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Our ref:
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9 May 2012

Dear Inquiry Team

Strictly Private and Confidential
The Leveson Inquiry – Letter of Mrs Taylor

We have taken instructions from Mr Lewis upon Mrs Taylor's letter of 27 January 2012, which you provided to us only recently. We comment as follows:

1. The issue of the state of Mrs Taylor's knowledge was first raised by Counsel to the Inquiry David Barr in the course of Mr Lewis' evidence of 30 November 2011. Mr Barr quoted from the Farrer & Co attendance note of 13 May 2010. Page 78 of the transcript of 30 November reads as follows:

"Can we go over the page and have on the screen page 8. I'm interested in the section about a third of the way down. This is in a section under the heading "Background Mark Lewis/Gordon Taylor". The third paragraph down says: "JCP said Taylor does not want the details of his claim regarding News Group to come up. Not even his wife knew that he did the deal."

2. It is clear from the above that David Barr is referring to Farrer & Co's note of Julian Pike's observation that Mrs Taylor did not know about her husband's settlement with News Group Newspapers Limited.
3. Contrary to what is set out in Mrs Taylor's letter our client does not state that Mrs Taylor was unaware of the fact that her husband was suing the newspaper. What Mr Lewis does say (confirming that his understanding is consistent with the Farrer & Co note and Mr Pike – having been referred to it by David Barr) is (page 80 of the transcript):

"I understand he hadn't told his wife about the settlement, but that's really a matter for him to deal with on a domestic level, but he is a union chief executive who ought to have represented his members."

4. It remains Mr Lewis' recollection that Mr Taylor had not told his wife of the amount of the settlement, although he understood that she knew about the case. Mr Lewis does not recall having had a telephone conversation (or any other substantive conversation) with Mrs Taylor at any stage. The note Mrs Taylor quotes from is clearly an extract of an attendance note of a conversation between Mr Lewis and Mr Taylor. Mr Lewis does not have access to the PFA's file (2142/215) PFA/Gordon Taylor/News Group Newspapers litigation file to be able to read the full note of which Mrs Taylor quotes part of or other such notes and correspondence. The only document in the possession of Mr Lewis and the Inquiry is the Farrer & Co attendance note which is consistent with Mr Lewis' recollection.
5. Mr Lewis denies having been disingenuous or spiteful as alleged by Mrs Taylor or otherwise having given evidence to the Inquiry that was not his honest recollection. If it is the case that Mrs

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Taylor did in fact know of the settlement from her husband, contrary to Mr Lewis' understanding, he has no objection to that being made clear to the Inquiry.

Yours faithfully,


Collyer Bristow LLP