

5 Great College Street
Westminster
London SW1P 3SJ
www.rlb-law.com
Direct Dial +44 (0)20 7227 6704

Tel +44 (0)20 7222 7040
Fax +44 (0)20 7222 6208
LDE 113 London Chancery Lane
info@rlb-law.com
simon.dinnick@rlb-law.com

COPY LETTER

RadcliffesLeBrasseur

29 June 2005

Our Ref: SRD/PXB/900100.8285

Your Ref:

W 2900509 v1

Mr Murray Morse
Editor
Cambridge Evening News
Cambridge Newspapers Ltd
Winship Road
Milton
Cambridge CB4 6PP

Dear Sir

Mr Andrew Wakefield

We act for Andrew Wakefield. In your edition of 21 June 2005 you carried an article entitled "Academic warned after e-mail abuse" The article was principally concerned with a local Cambridge academic.

In that article you refer to a Sunday Times article last year written by a Mr Brian Deer and you conclude your own article with the following two paragraphs,

"Mr Deer wrote a front page article in The Sunday Times last year claiming leading doctor Andrew Wakefield's study into the link between MMR and autism was tainted.

The article alleged Dr Wakefield had been given £55,000 to find a positive connection by lawyers representing families whose children had contracted the condition after being given the jab".

That allegation is untrue and defamatory of Andrew Wakefield. It states unequivocally and untruthfully that Dr Wakefield had been given £55,000 by lawyers representing families. It further alleges that the purpose of the £55,000 was to find a positive connection between MMR and autism. As you should know Andrew Wakefield was awarded up to £55,000 by the Legal Aid Board in respect of an agreed protocol to carry out research. The research methodology was agreed with the Legal Aid Board. Your article implies and indeed states that the money was paid by lawyers representing the families and that is not the case. It further alleges that the purpose of the money was to establish a positive link thus suggesting a predetermined outcome and a lack of objectivity in the work which Mr Wakefield was to carry out. There is no possible basis for such allegations and they are grossly defamatory of Mr Wakefield as you will clearly see.

You should be aware that proceedings in defamation have already been commenced against The Sunday Times in respect of the article published by Mr Brian Deer on 22 February 2004. Your article has gone even further than the allegations in The Sunday Times which are currently being litigated and allege impropriety on the part of Mr Wakefield to receive money from lawyers to achieve a predetermined outcome.

There could hardly be a more serious allegation against a research gastroenterologist and there is absolutely no basis for such an allegation whatsoever.

Incorporating Jay Benning & Peltz
Offices in London, Leeds, Cardiff and Singapore
A firm of solicitors regulated by the Law Society
A list of partners may be inspected at the above address



Lexcel
PRACTICE MANAGEMENT PROGRAMME
THE LAW SOCIETY

The Editor

29 June 2005

Page 2

RadcliffesLeBrasseur

We would invite you forthwith to agree to publish an apology to appear in an equivalent edition and with equivalent prominence to the original article and to pay a sum equivalent to Mr Wakefield's legal costs into a charity of his choice.

Failure to respond positively to this letter within 14 days may result in legal proceedings against you and your newspaper with obvious costs and damages risks for your newspaper. In that eventuality this offer of compromise made by Mr Wakefield is withdrawn and all his rights to damages, injunctive relief and costs are reserved.

We await to hear from you by return.

Yours faithfully

RadcliffesLeBrasseur

COPY

5 Great College Street
Westminster
London SW1P 3SJ
www.rlb-law.com
Direct Dial +44 (0)20 7227 6704

Tel +44 (0)20 7222 7040
Fax +44 (0)20 7222 6208
LDE 113 London Chancery Lane
info@rlb-law.com
simon.dinnick@rlb-law.com

RadcliffesLeBrasseur

Dr Evan Harris MP
27 Park End Street
Oxford
OX1 1HU

25 February 2005

Our Ref: SRD/PXB/900100.8285

Your Ref:

W 2832099 v1

Dear Sir

We act for Mr Andrew Wakefield. We represent his interests both in relation to the forthcoming General Medical Council investigation and also in relation to matters of defamation.

He has asked us to inform you that defamation proceedings have been instituted against Mr Brian Deer and The Sunday Times newspaper in relation to articles that have been appeared and statements that have been made by them which are defamatory of Mr Wakefield.

Mr Wakefield has drawn our attention to a number of statements made by you in connection with Mr Wakefield and the question of MMR both in newspapers and in BBC broadcast programmes.

As the whole question of Mr Wakefield's role in this matter is currently the subject of a General Medical Council investigation it clearly would not be appropriate for him to comment at length on the issues involved in that investigation.

Given however the fact of litigation having been instituted in defamation and the existence of the General Medical Council inquiry we hope you would agree that further comment on Mr Wakefield's conduct by you or anyone else should be limited until the outcome of those proceedings has been determined. This will avoid Mr Wakefield having to consider further legal proceedings at the present time.

Yours faithfully

RadcliffesLeBrasseur

Incorporating Jay Benning & Peltz
Offices in London, Leeds, Cardiff and Singapore
A firm of solicitors regulated by the Law Society
A list of partners may be inspected at the above address



5 Great College Street
Westminster
London SW1P 3SJ
www.rlb-law.com
Direct Dial +44 (0)20 7227 6704

Tel +44 (0)20 7222 7040
Fax +44 (0)20 7222 6208
LDE 113 London Chancery Lane
info@rlb-law.com
simon.dinnick@rlb-law.com

COPY LETTER

RadcliffesLeBrasseur

Ms Sophie Rawlings
Website Manager
The Department of Health
Skipton House
80 London Road
London SE1 6LH

23 June 2005

Our Ref: SRD/PXB/900100.8285

Your Ref:

W 2897692 v1

Dear Sir

**The Medical Protection Society
Mr Andrew Wakefield**

We act for Mr Andrew Wakefield on the instructions of the Medical Protection Society.

As you will know Mr Wakefield is a key proponent of views about the potential side effects of the MMR vaccine. This is a subject which features prominently on your website particularly under the heading "MMR – The Facts".

You may also be aware that Mr Wakefield has issued proceedings in defamation against variously The Sunday Times, Channel 4 Television and Mr Brian Deer, a journalist. You will further be aware that the contents of Mr Brian Deer's television documentary for Channel 4 and Dispatches "MMR – What they didn't tell you" is hotly disputed and is also the subject of defamation proceedings.

In the circumstances Mr Wakefield is concerned and surprised to note that your official website on behalf of the Department of Health offers links to not only Mr Deer's own website, but also the Channel 4 website on the programme. It seems extraordinary to us and wholly wrong that the Government's official organ should direct website visitors to another site which not only records partisan, hotly disputed opinions on the subject but is also the subject of defamation proceedings. You will appreciate our grave concern that this fact appears to suggest that Government offers this subject matter official weight and authority.

This letter is intended to provide formal written warning that the links provided to these two websites are allowing the dissemination of defamatory material. Since this is so you are now invited to withdraw the Department of Health link to these two websites forthwith given that this is an inappropriate use of Governmental weight and authority in such a controversial area.

We look forward to hearing from you in the near future.

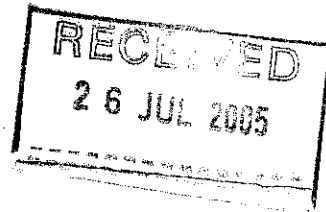
Yours faithfully

RadcliffesLeBrasseur

Incorporating Jay Benning & Peltz
Offices in London, Leeds, Cardiff and Singapore
A firm of solicitors regulated by the Law Society
A list of partners may be inspected at the above address



Lexcel
PRACTICE MANAGEMENT STANDARDS
THE LAW SOCIETY



RadcliffesLeBrasseur
5 Great College Street
Westminster
London
SW1P 3SJ

25 July 2005

Dear Sir

Thank you for your letter of 23 June, which we have now considered fully.

It is an important function of the Department of Health to make information available to parents to enable them to make informed decisions about the care of their children. That of necessity sometimes requires the dissemination of material which is not wholly agreed or is positively disputed. But it would be wrong of the Department to ignore or censor relevant material simply because it is of that type. Neither would it be proper for the Department to impede access to such material when a court seized of the issue has not.

We propose therefore to maintain the links concerned as indeed we propose to maintain the links to websites putting forward views supporting Dr Wakefield. These can be found at www.mmrthefacts.nhs.uk under Library/Useful websites/All websites in drop down menu/Further resources and other MMR issues.

Yours faithfully

Chris Owen
Head of Publishing
Immunisation Information
Department of Health