

From: GMAX <[REDACTED]>

To: J Jep <jeevacation@gmail.com>

Subject: FW: Draft Responses

Date: Sat, 05 Mar 2011 12:59:32 +0000

Attachments: The_Sunday_Times_-_Daniel_Foggo_-_AK_comments_-_05_03_11.DOC;
The_Mail_on_Sunday_Times_-_Anne_Witheridge_-_AK_comments_-_04_03_11.DOC

Inline-Images: image.gif

I am out of time – this has to go now and it is what is going..

----- Forwarded Message

From: Philip Barden <[REDACTED]>

Date: Sat, 5 Mar 2011 07:50:32 -0500

To: NY Max <[REDACTED]>

Cc: James Dunn <[REDACTED]>, <[REDACTED]>, Kevin Maxwell
<[REDACTED]>

Subject: Draft Responses

I have now received Alan Kilkenny's input and I have brought together two final versions. One for the Mail on Sunday and the other for the Sunday Times.

There is a fine line to be drawn here as what we are trying to achieve is to limit reputational damage. Given that these allegations are in Court papers and within the public domain, even before this morning's article in the Daily Mail it is inevitable that the papers will run this story tomorrow. What we want to achieve is a balanced article that makes it clear that the allegations are denied, there is doubt as to their genuineness, i.e. Rothstein and to make it relatively complex.

The one point Alan is very clear on is that if we overtly threaten litigation if they publish, that is only more likely to make them harden their stance as they are going to publish anyway.

I would therefore suggest we send the attached subject to Ghislaine's sign off asap.

I am on my mobile.

Kind regards,

Philip Barden | Partner | Devonshires

[REDACTED]
[REDACTED]
[REDACTED]

Website: www.devonshires.com <<http://www.devonshires.com/>>

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