

Your Reference:

Our Reference: JKC/MCK01021

By Email

Mr David Turner
novalis@novalis.org

20 April 2007

PRIVATE AND CONFIDENTIAL – NOT FOR PUBLICATION

Dear Sir

Paul McKenna & Wikipedia

We act for Paul McKenna.

The Wikipedia Posting

We refer to a posting by you on Wikipedia which we now quote for ease of reference:-

“LaSalle

I added back the bit about McKenna's libel suit. It is relevant to the section it was in, since it's about libel litigation. And it's relevant to the article as a whole, because it shows that he was stupid enough to buy a degree from a diploma mill. Please don't remove it without a discussion. [Novalis](#) 21:06, 19 April 2007 (UTC).”

The Posting is Defamatory of our Client

The allegation that our client “*was stupid enough to buy a degree from a diploma mill*” is defamatory of our client, in that it alleges that he merely purchased his US degree; i.e. that not only was his degree bogus, but in claiming to be the holder of a PhD, he also set out to deceive the public.

Our client recently brought proceedings against a national newspaper over allegations (inter alia) that his degree was bogus, and that his claim to be the holder of a PhD was dishonest. Mr Justice Eady, who heard that case, and who heard extensive expert evidence on the subject, found not only that our client was not dishonest in claiming to be the holder of a PhD, but also that his US degree was not bogus. Furthermore, as was admitted by the national newspaper during the course of the trial, our client also holds an “*unimpeachable*” PhD degree from an accredited UK institution.

Conclusion

We therefore require that you remove this posting immediately from the Wikipedia site, and also undertake not to repeat any allegations to the effect that our client's US degree is bogus, or that his entitlement to style himself as PhD is illegitimate.

Partners:

Stuart Barry
Julian Bentley
Jonathan Coad
Tom Cowling
Antony Gostyn
Charles Swan
Julian Turton

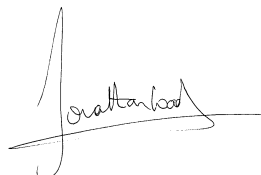
Consultants:

Melissa Bailey
Alice Rayman
Nicholas Sharp
Anne Todd

20 April 2007

Our client's right to issue proceedings against you for defamation are strictly reserved pending your response to this letter. Proceedings will be issued in any event unless we receive a response within 14 days from the date of this letter.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jonathan Coad', written over a horizontal line.

Swan Turton

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cc: client