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LITIGATION DEPARTMENT

Our ref : PL/kls/Legal/rm3536

Your ref : A279/SZW//FSI-1806941-1

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23 July 2003

Finers Stephens Innocent
1799 Great Portland Street
Lndon
W1W 5LS

Attn: Fiona Campbell

BY FAX: 0207 344 5603

Dear Ms Campbell

Your Client: Susan Watts - Hutton Inquiry

Thank you for your fax of yesterday.

I enclose a copy of a letter from the Inquiry to your client received yesterday addressed to her at the BBC. I called you last night to discuss the position but could not get an answer and left a message for you to contact me.

There are a number of points in your letter to which we would wish to reply if there was time to do so. Suffice it to say that the material your client holds is clearly relevant to the Inquiry - as is clear from the Inquiry's letter.

As I believe I fully explained to you yesterday afternoon in our telephone conversation the BBC's concern is solely to assist the Inquiry as fully and as accurately as possible. I believe it is your client's duty to assist the BBC to do so also. Members of this department are engaged in preparing the BBC's submission to the Inquiry, just as you are engaged in preparing your client's submission. I do not consider it unreasonable for the BBC's lawyers to have access to the materials held by your client to assist them in doing so. I believe that you accepted this when we spoke - albeit subject to certain assurances you stated your client would require. I said I would give assurances if they were reasonable, fair and appropriate.

Having considered your letter I cannot accept that the assurances that you seek are such. They would effectively prevent any lawyer who had seen the materials taking any further part in the

