 to our story. Our preferred story, however, would be 12 you speaking to us directly about your dealings with Max 13 and for that we would be extremely grateful. In return 14 for this we would grant you full anonymity, pixelate 15 your faces on all photographs and secure a substantial 16 sum of money for you. This puts you firmly in the 17 driving seat and allows you much greater control as well 18 as preserving your anonymities (your names won't be used 19 or your pictures). Please don't hesitate to call me or 20 email me with any thoughts." 21 And then finally there was an email with an offer of 22 money. 23 Anybody reading that, indeed, this was 24 Mr Justice Eady's conclusion, might think this was close 25 to being blackmail. Is that fair, Mr Mosley? Page 92

23 (Pages 89 to 92)

1 A. I think so. What he was saying to them, particularly in 2 the last email, was: if you don't co-operate, we will 3 publish your pictures unpixelated. If you do, we'll 4 give you £8,000 and pixelate them. 5 For these women, that was terrifying, because they 6 would all dread the idea of any of their family finding 7 out, or their work. Three of them had really 8 significant positions. One was a very serious 9 scientist, another one had a major position in 10 healthcare, another one ran an office. Very 11 significant. Only one of them was what you might call 12 fairly anonymous, and they were all terribly at risk. 13 And the thought of this being published in the 14 News of the World was terrifying for them. 15 But the really admirable thing is that they did not 16 succumb to it. 17 Q. Thank you, Mr Mosley. I'm not going to deal with what 18 happened at the trial itself. What I am going to deal 19 with is the judgment of Mr Justice Eady and navigate my 20 way through it so that one can understand his findings 21 and his reasoning, because his reasoning is important in 22 terms of Article 8. 23 In our bundle, the judgment starts at the internal 24 numbering at page 14. It is a lengthy judgment. 25 LORD JUSTICE LEVESON: It's certainly a judgment that repays Page 93	1 LORD JUSTICE LEVESON: It's the witness, Mr Myler works out 2 that the cross-examiner is talking about blackmail and 3 he said, "I'm not so sure it is", and he's asked: 4 "Do you think there's a justification about threats? 5 "I've already accepted that clearly looking at this 6 it could be interpreted as a threat and I accept that." 7 I would love to know how else it could be 8 interpreted. 9 MR JAY: Yes. Mr Justice Eady then asked his own questions 10 at paragraph 86. His questions were directed to the 11 obvious point: well, why wasn't this raised with 12 Mr Thurlbeck? Because here was Mr Thurlbeck possibly 13 blackmailing people. Why didn't Mr Myler raise that 14 with him? The answer was not, in Mr Justice Eady's 15 view, or perhaps the view of any objective reader, 16 satisfactory. What Mr Justice Eady says at the bottom 17 of page 33: 18 "That is effectively a non-answer, from which it 19 would appear that Mr Myler did not consider that there 20 was anything at all objectionable about Mr Thurlbeck's 21 approach to the two women, as he didn't query it at any 22 stage. This discloses a remarkable state of affairs." 23 So it's a matter for others to judge, but arguably 24 quite a strong judicial criticism there. 25 A. Well, I mean coming from a High Court judge, I think Page 95
1 reading in full. 2 MR JAY: Yes. 3 LORD JUSTICE LEVESON: Yes. 4 MR JAY: Mr Justice Eady first of all, having set the scene, 5 and I'm at paragraph 44 on the little internal numbers 6 page 24, considers the factual question: was there 7 a Nazi theme? And his conclusion was that there was 8 not, although his conclusion comes at a slightly later 9 point in the judgment. 10 At paragraph 79, this is page 31, Mr Justice Eady 11 deals with the blackmail allegation and he's absolutely 12 clear about it, Mr Mosley. At paragraph 82 at page 32, 13 Mr Justice Eady says: 14 "This would appear to contain a clear threat to the 15 women involved that unless they co-operated with 16 Mr Thurlbeck, their identities would be revealed." 17 There was then some cross-examination of Mr Myler on 18 this issue at paragraph 85, and Mr Myler accepted that 19 these emails could be interpreted as a threat. 20 Mr Justice Eady's observation in relation to Mr Myler at 21 the very end of paragraph 85: 22 "This seemed to fall short of a wholesale 23 endorsement of his chief report's behaviour." 24 A. He has a wonderful way of understatement. 25 Q. Yes, it's a nice flight of myosis, I suppose. Page 94	1 that's quite impressive, but almost sort of more 2 impressive is that a few months later they applied for 3 the title of newspaper of the year based on their 4 groundbreaking year, they said, the Mosley legal: 5 "We believe the impact of our experience and our way 6 forward, following the Max Mosley legal ruling, have 7 helped define the nature of modern tabloid reporting in 8 Britain. The Mosley case itself ... [et cetera] was 9 among the most fiercely debated stories of 2008." 10 They go on to say what a wonderful job they've done, 11 when a High Court judge has practically told them that 12 they should have done something about this reporter. 13 But I think that's -- it's completely symptomatic of 14 their entire attitude. 15 Q. In paragraph 87, his Lordship records the sequence of 16 cross-examination of Mr Thurlbeck on this point. I'm 17 not going to go through it with you, but the upshot was 18 at the end of paragraph 87 that Mr Thurlbeck either 19 didn't understand the point that was being put to him in 20 cross-examination or possibly pretended not to 21 understand the point that was put to him in 22 cross-examination. We're not sure exactly which. 23 A. Yes. His line was: but I was giving them a choice. But 24 of course that's what blackmailers always do. They give 25 you a choice between doing what they're blackmailing you Page 96

1 into doing ... 2 Q. Those are all the facts we need, and to be absolutely 3 clear, the judge makes a finding there was no Nazi 4 theme. 5 LORD JUSTICE LEVESON: Just before you leave that, there is 6 a point here, because I go back to the words that ring 7 in my ears all the time: culture, practice and ethics. 8 Mr Justice Eady said, when it was being put to him that 9 it's blackmailing, he said: 10 "No, I'm offering to give them something, I'm 11 offering to pay them money for an anonymous interview. 12 I'm offering to pay them, not to take anything from 13 them, so in that sense I'm not blackmailing them at all. 14 That thought never crossed my mind. I'm offering the 15 choice." 16 And the judge goes on: 17 "It seems that Mr Thurlbeck genuinely did not see 18 the point yet it is elementary that blackmail can be 19 committed by the threat to do something which would not 20 in itself be unlawful." 21 So the question that's obviously going to have to be 22 asked, quite apart from any questions to Mr Thurlbeck 23 about it, is whether that state of mind was limited to 24 one reporter or one newspaper or is actually the state 25 of mind of others. Page 97	1 interest. 2 Then in paragraph 112, he considers, well, if I had 3 come to the conclusion there was a Nazi theme, what 4 then? Maybe his conclusion was somewhat equivocal, he 5 didn't have to decide the point, but you may or may not 6 have -- or the case may or may not have followed 7 a certain path had he made a finding of fact which he 8 didn't. 9 The third public interest issue, and this I think is 10 an important one, is under the heading "Depravity and 11 adultery". It starts at paragraph 124. The argument 12 which Mr Justice Eady was addressing was whether there 13 was a public interest in revealing immoral, depraved or 14 even to an extent adulterous behaviour. 15 His Lordship found that there wasn't, really as 16 a matter of law, in particular at paragraph 127. But 17 his analysis of the Strasbourg cases and a case in the 18 House of Lords called Campbell was that given that there 19 was a human right in play here, namely a right to 20 privacy, and I quote: 21 "It's not for journalists to undermine human rights 22 or for judges to refuse to enforce them merely on 23 grounds of taste or moral disapproval. Everyone is 24 naturally entitled to espouse moral or religious beliefs 25 to the effect that certain types of sexual behaviour are Page 99
1 MR JAY: It's precisely a line which we have in mind, and 2 Mr Thurlbeck has been asked to deal with that. 3 LORD JUSTICE LEVESON: Yes. But my point is that it's not 4 just Mr Thurlbeck, because one can reach conclusions 5 about an individual which are all fine and dandy and 6 don't go very far. The question is: is this a pervasive 7 perception? If it isn't, then I want to know it. If it 8 is, then equally. 9 MR JAY: Yes. 10 Mr Justice Eady's route to his conclusion as 11 a matter of law, can we see whether we can chart a path 12 through that. Move forward to page 40 on the internal 13 numbering, paragraph 110. He's dealing here with the 14 public interest issue. Was there a public interest to 15 justify the intrusion? He deals first with a point 16 which I'm sure didn't feature in the News of the World's 17 thinking, but whether there was underlying criminality, 18 and he soundly rejected that point. It's not something 19 we need go into, Mr Mosley. 20 He then deals at paragraph 112 with the Nazi theme 21 point. There are two aspects to this. The first aspect 22 is paragraph 123, if I can take them slightly out of 23 sequence, where he finds that there wasn't a Nazi theme 24 and therefore self-evidently if there wasn't a Nazi 25 theme, it could not even classify as a possible public Page 98	1 wrong or demeaning to those participating. That does 2 not mean that they're entitled to hound those who 3 practice them or to detract them from their right to 4 live life as they choose." 5 The real point he's making is that, given that we 6 are in the domain of privacy, the law does not concern 7 itself with making a moral judgment as to what occurs 8 within the domain of privacy; my understanding of what 9 Mr Justice Eady is saying. Do you follow that, 10 Mr Mosley? 11 A. I do. I think that it's entirely reasonable because the 12 problem is that if you could breach privacy merely 13 because you disapproved of what someone was doing or it 14 was not to your taste, well, we would be all over the 15 place because sexual behaviour covers a huge variety of 16 things, and when you start analysing it, what I might 17 like, somebody else might hate, and vice versa, so where 18 would it stop? And the rational thing is to say that 19 provided it's adults and provided it's in private and 20 provided everybody consents, genuinely consents, then it 21 is nobody else's business. 22 I think Mr Justice Eady, if I've understood him 23 rightly, was stating the law to be precisely that. In 24 other words, it's the sort of John Stuart Mill attitude 25 rather than the rather disapproving moralist attitude, Page 100

25 (Pages 97 to 100)

1 and I think the law recognised the John Stuart Mill, 2 that if you're not doing any harm to anybody, you should 3 be allowed to do whatever you like. I think that view 4 is the modern view, but of course once upon a time, 5 people felt completely able to pillory people because 6 they did something of which they disproved or their 7 tastes were different, but we've moved on from that, and 8 the idea that it's in some way the function of the 9 tabloid journalists to pillory people whose tastes may 10 be unusual is completely outdated. If that had not 11 disappeared, we would still be persecuting homosexuals, 12 the gay community would be at risk, or anybody else. 13 So I think he's absolutely right, and I think it's 14 extraordinary that the tabloid press don't recognise 15 that, and of course the truth of it is that they do 16 recognise it, but it doesn't suit them to admit that 17 that is actually how things should be. 18 Q. Thank you, Mr Mosley. I think one has to be careful to 19 distinguish between a philosophical position, which of 20 course you're quite entitled to give us, and we can 21 agree or disagree with that, and a legal analysis. 22 Mr Justice Eady may or may not share that philosophical 23 view, but all he was doing was saying, analysing 24 Article 8 of the Convention, the concept of privacy 25 means, and this is how the courts have interpreted it, Page 101	1 I'm merely just reading on. 2 MR JAY: At the end of the day, the Nazi theme allegation 3 having fallen to the ground and the immorality point 4 being a point which could be taken, there was no public 5 interest justification which could be prayed in aid and 6 you won. 7 A. Yes. 8 Q. Is that right? But you weren't successful in obtaining 9 exemplary damages. It probably isn't necessary to 10 explore why, but he made findings of fact which meant 11 that whatever the law was on Cassell v Broome and the 12 second head of exemplary damages law, you weren't going 13 to obtain them in these circumstances. In a nutshell, 14 it was that? 15 A. That's correct. 16 Q. In terms of damages, the award was £60,000, which was, 17 perhaps still is, the highest award of damages in 18 a privacy case. Do you happen to know whether it still 19 is the highest? 20 A. I believe it still is. 21 LORD JUSTICE LEVESON: Awarded by a court. 22 MR JAY: By a court. 23 A. I might perhaps add that I think I'm right in saying 24 that since my case there's only been one full privacy 25 trial, and that was the recent Rio Ferdinand case, which Page 103
1 that you do not conduct a moral judgment of what is 2 occurring in the domain of privacy. It is just off 3 limits. Do you see that? 4 A. I see that completely, and it makes absolute sense. 5 Q. I know of no case in Strasbourg or domestically which 6 contradicts that part of Mr Justice Eady's reasoning. 7 It is core to one of the key issues involving this 8 Inquiry. 9 A. I think it is, and if I may say so, had he got that 10 wrong, that would have been a matter for the Court of 11 Appeal. The fact that it didn't go to the Court of 12 Appeal I think strongly suggests that he got it right. 13 Q. That's certainly a fair point, since we know the case 14 wasn't appealed. 15 The only other point of principle which we gather 16 from this judgment is -- and this is paragraph 135 -- 17 the point: who decides the public interest? 18 His Lordship is making it clear, and again this must be 19 right as a matter of basic law, that it's for the court 20 to decide ultimately, if the case comes before the 21 court, and journalists' perception doesn't assist. 22 A. I think, yes, that must be right as well. 23 LORD JUSTICE LEVESON: Well, except that the court has to 24 have regard to editorial judgment and the discretion so 25 far as tastes and modes of expression are concerned. Page 102	1 he actually lost, but of course people don't sue for the 2 reasons I explained earlier, that you have to be quite 3 eccentric or very determined before you bring a privacy 4 action, because it's lose, lose, lose. 5 LORD JUSTICE LEVESON: We don't know how many settled. We 6 don't know how many have settled. 7 A. No. 8 LORD JUSTICE LEVESON: Or maybe you do? 9 A. No, I don't know, but I think what happens is if 10 somebody find out there's an application for an 11 injunction, which then usually will be granted, if 12 there's a good case, and that's the end of the case. 13 Then, of course, if there's an application for an 14 injunction that fails, then the information will be 15 published and that's the end of the matter, so to speak. 16 So I think somebody being awarded damages, I don't 17 think there has been -- and certainly none of the 18 settlements that I've heard of, except of course the 19 famous Taylor and Clifford settlements, but that's 20 another matter, and I think there are other reasons 21 there, I've not heard of large sums of money changing 22 hands. 23 LORD JUSTICE LEVESON: Yes. 24 MR JAY: Mr Justice Eady at the end of his judgment 25 recognises two obvious things. The first is, and this Page 104

1 always applies, that no amount of damages can fully 2 compensate you for the damage done. That will always 3 apply, whatever the context. 4 Secondly, he says, in relation to you: 5 "He is hardly exaggerating when he says that his 6 life was ruined." 7 And this is the "genie out of the bottle" point, 8 isn't it? 9 A. It is because you work all your life to try and achieve 10 something or do something useful, and I'd got to the 11 point -- when this came out, I'd got to the age of 68 12 and I had achieved things that I was proud of, anyway, 13 to do with the work I'd been doing with road safety and 14 so on, and suddenly something like this happens and 15 that's what you're remembered for, and however long 16 I live now, that is the number one thing that people 17 think of when they hear my name, and of course it really 18 matters -- 19 And sometimes, if I could just make this point, it's 20 sometimes said, yes, but it's the same with personal 21 injuries. If you have an injury, if you lose your arm, 22 the courts can do nothing, they can only compensate you 23 financially, and of course that's true. But the 24 difference, and the fundamental difference, is this: 25 that if you could go to a High Court judge and say, "I'm Page 105	1 judgment. 2 Q. Whether he should have commented without appealing may 3 be for others to judge, but there was some fairly -- 4 certainly bad taste, if I may be forgiven for describing 5 it in that way, reporting. Paragraph 52 of your 6 judgment. 7 A. My statement. 8 Q. Of your statement, pardon me. Some newspaper couldn't 9 resist the rather feeble crack: 10 "The day freedom got spanked." 11 A. Yes. I mean, this is sort of typical of -- there's 12 a steady stream of that sort of thing coming from the 13 gutter press, and, you know, I think one just has to put 14 up with that. Once it was out, they were going to do 15 this, but -- and it's not just the Sun. 16 Q. But again, they had the right to comment, and whether 17 they do so in a high-minded way or some different way is 18 a matter for their house style? 19 A. Indeed. I think it reflects more on them than on me. 20 MR JAY: It's 1 o'clock. 21 LORD JUSTICE LEVESON: I think that's a convenient moment 22 but before we finish, you quoted, Mr Mosley, from 23 a document which you described as the News of the World 24 either putting themselves forward for or otherwise being 25 put forward for an award. Is that in the bundle of Page 107
1 about to have an accident, I'm going to lose my arm, 2 will you please stop the accident, because this is all 3 you have to do, make an order", it's inconceivable that 4 he'd refuse the order. The problem with accidents is 5 that every possible precaution is taken to try and stop 6 them happening, health and safety and so on, but in the 7 end they happen, whereas any revelation of privacy can 8 be stopped by a judge. The only thing that's absolutely 9 essential is that you should know so that you can go to 10 a judge. As soon as you know about it, it goes to an 11 independent right of assessment where the judge will 12 weigh your right to privacy against somebody's right to 13 free speech, or whatever, and he will make a decision. 14 But if they ambush you and they publish and it's out 15 there, no judge on earth can save you. That's really 16 what it comes to. 17 MR JAY: The judgment was handed down, there was not an 18 appeal, we know that as a matter of record. There was 19 a public statement or prepared statement delivered by 20 Mr Myler on the outside here accusing the courts of 21 introducing a privacy law via the back door. That's 22 paragraph 50 of your witness statement. But to be fair 23 to Mr Myler, that's his right, isn't it, to comment to 24 the judgment? Would you agree? 25 A. I think he's absolutely got a right to comment on the Page 106	1 documents? 2 A. I'm really sorry, sir, it's not, but I have a copy and 3 we can make copies available. I forgot to put it in. 4 LORD JUSTICE LEVESON: No, that's fair enough, but I would 5 like to see it. Just so that I make it clear why I want 6 to see it, because it goes back to whether this is one 7 reporter or, indeed, one journal, but what is happening 8 in the industry as a whole. 9 A. Indeed. 10 LORD JUSTICE LEVESON: That's the point. 11 A. Sir, as you will see, this makes it clear that they were 12 very proud of what they'd done. 13 LORD JUSTICE LEVESON: All right. That's the point. I'd be 14 very grateful if you could make that available. Thank 15 you very much. 2 o'clock. 16 (1.01 pm) 17 (The luncheon adjournment) 18 19 20 21 22 23 24 25 Page 108

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