

Our Ref A279/SZW/ /FSI-1811807-1

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Your Ref

**Finers Stephens Innocent**

Date . 22 July 2003

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Private & Confidential  
For Addressee Only  
FAO Mr Philip Lawrence  
BBC Legal Department  
British Broadcasting Corporation  
Television Centre  
Wood Lane  
London W12 7RJ

By fax: 020 8752 5080

Dear Mr Lawrence

**Susan Watts - Materials relating to Dr Kelly.**

We refer to our tele-con on the afternoon of 22<sup>nd</sup> July 2003 wherein you conveyed the BBC's request of our client Ms Susan Watts that she deliver up copies of her research materials related to the two Newsnight items on 2<sup>nd</sup> and 4<sup>th</sup> July respectively.

We had before us the letter apparently delivered to Ms Watts and copied to the writer dated 22<sup>nd</sup> July 2003 from Mr Richard Sambrook, BBC News Director.

During our telephone discussion, we intimated to you our client's grave concerns regarding this request and her need for re-assurance that her work and research not be used to support other BBC reports with which she was in no way involved. When we wrote to the BBC on 11<sup>th</sup> July 2003 and via the writer's conversations with BBC personnel, our client expressed her objection to the BBC's strategy of using her non-broadcast information and resources for the purposes of comparing two unrelated news stories, namely that produced by our client and that of Mr Gilligan on the *Today Programme* and otherwise involving her in the BBC/Downing Street dispute. At that time, our client's primary concern was to protect the confidentiality and identity of her source.

As we all know, the issue of Dr Kelly's confidentiality as a journalistic source has been resolved in tragic circumstances.

However, our client's sincere and genuine concerns regarding the legitimacy of BBC news personnel's request for further information and details regarding our client's source materials and the use to which this information might be put has been reaffirmed by events over the weekend. By the BBC permitting repeated analogy with, apparent reliance upon and otherwise misinterpretation of our client's source materials causes her to resist any demand for delivery up of her materials prior to their proper delivery to the Lord Hutton's Inquiry.

Our client has at all times confirmed to the BBC and has asked us to repeat her intentions to fully and frankly disclose to the Inquiry all of her materials, notes and information that might be relevant to the Inquiry's investigations and deliberations. The BBC should have no concern that our client would do anything other than cooperate fully. It is for this purpose that this firm continues to be retained by Ms Watts, who is in the process of preparing a

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