

FARRER & Co

John Whittingdale OBE MP
Chairman
Culture, Media and Sport Committee
House of Commons
7 Millbank
London
SW1P 3JA

31 October 2011

By Email: CMSCOM@parliament.uk
By Post

Dear Sir

Evidence of Mr Pike: 19 October 2011

We refer to the requests made during Wednesday's session for us to disclose certain documents relating to Mr Pike's evidence that there were a number of meetings within News International following the disclosure of the "For Neville" email.

Please find enclosed:

1. A copy of the email from Mr Crone to Mr Myler dated 24 May 2008 (JCP1) attaching Mr Crone's Briefing Note (JCP2-3). For the avoidance of doubt, the Firm was not involved in drafting the Briefing Note. Mr Pike's mobile number has been redacted from the last paragraph of the Note. Otherwise, there are no redactions;
2. A partially redacted copy of a second email from Mr Crone to Mr Pike dated 24 May 2008 (JCP4) confirming that Mr Myler was to speak with Mr James Murdoch during the following week. The redactions have been made for reasons of confidentiality given the on-going police investigation;
3. A copy of Mr Pike's contemporaneous manuscript note of his conversation with Mr Myler on 27 May 2008, together with a transcript of the handwritten note (JCP5-7). Mr Pike had a conversation with Mr Myler on 28 May 2008 for which he does not have a note.
4. Relevant attendance notes and manuscript notes relating to the evidence given by Mr Pike as regards the period 24 May to 10 June 2008 together with transcripts as necessary are enclosed (JCP8-13).

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5. A copy of redacted time entries from our time system recorded on the News Group Newspapers - Gordon Taylor file recording salient conversations between 24 May 2008 and 10 June 2008. We have redacted irrelevant entries covering communications with Counsel, internal entries and with Mr Muleaire's lawyers (JCP14-19);
6. A copy of the Opinion of Michael Silverleaf QC dated 3 June 2008 which was sent to Mr Crone on the same date (JCP20-26). Counsel's Opinion has been redacted to take account of: (a) the ongoing investigation; and (b) to protect the privacy of Mr Taylor. For the avoidance of doubt, we have previously obtained Mr Taylor's consent to us giving evidence provided we respect his privacy. The further advice referred to in the last paragraph of the Opinion does not concern the Committee's deliberations.
7. A copy of the pre-publication contract dated 4 February 2005 (JCP27) with certain information relating to Mr Taylor and the name of the individual at the *News of the World* who signed the agreement redacted.

Separately, in relation to Mr Farrelly's suggestion that Mr Pike should have done more when on notice of incorrect evidence having been given, the Committee were reminded of the submission made by Harbottle & Lewis LLP of 11 August that there is a positive lack of obligation to report such a matter. Mr Pike told the Committee that he adopted Harbottle's submission. For the Committee's ease of reference, Members are referred to paragraphs 19 - 21 and Appendix C of Harbottle's Response Document. Copies of the relevant pages are attached for ease of reference (JCP-28-32).

If we can be of any further assistance, please let us know.

Yours faithfully

