

RECORD OF ATTENDANCE

Client	News Group Newspapers Ltd (8085)	Date	20 January 2010
Matter	Max Clifford (697)	Ref	JCP/RXC

JCP and RXC attending a meeting at News International with Rebekah Brooks (RB), Jon Chapman (JC), Colin Myler (CM), Frederic Michel (FM) and Alice Macandrew (AM).

Select Committee

JC said that although RB is no longer required to give evidence at the Select Committee, the trade off is written questions that she will have to respond to in writing. This is a good result because they can construct the answers in a way that is beneficial to themselves. Personal attendance will no longer be necessary.

Overview of Recent Proceedings

said that yesterday an Order was made for the paperwork of the criminal trial from Mulcaire/Goodman's solicitors. This will include the Skeleton Argument and character references in mitigation. The Skeleton Argument in respect of Mulcaire is what supports the comment of "others at News International" during the sentencing hearing.

said that in respect of and the other would-be claimants, there has been no movement whatsoever. However, they do have the same solicitor/Counsel as in the Clifford case (Charlotte Harris/Jeremy Reed).

JCP said that ad also come up as a name and so it is likely that again there will be a link there.

JCP reported that the hearing in Clifford has been postponed to the first week of February. One of the reasons of Mulcaire's recent involvement. It is listed for either the 3rd, 4th or 5th February.

FM said that this is not an ideal time because the Select Committee questions have not yet been received in respect of RB. RB is also in Davos on Wednesday, Thursday and Friday next week.

JC said he would rather talk RB through those questions.

asked JCP to give a résumé of where we are on Max Clifford. He said this matter is going forward and it has developed a life of its own,

Metropolitan Police Disclosure

JCP said that, prior to last Friday's hearing, the Metropolitan Police disclosed the documents they had in the case of Clifford. Nothing came out which directly implicated NGN. and JCP were relaxed about that but it frustrated the other side. This is probably why Friday occurred.

Mulcaire's Recent Involvement

JCP said that Mulcaire has popped up out of the blue. There had previously been no letters from him. His solicitors are RJW who did his criminal case. He is concerned that Judgment will be entered against him and that he will be asked certain questions to say who he was dealing with at NGN. He does not have any money and he does not want a Court Judgment. It will affect his credit rating. It is not difficult to postpone his involvement until the NGN case is decided. But, he can answer the questions identifying individuals in respect of the phone accessing information.

Mulcaire came on the scene very late and the hearing was pushed off. The Order in respect of him filing a Defence is for 29 January. The substantive issues will be dealt with in the week of 2 February (3, 4, 5 February). There are a few issues facing News International.

NGN has not opposed the Order that Mulcaire has to answer questions. The only person who can challenge the request is Mulcaire himself. That is why last week we said he should be represented. There is a probable case and RJW will represent him.

Indemnity of Mulcaire

JCP said that Charlotte Harris spoke to the lawyer representing Mulcaire at RJW who said that NGN would indemnify Mulcaire's legal fees. It was then confirmed in writing by RJW but we have not yet seen that letter. This was not ideal.

RB asked if we had been in touch with RJW. JCP said that we have. Charlotte Harris at JMWW said that she heard NGN was indemnifying Mulcaire and asked if that was the case for the hearing or the whole case. JCP did not answer that question. At that stage, JCP did not have full instructions on what was going to happen. We have kept in touch with RJW.

CM asked what we should say in terms of why we are indemnifying Mulcaire. JCP said that we can simply say that Mulcaire approached us saying that he wanted to be represented at the hearing and asked if NGN would indemnify him.

said that Judgment against Mulcaire is not a problem for NGN. But if an Order does get made then there is a criminal penalty if he does not answer various questions.

JC asked why it was relevant to ask these questions of Mulcaire. said it was just to get NGN. JCP said they do not have direct evidence of anyone at NGN involved in the accessing of Clifford's voicemail, unlike in Taylor.

said that if Mulcaire does not turn up and make an argument then the Order served on him will have criminal penalties. If he does not have representation then the Order will get made. That's why' said to JCP that NGN would help to pay for Mulcaire.

Rebekah Brooks' meeting with Max Clifford

RB reported that she got Max to agree £200,000 per annum to represent *The Sun*/do business for *The Sun*. He would call the lawyers off the next day if the deal was put in writing. She then spoke to NGN's lawyers who said that she should not put anything in writing. RB then got informed by Gordon Brown/the Select Committee that she would be called to give evidence. She then rang Max/emailed him to organise a phone call without prejudice at 12.30pm. She said she could not continue the discussion because although the *News of the World* case is not with RB and totally above board she did not think she could be seen to be doing business with him. She said she would get back to him after the Select Committee. This conversation would have been about 4 January. When RB found out that she was not going to give evidence at the Select Committee her view was that things could change. The offer with Clifford still stands but the longer we go down the case the more difficult it will be to make the deal. We either get something in writing or she could physically turn up with cash to see him.

JC said that Max wanted a retainer but RB had said no. The way RB wants it is fine but the retainer is a problem.

RB said Clifford's argument is that he doesn't want to be obliged to bring £200,000 worth of stories in on an ad hoc basis. He wants £200,000 per annum each year for two years regardless. The negotiation happened the day after the Police disclosed the information and there was nothing there. At that stage there was no suggestion that Mulcaire was on the scene. It was just the Police disclosure.

CM said that Andy Hayman and John Yates had indicated to him previously that this was probably going to be the case.

Order against NGN (Mulcaire)

said that in terms of the Order this will be the first week of February. Mulcaire will be ordered to identify those in the organisation whom he discussed accessing Clifford's voicemail with and the messages c

JCP said that Ian Edmondson had spoken to she is willing to help but off the record. There is a window there. said that we have the records of when her phone was accessed and it was only for four seconds. So there was nothing there.

There were concerns that if Mulcaire was forced to give evidence, others might be named. We simply do not know.

RB asked if she would need to do the deal with Max before the Order. It was felt that she should. It was 50/50 that the Order be made. RB said that in those circumstances it was more like 80/20 against NGN. There is enough publicity about this to swing it. You have to think about what is worse -- her doing a deal with Max which will be perceived as a cover up or indemnifying Mulcaire so that he doesn't say anything about NGN. He could say anything and he could say anybody. JC said it would certainly be difficult to prove that he was just making up names.

RB said it would look terrible if seen to be "buying off" Max.

Farrer & Co Draft Part 36 letter

said he was concerned about the "blackmail" references in the letter. He does not think we need to spell this out. JCP said that this was just a suggestion. However, we can construe the phrases as we want to. Ultimately, Taylor got what he wanted because of the blackmail factor. Here there is no question of confidentiality.

JCP said that the amount we were offering in the Part 36 is above what Max would get if we went to Court. There was clearly a commercial value in settling. If NGN settled with him one factor is the risk of others coming forward on the bandwagon. We have been informed that there are at least seven others. One is is a possibility and is likely because If we settle for vast sums we should expect others coming through. The expectation will be the same if not more in terms of costs.

said that he, JCP and RXC had recently attended a conference with Michael Silverleaf QC. It is the Senior Counsel and Junior (Anthony Hudson) that we used on the Taylor case. Their joint advice was that if Clifford wins the damages would be £5,000. If he was awarded exemplary damages this might be doubled to £10,000. Ultimately £25,000 is a good comfort figure for the Part 36 letter.

JCP reiterated that we are not making any admissions. We are offering this because we want to be economically protected in the proceedings. If they do not beat the offer then Clifford will have to pay our costs from 21 days from the date of the letter to the trial. NGN's costs will probably be about £300,000.

said that he understood in terms of a Conditional Fee Agreement that if a proper inducing offer is made then lawyers are entitled to pull out of the CFA.

Deal with Max Clifford

RB said her concern is that everything so far has been leaked. The only thing that hasn't been leaked is RB's conversations with Max. The reason is that he is hoping to get some money and he needs the business. This outweighs anything he can get from leaking information to *The Guardian*.

JCP said that there is no need to put anything in writing. If he wants the business he will have to take it on RB's word.

CM said that we need to get to the point where she can just say that he knows she cannot give the agreement in writing.

JC suggested one lengthy session in which they re-engage.

RB said she was happy to do whatever it takes. She can try again and say that he has got to trust her. She can ring Geoff Webster and say that we are doing business with Max again. Once Max sees say, £30,000 in his bank account, he will see that we pay good rates at *The Sun* and proof that the money had immediately gone into his account.

JCP said that he will just have to accept that he will be paid as things go along.

JC said this would be a mark of good faith. A conversation needs to be had with Max saying there is litigation going on but we would like to sort it out.

RB asked if JCP could speak to his solicitors before sending a letter to say that we have got this Part 36 Offer and we are going to send it. We think the offer will be between £20,000 and £25,000 and we are just finalising. What would be the chances of his solicitor telling him? JCP said they would probably tell him immediately.

[RB left the room]

CM said that presumably Max will have been given the same advice as we have in terms of the price. JCP said that we should not assume that that will be the case. For example, they have no leader there (no QC). JCP said we should not assume that they will have given Max the same advice. Particularly as the lawyers are on a CFA. They

RECORD OF ATTENDANCE

Client	News Group Newspapers Ltd (8085)	Date	3 February 2010
Matter	Max Clifford (697)	Ref	JCP/RXC/nl

JCP and RXC attending the hearing before Mr Justice Vos of 3 February 2010 in Court 57 of the Royal Courts of Justice. The following Counsel were in attendance: Jeremy Reed for the Claimant, Anthony Hudson for NGN Ltd, Manuel Barca for Gordon Taylor and Alex Marzec for Glenn Mulcaire.

The Judge ordered as follows:

Mr Max Clifford is a well known PR expert. Whilst Mr Mulcaire is unemployed and on Job Seeker's Allowance. Clive Goodman was Royal Editor of the *News of the World*.

There are three ~~issues~~ applications before me for disclosure:

1. In the context of judgment in default against Mr Mulcaire, Mr Clifford asked for a disclosure Order against Mr Mulcaire.
2. Disclosure of documents sought in respect of the documents referred to in NGN's Defence under CPR 31.14. Mr Clifford and NGN agreed an Order regarding appropriate confidentiality undertakings. Gordon Taylor intervened to oppose in so far as it related to a Compromise Agreement between himself and News Group Newspapers Limited.
3. Disclosure under CPR 31.17 from the Information Commissioner's Office regarding Operation Motorman. The main issue is whether the documents will support Max Clifford's case. NGN disputes that they will.

Factual background

Glenn Mulcaire is an individual who provided information services for News Group Newspapers Limited for £105,000 per annum. It is not clear what he was paid in 2006 and other years. Between 2001 and 2003 the ICO undertook Operation Motorman. This culminated in a report in 2006 – What Price Privacy? – and a follow up report in December 2006.

From 16 February 2006 to 16 June 2006, there were 66 telephone calls and messages forming the subject matter of the criminal charges brought against Glenn Mulcaire and Clive Goodman. Counts 16 to 20 were against Mr Mulcaire. Count 16 concerned Mr Clifford. These related to seven telephone mobile voicemail messages that had been intercepted.

In the prayer to the Particulars, an injunction is sought of both Defendants. There is also an Order for a delivery up and an enquiry into damages together with aggravated and exemplary damages.

Applications against Mr Mulcaire

The disclosure Order sought against Glenn Mulcaire is at paragraph 7 of the draft order. Those somewhat lengthy terms boil down to a request for:

1. The name of the people who allegedly instructed Glenn Mulcaire to intercept Max Clifford's voicemails;
2. The names of the people to whom Glenn Mulcaire passed the information contained in the voicemails;
3. The names of the people he passed on the technical means to intercept Max Clifford's voicemails.

Jeremy Reed has submitted that his application is based on Norwich Pharmacal principles, although it is clear in reality this is based from the speeches in Norwich Pharmacal in terms of the law before it was extended. He accepts that the application cannot be made under CPR 31.17 because, although it would perhaps be applicable by analogy, that CPR relates only to documents. Max Clifford is seeking information rather than documents, there being no evidence to suggest he has documents even if he once did, since all Glenn Mulcaire's documents were seized by the Police and confiscated/forfeited.

CPR 31.18 preserves the applicability of the disclosure allowed by Norwich Pharmacal.

The Orders that Jeremy Reed seeks could in fact have been obtained in another context – via CPR 18.1. The order in Part 18 could be made on the Court's own initiative (see note to that Part). That Part would have been useful if Glenn Mulcaire had served a Defence. If Glenn Mulcaire admitted what he had admitted in his plea in mitigation at the criminal trial – namely, that his purpose in intercepting Max Clifford's voicemails was to pass it on to the *News of the World* - then the Claimant would be entitled to ask for further information. Moreover, it is clear to me from the pleadings I have read out and the denial of major parts of the Particulars the *News of the World* gave him permission is at the heart of the issue in the proceedings.

Alex Marzec has complained that the evidence in support of the Claimant's application against her client is brief and exiguous. It is contained only at paragraph 10 of Charlotte Harris's witness statement "*In addition.....*". It seems to me though that the Claimant relies on other matters. In particular, on admissions made in the plea in mitigation and the Claimant may want to bring proceedings against anyone who commissioned or received the relevant information. I will not decide whether or not he is likely to bring such proceedings if such confidential information was so attained. It is open to Max Clifford to bring proceedings whether or not he succeeds or if it is commercial to do so, that is not an issue at this stage.

I accept this is not strictly an application made as a Norwich Pharmacal Order. Jeremy Reed submits that Norwich Pharmacal Disclosure Orders which are "exceptional cases" do not apply in this instance as Glenn Mulcaire is the admitted wrongdoer. It would therefore be unfair if the Order was not made against him. Nonetheless, it is helpful to set out the principles to decide if it is appropriate in this case. (See *Mitsui v Nexen Petroleum UK Ltd* 3 All ER 511 at paragraph 82. See also *Nikitin v Richards Butler* [2007] EWHC 173.)

Against that legal background, I have to consider whether the applications for disclosure are in this sense justified. I have come to the conclusion that they are justified for the following reasons.

1. Mr Mulcaire is a wrongdoer and an admitted wrongdoer;
2. The pleaded issue between the Claimant and the First Defendant is the question of whether or not Glenn Mulcaire and News Group Newspapers Limited got together (to put the matter neutrally) and agreed to intercept Max Clifford's voicemails and make use of them for a commercial purpose.

NGN denies this, notwithstanding that it is undertaken that some other conduct did take place in relation to others. The question of whether or not Mulcaire was commissioned to intercept Max Clifford's voicemails and the question of whether Glenn Mulcaire passed information obtained to NGN are central to the issues in this case.
3. It is also Max Clifford's contention to bring proceedings against other third parties proved to be involved.
4. Had the action proceeded against Glenn Mulcaire and had he included the plea in mitigation it would have been easy to make the request by Part 18 and Glenn Mulcaire would have immediately been ordered to provide that information.
5. I am concerned here that the trial between Max Clifford and NGN be tried fairly, conducted properly and justly resolved. This can only be done if Glenn Mulcaire says whether or not he passed the information to NGN journalists. It seems to me he must be asked to provide that evidence at trial so that it can be established if Glenn Mulcaire or the journalists are telling the truth. Only in that way can the truth be found as to whether NGN was involved in the interception or not. It is extremely important that Glenn Mulcaire answers two of the questions put to him namely:
 - (i) Whether NGN commissioned the interception of voicemails and if so, who;
 - (ii) To whom was the information passed if he did so.
6. As to the third question, the names to whom he gave the wherewithal to intercept voicemail messages, it seems to me if Glenn Mulcaire did so, he would know the names of the individuals involved so the third parties will be included in numbers one and two.

The jurisdiction to make this Order

If there were an application under Norwich Pharmacal the three conditions would be made out:

1. A wrong was carried out by a wrongdoer who is an admitted wrongdoer;
2. There is need for the Order to enable action(s) to be brought against the ultimate wrongdoer. The Order must be made so the matter can be justly tried;
3. The person the Order is sought against was mixed up in the wrongdoing so as to have facilitated it. Glenn Mulcaire can provide the information so as to enable the issues to be fairly tried. In these circumstances, it seems to me there must be jurisdiction to order the disclosure against a non-party on the basis that it is necessary to achieve a fair trial and bring proceedings against third parties not presently known to the Claimant.

I will order the Order sought in paragraph 7 of the draft Order and each of the Particulars requested. I will have argument from each Counsel in due course.

Disclosure against the ICO

This application is made under CPR 31.17 and also raises some specific points. See Mr Justice Eady's comments in *Flood v Times [2009] EWHC 411* at paragraph 29.

The ICO has consented to the requested Order. In addition, Mr Clancy, the investigations Manager at the ICO, has provided two witness statements in support of the Claimant's application for these documents. The three key paragraphs are at his second witness statement, paragraph 4 and paragraph 7 and in his first statement in the paragraph beginning "*I have read the Consent Order...*".

The three requirements for disclosure to be ordered under CPR 31.17 are well set out in the authorities. In summary:

1. The document is likely to support the case of the Applicant/adversely affect the case of the Respondent. The word "*likely*" was interpreted in *Three Rivers* as meaning "*may well*".
2. Disclosure is necessary in order to dispose fairly of the claim/save costs.
3. The residual discretion of the Court.

Mr Hudson, acting for NGN, has fiercely opposed the Order for disclosure of documents by the ICO. He has put forward his primary argument on the basis that the documents do not go to any issue between the parties on looking at the pleadings. He draws attention to his client's Defence which denies the crucial first sentence at paragraph 30.13 to the effect that the two Defendants were acting in concert to intercept the voicemails but his client's admission is "*it is averred that Operation Motorman...all the findings relate only to that time and have no bearing...save for the aforesaid that paragraph is admitted.*"

74

BPR/66 p 133
Jury Bundle 8 1192

In court today

PT33

In court today

From: "Michel, Frederic"
To: "Brooks, Rebekah"
Date: Wed, 03 Feb 2010 23:08:27 +0000

Fyt:

Mulcaire's barrister made today in Court an admission that if Mulcaire had had to plead a defence (he admitted liability instead) he would have pleaded that the information obtained from Clifford's phone would have been passed to the NoW. ...

Why this admission had to be made is beyond Anthony Hudson (our counsel) and Julian.

However, it could have provided (a) the Guardian with a headline and (b) more importantly justification for the Judge to exercise his discretion in favour of disclosure of to whom the information was passed.

Frederic Michel
Director, Public Affairs, Europe
News Corporation

Page 1 of 4

LAWRIE, Nova

From: PIKE, Julian
Sent: 10 February 2010 18:15
To:
Cc: CORDREY, Rowena
Subject: FW: Max Clifford v NGN and Mulcaire - Without Prejudice save as to costs

See below. She mentioned Friday as a day for a meeting.

She has said on the phone her profit costs are @ 200k, plus uplift and disbursements inc Counsel's fees. Hasn't mentioned VAT, but I assume we know if Max is VAT registered.

I asked on the phone in the conversation that preceded this email chain to give me a hours x rates breakdown with her profit costs, the basis for the uplift (would this settlement trigger a "win"?) plus disbursements. I'll ask once more.

This is looking expensive. But, do we want the risk of Mulcaire answering the questions

Julian

From: Charlotte Harris
Sent: 10 February 2010 18:01
To: PIKE, Julian
Subject: RE: Max Clifford v NGN and Mulcaire - Without Prejudice save as to costs

Dear Julian,

Thank you for email. I can confirm that I have taken instructions from my client and he has confirmed that position is that a specific sum needs to be agreed in advance of the action being settled.

My client has suggested that a meeting attending by _____ and myself and himself in the next few days would be helpful in clarifying any outstanding issues in this respect.

Kind regards

Charlotte

Charlotte Harris
 Partner
 Head of Media
 For and on behalf of
 JMW Solicitors LLP

T:
F:
E: charlotte@jmw.co.uk
W: www.jmw.co.uk

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12/02/2010

A4883
 P171

Page 2 of 4

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From: PIKE, Julian []
Sent: 10 February 2010 16:59
To: Charlotte Harris
Cc: CORDREY, Rowena
Subject: RE: Max Clifford v NGN and Mulcaire - Without Prejudice save as to costs

Charlotte

This is not the issue I asked you to confirm in writing. You told me on the phone that your instructions were that your client would only agree to settle this case if the actual amount of your costs were agreed in advance. In contrast, our (and my) understanding is that you have been told by your client that he is happy to agree the principle that NGN pays your costs but these are to be assessed if not agreed, i.e. as set out in the draft minute of order sent to you this morning.

On the specific point of your costs, please confirm by return if your instructions are:

- a. that a specific sum needs to be agreed in advance of the action being settled; or
- b. if your costs are to be paid by NGN to be assessed if not agreed.

If b. then the action is resolved as per my draft minute of order. If a. then I will need to take further instructions. Please confirm what your instructions are on the question of your costs as opposed to dealing with irrelevant issues.

Yours sincerely

Julian Pike
Partner
Farrer & Co
66 Lincoln's Inn Fields, London WC2A 3LH
Direct dial
Switchboard:
Direct fax:
email:

From: Charlotte Harris
Sent: 10 February 2010 16:28
To: PIKE, Julian
Subject: Max Clifford v NGN and Mulcaire - Without Prejudice save as to costs

Dear Julian,

Further to our conversation just now, I confirm that my instructions from Mr Clifford are that terms of

12/02/2010

A4884
P172

settlement have been agreed privately between Ms Brooks and Mr Clifford subject to the costs being agreed between the parties. Just for the record, I am not party to any terms agreed between Mr Clifford and Ms Brooks, except that Mr Clifford is satisfied that this matter can be resolved subject to our costs being settled between us. I understand that this is in respect of both defendants.

Kind regards

Charlotte

Charlotte Harris
Partner
Head of Media
For and on behalf of
JMW Solicitors LLP

T:
F:
E:
W:

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Re:

From: "Brooks, Rebekah"
To: "Ivens, Martin"
Date: Sat, 20 Feb 2010 14:07:07 +0000

Thanks Martin. Huge favour to ask I know!

From: Ivens, Martin
To: Brooks, Rebekah
Sent: Sat Feb 20 14:02:33 2010
Subject: RE:

No probs, Rebekah. The story is quite vague and minor league, so will leave it

From: Brooks, Rebekah
Sent: 20 February 2010 13:52
To: Ivens, Martin
Subject: Re:

Martin, a tricky one but could you do me a favour. We are in the final throws of a legal settlement with Max clifford...it will be done next week. He's kicking up a fuss about some story he says is not true about MMR. He's a slippery fish so you may have him bang to rights in which case don't worry. But could you cast an eye over it. Another legal would be a nightmare right now three days before the select committee!

From: Ivens, Martin
To: Brooks, Rebekah
Sent: Sat Feb 20 12:54:37 2010
Subject: RE:

Tories down only one point - 39 from 40 last month but Labour up three to 33. Labour core vote coming back: fear factor of double dip recession, Tory wobbles and maybe even a bit of Piers's new human Gordon

From: Brooks, Rebekah
Sent: 20 February 2010 12:50
To: Ivens, Martin
Subject: Re:

Christ. Why?

From: Ivens, Martin
To: Brooks, Rebekah
Sent: Sat Feb 20 12:43:40 2010
Subject:

Tory lead down to 6 points

RE: Private

From: "Anderson, Matthew" <
To: "Brooks, Rebekah"
Date: Thu, 16 Dec 2010 18:38:18 +0000

I do not think that it means he is guilty.

However, a specific and serious allegation has been made about him. And that we can be confident that the allegation will be made in court.

The paper, which we now have seen, will be used to assert his involvement. This is evidence – which now needs legal debate as to its merits.

So, he needs to be able to defend himself. And that in light of the allegations he should be suspended.

On top of this, we are privately aware of several other cases or circumstances where he is very likely to be named in court.

This is strong justification not to delay.

Another thing that worries me is that Colin has spoken to him. It could be strange to wait a long time.

From: Brooks, Rebekah
Sent: 16 December 2010 18:27
To: Anderson, Matthew
Subject: Re: Private

Do you think that Ian written in the corner is evidence that it is IE and that he is guilty.

From: Anderson, Matthew
Sent: Thursday, December 16, 2010 06:22 PM
To: Brooks, Rebekah
Subject: RE: Private

I'm with you that can be almost bizarrely selective.

What we lose by not putting out a statement is credibility.

We have spent months moving from Rogue Reporter to Zero Tolerance. With some success. But these allegations against IE test whether we mean it.

By not acting, we also have to live with a damning storyline – that an alleged organiser of hacking is employed at NOTW today. We can take this off the table.

My view is that these are very high prices.

Matthew

From: Brooks, Rebekah
Sent: 16 December 2010 18:10
To: Anderson, Matthew
Subject: Re: Private

I understand but I don't feel I am getting the right advice. It is crazy that Sheridan was not mentioned. The issue is what do we gain by putting out a statement verses what do we lose. Its not going to change cable view of us and no one is asking for a statement, Nick Robinson rubbished the whole thing and said it was one side of a civil court case and totally unprofessional reporting.

FT are attacking NI because Newscorp is trying to buy Sky not because there is a genuine story there.

From: Anderson, Matthew
Sent: Thursday, December 16, 2010 05:55 PM
To: Brooks, Rebekah
Subject: Private

We lose a lot by not announcing the suspension quickly.

I am worried that this will drift, so can we be very focused on the value we get from waiting in Sheridan and what the soonest point is when we can announce.

We'll be asked for a plausible reason for delay.

Matthew

Matthew Anderson
Group Director, Strategy & Corporate Affairs, Europe & Asia
News Corporation
Tel: +