For Distribution to CPs

IN THE HIGH COURT OF JUSTICE QUEENS BENCH DIVISION
Claim Form Issued: 31 October 2003
BETWEEN

CLAIM NUMBER:"HQ03X03360

ALIN-TURGU BOGDAN STEFAN MARIS

## NEWS GROUP NEWSPAPERS LIMITED

Defendant

## DRAFT AMENDED PARTICULARS OF CLAIM

1. The Claimant is of Romanian descent-aged 20. He came to England in August 1999 and entered employment as an office junior.
2. The Defendant is the publisher of The Sun and the News of the Worid ("NOW"), respectively national daily and Sunday newspapers with very large and influential circulations in England and Wales.
3. In all editions of the issue of the NOW of 3 November 2002 on pages 1, 2, 3, 4, 5, 6 and 7 , the Detendant published the following words, photographs and captions ("the NOW articles") which are defamatory of the Claimant:

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[Front Page]

[Headline]

"POSH KIDNAP"

[Box Headline]

## "WORLD EXCLUSIVE We stop f5m ransom gang"

"Moment NEWS OF THE WORLD saves Vlctoria and her sons from thugs"
Armed police surround an international terror gang preparing to kidnap Devid Beckham's wife Victoria and their two young children yesterday.
They were arrested after our reporters infiltrated the group who were planned to ransom Posh for $£ 5 m$ or kill her. One of our team, at the top right of this picture, was in on the raid. Cops stepped up securily today as one thug remained on the loose.
Det Insp lan Horrocks of Scotland Yard's kidnap unit said "You've done a fantastic job taking on dangerous criminals". Victoria 26, said: "l'rn incredibly grateful".
[Photograph of four armed police officers pointing guns at four men standing by the boot of a car]

Victoria: 'I'm in total shock'. More pictures, the full story 2, 3, 4, 5, 6\&7."
[Photograph of David Beckham]
[Photograph of Victoria Beckham]

## [Pages 2-3]

[Headline]

## "DON'T EVEN BLINK Gun cops arrest five"

This is the moment News of the World undercover reporter's smashed the heart out of a murdering kidnap gang on the brink of snatching Victoria Beckham and her two little children.
They planned to demand a $£ 5$ million ransom for her life.
But after weeks spent infiltrating an Eastern bloc crime syndicate, we lured senior members to the car park of the lbis hotel in east London's Docklands.
The gang believed we were going to pay $£ 45,000$ for art treasures they had stolen from a vault at world-famous auction house Sotheby's.
But at a pre-arranged signal from us, almost two dozen officers of Scotland Yard's elite SO19 firearms team, many of them hiding in the back of a non-
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