

In the Matter Of:

MICHAEL E. MANN vs NATIONAL REVIEW

2012 CA 008263 B

MARK STEYN

October 26, 2020



ESQUIRE
DEPOSITION SOLUTIONS

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SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

CIVIL DIVISION

MICHAEL E. MANN, M.D.

PLAINTIFF,

-V-

NATIONAL REVIEW, INC., ET AL.

DEFENDANTS.

CASE NO:

2012 CA 008263 B

ZOOM DEPOSITION OF MARK STEYN

BALTIMORE, MD

MONDAY OCTOBER 26, 2020

10:07 A.M.

JOB NO: J6122503

PAGES: 1-206

REPORTED BY: KENNETH NORRIS

1 DEPOSITION OF MARK STEYN

2 HELD VIA ZOOM.

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13 PURSUANT TO NOTICE, BEFORE KENNETH NORRIS, A
14 PROFESSIONAL REPORTER AND NOTARY PUBLIC IN AND FOR THE
15 STATE OF MARYLAND.
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CONTENTS

EXAMINATION OF MARK STEYN PAGE

BY MR. WILLIAMS 9

EXHIBITS PAGE

EXHIBIT 1 SUPPLEMENTAL INTERROGATORY 13

ANSWERS

EXHIBIT 2 ARTICLE FROM TELEGRAPH IN LONDON 37

EXHIBIT 26 HAND WRITTEN NOTE 57

EXHIBIT 28 ARTICLE, "SUBTLE SCIENCE 40

CATCHES UP WITH STEYN"

EXHIBIT 32 REPORT BY THE ASSOCIATED PRESS 107

EXHIBIT 33 THE GUARDIAN 108

EXHIBIT 34 ARTICLE BY THE UNION OF 109

CONCERNED SCIENTISTS

EXHIBIT 35 NEW YORK TIMES ARTICLE 109

EXHIBIT 37 ARTICLE ENTITLED: "NSF 172

1		CONFIRMS RESULTS OF	
2		PENN STATE INVESTIGATION	
3		EXONERATES MICHAEL MANN	
4		OF RESEARCH MISCONDUCT. "	
5	EXHIBIT 41	NATIONAL REVIEW BIO	123
6	EXHIBIT 43	ARTICLES WRITTEN ABOUT DR. MANN	136
7	EXHIBIT 44	DEFAMATORY PUBLICATION TO	138
8		DR. MANN	
9	EXHIBIT 45	ARTICLE ENTITLED: "DR. MANN,	140
10		SUPER VILLAIN	
11	EXHIBIT 47	ARTICLE SUBJECT: "BIG CLIMATE	141
12		SLEAZY CHARLATAN"	
13	EXHIBIT 48	ARTICLE: "MICHAEL E. MANN	96
14		LIAR, CHEAT, FALSIFIER AND	
15		FRAUD. "	
16	EXHIBIT 49	ARTICLE: "STEYN DOESN'T	161
17		UNDERSTAND THE PICTURE"	
18	EXHIBIT 53	ARTICLE: "MAN, I FEEL LIKE	151
19		A WARMIN"	
20	EXHIBIT 57	ARTICLE CALLED "CONGRATULATIONS	166
21		PENN STATE. "	

1	EXHIBIT	59	"FOOTBALL AND HOCKEY"	88
2	EXHIBIT	60	ARTICLE "BLOCKING IN A LEGAL	185
3			WONDERLAND. "	
4	EXHIBIT	62	THE LAMB GRAPH	43
5	EXHIBIT	63	THE LAMB GRAPH	43
6	EXHIBIT	64	THE LAMB GRAPH	43
7	EXHIBIT	67	ARTICLE ENTITLED "THE OTHER	27
8			SCANDAL IN UNHAPPY VALLEY. "	
9	EXHIBIT	69	ARTICLE: "DOCTOR OF PHRAUDOLOGY"	146
10	EXHIBIT	71	ARTICLE SUBJECT: "MICHAEL MANN	149
11			AS A "THOROUGH TOP 2.0 FRAUD"	
12	EXHIBIT	72	CARTOON FROM BOOK, "A	155
13			DISGRACE TO THE PROFESSION"	
14	EXHIBIT	74	STEYN PROPOSAL	192
15				
16				
17				
18				
19				
20				
21				

P R O C E E D I N G S

THE VIDEOGRAPHER: OKAY. GOOD MORNING. WE
ARE NOW ON THE RECORD. THE TIME IS NOW 10:07 A.M. ON
OCTOBER 26TH, 2020.

THIS BEGINS THE VIDEOTAPED DEPOSITION OF
MARK STEYN TAKEN IN THE MATTER OF MICHAEL E. MANN, PHD
VERSUS NATIONAL REVIEW INC., ET AL, FILED IN THE
SUPERIOR COURT OF THE DISTRICT OF COLUMBIA, CIVIL
DIVISION. CASE NUMBER OF WHICH IS 2012 CA 008263 B.

MY NAME IS KAI YOST. I'M YOUR REMOTE
VIDEOGRAPHER TODAY.

COURT REPORTER IS KENNETH NORRIS. WE ARE
REPRESENTING ESQUIRE DEPOSITION SOLUTIONS.

AS A COURTESY WILL EVERYONE WHO IS NOT
SPEAKING, PLEASE MUTE YOUR AUDIO AND PLEASE REMEMBER TO
UNMUTE YOUR AUDIO WHEN YOU ARE READY TO SPEAK?

COUNSEL, WILL YOU PLEASE STATE YOUR NAMES
AND WHOM YOU REPRESENT, AFTER WHICH THE COURT REPORTER
WILL SWEAR IN THE WITNESS.

MR. WILLIAMS: MY NAME IS JOHN WILLIAMS AND

1 I REPRESENT MICHAEL MANN.

2 MR. WILSON: MY NAME ANDREW WILSON. I
3 REPRESENT MARK STEYN.

4 MR. HEINTZ: THIS IS JON HEINTZ FROM JONES
5 DAY ON BEHALF OF DEFENDANT NATIONAL REVIEW, INC.

6 MR. DELAQUIL: I'M MARK DELAQUIL FROM THE
7 BAKER & HOSTETLER LAW FIRM ON BEHALF OF DEFENDANTS
8 RAND SIMBERG AND THE COMPETITIVE ENTERPRISE INSTITUTE.
9 WHEREUPON,

10 MARK STEYN,
11 A WITNESS OF LAWFUL AGE, AFTER BEING DULY SWORN TO
12 TELL THE TRUTH, THE WHOLE TRUTH AND NOTHING BUT THE
13 TRUTH, TESTIFIED AS FOLLOWS:

14 EXAMINATION:

15 BY MR. WILLIAMS:

16 Q. GOOD MORNING, MR. STEYN. THIS IS JOHN
17 WILLIAMS. I'D LIKE TO THANK YOU FOR MAKING YOURSELF
18 AVAILABLE TODAY.

19 A. NO PROBLEM.

20 Q. I'M GOING TO START WITH SOME QUESTIONS THAT
21 WE START -- SEEM TO START WITH ALL OF THE WITNESSES IN

1 THIS CASE. AND THAT IS: CAN YOU PLEASE TELL US
2 BRIEFLY WHAT YOU DID TO PREPARE YOURSELF FOR THIS
3 DEPOSITION TODAY?

4 A. I HAD A TELEPHONE CONVERSATION LAST WEEK
5 WITH COUNSEL. I HAD A -- I'D GUESS YOU'D CALL IT A
6 DUMMY DEPOSITION FOR ABOUT A HALF AN HOUR WITH A
7 CANADIAN COLLEAGUE OF MINE AND I HAD A MEETING,
8 FURTHER MEETING WITH COUNSEL, MR. WILSON.

9 Q. I'M SORRY. I'M HAVING A LITTLE DIFFICULTY
10 HEARING YOU.

11 MR. WILSON: COUNSEL, ARE YOU-ALL ABLE TO
12 HEAR MR. STEYN?

13 THE COURT REPORTER: I'M HAVING DIFFICULTY.

14 THE WITNESS: OKAY? CAN YOU HEAR ME NOW.
15 IS THAT BETTER? I'M HAPPY TO REPEAT MY PREVIOUS
16 ANSWERS IF YOU WILL.

17 THE COURT REPORTER: NO. I HAVE THOSE.
18 BY MR. WILSON:

19 Q. YOU MIGHT HAVE TO REPEAT IT FOR ME. YOU HAD
20 A -- SOME SORT OF SESSION WITH A CANADIAN COLLEAGUE.
21 IS THAT WHAT YOU SAID?

1 A. YES, I HAD -- TOWARD THE END OF LAST WEEK I
2 HAD A HALF HOUR TELEPHONE CALL WITH COUNSEL IN NEW
3 YORK. I HAD A -- I GUESS YOU'D CALL IT A DUMMY
4 DEPOSITION FOR ABOUT 45 MINUTES, AN HOUR OR SO WITH A
5 CANADIAN COLLEAGUE, AND I HAD A MEETING WITH MR.
6 WILSON WHEN HE ARRIVED HERE FROM NEW YORK YESTERDAY.

7 Q. THANK YOU. AND WHEN YOU SAY HERE, WHERE ARE
8 YOU RIGHT NOW? ARE YOU IN BURLINGTON?

9 MR. WILSON: OBJECTION. WE'RE GOING TO KEEP
10 THE LOCATION OF THE DEPOSITION CONFIDENTIAL BECAUSE OF
11 SECURITY CONCERNS.

12 BY MR. WILLIAMS:

13 Q. OKAY. YOU'RE SOMEPLACE IN NEW ENGLAND. IS
14 THAT FAIR?

15 A. YEAH. NORTHERN NEW ENGLAND.

16 Q. OKAY. THANK YOU. ALL RIGHT. AND WHO IS
17 YOUR CANADIAN COLLEAGUE IN THE DUMMY SESSION?

18 A. THAT'S MR. LAWTON WHO WAS ON THE CALL. HE
19 ENJOYS COMING DOWN TO AMERICA AND PRACTICING AS AN
20 UNDOCUMENTED BARRISTER ONCE IN A WHILE, SO HE AGREED
21 TO PUT ME THROUGH A DUMMY DEPO.

1 Q. THANK YOU. AND IN CONNECTION WITH YOUR
2 PREPARATION, MR. STEYN, DID YOU REVIEW THE
3 INTERROGATORY ANSWERS THAT YOU HAD PROVIDED TO US?

4 A. YES, I DID. THE -- I BELIVE THE
5 SUPPLEMENTED INTERROGATORY ANSWERS?

6 Q. YES.

7 A. IF THAT'S WHAT I'M THINKING OF?

8 Q. ALL RIGHT. YEAH. GOOD, THANK YOU. AND I
9 BELIEVE THAT'S EXHIBIT 1 IN THE BINDER THAT WE SENT
10 YOU.

11 AND I TAKE IT YOU DO HAVE THAT BINDER, MR.
12 STEYN?

13 A. YES, I DO. I HAVE IT RIGHT HERE.

14 (STEYN EXHIBIT NO. 1 WAS MARKED FOR
15 IDENTIFICATION.)
16 BY MR. WILLIAMS:

17 Q. OKAY. GOOD. THANK YOU VERY MUCH. AND WE
18 SENT SOME ADDITIONAL ONES YESTERDAY BUT WE WILL NOT
19 GET TO THOSE FOR A WHILE.

20 DID YOU REVIEW THE DOCUMENTS THAT WE HAD
21 SENT TO YOU?

1 A. YES. I GAVE THEM THE ONCE-OVER.

2 Q. OKAY. AND YOU GAVE THE ONCE-OVER TO THE
3 SUPPLEMENTAL INTERROGATORY ANSWERS OR DID YOU LOOK AT
4 THAT IN ANY MORE DETAIL?

5 A. I COULDN'T HONESTLY SAY I'VE LOOKED AT IT IN
6 GREAT DETAIL, BUT I DID LOOK THEM OVER.

7 Q. OKAY. YOUR INTERROGATORY ANSWERS HAVE A
8 NUMBER OF ARTICLES IDENTIFIED IN THEM. DID YOU LOOK
9 AT THOSE ARTICLES OR JUST GIVE THEM THE ONCE OVER TOO?

10 A. I COULDN'T HONESTLY SAY THAT I'VE BROKEN
11 THEM OUT. SOME OF THEM OBVIOUSLY I READ AT THE TIME,
12 SOME OF THEM I READ YEARS AGO WHEN THEY FIRST CAME
13 OUT. BUT I DIDN'T REFRESH MY RECOLLECTION WITH REGARD
14 TO SPECIFIC ARTICLES.

15 Q. OKAY. AND, MR. STEYN, OTHER THAN THE
16 ARTICLES THAT WE HAVE -- EXCUSE ME, THE EXHIBITS WE
17 HAVE SENT UP TO YOU, HAD YOU REVIEWED -- DID YOU
18 REVIEW ANY OTHER DOCUMENTS?

19 A. I HAD A LOOK AT THE BOOK I EDITED, "A
20 DISGRACE TO THE PROFESSION, THE WORLD'S SCIENTISTS ON
21 MICHAEL E. MANN, HIS HOCKEY STICK AND THE DAMAGE TO

1 SCIENCE, VOLUME 1." I GAVE THAT A QUICK GLANCE TOO.

2 Q. OKAY. THANK YOU. AND ANY OTHER DOCUMENTS?

3 A. NO.

4 Q. AND ABOUT HOW LONG DID YOU SPEND PREPARING
5 YOURSELF FOR THIS DEPOSITION INCLUSIVE OF YOUR DUMMY
6 SESSION AND YOUR DISCUSSIONS WITH COUNSEL?

7 A. WELL, YESTERDAY WENT A LITTLE LONGER. I'D
8 SAY MAYBE FOUR HOURS MAX.

9 Q. FOUR HOURS MAX, INCLUDING THE MEETING WITH
10 MR. WILSON YESTERDAY?

11 A. YES. WITH MR. WILSON, WITH MR. LAWTON UP IN
12 ONTARIO AND WITH MR. KORNSTEIN ON THE TELEPHONE.

13 Q. I SEE. OKAY. ALL RIGHT.

14 LET'S MOVE INTO SOME SUBSTANCE AND IN
15 PARTICULAR CLIMATEGATE. IF YOU LOOK AT YOUR
16 INTERROGATORY, SUPPLEMENTAL INTERROGATORY RESPONSES, I
17 WANT TO JUMP RIGHT IN THERE.

18 AND, SIR, IF YOU COULD GO TO PAGE 8, I JUST
19 WANT TO ESTABLISH WHAT IS APPARENT FROM YOUR ANSWERS,
20 THAT YOU ARE AN AVID READER OF THE MEDIA ON CLIMATE
21 CHANGE, CORRECT?

1 A. I WAS AT THAT TIME. I'M A LITTLE LESS AVID
2 SINCE THE POT NO LONGER SEEMS TO BE QUITE ON THE BOIL.
3 BUT CERTAINLY AT THAT TIME, I WAS AN AVID READER OF
4 MEDIA ON CLIMATE CHANGE.

5 Q. AND SO -- ALL RIGHT. I UNDERSTAND.

6 AND THEN AT THAT TIME WHEN YOU WROTE THE
7 ARTICLE, I TAKE IT YOU WERE AWARE OR GENERALLY AWARE
8 OF PUBLISHED SCIENTIFIC CRITICISM OF THE HOCKEY STICK
9 GRAPH?

10 A. YES, I WAS.

11 Q. AND BACK AT THAT TIME, MR. STEYN WHEN YOU
12 WERE AN AVID READER, CAN YOU TELL ME APPROXIMATELY HOW
13 MUCH TIME A MONTH YOU WOULD SPEND KEEPING YOURSELF
14 ABREAST OF ISSUES RELATED TO THE HOCKEY STICK GRAPH?

15 A. WELL, DURING THE CLIMATEGATE PERIOD I WOULD
16 SAY I WAS CHECKING IN ON NEW DEVELOPMENTS EVERY DAY.
17 CERTAINLY WHEN IT WAS LESS DRAMATIC I WOULD
18 NEVERTHELESS BE CHECKING THE VARIOUS CLIMATE CHANGE
19 WEBSITES, NOT NECESSARILY ON A DAILY BASIS BUT
20 CERTAINLY THREE OR FOUR TIMES A WEEK.

21 SO, I THINK IT WOULD BE FAIR TO SAY THAT IF

1 YOU'RE TALKING ABOUT A MONTH, I WOULD CERTAINLY
2 AVERAGE AT LEAST ONCE EVERY OTHER DAY.

3 Q. AND HOW MUCH TIME WOULD YOU SPEND LOOKING AT
4 THE CLIMATE CHANGE WEBSITES WHEN YOU WOULD TUNE IN?

5 A. WELL, IF I WOULD TUNE IN I WOULD SAY I WOULD
6 BE SPENDING, YOU KNOW, 30 TO 60 MINUTES A DAY BRINGING
7 MYSELF ABREAST OF THINGS.

8 Q. OKAY. AND CAN YOU TELL US THE VARIOUS
9 CLIMATE CHANGE WEBSITES THAT YOU WOULD TUNE IN TO?

10 A. WELL, FOR EXAMPLE, I WAS A REGULAR READER OF
11 STEVE MCINTYRE'S CLIMATE AUDIT WEBSITE WHICH HAS GONE
12 A BIT SILENT SINCE.

13 I'M A REGULAR READER OF ANTHONY WATT'S
14 "WATTS UP WITH THAT" SITE, WHICH IS I BELIEVE THE MOST
15 READ CLIMATE WEBSITE IN THE WORLD.

16 I FOLLOW AW MONTFORD'S BISHOP HILL WEBSITE
17 IN THE UNITED KINGDOM, JAMES DELINGPOLE IN THE UNITED
18 KINGDOM.

19 MY FRIEND, JOE NOBER IN AUSTRALIA AND IN
20 CANADA OBVIOUSLY, STEVE MCINTYRE'S FROM CANADA. BUT
21 MY OLD COLLEAGUE FROM THE NATIONAL POST, DONNA

1 LAFRAMBOISE, HER WEBSITE, AND DR. JUDITH CURRY IN THE
2 U.S. -- AND I SHOULD ALSO SAY I FOLLOW WHAT YOU MIGHT
3 CALL PRO MANN, OR I DID FOLLOW WHAT YOU MIGHT CALL PRO
4 MANN WEBSITES.

5 Q. WHEN YOU SAY PRO MANN, YOU'RE REFERRING TO
6 MIKE MANN?

7 A. CORRECT.

8 Q. THANKS. AND WHAT WERE THOSE WEB SITES?

9 A. THESE ARE ALL PEOPLE WHOM I BELIEVE ACTUALLY
10 ARE FRIENDS OF HIS BUT I WOULD FOLLOW GREG BINLADEN AT
11 HIS WEBSITE. I ALSO FOLLOWED AROUND THAT TIME A
12 FELLOW CALLED DAVID APPELL OR APPELL (SIC), WHO HAD I
13 THINK SOME KIND OF MELTDOWN AND DOESN'T POST SO
14 REGULARLY. AND THEN A FELLOW CALLED BARRY BICKMORE, A
15 FRIEND OF MR. MANN WHO HAS BIZARRE SEXUAL FANTASIES
16 ABOUT ME, SO I EVENTUALLY GAVE UP ON THAT ONE.

17 Q. OKAY. ANYBODY ELSE?

18 A. AND THERE WAS ANOTHER -- THERE WAS ANOTHER
19 FELLOW I CAN'T RECALL HIS NAME, BUT HE ACCUSED DR.
20 JUDITH CURRY OF BEING LITERALLY IN BED WITH ME, AND
21 MR. MANN QUITE DISGRACEFULLY RE-TWEETED THAT

1 PARTICULAR DISGUSTING AND SCANDALOUS ACCUSATION, BUT I
2 CANNOT RECALL THE NAME OF THAT PARTICULAR SCOUNDREL.

3 Q. OKAY. ANYBODY ELSE? ANY OTHER WEBSITES?

4 A. I THINK NOT. THOSE WERE -- THOSE WERE THE
5 MAIN ONES. AS I SAID, JAMES DELINGPOLE IN THE U.K.
6 FOR THE GENERAL CUT AND THRUST. AND THEN THE OTHERS,
7 MORE FOR THE SCIENTIFIC.

8 Q. AND ONE OF YOUR WITNESSES OR ONE OF THE
9 DEFENSE WITNESSES IN THIS CASE IS SOMEBODY NAMED ROGER
10 PIELKE, JUNIOR. DO YOU KNOW WHO HE IS?

11 A. YES, I DO.

12 Q. I'VE SEEN THAT YOU REFERRED TO HIM IN SOME
13 OF YOUR ARTICLES. DID YOU LOOK AT HIS WEBSITE?

14 A. WELL, AFTER -- AFTER MANN GOT PIELKE BOUNCED
15 FROM NATE SILVER'S WEBSITE I BELIEVE IT WAS; THE
16 FIVETHIRTYEIGHT WEBSITE, I DID CHECK IN WITH ROGER
17 PIELKE, JR.'S WEBSITE FROM TIME TO TIME. BUT I
18 WOULDN'T SAY IT WAS ONE OF MY REGULAR CALLS.

19 Q. OKAY. NOW, OTHER THAN CHECKING IN ON
20 WEBSITES, DID YOU DO ANY OTHER READING WITH RESPECT TO
21 CLIMATEGATE?

1 A. WELL, I READ WHAT I WOULD CALL -- I COULDN'T
2 HONESTLY SAY WHETHER I READ IT IN A SINGLE E-MAIL, BUT
3 I'VE CERTAINLY READ MOST OF THOSE E-MAILS THAT ARE
4 RELEVANT TO WHAT WE'RE TALKING ABOUT AND I'VE ALSO
5 SEARCHED THROUGH THOSE E-MAILS FOR OTHER THINGS. AND
6 I HAVE PURCHASED, WHEN NECESSARY, VARIOUS SCIENTIFIC
7 PAPERS THAT MIGHT BE RELEVANT. I'M NOT A REGULAR
8 SUBSCRIBER TO PEER REVIEW JOURNALS.

9 AND I'VE READ VARIOUS GENERAL INTEREST
10 PIECES IN MAGAZINES AND NEWSPAPERS, OFTEN MAGAZINES
11 AND NEWSPAPERS I'VE WRITTEN FOR.

12 Q. OKAY. GOOD.

13 WE'LL GET TO SOME OF THE SPECIFICS LATER.

14 BUT YOU SAID THE E-MAILS. YOU'RE REFERRING
15 TO THE E-MAILS THAT CAME OUT OF THE CLIMATEGATE THEFT
16 OF E-MAILS OR LEAK OF E-MAILS?

17 A. YES. I DISPUTE YOUR WORD "THEFT." THEY
18 WERE LEAKED.

19 THEY WERE LEAKED BY THE --

20 Q. YES.

21 A. -- IN THE CLIMATE RESEARCH UNIT.

1 BUT YES, THOSE WERE THE E-MAILS I WAS
2 REFERRING TO.

3 Q. OKAY. AND YOU READ MOST OF THEM. IS THAT
4 WHAT YOU SAID?

5 A. WELL, I COULDN'T -- I COULDN'T HONESTLY SAY
6 THAT BUT I WOULD CERTAINLY SAY I'VE READ HUNDREDS OF
7 THEM.

8 Q. AND YOU ALSO SAID YOU OCCASIONALLY WOULD
9 PURCHASE ARTICLES WHEN NECESSARY. DO YOU REMEMBER
10 THAT?

11 A. YES. THAT'S JUST PEER REVIEWED PAPERS WHICH
12 ARE PUBLISHED IN PEER REVIEW JOURNALS, AND THE NEXT
13 ONE IS A SUBSCRIBER TO THOSE JOURNALS, THEY CHARGE YOU
14 WHATEVER IT IS; 29.95, IF YOU WISH TO PURCHASE THE
15 FULL PAPER.

16 I NOTICE SOMETIMES WHEN YOU'RE ON THESE
17 WEBSITES, PEOPLE DON'T WANT TO PAY FULL RATE FOR THOSE
18 PAPERS AND THEY'LL OFTEN JUST COMMENT ON THEM BY
19 REFERRING TO THE ABSTRACT. AND IF IT'S SOMETHING IN
20 THE ABSTRACT THAT PARTICULARLY TICKLES MY FANCY, I
21 WILL WHIP OUT THE OLD CREDIT CARD AND BUY THE FULL

1 PAPER.

2 Q. SO YOU WOULD BUY THE ARTICLE AND PRINT IT
3 OUT?

4 A. YES. THEY SEND YOU IT IN A PDF. FOR
5 EXAMPLE, MY BOOK, "A DISGRACE TO THE PROFESSION" ABOUT
6 MR. MANN INCLUDES -- INCLUDES MULTIPLE REFERENCES FROM
7 PEER REVIEWED PAPERS, AND THOSE PAPERS WERE PURCHASED
8 AND READ IN FULL.

9 (AUDIO INTERFERENCE.)

10 THE WITNESS: YES, IT'S NOT AT THIS END. I
11 HEARD IT. I HEARD SOMEONE TORTURING A CAT SOMEWHERE.
12 BUT IT'S NOT ME.

13 BY MR. WILLIAMS:

14 Q. I HEARD THE CAT AS WELL, MR. STEYN. COULD
15 YOU JUST REPEAT?

16 YOU STARTED TO SAY SOMETIMES YOU WOULD
17 DOWNLOAD AND PRINT OUT THESE ARTICLES, SOMETHING LIKE
18 THAT?

19 A. YES. WHEN YOU PURCHASE THESE THINGS FROM
20 SCIENCE OR NATURE OR WHATEVER THE JOURNAL OF TREE RING
21 STUDIES, THEY SEND IT TO YOU IN THE FORM OF A PDF.

1 AND I WOULD GENERALLY, IF IT'S LIKE A 30-PAGE PDF, I
2 DON'T FIND THAT EASY TO READ ON THE INTERNET, SO I
3 PRINT IT OUT.

4 AND, FOR EXAMPLE, WITH THEIR PEER REVIEWED
5 PAPERS THAT ARE REFERENCED IN MY BOOK, "A DISGRACE TO
6 THE PROFESSION" THOSE ARE PEER REVIEWED PAPERS I'VE
7 BOUGHT AND GONE THROUGH IN FULL.

8 Q. I SEE. I JUST ASKED THAT BECAUSE WHEN WE
9 ASKED IN THE PRODUCTION OF DOCUMENTS FOR ANYTHING THAT
10 WOULD RELATE TO DR. MANN OR CLIMATEGATE, I DIDN'T SEE
11 THOSE IN THE PRODUCTION. DO YOU STILL HAVE THOSE?

12 A. WELL, I THINK -- I THINK -- I THINK, SIR, AS
13 I RECALL CORRECTLY -- AND ACTUALLY IT'S QUITE HARD TO
14 RECALL CORRECTLY AFTER ALL EIGHT YEARS, BUT AS I
15 RECALL THE PRESENT JUDGE SHRANK THE TIME FRAME
16 CONSIDERABLY. SO, I BELIEVE THE DOCUMENTS I WAS
17 REQUIRED TO PRODUCE DO NOT EXTEND OVER THE WHOLE YEARS
18 OF THIS CASE -- NEVER MIND THE WHOLE YEARS OF THE
19 DISPUTE OVER CLIMATE CHANGE.

20 AND THOSE ALSO OBVIOUSLY ARE PUBLICLY
21 ACCESSIBLE DOCUMENTS IN THE SENSE THAT THEY ARE

1 PUBLISHED IN PUBLICATIONS. AND I RECALL THAT WE HAD
2 SOME BACK AND FORTH OVER OUR OBLIGATION TO PROVIDE YOU
3 WITH PUBLICLY AVAILABLE DOCUMENTS, AND I BELIEVE IN
4 THE END WE PROVIDED YOU WITH MY OWN PERSONAL COLUMNS
5 FROM THE TELEGRAPH IN LONDON AND THE NATIONAL POST IN
6 CANADA AND THE AUSTRALIAN AND VARIOUS OTHER
7 PUBLICATIONS MORE AS A PROFESSIONAL COURTESY THEN AS
8 ANY COURT ORDERED OBLIGATION.

9 Q. THANK YOU. OKAY.

10 SO WHILE THEY HAVEN'T BEEN PRODUCED, YOU DO
11 HAVE SOME OF THE ARTICLES REGARDING -- EXCUSE ME.

12 YOU DO HAVE SOME OF THE PUBLISHED STUDIES ON
13 THE HOCKEY STICK. IS THAT FAIR TO SAY?

14 A. WELL, I'VE READ SOME -- AS YOU KNOW, MY BOOK
15 CITES MANY PEER REVIEWED PAPERS AND I DID -- I DID
16 READ THOSE PAPERS IN FULL. SO THEY'RE THE PAPERS THAT
17 ARE CITED IN "A DISGRACE TO THE PROFESSION, THE
18 WORLD'S SCIENTISTS ON MICHAEL E. MANN, HIS HOCKEY
19 STICK AND THEIR DAMAGE TO SCIENCE."

20 Q. OKAY. AND IF YOU'D JUST LOOK, SIR, AT YOUR
21 SUPPLEMENTAL INTERROGATORY ANSWERS, I THINK YOU LIST

1 THESE ARTICLES ON PAGE -- PAGES 10 AND 11. IS THAT
2 CORRECT?

3 MR. WILSON: OBJECTION TO FORM.

4 THE WITNESS: YES. I CAN CERTAINLY
5 RECOLLECT LOOKING AT MOST OF THOSE.

6 BY MR. WILLIAMS:

7 Q. GOOD. THANK YOU.

8 AND LET ME ASK YOU, DID YOU ALSO READ SOME
9 OF THE REPORTS OF INVESTIGATION INTO CLIMATEGATE?

10 A. I READ SOME OF THOSE AT THE TIME. I WOULD
11 SAY MOSTLY THE SO-CALLED REPORTS FROM THE UNITED
12 KINGDOM. I DON'T RECALL READING THE AMERICAN
13 SO-CALLED REPORTS AT THE TIME.

14 Q. OKAY. THE UNITED KINGDOM REPORTS, THAT
15 WOULD INCLUDE THE SIR MUIR RUSSELL REPORT?

16 A. INDEED.

17 Q. AND THE U.K. HOUSE OF COMMONS REPORT?

18 A. I'M NOT -- I'M NOT SURE I FORMALLY
19 DESIGNATED AS A REPORT BY THE HOUSE OF COMMONS. IF
20 YOU MEAN THE REPORT TO THE HOUSE OF COMMONS?

21 Q. YES, I'M SORRY.

1 A. I DID -- I DID READ THAT AT THE TIME AND I
2 ALSO READ LORD OXBURGH'S REPORT.

3 Q. OKAY. LET ME JUST DO THIS.

4 SO THOSE THREE OUT OF THE UNITED KINGDOM.
5 AND YOU READ THOSE AT THE TIME THEY CAME OUT BACK IN
6 2010 OR 2011. IS THAT RIGHT?

7 A. YES, I FOLLOWED THE RELEASE OF THOSE REPORTS
8 AS THEY WERE ISSUED.

9 Q. AND I TAKE IT, SIR, BECAUSE YOU MENTIONED IT
10 IN YOUR ARTICLE ENTITLED "FOOTBALL AND HOCKEY," THAT
11 YOU ALSO READ THE PENN STATE INVESTIGATIVE REPORTS?

12 A. YES, I DID. I READ THOSE BACK WHEN THEY
13 WERE ISSUED.

14 Q. OKAY. AND THE SIMBERG ARTICLE WHICH YOU
15 QUOTE FROM, ALSO DISCUSSED A REPORT FROM THE NATIONAL
16 SCIENCE FOUNDATION. DID YOU READ THAT ONE AS WELL?

17 A. I DON'T BELIEVE I DID.

18 Q. OKAY. DO YOU KNOW WHAT I'M TALKING ABOUT?

19 A. I DO. BUT AS I SAID EARLIER, THE ONES I
20 READ IN REAL TIME WERE MAINLY FROM THE UNITED KINGDOM.
21 I'M NOT SURE, FOR EXAMPLE, WITH THAT ONE, IF I READ IT

1 -- NO. ACTUALLY AT THE TIME I DID MY BOOK, I LOOKED
2 AT THAT THING. BUT I DON'T BELIEVE I'VE LOOKED AT IT
3 BEFORE I DID THE BOOK ON "A DISGRACE TO THE
4 PROFESSION."

5 Q. WHEN I REFER TO THE SIMBERG ARTICLE ENTITLED
6 "THE OTHER SCOUNDREL IN UNHAPPY VALLEY," YOU KNOW WHAT
7 I'M REFERRING TO, CORRECT?

8 A. CORRECT.

9 Q. AND YOU READ -- DID YOU READ THAT -- I
10 ASSUME YOU READ THAT ARTICLE BEFORE YOU WROTE YOUR
11 ARTICLE ENTITLED "FOOTBALL AND HOCKEY?"

12 A. CORRECT.

13 Q. AND IF YOU COULD JUST GO TO THAT FOR A
14 MINUTE AND WE HAVE THE SIMBERG ARTICLE AS EXHIBIT 67.

15 A. OKAY.

16 Q. I'M SURE THAT'S IN THE BOOK. IT MIGHT HAVE
17 COME A LITTLE BIT LATER.

18 (STEYN EXHIBIT NO. 67 WAS MARKED FOR
19 IDENTIFICATION.)

20 THE WITNESS: OH, NO. I THINK WE PUT THE
21 NEW -- THE ONES YOU SENT LAST NIGHT, I THINK WE PUT IN

1 THE BIG BOOK. SO I THINK IT IS IN THERE, 67?

2 BY MR. WILLIAMS:

3 Q. CORRECT.

4 A. OKAY. I SEE IT.

5 Q. THANK YOU. AND IF YOU LOOK AT, SAY, THE
6 THIRD PAGE, IT TALKS ABOUT A REPORT TITLED "THE NAS
7 REPORT." I THINK THAT'S A MISTAKE. MR. SIMBERG HAS
8 INDICATED THAT'S REALLY THE NSF REPORT, NATIONAL
9 SCIENCE FOUNDATION REPORT. THAT'S THE ONE I'M
10 REFERRING TO.

11 MR. WILSON: OBJECT TO FORM.

12 BY MR. WILLIAMS:

13 Q. THAT IS THE ONE I'M REFERRING TO.

14 MR. WILLIAMS: I HAVEN'T FINISHED THE
15 QUESTION YET.

16 BY MR. WILLIAMS:

17 Q. AND MY QUESTION IS: WHEN DO YOU RECALL
18 REVIEWING THE REPORT THAT HE REFERS TO AS THE NAS
19 REPORT?

20 A. WELL, YOU'RE SAYING THAT'S REALLY THE NSF?

21 Q. WELL, I THINK WE CAN ALL AGREE ON THAT.

1 YES.

2 A. I HAVE NO EXPERTISE IN THE BEWILDERING
3 NUMBER OF ACRONYMS IN THE ALPHABET SOUP OF AMERICAN
4 LIFE, AND AS I'VE JUST TESTIFIED, COUNSELOR, I READ
5 THE AMERICAN REPORTS. ALTHOUGH I MAY HAVE HAD A
6 CASUAL ACQUAINTANCE WITH THEIR EXISTENCE, I DON'T
7 BELIEVE I REVIEWED THEM BEFORE I DID MY BOOK, "A
8 DISGRACE TO THE PROFESSION".

9 Q. THANK YOU, SIR. AND WHEN DID YOU DO YOUR
10 BOOK -- WHEN DID YOU WRITE YOUR BOOK "A DISGRACE TO
11 THE PROFESSION"?"

12 A. MY RECOLLECTION OF THAT IS THAT THAT WOULD
13 HAVE BEEN 2014 OR 2015.

14 Q. AFTER YOU WROTE YOUR ARTICLE ENTITLED
15 "FOOTBALL AND HOCKEY," CORRECT?

16 A. THAT'S RIGHT. I HAD ASSUMED -- BEING
17 CANADIAN, I HAD ASSUMED WE WOULD HAVE GONE TO TRIAL
18 AND THE MATTER WOULD HAVE BEEN DISPOSED OF WITHIN
19 TWO YEARS, AS IT IS IN MOST FUNCTIONING JURISDICTIONS.
20 AND AFTER TWO YEARS I HAD ALL THIS STUFF LYING AROUND
21 TO DO WITH CLIMATE CHANGE, AND I THOUGHT I MIGHT AS

1 WELL GET A BOOK OUT OF IT.

2 Q. GOOD. THANK YOU. ALL RIGHT.

3 SO LET ME ASK THIS QUESTION. WE HAD A
4 COUPLE OF OTHER AMERICAN REPORTS, ONE IS ENTITLED --
5 ONE IS FROM THE EPA AND THE OTHER IS FROM NOAA. AND I
6 TAKE IT THAT YOU DID NOT READ THOSE REPORTS PRIOR TO
7 THE TIME YOU READ FOOTBALL AND HOCKEY -- WROTE
8 "FOOTBALL AND HOCKEY?"

9 A. I'D AN ACQUAINTANCESHIP WITH THEIR EXISTENCE
10 BUT I COULDN'T SAY I'VE READ THE FULL REPORTS. I DID
11 AT THE TIME I DID MY BOOK -- SAME AS WITH WHATEVER THE
12 OTHER ACRONYMS WERE.

13 Q. OKAY. SO AT THE TIME YOU WROTE "FOOTBALL
14 AND HOCKEY," YOU HAD AN ACQUAINTANCESHIP WITH THE EPA
15 REPORT AND THE NOAA REPORT?

16 A. I HAD AN ACQUAINTANCESHIP WITH THEIR
17 EXISTENCE. I HAD, AT THE TIME OF THOSE REPORTS, THE
18 SUBSTANCE OF THE REPORT WAS LARGELY UNKNOWN TO ME.
19 I'M VERY -- FOR EXAMPLE, I'M VERY FAMILIAR NOW WITH
20 THE FACT THAT GERALD NORTH, WHO WAS ONE OF THE TWO
21 WITNESSES SO-CALLED, ACTUALLY NON WITNESSES -- THAT

1 PENN STATE INTERVIEWED FOR THEIR QUOTE/UNQUOTE
2 EXONERATION OF MANN, I'M WELL AWARE, FOR EXAMPLE THAT
3 GERALD NORTH HAD HAD SOMETHING TO DO WITH ONE OF THE
4 2006 INVESTIGATIONS.

5 BUT AS I SAID I HAD NO -- I HAD NO DEEP
6 KNOWLEDGE OF THE AMERICAN ALLEGED INVESTIGATIONS, I
7 SIMPLY READ THE U.K. ONES.

8 Q. OKAY. SO YOU HAD AN ACQUAINTANCESHIP --
9 LET'S DEFINE THAT.

10 YOU -- YOU -- ACQUAINTANCESHIP MEANS YOU
11 KNEW THAT THEY EXISTED. IS THAT FAIR?

12 A. THAT'S RIGHT. AND I -- MY GO-TO GUY FOR THE
13 REPORTS, BECAUSE HE'S VERY SHARP ON THESE KINDS OF
14 THINGS, IS STEPHEN MCINTYRE IN TORONTO, AND I'M AWARE
15 THAT MR. MCINTYRE HAD REFERENCED THESE VARIOUS REPORTS
16 AS THEY CAME OUT IN REAL TIME AND QUOTED FROM THEM AND
17 LINKED TO THEM. BUT THAT'S WHAT I MEAN WHEN I SAY I
18 WAS ACQUAINTED WITH THEIR EXISTENCE.

19 Q. SO IN YOUR DISCUSSIONS WITH MR. MCINTYRE, HE
20 TOLD YOU ABOUT THESE OTHER AMERICAN REPORTS?

21 MR. WILSON: OBJECTION.

1 THE WITNESS: I HAVE -- I DID NOT HAVE A
2 FACE TO FACE DISCUSSION WITH STEVE MCINTYRE UNTIL
3 AFTER THIS SUIT WAS FILED, WHEN MY DEAR FRIENDS JULIAN
4 PORTER WHO'S A VERY EMINENT QC IN TORONTO, QUEEN'S
5 COUNSEL, I SUPPOSE I SHOULD SAY FOR AMERICANS. HE'S
6 -- JULIAN PORTER IS A VERY DISTINGUISHED QUEENS
7 COUNSEL IN TORONTO. ACTUALLY HE'S BEEN REPRESENTING
8 THE PRIME MINISTER RECENTLY. AND IN A SORT OF CASUAL
9 GET TOGETHER, JULIAN INTRODUCED ME TO STEVE.

10 I BELIEVE THEIR GRANDFATHERS WERE BOTH
11 ATTORNEYS GENERAL OF ONTARIO. AND THAT WAS THE FIRST
12 TIME I HAD EVER MET STEVE. SO IT WAS A WHILE AFTER
13 THE "FOOTBALL AND HOCKEY" PIECE WAS PUBLISHED.

14 Q. WELL, WHEN YOU SAY HE WAS YOUR GO-TO GUY,
15 WHEN DID YOU FIRST TALK TO MR. MCINTYRE?

16 A. WELL, THAT WAS THE FIRST TIME I TALKED TO
17 HIM. WHEN I SAY GO-TO GUY. I MEAN HIS WAS THE GO-TO
18 WEBSITE. HE WAS THE -- HE WAS RECOGNIZED, HE AND ROSS
19 MCKITRICK WERE RECOGNIZED AS THE GUYS WHO DEMOLISHED
20 THE HOCKEY STICK. AND AT THAT POINT OBVIOUSLY THERE
21 WAS A SUSTAINED PUSHBACK FROM MR. MANN AND HIS COTERIE

1 TO DO -- INFLICT DAMAGE ON MCINTYRE AND MCKITRICK.
2 AND AT THAT TIME I WOULD GO TO STEVE MCINTYRE'S
3 WEBSITE AND READ WHAT HE SAID, BUT IT'S ONLY -- HE WAS
4 A GUEST ON MY -- ON THE MARK STEYN CRUISE LAST YEAR,
5 AND I BELIEVE THAT WAS ACTUALLY THE SECOND TIME I MET
6 HIM.

7 SO I MET HIM ONCE WITH MY DEAR FRIEND JULIAN
8 PORTER QC AND I MET HIM SEVERAL YEARS LATER WHEN HE
9 WAS ON THE 2018 MARK STEYN CRUISE WITH HIS
10 DELIGHTFULLY SPRY, NONAGENARIAN MOTHER AND HIS SISTER.

11 Q. GOOD. ALL RIGHT.

12 SO, PRIOR TO THE TIME YOU WROTE FOOTBALL AND
13 HOCKEY, YOU WERE AWARE OF HIS WEBSITE. IS THAT RIGHT?

14 A. OH, I THINK SO. HE'S BECOME -- I KNOW IT'S
15 A SHORT LIST BUT HE'D BECOME ONE OF THE MOST FAMOUS
16 CANADIANS ON THE PLANET AND HE CERTAINLY DESERVED THAT
17 HONOR.

18 Q. THAT'S FINE. BUT YOU HAD NOT ACTUALLY
19 SPOKEN TO HIM?

20 A. NO. AS I SAID, UNTIL THAT ENCOUNTER WITH
21 JULIAN PORTER IN TORONTO I HAD NEVER ACTUALLY BEEN IN

1 A ROOM WITH HIM OR HAD ANY CONVERSATION.

2 AFTER "FOOTBALL AND HOCKEY" AND THE SUIT
3 CAME UP, I RECALL HAVING AN E-MAIL FORWARDED TO ME
4 FROM HIM. BUT OTHERWISE, WE HAD NO DIRECT CONTACT
5 UNTIL THAT MEETING IN TORONTO.

6 Q. SO NOTHING OVER THE TELEPHONE, CORRECT?

7 A. NO. I'VE NEVER SPOKEN TO HIM BY TELEPHONE.
8 AND THE -- WHATEVER, THE E-MAIL. THE E-MAIL AS I
9 RECALL WAS ABOUT THE FACT THAT HE -- HIS NEIGHBOR IS
10 RACHEL MCADAMS THE COSTAR OF THE FILM MEAN GIRLS AND I
11 THINK SOME KIND OF RACQUETS PARTNER WITH MR. MCINTYRE.
12 SO IT WAS -- I GUESS IT WAS IN THE NATURE OF CINEMATIC
13 CONVERSATION. HE'S VERY FORTUNATE.

14 LINDSAY LOHAN FROM MEAN GIRLS HAS GONE TO
15 PIECES BUT MS. MCADAMS IS LOVELY AS EVER AND SHE'S A
16 NEIGHBOR OF MR. MCINTYRE.

17 Q. ALL RIGHT.

18 SO COMING BACK, YOU HAD AN ACQUAINTANCE WITH
19 THE AMERICAN -- THE AMERICAN INVESTIGATIONS. IS THAT
20 FAIR?

21 A. I WAS AWARE OF THEIR EXISTENCE, AND SUDDENLY

1 I HAD READ INTERNET POSTS BY MR. MCINTYRE IN WHICH HE
2 REFERRED TO THEM AND POSSIBLY -- AND MORE THAN LIKELY
3 PROBABLY QUOTED FROM THEM.

4 Q. AND THAT WAS PRIOR TO THE TIME YOU WROTE
5 "FOOTBALL AND HOCKEY," CORRECT?

6 A. YES.

7 Q. AND THE AMERICAN REPORTS WERE -- THAT YOU
8 HAD AN ACQUAINTANCE WITH WERE THE NATIONAL SCIENCE
9 FOUNDATION, NOAA AND EPA. IS THAT RIGHT?

10 A. I COULDN'T HONESTLY REMEMBER. I KNOW -- I
11 THINK THERE'S ONE OTHER ONE THAT BEGINS WITH N. THESE
12 ARE -- I'LL MAKE A GENERAL OBSERVATION, THAT I FIND
13 THE U.K. REPORTS EASIER TO DISTINGUISH BECAUSE THEY'RE
14 GENERALLY ARE NAMED AFTER THE MAIN CHAIRMAN IN LIFE,
15 THEY'RE LIKE LORD OXBURGH AND SIR MUIR RUSSELL.

16 AND I FIND THE AMERICAN ONES A BIT HARDER TO
17 FOLLOW BECAUSE THEY'RE ALL BY ACRONYMS BEGINNING WITH
18 N. AND I -- AT SOME POINT I LOSE INTEREST IN WHICH
19 ACRONYM BEGINNING WITH N THIS IS. SO I FIND THE -- IN
20 MY MIND, THE U.K. REPORTS EASIER TO DISTINGUISH.

21 Q. OKAY. THANK YOU.

1 OKAY. LET'S TALK ABOUT THE HOCKEY STICK
2 GRAPH AND YOUR POSITION ON THE HOCKEY STICK GRAPH.

3 AND COULD YOU PLEASE TURN, MR. STEYN, TO --
4 EXCUSE ME. TO YOUR SUPPLEMENTAL ANSWER WHICH IS
5 EXHIBIT 1, YOUR ANSWER TO INTERROGATORY 14, WHICH IS
6 ON PAGE 16 OF YOUR ANSWERS?

7 A. PAGE 16?

8 Q. YES, SIR.

9 A. AND WHICH WAS THE INTERROGATORY NUMBER?

10 Q. THE INTERROGATORY NUMBER IS -- I'M GOING TO
11 ASK YOU ABOUT TWO. THE INTERROGATORY NUMBERS ARE 13
12 AND 14, AND THEY ARE ON PAGE 16 OF YOUR SUPPLEMENTAL
13 ANSWERS.

14 A. OKAY. GOT IT.

15 Q. AND DO YOU SEE IN 14, WE ASK YOU THAT IF YOU
16 CONTENDED THAT THE HOCKEY STICK GRAPH WAS FRAUDULENT?

17 A. RIGHT.

18 Q. TO TELL US AND IDENTIFY THE DOCUMENTS
19 SUPPORTING THAT CONTENTION. DO YOU SEE THAT?

20 MR. WILSON: OBJECTION. I THINK THAT
21 MISSTATES THE INTERROGATORY, JOHN.

1 BY MR. WILLIAMS:

2 Q. WELL, DO YOU SEE NUMBER 14?

3 A. I DO.

4 Q. OKAY. AND YOU SAY IN RESPONSE TO THAT THAT
5 IT WAS THE GRAPH YOU CHARACTERIZED AS FRAUDULENT. DO
6 YOU SEE THAT?

7 A. YES, I THINK I SAY THAT IN 13.

8 Q. THAT'S RIGHT. YES. NOW, I'M ONTO 14.

9 A. OKAY.

10 Q. AND 14, THE ANSWER IS SUBJECT TO OBJECTIONS.
11 "STEYN RELIED ON HIS OWN RESEARCH AND DETERMINATION
12 ABOUT THE HOCKEY STICK GRAPH THAT HE HAD REACHED
13 SHORTLY AFTER THE GRAPH WAS MADE PUBLIC, WHICH HE THEN
14 SHARED IN THE SUNDAY TELEGRAPH OF LONDON AND HAS
15 MAINTAINED AS HIS POSITION IN THE 20 YEARS SINCE."
16 RIGHT?

17 A. CORRECT.

18 Q. OKAY. I WANT TO ASK A LITTLE BIT ABOUT
19 THAT.

20 AND I BELIEVE WE HAVE THE EXHIBIT 2.

21 (STEYN EXHIBIT NO. 2 WAS MARKED FOR

1 IDENTIFICATION.)

2 BY MR. WILLIAMS:

3 Q. TAKE A LOOK AT THAT, PLEASE?

4 A. YES.

5 Q. AND THAT'S THE ARTICLE YOU WERE REFERRING
6 TO, CORRECT?

7 A. YES, THAT'S FROM THE TELEGRAPH IN LONDON.

8 Q. 2001, CORRECT?

9 A. CORRECT.

10 Q. AND THE TITLE OF THE ARTICLE IS "WHERE
11 RISING HOT AIR HITS COLD HARD FACTS."

12 A. CORRECT.

13 Q. OKAY. AND YOUR DISCUSSION HERE OF THE
14 HOCKEY STICK IS ON PAGE -- I BELIEVE IT STARTS AT PAGE
15 1, BOTTOM, AND THEN IT GOES OVER TO PAGE 2. CAN YOU
16 PLEASE LOOK AT THAT? YOU HAVE IT?

17 A. YES, I DO.

18 Q. OKAY. I'M SORRY. AND YOU TALK ABOUT THE
19 RESULTANT GRAPH LOOKS LIKE A LONG BUNGALOW HAT ONTO
20 THE SIDE OF THE EMPIRE STATE BUILDING. DO YOU SEE
21 THAT?

1 A. YES.

2 Q. AND THAT'S WHAT YOU'RE REFERRING TO AS THE
3 HOCKEY STICK GRAPH?

4 A. YES, THAT'S CORRECT.

5 Q. AND THE REASON THAT YOU BELIEVE IT IS
6 INCORRECT OR NOT FORMATTED PROPERLY IS BECAUSE IT USES
7 INCOMPATIBLE DATA SETS, RIGHT?

8 MR. WILSON: OBJECTION.

9 THE WITNESS: YES, THAT'S WHAT I SAY. THEY
10 ARE INCOMPATIBLE SETS OF DATA.

11 BY MR. WILLIAMS:

12 Q. RIGHT. ONE IS TEMPERATURE RECORDS AND THE
13 OTHER ARE PROXY RECORDS, RIGHT?

14 A. CORRECT.

15 Q. AND THIS -- YOU HAVE MAINTAINED THIS
16 POSITION THAT THE HOCKEY STICK GRAPH IS FRAUDULENT FOR
17 THAT REASON FROM THAT PERIOD OF TIME ALL THE WAY UP TO
18 THE PRESENT, CORRECT?

19 A. WELL, I'VE MAINTAINED MY POSITION SINCE THAT
20 TELEGRAPH ARTICLE 19 AND A HALF YEARS AGO. BUT THE
21 BASIS FOR ITS FRAUDULENCE EXPRESSED MORE GENERALLY IS

1 THAT IT DOES NOT DEMONSTRATE WHAT IT PURPORTS TO
2 DEMONSTRATE. AND THE INCOMPATIBLE SETS OF DATA I
3 REFERENCE THERE, WHAT MY FRIEND JENNIFER MAROHASY
4 WHO'S A SCIENTIST AT QUEENSLAND CENTRAL UNIVERSITY IN
5 AUSTRALIA WHAT, PROFESSOR MAROHASY SAYS IS LIKE
6 STICKING AN APPLE ON THE END OF A BANANA OR WHAT I
7 CALL STAPLING THE EMPIRE STATE BUILDING TO A VERY LONG
8 BUNGALOW, IS ONLY A PART OF THAT.

9 BUT THE FRAUDULENCE OF THE STATEMENT I HAVE
10 MAINTAINED SINCE -- IN PUBLIC, SINCE THAT PIECE IN
11 APRIL 2001.

12 Q. YOU JUST GAVE A NAME AND I DIDN'T CATCH IT
13 AND I DOUBT THE COURT REPORTER CAUGHT IT. SO COULD
14 YOU GIVE THAT NAME AGAIN, PLEASE, AND SPELL IT?

15 A. IT'S JENNIFER AND THEN MAROHASY,
16 M-A-R-O-H-A-S-Y FROM -- WHO'S AN AUSTRALIAN SCIENTIST,
17 M-A-R-O-H-A-S-Y, WHICH IS A MALAGASY NAME.

18 Q. THANK YOU.

19 NOW, I'D LIKE YOU TO LOOK, IF YOU COULD, TO
20 ANOTHER EXHIBIT THAT IS MARKED BY US AS EXHIBIT 28.

21 (STEYN EXHIBIT NO. 28 WAS MARKED FOR

1 IDENTIFICATION.)

2 BY MR. WILLIAMS:

3 Q. IT'S AN ARTICLE YOU WROTE ON STEYN ONLINE
4 CALLED "SETTLED SCIENCE CATCHES UP WITH STEYN."

5 A. YES, I SEE THAT.

6 Q. AND IF YOU WOULD TURN TO PAGE 2 OF THAT
7 ARTICLE, SORT OF IN THE MIDDLE OF THE PAGE, CAN YOU
8 SEE WHERE IT SAYS, "NOW, I DON'T CONSIDER MYSELF A BIG
9 CREDENTIALLED EXPERT OR ANYTHING?"

10 A. WHERE IS THAT? YOU SAY THE MIDDLE OF THE
11 PAGE.

12 "I DON'T CONSIDER MYSELF A BIG," YOU KNOW,
13 IS THAT IN ONE OF THE QUOTES OR IS IT -- YES. NO, I
14 SEE IT. I SEE IT. YES. GO AHEAD.

15 Q. OKAY. YOU SAY, "I DON'T CONSIDER MYSELF A
16 BIG CREDENTIALLED EXPERT OR ANYTHING." CONTINUING ON,
17 YOU SAY, "I SIMPLY LOOKED AT THE GRAPH MICHAEL E. MANN
18 HADN'T BEEN ANYWHERE NEAR AND DREW THE OBVIOUS
19 CONCLUSION. GAVE IT TWO MINUTE'S THOUGHT, IF THAT."

20 A. YES.

21 Q. AND THE CONCLUSION WAS THAT IT WAS

1 FRAUDULENT, CORRECT?

2 A. NO, I'M WRITING HERE ABOUT MY GENERAL VIEW
3 OF 20TH CENTURY WARMING AND COOLING. AS A MATTER OF
4 FACT I THINK YOU CAN SAY IT GOES BACK EARLIER,
5 CERTAINLY TO THE TIME TEMPERATURE RECORDS BEGAN. BUT
6 THERE WERE GENERAL 30-YEAR WARMING TRENDS, GENERAL
7 30-YEAR COOLING TRENDS FOLLOWING BY ANOTHER 30-YEAR
8 WARMING TREND. AND I DON'T THINK THESE 30-YEAR TRENDS
9 ARE, AS I SAY, WORTH COLLAPSING THE GLOBAL ECONOMY
10 OVER. AND THAT'S THE POINT I WAS MAKING.

11 I'M NOT SURE WHERE THE QUOTATION -- I THINK
12 THE QUOTATION -- I RECOGNIZE WHAT I'VE SAID WHEN I
13 MADE THAT POINT MAYBE ON TV AND IN PRINT EVERY SO
14 OFTEN IF I'M ASKED ABOUT IT. AND I MADE THAT POINT
15 ABOUT THE 30-YEAR TRENDS MULTIPLE TIMES OVER THE 20TH
16 CENTURY.

17 AND I SAID THAT IF YOU LOOK AT ANY GRAPH
18 THAT MICHAEL MANN HASN'T BEEN ANYWHERE NEAR, YOU SEE
19 THOSE 30-YEAR TRENDS. WHICH IS WHY THE 1970S THE NEWS
20 MAGAZINES WERE TERRIFIED THAT WE'LL HAVE A NEW ICE
21 AGE. AND THEN BY THE END OF THE 20TH CENTURY, IT WAS

1 THE COMPLETE OPPOSITE AND WE WERE ALL GOING TO FRY.

2 Q. RIGHT. I UNDERSTAND.

3 AND YOU I SENT -- I WANTED TO UNDERSTAND
4 WHICH GRAPH THAT YOU WERE REFERRING TO -- AND MAYBE
5 IT'S A NUMBER OF THEM, BUT WOULD YOU LOOK AT THE
6 EXHIBIT WE HAVE AS NUMBER 62, PLEASE -- ACTUALLY 62,
7 63 AND FOUR?

8 (STEYN EXHIBIT NOS. 62, 63 AND 64 WERE
9 MARKED FOR IDENTIFICATION.)

10 BY MR. WILLIAMS:

11 Q. ONE OF THESE IS CALLED THE LAMB GRAPH, AND
12 I'M WONDERING IF THAT'S THE GRAPH THAT YOU WERE
13 REFERRING TO, SIR, THAT SHOWS OSCILLATION FOR --

14 MR. WILSON: OBJECTION TO THE FORM.

15 CAN YOU DO IT ONE BY ONE? OTHERWISE IT'S A
16 COMPOUND QUESTION. WE'RE NOT GOING TO KNOW WHAT
17 YOU'RE REFERRING TO.

18 BY MR. WILLIAMS:

19 Q. OKAY. ARE THESE THE TYPES OF GRAPHS YOU'RE
20 REFERRING TO?

21 A. NO, THIS IS THE -- WHAT YOU CALL THE LAMB BY

1 HUBERT LAMB WHO IS THE FOUNDER OF THE CLIMATE RESEARCH
2 UNIT IN EAST ANGLIA.

3 THAT GRAPH IS BASICALLY THE GRAPH THE IPCC
4 USED BEFORE MICHAEL MANN'S HOCKEY STICK. AND AS YOU
5 CAN SEE, IT SHOWS THE MEDIEVAL WARM PERIOD FOLLOWED BY
6 THE LITTLE ICE AGE. SO THAT'S THE GLOBAL GRAPH THAT
7 THE IPCC USED IN I BELIEVE THE FIRST ASSESSMENT REPORT
8 BY HUBERT LAMB, A VERY GREAT MAN, HUBERT LAMB, BY THE
9 WAY WHO WOULD HAVE BEEN UTTERLY DISGUSTED BY WHAT HIS
10 SUCCESSORS AT THE CLIMATE RESEARCH UNIT WERE GETTING
11 UP TO AFTER HIS DEATH.

12 BUT THAT WAS THE -- THAT WAS HUBERT LAMB'S
13 -- THAT'S NOTHING TO DO WITH WHAT I'M SAYING. I'M
14 JUST TALKING ABOUT THE TEMPERATURE RECORD OF THE 20TH
15 CENTURY BY THERMOMETERS. IN OTHER WORDS, WITHOUT
16 MONKEYING AROUND AND GETTING INTO YOUR TREE RINGS AND
17 YOUR ICE BALLS AND YOUR SMOOTHINGS AND YOUR HIGHS AND
18 DECLINES AND ALL THE REST OF IT.

19 JUST THE BOG STANDARD OLD TEMPERATURE RECORD
20 WHICH BEFORE NOAA I BELIEVE STARTED ADJUSTING IT.

21 JUST THE BOG STANDARD 20TH CENTURY THERMOMETER RECORDS

1 SHOWS THE SLIGHT WARMING TREND FROM THE TEENS TO THE
2 '40S. AS I SAID, I HAVE NO IDEA WHY THAT WAS. THE
3 VERSAILLES TREATY CAUSED IT, IT COULD BE ANYTHING.
4 THEN A COOLING TREND FROM THE '40S TO 70S, THEN A
5 WARMING TREND TO THE END OF THE CENTURY.

6 SO THAT'S A REFERENCE SIMPLY TO THE
7 THERMOMETER RECORD OF THE 20TH CENTURY, NOT TO
8 ANYBODY'S GRAPHS, NOT TO -- CERTAINLY NOT TO HUBERT
9 LAMB. AS I SAID A VERY GREAT MAN, BUT HE'S TALKING
10 ABOUT THE LAST MILLENNIUM.

11 Q. I SEE. SO WHAT IS IT THAT YOU GAVE TWO
12 MINUTES THOUGHT TO REACH A CONCLUSION ON. MR. STEYN?

13 A. THE TEMPERATURE -- THE TEMPERATURE RECORDS
14 OF THE 20TH CENTURY.

15 Q. AND WHAT DOES THAT INDICATE -- WHAT IS THE
16 OBVIOUS CONCLUSION YOU DREW FROM THOSE TEMPERATURE
17 RECORDS OF THE 20TH --

18 A. WELL, TO KEEP IT VERY SIMPLE, IT'S ABOUT
19 NATURAL CLIMATE VARIABILITY WHICH YOUR CLIENT HAS MORE
20 OR LESS ELIMINATED, SO THAT PEOPLE THINK THERE IS NO
21 SUCH THING ANYMORE. NOTHING HAPPENED IN 900 YEARS,

1 AND THEN MAN CLIMBED IN TO HIS SUV AND DESTROYED THE
2 PLANET.

3 SO ONE CONSEQUENCE -- TERRIBLE CONSEQUENCE
4 OF THIS FRAUDULENT GRAPH IS THAT YOUR CLIENT
5 ELIMINATED AMONGST MANY OTHERWISE APPARENTLY WELL
6 EDUCATED PEOPLE, THE UNDERSTANDING OF NATURAL
7 VARIABILITY.

8 NOW, IF WE LOOK AT NATURAL VARIABILITY --
9 SO, WE'RE NOT USING TREE RINGS, WE'RE NOT USING ICE
10 BALLS. WE'RE JUST LOOKING AT THE MOMENT -- JUST
11 LOOKING AT THE SITUATION SINCE MR. FARENHEIT AND MR.
12 CELSIUS CAME ALONG, AND IF YOU JUST LOOK AT THE
13 OBSERVED TEMPERATURE RECORD FROM THE MID 19TH CENTURY
14 UNTIL TO OUR TIME, YOU CAN SEE THAT THERE -- THERE ARE
15 BASICALLY -- YOU KNOW, NOT ALWAYS THREE DECADES. I
16 WOULDN'T -- I WOULDN'T WANT TO GET ANYBODY WATCHING
17 THIS EXCITED ABOUT IMPEACHING ME BECAUSE ONE OF THE
18 TRENDS WAS JUST 27 YEARS, AND ANOTHER ONE WENT ON FOR
19 38 YEARS.

20 BUT APPROXIMATELY EVERY THREE DECADES OR SO,
21 YOU HAVE A WARMING TREND, COOLING TREND, WARMING

1 TREND, COOLING TREND.

2 SO WE HAD THE WARMING TREND, THEN THE
3 COOLING TREND SORT OF POST GREAT WAR, WE HAD A WARMING
4 TREND. IN THE '40S, WE HAD -- I BEG YOUR PARDON, A
5 WARMING TREND POST GREAT WAR. A COOLING TREND
6 STARTING IN THE '40S, AND ANOTHER WARMING TREND
7 STARTING IN THE LATE '70S. AND THE COOLING TREND THEN
8 SO FAR IN THIS MILLENNIUM.

9 AND THAT LOOKS LIKE NATURAL VARIABILITY TO
10 ME AND NOTHING -- AS I SAID, NOTHING TO COLLAPSE THE
11 GLOBAL ECONOMY OVER.

12 Q. OKAY. SO THIS OBVIOUS CONCLUSION THAT
13 YOU'VE JUST INDICATED, WHEN DID YOU DRAW THIS OBVIOUS
14 CONCLUSION? WAS THIS BEFORE YOU WROTE "FOOTBALL AND
15 HOCKEY?"

16 A. CORRECT.

17 Q. AND ABOUT -- WAS THAT BACK WHEN YOU FIRST
18 DETERMINED THAT THE HOCKEY STICK WAS FRAUDULENT?

19 A. WELL, AS I'VE ANSWERED, THEY'RE SEPARATE
20 THINGS. BUT CERTAINLY, AT THE TIME I WROTE
21 THE PIECE IN THE TELEGRAPH IN THE U.K. AND THE

1 NATIONAL POST IN CANADA, I WAS WELL AWARE OF WHAT THE
2 TEMPERATURE RECORD SHOWED.

3 SO, I DIDN'T GET SCARED WHEN THEY WERE
4 PREDICTING A NEW ICE AGE AND I DIDN'T GET SCARED WHEN
5 THEY WERE SAYING WE WERE ALL GOING TO FRY. AND I
6 HAVEN'T BEEN SCARED WITH THE COOLING TREND SINCE THIS
7 NEW CENTURY BEGAN.

8 Q. OKAY. SO, THE ANSWER TO MY QUESTION, I
9 THINK IT'S YES, THAT YOU DREW THIS CONCLUSION THAT YOU
10 JUST INDICATED PRIOR TO THE TIME YOU WROTE "FOOTBALL
11 AND HOCKEY?"

12 A. OH, ABSOLUTELY, YES.

13 Q. OKAY. THANK YOU.

14 SO I UNDERSTAND, MR. STEYN, THAT YOU HAVE
15 ALWAYS THOUGHT THAT THE HOCKEY STICK WAS INCORRECT.
16 HOW IS IT THAT YOU KNEW IT WAS FRAUDULENT?

17 A. WELL, AS MANY SCIENTISTS WILL TELL YOU, IT
18 IS AN ISSUE. AND AS I SAID IN THE SUNDAY TELEGRAPH,
19 IT IS AN ISSUE WHEN YOU'RE USING ONE KIND OF DATA WHEN
20 YOU'RE USING PROXY DATA FOR ONE PART OF THE GRAPH AND
21 YOU'RE USING OBSERVED TEMPERATURES FOR ANOTHER.

1 THEN THE ISSUE BECOMES HOW DO YOU -- HOW DO
2 YOU MERGE THOSE? THE POINT AT WHICH THEY MEET, HOW DO
3 YOU BLEND THEM, HOW DO YOU SMOOTH THEM?

4 IF YOU LOOK AT A LOT OF GRAPHS, IF THEY'RE
5 USING ONE KIND OF GRAPHING, IT'S IN THE CLIMATE ZONE.
6 SAYING THIS APPLIES -- IT CAN APPLY TO ANY AREA OF
7 LIFE IN WHICH YOU REQUIRE A GRAPH.

8 THERE OFTEN WOULD BE A LINE THAT STOPS IN
9 1853, AND THEN A DIFFERENT LINE IN ANOTHER COLOR IN
10 1837, SO THAT YOU CAN SEE AND YOU CAN UNDERSTAND THAT
11 THEY'RE DIFFERENT KINDS OF DATA.

12 MY MAIN OBJECTION ON THE DATA FRONT,
13 OBVIOUSLY, IS THAT THE DATA CHOSEN BY MANN TO
14 REPRESENT THE FIRST EIGHT AND A HALF CENTURIES WITH
15 THE TEMPERATURE RECORD FOR THE MODERN ERA IN WHICH WE
16 HAVE THERMOMETERS.

17 AND SO AS YOU KNOW, ANY HONEST GRAPH WOULD
18 SHOW THAT -- FOR THE MORE MODERN ERA, BASICALLY FOR
19 THE SPAN OF HUMAN LIFE IN THE POST SECOND WORLD WAR
20 ERA, THE -- THE TREE RINGS DO NOT TRACK THE
21 TEMPERATURE RECORD.

1 AND THE FACT THAT -- SO YOU'RE USING AS A
2 PROXY FOR THE YEAR 1437, SOMETHING THAT DOESN'T EVEN
3 CORRELATE WITH THE TEMPERATURE RECORD IN THE YEAR
4 1978. THAT'S OBVIOUSLY A DUBIOUS PROXY.

5 MANN EVER SINCE HE DID MBH '98 HAS STATED
6 WHAT IS ESSENTIALLY A PIECE OF CARTOON SCIENCE AND
7 TURNED IT INTO AN EVEN GREATER CARICATURE SO THAT BY
8 THE TIME YOU GET TO THE WORLD METEOROLOGICAL
9 ORGANIZATION VERSION OF THE HOCKEY STICK, YOU'RE JUST
10 LOOKING AT A COMPLETELY PREPOSTEROUS CARTOON.

11 Q. OKAY. MY QUESTION WAS A LITTLE SIMPLER AND
12 MAYBE YOU ANSWERED IT, BUT I ASKED YOU SIMPLY BECAUSE
13 IT WAS WRONG AND IMPROPERLY MERGED DATA SETS, HOW DO
14 YOU KNOW FROM THAT THAT IT WAS FRAUDULENT?

15 A. OH, YES. I'M SORRY. I DO APOLOGIZE. I'VE
16 FORGOTTEN. SO YOU ARE ASKING ME TO DISTINGUISH
17 BETWEEN WHETHER WHAT HAPPENED IS AN HONEST MISTAKE OR
18 WHETHER THERE IS A KIND OF INTENTIONAL COVERUP THAT IS
19 GOING ON. AND I THINK YOU CAN CERTAINLY SEE THAT THE
20 -- PARTICULARLY BY THE TIME IT GETS USED BY THE IPCC
21 AND THEN BY WHATEVER IT'S CALLED, THE WORLD

1 METEOROLOGICAL ORGANIZATION. AND SUDDENLY THE
2 CLIMATEGATE E-MAILS REVEALED THAT THEY -- THAT THEY'RE
3 GOING THROUGH A LOT OF TROUBLE TO OBSCURE THE FACT
4 THAT THE -- THAT THE OBSERVED TEMPERATURES DO NOT
5 CORRELATE WITH THE TREE RING DATA TO THE POINT WHERE
6 ON ONE OF THE GRAPHS, IF YOU LOOK VERY CLOSELY, YOU
7 CAN SEE WHERE THE ONE LINE DISAPPEARS INTO THE GIANT
8 BLADE OF THE HOCKEY STICK AND DOESN'T COME OUT FROM
9 THAT. THAT'S SEEMS TO ME NOT A GOOD FAITH MISTAKE,
10 NOT AN HONEST MISTAKE.

11 THEN OF COURSE YOU HAVE THINGS THAT I REGARD
12 AS PATENTLY ABSURD AND MANN PRESUMABLY AS A TRAINED
13 SCIENTIST, CANNOT NOT HAVE KNOWN WHAT THE SWITCH IS.

14 BUT FOR EXAMPLE, THE FAMOUS TREE IN THE
15 GASPÉ PENINSULA, AN AREA I KNOW VERY WELL. I'VE BEEN
16 GOING THERE ALL MY LIFE AND I LOVE IT, AND I WAS
17 ASTOUNDED TO FIND THAT BASICALLY FOR ONE YEAR IN THE
18 HOCKEY STICK, MANN RELIES ON ONE TREE IN THE GASPÉ
19 PENINSULA.

20 NOW, THIS TREE CANNOT EVEN TELL THE WEATHER
21 IN THE GASPÉ PENINSULA, SO THE TREE IS USELESS IN

1 TELLING YOU WHAT THE TEMPERATURE IS IN THE GASPÉ. BUT
2 WE ARE EXPECTED TO BELIEVE AND WE ARE EXPECTED TO
3 BELIEVE THAT MANN KNEW IT, THAT THE TREE IN THE GASPÉ,
4 WHICH CAN'T TELL YOU THE TEMPERATURE IN THE GASPÉ CAN
5 SOMEHOW TELL YOU THE TEMPERATURE FOR PARIS AND ROME
6 AND BERLIN AND ST. PETERSBURG. AND THAT, I DO NOT
7 HONESTLY THINK YOU CAN REGARD THAT AS A GOOD FAITH
8 ERROR.

9 Q. OKAY. GOOD. THANK YOU.

10 SO JUST SO I UNDERSTAND, MR. STEYN, THE
11 BASIS OF THE ALLEGATION THAT THE HOCKEY STICK IS
12 FRAUDULENT COMES FROM THE FACT THAT THERE WAS AN
13 OBSCURING OF THE INTERSECTION BETWEEN THE PROXY DATA
14 AND THE TEMPERATURE DATA, CORRECT? I'M GOING TO GO ON
15 TO THE OTHER POINT BUT THAT'S ONE OF THE BASES, RIGHT?

16 A. WELL, JUST TO BE CLEAR ON THIS, MY VIEW --
17 THE HOCKEY STICK IS FRAUDULENT BECAUSE IT DOES NOT
18 PROVE WHAT IT PURPORTS TO PROVE. WHICH THE HOCKEY
19 STICK GRAPH WHICH THE IPCC SENT TO EVERY CANADIAN
20 HOUSEHOLDER, EVERY NEW ZEALAND HOUSEHOLDER, THE HOCKEY
21 STICK GRAPH SHOWS NOTHING HAPPENING FOR 900 YEARS, AND

1 THEN BOOM, ROCKETING UP AT THE TOP RIGHT-HAND CORNER
2 OF THE GRAPH AND WE'RE ALL GOING TO FRY.

3 THAT IS NOT THE GLOBAL TEMPERATURE RECORD.

4 AND, SO, IN THAT SENSE, IT IS PRESENTING A
5 MESSAGE THAT IS INTENDED TO TERRIFY PEOPLE. THAT
6 MESSAGE IS FRAUDULENT. IT SHOWS NO NATURAL
7 VARIABILITY.

8 AND WHEN YOU LOOK AT IT, THE PROXIES CHOSEN
9 COULD NOT POSSIBLY DEMONSTRATE THE GLOBAL -- TO START,
10 A GLOBAL TEMPERATURE RECORD IS A WEATHER SYSTEM THAT
11 NOBODY HAS LIVED IN AT ANY POINT IN HUMAN HISTORY.
12 BECAUSE, AS YOU KNOW, SOME PEOPLE LIVE IN -- EVEN IN
13 THE UNITED STATES, I ONCE LEFT NEW HAMPSHIRE TO GO TO
14 GIVE A PUBLIC APPEARANCE IN ARIZONA.

15 AND ON THAT NEW HAMPSHIRE -- WHEN I LEFT NEW
16 HAMPSHIRE AND WHEN I LANDED IN PHOENIX, THE
17 TEMPERATURE WAS A HUNDRED DEGREES HOTTER IN PHOENIX
18 THAN IT WAS WHEN I LEFT NEW HAMPSHIRE. THAT'S ONE
19 SINGLE NATION. SO NOBODY HAS LIVED -- WHATEVER THE
20 GLOBAL TEMPERATURE RECORD IS, IT'S NOT A SYSTEM THAT
21 ANYBODY LIVES IN. EVEN IF YOU TAKE COMPATIBLE PARTS

1 OF THE WESTERN -- THE DEVELOPED WORLD, THE NORTHERN
2 EUROPE -- THE NORTHERN EUROPEAN TEMPERATURE RECORD IN
3 THE MODERN ERA IS QUITE DIFFERENT THAN THE NORTH
4 AMERICAN, EVEN THOUGH, BY AND LARGE THEY LIVED THE
5 SAME KINDS OF LIVES. THEY HAVE WASHING MACHINES, THEY
6 HAVE DRYERS, THEY HAVE AUTOMOBILES.

7 SO THE HOCKEY STICK IS AN ATTEMPT TO
8 SIMPLIFY A VERY SOPHISTICATED, COMPLEX NUANCED SUBJECT
9 AND SIMPLIFY IT TO THE POINT WHEREBY IT TERRIFIES
10 PEOPLE.

11 Q. OKAY. THANK YOU.

12 ALL RIGHT. I'M JUST TRYING TO UNDERSTAND,
13 SIR, THE REASONS YOU SAY IT'S FRAUDULENT. I GOT THE
14 PART ABOUT SIMPLIFICATION AND TERRIFICATION -- IS THAT
15 A WORD, TERRIFICATION?

16 A. I DON'T THINK I SAID TERRIFICATION.

17 Q. ALL RIGHT.

18 A. IT INTENDED TO -- INTENDED TO INDUCE A STATE
19 OF TERROR IN PEOPLE, AS IT DOES IN CHILDREN. I MEAN,
20 ONE OF THE EVIL THINGS ABOUT THIS IS THAT CHILDREN ARE
21 TAUGHT THIS NONSENSE IN GRADE SCHOOLS AND THEY HAVE

1 SLEEPLESS NIGHTS OVER IT BECAUSE THEY GENERALLY THINK
2 THEY'RE NEVER GOING TO GROW UP BECAUSE WE'RE ALL GOING
3 TO BE IN A BURNING, IN A HUGE GLOBAL INFERNO.

4 BECAUSE THAT'S WHAT THE HOCKEY STICK TELLS
5 THEM AND IT'S ABSOLUTE BUNK.

6 Q. GOT IT. OKAY. THAT'S ONE I UNDERSTAND
7 THAT.

8 ANOTHER IS THE OBSCURING OF THE INTERSECTION
9 OF THE DATA, CORRECT?

10 A. YES. I THINK -- THE SO-CALLED SMOOTHING, AS
11 THEY CALL IT, BETWEEN THE PROXY DATA AND THE
12 TEMPERATURE RECORD IS DISHONEST. AND FURTHERMORE, THE
13 FACT THAT THE -- AND IT'S INTENDED TO OBSCURE THE FACT
14 THAT THE PROXY DATA DOES NOT CORRELATE WITH THE
15 OBSERVED RECORDS.

16 Q. THANK YOU.

17 AND THEN I THINK THE THIRD REASON HAD TO DO
18 WITH THIS TREE IN THE GASPÉ PENINSULA IN CANADA. IS
19 THAT RIGHT?

20 A. YEAH, THE GASPÉ IN QUEBEC, IT'S BEAUTIFUL
21 AND YOU SHOULD GO THERE IF YOU HAVEN'T, AND IT HAS

1 BEAUTIFUL TREES BUT THOSE TREES -- AND I WOULD SAY I
2 WOULD USE THE GASPÉ AS AN EMBLEM FOR THE PROBLEM WITH
3 THE LARGER NORTH AMERICAN TREE RECORD. IT'S THAT THE
4 NORTHERN AMERICAN TREE RECORD DOES NOT CORRELATE TO
5 THE TEMPERATURES OF NORTH AMERICA GENERALLY. AND THE
6 IDEA IS THEREFORE, THAT IT CAN TELL YOU THE
7 TEMPERATURE IN KAZAKHSTAN OR UZBEKISTAN FOR THE YEAR
8 1432 IS COMPLETELY LUDICROUS.

9 Q. ALL RIGHT. GOOD. THANK YOU. I THINK I
10 UNDERSTAND THE POSITION.

11 AND THE POSITION THAT IT'S FRAUDULENT, SIR,
12 YOU HAVE WRITTEN MANY TIMES YOU STAND BY THAT
13 POSITION, CORRECT?

14 A. YES. I THINK -- I THINK ITS FRAUDULENCE
15 BECAME MORE EVIDENT, SO THAT WHEN HAROLD LEWIS, THE
16 VERY DISTINGUISHED AMERICAN PHYSICIST CALLED IT THE
17 GREATEST PSEUDO SCIENTIFIC FRAUD OF MY LIFETIME. AND
18 I BELIEVE HE WAS WELL INTO HIS 80S BY THEN, HE WAS
19 CERTAINLY GETTING UP THERE -- WHEN IVAR GIAEVER, THE
20 NOBEL LAUREATE, GENUINE NOBEL LAUREATE NOT A POSEUR
21 FRAUD LAUREATE LIKE YOUR CLIENT.

1 WHEN IVAR GIAEVER SAID IT WAS THE EMPEROR'S
2 NEW CLOTHES OF SCIENCE, WHEN ROB WATSON, A SCOTTISH
3 CLIMATE SCIENTIST DESCRIBED IT AT A PUBLIC MEETING AS
4 A "CROCK OF SHIT," WHEN JONATHAN JONES AT OXFORD
5 UNIVERSITY CALLED IT OBVIOUS DRIVEL, THESE GUYS WERE
6 REACTING AS MUCH -- NOT -- NOT JUST THE FACT THAT, AS
7 PROFESSOR JONES SAYS, THE HOCKEY STICK IS OBVIOUS
8 DRIVEL BUT ALSO TO THE FACT THAT WHEN -- WHEN ITS
9 FLAWS WERE POINTED OUT, MANN OBFUSCATED, DOUBLED DOWN
10 ON THEM, AND AT THAT POINT MADE IT CLEAR THAT THESE
11 WERE NOT INNOCENT MISTAKES.

12 THAT AS ROSEANNE D'ARRIGO, WHO IS -- BY THE
13 WAY, ALL THESE PEOPLE, MOST OF THESE PEOPLE I
14 MENTIONED ARE ALL PEOPLE WHO BELIEVE IN GLOBAL WARMING
15 -- WHEN ROSEANNE D'ARRIGO THEN SAID THAT MANN MISLEADS
16 THE PUBLIC, WHAT THESE SCIENTISTS AND MANY OTHERS WERE
17 SAYING THAT ONCE YOU'VE POINTED OUT SOME OF THE FLAWS
18 AND THE GUY JUST DOUBLES DOWN ON THEM AND IN FACT
19 SIMPLIFIES AND SMOOTHS TO OBSCURE THE FLAWS, THEN
20 THERE CAN BE NO DOUBT THAT THE DECEPTION IS
21 INTENTIONAL. AND, SO, ROSEANNE D'ARRIGO SAID WHEN SHE

1 SAID THAT MANN MISLEADS THE PUBLIC.

2 Q. OKAY. I THINK MY QUESTION WAS A LITTLE
3 SIMPLER. YOU HAD WRITTEN, AND PLEASE LOOK AT IT,
4 EXHIBIT 26 -- LET ME GET THAT.

5 (STEYN EXHIBIT NO. 26 WAS MARKED FOR
6 IDENTIFICATION.)

7 BY MR. WILLIAMS:

8 Q. GOT YOU. VERY SIMPLY, MR. STEYN, YOU WROTE
9 IN 2014, "I STAND BY EVERYTHING I WROTE." DO YOU SEE
10 THAT?

11 A. CORRECT.

12 Q. AND YOU WERE REFERRING TO YOUR "FOOTBALL AND
13 HOCKEY" ARTICLE, CORRECT?

14 A. I THINK SO. IT'S A QUOTE, THOUGH, SO I'M
15 JUST TRYING TO SEE AND WHAT -- OH, YES, I BELIEVE -- I
16 THINK I'D GIVEN IT WHEN WE WERE ALL HAVING SUCH FUN
17 THAT DAY IN THE D.C. COURT OF APPEALS OR WHATEVER IT'S
18 CALLED.

19 AND I THINK -- OH, YES. THAT'S RIGHT. SO,
20 I BELIEVE THIS WAS A QUOTE I GAVE TO THIS NEWSWEEK
21 REPORTER FOLLOWING THAT DAY AT THE D.C. COURT OF

1 APPEALS.

2 Q. THE QUESTION'S VERY SIMPLE: DO YOU CONTINUE
3 TO STAND BY EVERYTHING YOU WROTE IN "FOOTBALL AND
4 HOCKEY?"

5 A. ABSOLUTELY.

6 Q. THANK YOU. AND IT IS STILL -- "FOOTBALL AND
7 HOCKEY" AS I UNDERSTAND IT, IS STILL POSTED ON YOUR
8 WEBSITE. IS THAT RIGHT?

9 A. WELL, WE HAVE IT ON THE HOME PAGE BUT IT'S
10 BASICALLY A LINK TO THE NATIONAL REVIEW POST.

11 "FOOTBALL AND HOCKEY" WAS ORIGINALLY POSTED AT
12 NATIONAL REVIEW AND -- AND WE KEEP THAT LINK TO IT ON
13 OUR HOMEPAGE.

14 AS YOU KNOW, NATIONAL REVIEW HAS A RATHER
15 ECCENTRIC AND FRANKLY PREPOSTEROUS THEORY OF THE CASE
16 AT THE MOMENT. SO ONE -- ONE MIGHT SUSPECT THAT WERE
17 THEY TO PREVAIL IN THEIR MOST RECENT MOTION, THEY
18 MIGHT ACTUALLY TAKE DOWN "FOOTBALL AND HOCKEY" AT
19 NATIONALREVIEW.COM, BUT I CAN ASSURE YOU THAT WE WOULD
20 THEN POST IN FULL AT STEYN ONLINE.

21 Q. AND I'M SORRY, WHAT IS NATION REVIEW'S

1 PREPOSTEROUS VIEW?

2 MR. HEINTZ: OBJECTION TO THE FORM.

3 THIS IS JON HEINTZ FOR NATIONAL REVIEW.

4 BY MR. WILLIAMS:

5 Q. YOU JUST SAID SOMETHING. WHAT ARE YOU
6 REFERRING TO, MR. STEYN?

7 A. WELL, THIS -- IT'S BEEN IN THE WORKS FOR
8 SOMETIME. THIS THING WHERE THEY'RE TRYING TO GET OUT
9 OF THE CASE ON THE GROUNDS THAT THEY'RE NOT REALLY A
10 PUBLISHER, WHICH, AS I SAID I THOUGHT IT WAS FRANKLY
11 PREPOSTEROUS WHEN THEY INITIALLY CAME UP WITH IT.

12 AND -- AND I THINK THEY RATHER CROSSED THE
13 LINE IN THEIR LAST, MOST RECENT MOTION FROM WHATEVER
14 IT WAS A COUPLE OF WEEKS AGO, WHERE IT FRANKLY WAS --
15 I REGARD AS A FRAUD UPON THE COURT, AT LEAST WITH
16 RESPECT TO WHAT IT SAYS ABOUT ME.

17 BUT THEY HAVE -- THEY HAVE THE SORT OF
18 THING, THE KIND OF MERETRICIOUS SOPHISTRY I TAKE IT
19 LAWYERS ARE PARTIAL TO BUT WHICH STRIKES ME AS ABSURD
20 ON ITS FACE. BUT THEY SEE THEMSELVES AS EQUIVALENT TO
21 A SO-CALLED PLATFORM LIKE FACEBOOK AND TWITTER,

1 COVERED BY C230 OR WHATEVER THE HELL IT IS. AND
2 THEREFORE, THEY HAVE NO RESPONSIBILITY FOR MY POST AT
3 THE CORNER.

4 I THINK THAT'S COMPLETE RUBBISH BUT IF
5 PEOPLE WANT TO GIVE IT A GO, THAT'S FINE. WHAT THEY
6 DON'T HAVE THE RIGHT TO DO IS DO THE FRAUD UPON THE
7 COURT STUFF THAT THEY WERE DOING IN THEIR MOST RECENT
8 MOTION. I HAVE NO TIME FOR THAT.

9 Q. AND WHAT IS THE FRAUD UPON THE COURT, MR.
10 STEYN?

11 A. WELL, I WOULD SAY THAT EXTENDS TO SMALL
12 THINGS. IT SAYS RATHER CUNNINGLY THERE THAT NATIONAL
13 REVIEW ONLINE IS OPEN TO -- FOR MEMBERS OF THE PUBLIC
14 TO POST THINGS, AND THEREFORE IMPLYING THEY'RE LIKE
15 FACEBOOK. THAT'S COMPLETE NONSENSE. ALL THAT MEMBERS
16 OF THE PUBLIC CAN DO AT NATIONAL REVIEW ONLINE IS POST
17 COMMENTS TO PUBLISHED PIECES, JUST LIKE THEY DO AT THE
18 NEW YORK TIMES OR THE DAILY MAIL IN LONDON OR ANY
19 OTHER NEWSPAPER WEBSITE.

20 SO I THINK THAT IS DISHONEST. I THINK THAT
21 IS WHATEVER YOU CALL IT, A LACK OF CANDOR TO THE

1 TRIBUNAL AND I THINK NATIONAL REVIEW KNEW THAT WHEN
2 THEY WROTE IT, AND THE STUFF ABOUT ME IS COMPLETE
3 RUBBISH FROM TOP TO TOES STARTING WITH THE -- STARTING
4 WITH THEIR ASSERTION THAT I FAILED TO PERFORM MY
5 CONTRACT.

6 I OVER PERFORMED MY CONTRACT AND IN FACT,
7 THE ONLY PEOPLE WHO FAILED TO PERFORM THEIR CONTRACT
8 WAS -- WAS NATIONAL REVIEW WHEN THEY DECLINED TO PAY
9 ME FOR THE FINAL MONTH WHICH WE WERE NOT AWARE OF
10 UNTIL THEY FILED THAT MOTION. SO, I REGARD THAT
11 MOTION AS CERTAINLY FUNDAMENTALLY MISSTATING THE
12 RECORD AS IT EXISTS TO THE RELATIONSHIP BETWEEN
13 NATIONAL REVIEW AND ME.

14 AND ACTUALLY EXTRAORDINARY. I COULD DO
15 ANOTHER 20 MINUTES ON THIS, BUT THAT'S THE GIST OF IT.

16 Q. AND HOW DOES IT MISSTATE THE RECORD, MR.
17 STEYN?

18 A. WELL, FOR EXAMPLE, IF YOU READ THAT
19 MOTION -- AND THAT'S WHY I DO BELIEVE IT IS A FRAUD
20 UPON THE COURT -- THEY SAY I FAILED TO PERFORM MY
21 CONTRACT. I OVER PERFORMED MY CONTRACT. AND I WELL

1 KNEW WHAT I WAS DOING IN THE FINAL MONTHS WITH
2 NATIONAL REVIEW. NOW, IF NATIONAL REVIEW THOUGHT I
3 HAD FAILED TO PERFORM IT, THEY CERTAINLY DID NOT TELL
4 US AT THE TIME. IN FACT, IT WAS QUITE THE OPPOSITE.

5 THEY CAME UP WITH A NEW CONTRACT DESPERATE
6 FOR ME TO SIGN IT. AND OBVIOUSLY YOU WOULDN'T DO THAT
7 IF YOU THOUGHT THE GUY HAD BREACHED THE PREVIOUS
8 CONTRACT. YOU KNOW, WHEN SOMEBODY BREACHES CONTRACT
9 A, YOU DON'T -- YOU DON'T SUDDENLY SAY, OH, WE DON'T
10 MIND ABOUT THAT. HERE, WE'RE GOING TO OFFER YOU A NEW
11 CONTRACT FOR YOU TO BREACH.

12 ALL THESE PEOPLE WHO -- NOW RICH LOWRY AND
13 JACK FOWLER AND ALL THE OTHER WITNESSES YOU'VE DEPOSED
14 WHO ACCORDING TO CARVIN'S LATEST MOTION, SAY THAT I
15 BREACHED MY CONTRACT, THEY NEVER TOLD US. AT THE TIME
16 IT WAS QUITE THE OPPOSITE, RICH LOWRY SAYING I'M READY
17 TO JUMP ON A PLANE AND COME TO NEW HAMPSHIRE AND BEG
18 YOU TO STAY WITH NATIONAL REVIEW.

19 JACK FOWLER, WHO'S TELLING CHRISTOPHER
20 BUCKLEY IN E-MAILS THAT I'M AN "ASSHOLE"
21 QUOTE/UNQUOTE, AT THE TIME AND IN THE YEARS SINCE

1 WOULD'N'T STOP HANGING AROUND, TRYING TO GET ME TO COME
2 BACK TO THE NATIONAL REVIEW, BEGGING TO INTRODUCE ME
3 AT PUBLIC APPEARANCES SO PEOPLE WILL THINK HE'S MY
4 FRIEND. THE NATIONAL REVIEW'S LATEST MOTION TOTALLY
5 MISCHARACTERIZES THE CIRCUMSTANCES IN WHICH I DEPARTED
6 NATIONAL REVIEW. IT'S A DISGRACE.

7 AS YOU KNOW WITH DEFAMATION CASES, OFTEN
8 IT'S AN INDIVIDUAL, THE WRITER AND THE CORPORATE
9 CO-DEFENDANT, AND I HAVE NEVER -- I'VE HAD CORPORATE
10 CO-DEFENDANTS IN CANADA, HAD CORPORATE CO-DEFENDANTS
11 IN THE U.K. AND ELSEWHERE, AND I'VE NEVER HAD A
12 CORPORATE CO-DEFENDANT THAT JUST PUTS A PACK OF LIES
13 INTO THE COURT LIKE THAT.

14 Q. AND YOU SAY THEY MISREPRESENTED THE
15 RELATIONSHIP THAT YOU HAD WITH THEM. IS THAT WHAT YOU
16 SAID?

17 A. ABSOLUTELY.

18 Q. AND HOW DID THEY MISREPRESENT THE
19 RELATIONSHIP?

20 A. WELL, THEY MISREPRESENTED IN THEIR FINAL --
21 IN THAT LAST MOST RECENT MOTION -- AND I HAVE NO IDEA

1 WHY THEY PUT IT IN THERE BECAUSE IT DOESN'T SEEM
2 RELEVANT TO THE HOCKEY STICK OR ANYTHING ELSE OR EVEN
3 TO THEIR THEORY THAT THEY'RE JUST A PLATFORM LIKE
4 FACEBOOK AND TWITTER, AND SO I'M JUST -- YOU KNOW,
5 IT'S A SLIGHTLY SUBTLER ARGUMENT THAN THEY WERE MAKING
6 A COUPLE OF YEARS AGO WHEN THEY CLAIMED I WAS JUST
7 LIKE THAT GERMAN PILOT. I BASICALLY BUSTED INTO THE
8 COCKPIT OF NATIONAL REVIEW AND FLEW IT INTO THE
9 MOUNTAIN OR WHATEVER, WHAT THEIR ABSURD VIEW OF THE
10 CASE WAS.

11 BUT THEY'VE -- IN THIS CASE THEY'VE SAID I
12 FAILED TO PERFORM MY CONTRACT. I OVER PERFORMED MY
13 CONTRACT AND I WAS VERY CLEAR WHEN I DECIDED THAT I NO
14 LONGER WISHED TO BE ASSOCIATED WITH THEM AS TO WHAT
15 CONTRACTUAL OBLIGATIONS I WAS STILL OBLIGED TO
16 FULFILL, WHICH IS WHY I CONTINUED TO WRITE MY
17 FORTNIGHTLY COLUMN FOR THEM UNTIL THE CONTRACT EXPIRED
18 AT THE END OF FEBRUARY.

19 AND MANN AND NATIONAL REVIEW'S REVELATION
20 THAT THEY -- THAT THEY DID NOT PAY THE FEBRUARY AMOUNT
21 OF MONEY OWING, I'M A -- I KNOW VERY LITTLE ABOUT THE

1 OPERATIONAL ASPECTS OF MY BUSINESS, AND IT WAS NEWS TO
2 ME, THIS. AND WE LOOKED IT UP AND WE HAD NEVER HEARD
3 OR NOTICED BEFORE THAT THEY HAD FAILED TO PAY THE
4 FINAL CHECK ON THE CONTRACT. THE FEBRUARY PAYMENT.
5 AND WE HAVE DEMANDED PAYMENT. SO THE ONLY PEOPLE WHO
6 BROKE THE CONTRACT ARE NATIONAL REVIEW.

7 I PERFORMED MY CONTRACT AND IT IS
8 EXTRAORDINARY TO ME, AS YOU KNOW WE MOVED TO SEPARATE
9 FROM THEM A FEW YEARS AGO WITHOUT SUCCESS. BUT THIS
10 IS AN EXTRAORDINARY BUSINESS WHERE THEY BASICALLY
11 DECLARE THAT I FAILED TO PERFORM MY CONTRACT AND THEY
12 DIDN'T -- AND THEY DIDN'T PAY ME. I WOULD SAY ALSO
13 IT'S LITTERED WITH SMALL UNTRUTHS EITHER. THE FACT
14 THAT I DIDN'T HAVE A TITLE WITH NATIONAL REVIEW, FOR
15 EXAMPLE.

16 Q. DID YOU HAVE A TITLE WITH NATIONAL REVIEW?

17 A. I WAS OFFERED A TITLE TO GO ON THE MASTHEAD.
18 AND IF YOU KNOW ANYTHING ABOUT PUBLICATIONS AROUND THE
19 WORLD, YOU'D KNOW THAT THESE MASTHEADS ARE A VERY
20 AMERICAN THING, YOU KNOW, WHERE YOU'VE GOT YOUR
21 ASSISTANT DEPUTY UNDER BUREAU CHIEF IN JAKARTA LIKE

1 TIME MAGAZINE HAD.

2 AND I TURNED IT DOWN BASICALLY FOR THE
3 REASON THAT MY OLD FRIEND BORIS JOHNSON -- MY OLD
4 FRIEND BORIS JOHNSON, NOW THE PRIME MINISTER OF THE
5 U.K. AT THE TIME WHEN THE SPECTATOR, MY OLD HOME IN
6 THE U.K., WE HAD A NEW AMERICAN PUBLISHER AND SHE WAS
7 WANTING TO PUT A MASTHEAD -- A TIME MAGAZINE NATIONAL
8 REVIEW STYLE MASTHEAD ON THE SPECTATOR.

9 AND BORIS SAID TO MS. FORTIER ONLY -- AND TO
10 ME -- ONLY WANKER AMERICAN JOURNALISTS CARE ABOUT
11 THESE STUPID TITLES. AND I GENERALLY WITHOUT WISHING
12 TO GET INTO THE SUBSTANCE OF THE WANKER AMERICAN BIT,
13 I GENERALLY TAKE THAT LINE.

14 SO, I TOLD -- I LOOKED AT THE NAMES ON THE
15 MASTHEAD AT NATIONAL REVIEW AND DECLINED TO BE AMONG
16 THEM. BUT SUDDENLY I WAS OFFERED A TITLE BY NATIONAL
17 REVIEW. AND I'M CONCERNED BY -- THIS IS THE ONE --
18 GETS BACK TO THE HOCKEY STICK IN THE SAME WAY. I'M
19 CONCERNED ABOUT THE ESCALATOR OF LIES, WHERE SMALL
20 LIES LIKE THAT ONE LEAD TO BIGGER LIES LIKE THE FACT
21 THAT I DID NOT PERFORM MY CONTRACT.

1 Q. MR. STEYN, WHAT TITLE WERE YOU OFFERED?

2 A. I HAVE NO IDEA. I TAKE IT IT WOULD HAVE
3 BEEN SOME STUPID TITLE LIKE EDITOR AT LARGE OR, YOU
4 KNOW, SENIOR CONTRIBUTING EDITOR.

5 I MEAN, THEY'RE ALL -- THESE ARE ALL STUPID
6 AND MEANINGLESS TITLES. AND IN MY VIEW ARISE FROM THE
7 FACT THAT AMERICA HAS NO TITLES OF NOBILITY BECAUSE IF
8 YOU'VE GOT MARQUESSES AND VISCOUNTS RUNNING AROUND,
9 NOBODY GIVES A WHIT ABOUT, YOU KNOW, SENIOR
10 CONTRIBUTING EDITOR AT LARGE. THESE ARE -- THESE ARE
11 WORTHLESS BAUBLES AND I REJECTED IT AT SUCH. BUT THE
12 OFFER WAS MADE.

13 Q. YOU INDICATED THAT THERE WERE OTHER KNITS
14 THAT YOU DISAGREED WITH IN THEIR FILING. CAN YOU
15 RECALL WHAT THOSE ARE?

16 A. WELL, I WOULD -- AS I SAID, THE MAIN PROBLEM
17 FOR ME IS THAT IN ORDER TO ADVANCE THEIR PREPOSTEROUS
18 THEORY OF THE CASE WHICH I WOULD BE SURPRISED IF IT
19 PREVAILED, BUT THE PREPOSTEROUS THEORY OF THE CASE
20 THAT THEY'RE A PLATFORM AND RATHER THAN A PUBLISHER.
21 THAT'S ESSENTIALLY WHAT THEY ARE. IT'S NONSENSE AND

1 WE ALL KNOW THAT. AND, YOU KNOW, MAYBE YOU CAN FIND
2 THAT AS IS THE WAY, MAYBE YOU CAN FIND THE FORM OF
3 WORDS THAT SLIPS IT PAST THE JUDGE.

4 BUT IN ORDER TO ADVANCE THAT, THEY HAVE TOLD
5 THE COMPLETE FALSEHOOD, WHICH IS THAT I DID NOT -- I
6 DID NOT PERFORM MY CONTRACT. I CERTAINLY -- I
7 CERTAINLY DID AND THE BEHAVIOR THEY SAY, IN THE PERIOD
8 THEY'RE REFERRING TO, IF A CHAP IS NOT PERFORMING HIS
9 CONTRACT, YOU USUALLY GIVE HIM A WARNING, YOU USUALLY
10 TELL HIM HE'S GOT TO CUT IT OUT.

11 NONE OF THAT. NONE OF THAT HAPPENED HERE.
12 INSTEAD WE WERE GETTING ALL THIS, YOU KNOW, RICH LOWRY
13 WANTED TO JUMP ON A PLANE AND COME UP TO NEW HAMPSHIRE
14 AND BEG ME TO STAY WITH HIM, AND I HAD NO DESIRE TO
15 SEE RICH LOWRY.

16 AND LIKEWISE, JACK FOWLER THE PUBLISHER,
17 HE'S SENDING ME ALL OF THIS AFTER THE DISPUTE WITH
18 JASON STEORTS, THE MANAGING EDITOR, HE'S SENDING ME
19 ALL THIS SORT OF LOCKER ROOM HOMOPHOBIC BANTER BY
20 E-MAIL, "YOU SQUEEZE-A DA FRUIT, YOU GETTA DA BRUISE",
21 AS HE PUT IT. WHICH IS APPARENTLY AN AMUSING GEST IN

1 THE OFFICES OF NATIONAL REVIEW.

2 BUT THEIR -- THEIR BEHAVIOR AND THEIR
3 RELATIONSHIP WITH US WAS THAT THEY WERE DESPERATE TO
4 HAVE ME WITH THEM. AND THE IDEA THAT I FAILED TO
5 PERFORM MY CONTRACT IS ABSOLUTELY -- AS I SAID, IT'S A
6 FRAUD UPON THE COURT BY NATIONAL REVIEW AND CARVIN AND
7 I CERTAINLY WILL BE HAPPY TO FILE OF AN AFFIDAVIT TO
8 THAT EFFECT.

9 Q. ALL RIGHT. MR. STEYN, YOU'RE AWARE THAT
10 NATIONAL REVIEW IS STILL RUNNING THE "FOOTBALL AND
11 HOCKEY" ARTICLE ON THEIR WEBSITE?

12 YOU KNEW THAT, RIGHT?

13 A. I'M NOT SURE I COULD TESTIFY TO THE FACT
14 THAT THE LINK IS STILL THERE. I KNOW FROM YOUR
15 EXHIBITS -- WHICH, AGAIN, SURPRISED ME -- THEY HAVE MY
16 BIO UP THERE APPARENTLY, WHICH I HAD NO IDEA. BECAUSE
17 AS YOU KNOW, IT'S WHATEVER IT IS NOW, SEVEN YEARS
18 SINCE I'VE CEASED WRITING FOR THEM AND THEY HAVE MY
19 BIO UP ON THEIR WEBSITE. BUT I COULDN'T HONESTLY -- I
20 BELIEVE THE "FOOTBALL AND HOCKEY" IS STILL UP THERE
21 AND THAT THAT LINK IS STILL ALIVE. BUT IF IT'S NOT,

1 WE'LL PUT IT BACK UP AT OUR WEBSITE.

2 Q. I'LL GET TO THE BIO IN A MINUTE, BUT I TAKE
3 IT YOU DID NOT AUTHORIZE NATIONAL REVIEW TO HAVE YOUR
4 BIO UP ON THEIR WEBSITE?

5 A. WELL --

6 MR. WILSON: OBJECTION TO FORM.

7 THE WITNESS: -- I DID -- I'M NOT SURE IN
8 WHAT SENSE AUTHORIZATION WOULD APPLY THERE.

9 I KNOW THAT, YOU KNOW, THERE ARE LIKE SLEAZY
10 SPEAKING AGENCIES AROUND THE UNITED STATES THAT HAVE
11 MY BIO UP THERE AS IF I'M ONE OF THEIR SPEAKERS, WHICH
12 I'M NOT. AND SO I REGARD THAT AS DECEPTIVE.

13 AND I AM CONCERNED BY THE NATIONAL REVIEW
14 BIO AT THE WEBSITE SEVEN YEARS AFTER I CEASED WRITING.
15 THAT SEEMS TO ME ODD.

16 BY MR. WILLIAMS:

17 Q. ALL RIGHT. HAVE YOU EVER SPOKEN TO MR.
18 LOWRY OR MR. FOWLER ABOUT "FOOTBALL AND HOCKEY?"

19 A. NO.

20 Q. SO ONCE IT RAN, YOU HAD NO MORE
21 COMMUNICATION WITH THEM?

1 MR. WILSON: OBJECTION TO FORM.

2 THE WITNESS: I RAN INTO RICH LOWRY A COUPLE
3 OF TIMES IN TELEVISION GREEN ROOMS AND JACK FOWLER AT
4 THE APPELLATE COURT HEARING WHERE I WAS WITH MR.
5 KORNSTEIN, MY COUNSEL AND MY PUBLICIST KATHLEEN
6 MITCHELL AND PHELM MCALEER AND ANN MCELHINNEY AND A
7 COUPLE OF IRISH FRIENDS WHO MADE A CLIMATE CHANGE FILM
8 AND WE WERE ALL SHOOTING THE BREEZE ABOUT -- AS I
9 SAID, MR. KORNSTEIN ONCE REPRESENTED KING MICHAEL OF
10 ROMANIA AND WE WERE HAVING A RATHER ABSTRUSE
11 CONVERSATION ABOUT MINOR BALKAN ROYALTY, I BELIEVE THE
12 PRINCE OF MONTENEGRO CAME INTO IT.

13 AND JACK FOWLER CAME UP AND STARTED HANGING
14 AROUND ON THE FRINGES IN THAT COURTROOM THAT DAY, THE
15 D.C. COURT OF APPEALS, BUT WE HAD -- DURING THIS
16 THING, HE'S CALLING ME AN ASSHOLE TO CHRISTOPHER
17 BUCKLEY WHILE PRETENDING TO BE OR WANTING TO BE MY
18 FRIEND. WELL, I CAN'T GO ANYWHERE IN NEW YORK OR
19 WASHINGTON WITHOUT HIM TRYING TO HANG AROUND IN THE
20 FRINGES. BUT HE DIDN'T -- I DON'T BELIEVE HE KNEW ANY
21 MINOR BALKAN ROYALTY AND THAT WAS THE SUBJECT OF

1 CONVERSATION THAT DAY.

2 Q. DID ANYBODY FROM NATIONAL REVIEW EVER
3 INDICATE TO YOU THAT THEY ENDORSED THE "FOOTBALL AND
4 HOCKEY" ARTICLE?

5 MR. WILSON: OBJECTION TO FORM.

6 MR. HEINTZ: SAME OBJECTION, VAGUE.

7 THE WITNESS: I DON'T -- I'M NOT SURE WHAT
8 THAT ACTUALLY MEANS. COULD YOU ACTUALLY EXPLAIN THAT?
9 BY MR. WILLIAMS:

10 Q. WELL, THAT THEY STOOD BY THE ARTICLE JUST
11 LIKE YOU STAND BY THE ARTICLE?

12 MR. HEINTZ: SAME OBJECTION.

13 I'M SORRY. THAT'S JON HEINTZ FROM THE
14 NATIONAL REVIEW.

15 THE WITNESS: WELL, YOU KNOW, THEY PUBLISHED
16 IT AND THEY HAVEN'T UNPUBLISHED IT. AND THEN, AS YOU
17 KNOW, RICH LOWRY DID HIS GO AHEAD MAKE MY DAY, PUNK
18 COLUMN. I HAD NO REASON TO BELIEVE THAT NATIONAL
19 REVIEW DID NOT STAND BY EVERY WORD I SAID.

20 ALTHOUGH, AS YOU KNOW, THE JASON STEORTS
21 E-MAIL THAT ULTIMATELY LED TO MY DEPARTURE WAS VERY

1 DISTURBING TO ME BECAUSE I REALIZED THESE GUYS WERE
2 POSEURS.

3 AS YOU KNOW, I LOOK ON THIS AS A FREE SPEECH
4 CASE, AN IMPORTANT FREE SPEECH CASE. AND IN THAT
5 SENSE, YOU WANT PEOPLE WHO AS WITH MACLEAN'S AND
6 ROGERS COMMUNICATIONS IN CANADA IN MY HUMAN RIGHT
7 CASES, AND AS WITH ACTUALLY ALMOST EVERYWHERE THAT ONE
8 OF THESE HAS COME UP, YOU WANT PEOPLE WHO STAND ON THE
9 PRINCIPLE OF FREE SPEECH FIERCELY AND PROUDLY, AND THE
10 CORNER POST BY THE MANAGING EDITOR INDICATED TO ME
11 THAT THESE FELLOWS WERE JUST POSEURS AND WEREN'T
12 SERIOUS ABOUT IT.

13 BY MR. WILLIAMS:

14 Q. WEREN'T SERIOUS ABOUT WHAT, MR. STEYN?

15 A. A PRINCIPLED STAND ON FREE SPEECH.

16 BEAR IN MIND THAT THIS WAS BEFORE THEY
17 STARTED DOING ALL THE -- OH, THIS CRAZY GUY JUST
18 BUSTED INTO THE COCKPIT AND FLEW THE NATIONAL REVIEW
19 PLANE INTO THE MOUNTAINS. THIS IS BEFORE THEY STARTED
20 PRETENDING THEY WERE A PLATFORM LIKE FACEBOOK AND
21 TWITTER, OPEN TO ALL MEMBERS OF THE PUBLIC.

1 BUT IT WAS -- ACTUALLY IT DOES WITH
2 HINDSIGHT CONFIRM THAT I WAS RIGHT TO SEPARATE FROM
3 THEM, BECAUSE THEY WERE NOT INTERESTED.

4 TED -- IN MY FREE SPEECH CASES IN CANADA,
5 TED ROGERS WHO DIED MIDWAY THROUGH THE THING, BUT TED
6 RAN BASICALLY THE PEOPLE WHO PROVIDED THE CABLE TV,
7 THE INTERNET SERVICE, THE E-MAILS AND THEY PUBLISH
8 LIKE MAINSTREAM, LIKE CANADA'S MOST FAMOUS MAINSTREAM
9 WOMEN'S MAGAZINES, THE LA CHÂTELAIN, THEY'RE NOT
10 IDEOLOGICAL AT ALL.

11 BUT THE ROGERS FAMILY WERE LIKE A ROCK ON
12 THE ISSUE OF FREE SPEECH, AND I REALIZED THAT THESE
13 IDEOLOGICAL SOULMATES AT NATIONAL REVIEW WERE IN FACT
14 NOT SERIOUS.

15 THEY'VE RAISED ALL THIS MONEY OFF THE CASE
16 AS A BIG FREE SPEECH BACKER, AND THEN THEY'RE
17 ADVANCING THIS LUDICROUS ARGUMENT OF PATHETIC
18 SOPHISTRY PURPORTING TO BE MERELY A PLATFORM AND IN
19 FACT INsofar AS I HAD ANY RELATIONSHIP WITH THEM, I
20 FAILED TO PERFORM THE OBLIGATIONS OF THAT RELATIONSHIP
21 AND THEY DIDN'T PAY ME.

1 AND THIS IS JUST ACTUALLY A PACK OF LIES
2 FROM BEGINNING TO END, WHICH JUSTIFIES MY SEPARATING
3 FROM THEM AT -- IN FEBRUARY 2014, OR WHENEVER IT WAS.

4 Q. AND I THINK YOU SAID THAT YOU QUESTIONED
5 THEIR POSITION ON FREE SPEECH PRIOR TO THE TIME THEY
6 RAISED A SECTION 230 ARGUMENT. DID I MISUNDERSTAND
7 YOU?

8 A. NO, I THINK THE JASON STEORTS COMMENT AT THE
9 CORNER, WHICH WAS REALLY IN REFERENCE I BELIEVE TO ONE
10 OF THE FELLOWS FROM THE DUCK DYNASTY THING WHO HAD GOT
11 HIMSELF INTO A BIT OF HOT WATER BY EXPLAINING THE
12 NEED -- REMARKING IN AN ASIDE THAT HE COULDN'T
13 PERSONALLY SEE THE CHARMS OF HOMOSEXUALITY.

14 AND HE WAS -- THERE WAS SOME TALK ABOUT
15 CANCELLING HIS SERIES AND ALL THE REST OF IT, AND I
16 THINK -- I'M AN ABSOLUTIST IN FREE SPEECH. A LOT OF
17 PEOPLE SAY THINGS YOU DON'T WANT TO HEAR, AND REALLY
18 IF YOU'RE LIVING IN A SOCIETY WHERE NOBODY SAYS
19 ANYTHING YOU DON'T WANT TO HEAR, THAT SOCIETY IS NOT
20 FREE.

21 AND I -- WHEN I WAS REBUKED BY JASON STEORTS

1 IN HIS CORNER POST, I UNDERSTOOD THAT THESE PEOPLE
2 WERE FAINT HEARTS ON FREE SPEECH AND I DIDN'T WANT
3 ANYTHING TO DO WITH THEM.

4 THAT'S JUST HOW I FELT. I'VE BEEN THROUGH
5 -- I GOT THE LAW CHANGED IN CANADA. TOOK A BLOODY
6 LONG TIME BECAUSE HER MAJESTY'S GOVERNMENT UNDER
7 STEPHEN HARPER, THE PRIME MINISTER WOULD NOT ACTUALLY
8 MOVE A MOTION TO APPEAL THIS PART OF THE LAW. SO, IN
9 THE END IT TOOK A BACKBENCHER TO MOVE THE MOTION. IT
10 TOOK A LONG TIME TO PROGRESS FROM THAT -- PASSING IN
11 THE HOUSE OF COMMONS TO GETTING ROYAL ASSENT.

12 AND THAT HAD HAPPENED JUST A COUPLE OF
13 MONTHS -- I THINK ABOUT FOUR OR FIVE MONTHS EARLIER,
14 THE LAW HAD BEEN COMPLETELY REPEALED BEFORE THIS
15 MATTER AROSE AT NATIONAL REVIEW.

16 AND SO I WAS, YOU KNOW, TO A CERTAIN EXTENT
17 I WAS EXHAUSTED AFTER A LONG FREE SPEECH BATTLE THAT
18 ENDED WITH THE REPEAL OF THE LAW, BECAUSE THAT'S HOW
19 SERIOUS I AM ABOUT FREE SPEECH.

20 AND TO DISCOVER THAT IN THE UNITED STATES
21 THE SO-CALLED MAJOR SO-CALLED CONSERVATIVE INSTITUTION

1 WAS NOT IN THE LEAST BIT SERIOUS ABOUT FREE SPEECH WAS
2 ACTUALLY RATHER DISTURBING TO ME.

3 AND SO BECAUSE OF THAT JASON STEORTS POST,
4 HE'S THE MANAGING EDITOR, I DECIDED I'D RATHER WALK
5 AWAY AND FIGHT THIS BATTLE WITH YOUR CLIENT ON MY OWN.

6 HOW DID THEY REACT? THEY DIDN'T TELL YOU IN
7 THEIR -- IN THEIR MOTION. SO I BASICALLY HAD A
8 FALLING OUT WITH THE MANAGING EDITOR. DID THEY TAKE
9 THE SIDE OF THE MANAGING EDITOR? NO. THEY ACTUALLY
10 REVOKED HIS ACCESS TO THE CORNER AT NATIONAL REVIEW.

11 DON'T YOU THINK THAT'S A LITTLE ODD? FOR A
12 -- FOR A SO-CALLED PLATFORM, TWO-PERSON PLATFORM THAT
13 CLAIMS TO BE OPEN TO ONE AND ALL, BUT IN FACT THE
14 MINUTE HE FELL OUT WITH ME THEY REVOKED HIS PRIVILEGES
15 TO POST TO THE CORNER.

16 THEY SPENT THE NEXT TWO MONTHS FRANTICALLY
17 TRYING TO GET ME TO RENEW WITH NATIONAL REVIEW. AND
18 NOBODY SAID ANYTHING ABOUT FAILING TO PERFORM A
19 CONTRACT. ALL I HEARD WAS RICH LOWRY WANTED TO JUMP
20 IN A PLANE AND JACK FOWLER WAS DOING HIS HOMOPHOBIC
21 BANTER, WE'RE ALL BOYS TOGETHER IN THE LOCKER ROOM.

1 AND NOBODY -- NOBODY ACTUALLY SAID THAT YOU'VE
2 BREACHED YOUR CONTRACT AND SORRY, WE CAN'T HAVE THAT.
3 NOBODY SAID THAT. NOBODY SAID, WE'RE NOT GOING TO
4 SEND YOU YOUR FEBRUARY CHECK.

5 IT'S JUST BECAUSE I HAD AT THAT TIME A
6 RATHER CHARMING AND AGREEABLE YOUNG LADY WHO
7 NEVERTHELESS WAS NOT ALWAYS ENTIRELY ON TOP OF
8 ACCOUNTING MATTERS THAT I PROBABLY DIDN'T EVEN NOTICE
9 WE -- WE DIDN'T EVEN NOTICE THAT THEY HADN'T PAID US
10 UNTIL THEY FILED THAT MOTION A COUPLE OF WEEKS AGO.

11 BUT THEIR CHARACTERIZATION OF THE
12 RELATIONSHIP AND ITS END IS FALSE.

13 Q. AND HAVE THEY SINCE PAID YOU YOUR FEBRUARY
14 SALARY?

15 A. NO, WE'VE SENT A DEMAND.

16 IN FACT I THINK WE'VE SENT MULTIPLE DEMANDS
17 FOR PAYMENT. NOW, I THINK WE'VE SENT -- WELL,
18 CERTAINLY BY MULTIPLE, CERTAINLY AT LEAST TWO. WE'VE
19 SENT DEMANDS FOR PAYMENT BECAUSE THEY SIMPLY DID NOT
20 PAY US AND DID NOT TELL US THAT THEY WERE NOT PAYING
21 US AND DID NOT TELL US WHY THEY WERE NOT PAYING US.

1 Q. ALL RIGHT. WE HAVE BEEN GOING OVER AN HOUR
2 AND A HALF. WE GENERALLY TAKE A MIDMORNING BREAK. IS
3 THAT ACCEPTABLE TO YOU, MR. STEYN?

4 A. WHATEVER SUITS YOU.

5 Q. LET'S TAKE A FEW MINUTES. MAYBE COME BACK
6 IN 10 MINUTES.

7 MR. WILLIAMS: IS THAT ALL RIGHT, COUNSEL?

8 MR. WILSON: THAT'S FINE. WE CAN COME BACK
9 IN 10 MINUTES.

10 MR. HEINTZ: FINE WITH ME, JOHN.

11 THE VIDEOGRAPHER: IF EVERYONE CONSENTS,
12 PLEASE GIVE ME A MOMENT.

13 WE ARE GOING OFF THE RECORD AT 11:40 A.M.

14 MR. WILLIAMS: WHY DON'T WE COME BACK AT
15 11:50 IF THAT'S ALL RIGHT WITH EVERYBODY. THANK YOU.

16 (WHEREUPON, A RECESS ENSUED.)

17 VIDEOGRAPHER: OKAY. WE'RE BACK ON THE
18 RECORD AT 11:55 A.M.

19 BY MR. WILLIAMS:

20 Q. WELCOME BACK, MR. STEYN.

21 AND I HAVE TO ASK YOU, WHAT SORT OF FLAG IS

1 THAT TO THE LEFT OF YOU?

2 A. THAT IS THE CANADIAN RED ENSIGN, WHICH WAS
3 CANADA'S NATIONAL FLAG FROM 1922 TO 1957 WHEN IT WAS
4 SLIGHTLY MODIFIED BY LETTERS PATENT. BUT THAT IS THE
5 FLAG THAT FLIES OVER THE GRAVES OF CANADIAN SOLDIERS
6 AT THE VIMY CEMETERY IN EUROPE AND AT OTHER CANADIAN
7 WAR GRAVES IN EUROPE, FROM BOTH WORLD WARS.

8 Q. OKAY. CAN WE GET, PLEASE, TO THE
9 INTERROGATORY ANSWERS, THAT'S EXHIBIT 1?

10 AND I JUST WANT TO ASK YOU QUICKLY, YOUR
11 RESPONSE TO OUR INTERROGATORY 4E, AS IN EDWARD. THERE
12 ARE A NUMBER OF ARTICLES THERE THAT YOU RELY UPON TO
13 SUPPORT YOUR ALLEGATION OR YOUR STATEMENT THAT THE
14 HOCKEY STICK GRAPH WAS FRAUDULENT. TAKE A LOOK AT
15 THAT, PLEASE.

16 A. YES.

17 Q. AND I'M JUST A LITTLE CONFUSED BY THE
18 ANSWER, SIR, BECAUSE WE HAD ASKED YOU WHAT DOCUMENTS
19 YOU RELIED UPON, AND I'M NOT SURE THAT THE STATEMENT
20 IS THAT THESE PUBLICATIONS CONCERN THE HOCKEY0 STICK
21 POLEMIC. ARE YOU SAYING THAT YOU ACTUALLY DID RELY ON

1 THESE PRIOR TO PUBLICATION, SIR?

2 A. WELL, I THINK WHAT I'VE SAID IS THAT THESE
3 WERE PAPERS THAT I'D READ OVER THE YEARS. AS YOU
4 PROBABLY KNOW, THERE WAS A FAMOUS COURT CASE WITH THE
5 PAINTER WHISTLER WHO HAD BEEN ACCUSED OF OVERCHARGING
6 FOR A PORTRAIT. AND HE WAS ASKED HOW LONG IT TOOK TO
7 DO THE PORTRAIT IN A LONDON COURT AND MR. WHISTLER
8 TESTIFIED TWO HOURS AND A LIFETIME OF EXPERIENCE.

9 SO MY POST "FOOTBALL AND HOCKEY" TOOK
10 WHATEVER IT WAS TO WRITE; 20, 30 MINUTES, IT'S
11 270 WORDS. BUT CERTAINLY A COUPLE OF DECADES OF
12 EXPERIENCE. AND IN THE IMMEDIATE YEARS BEFOREHAND, I
13 HAD READ CERTAINLY MCINTYRE AND MCKITRICK AND KEITH
14 BRIFFA AND JUDITH CURRY AND THE CLIMATEGATE E-MAILS
15 AND THE PENN STATE PROBE.

16 Q. OKAY. AND WHY ARE THESE OTHER ARTICLES ON
17 HERE AS WELL?

18 A. NO, I'M JUST -- I'M SIMPLY SAYING THAT THESE
19 WERE -- FOR EXAMPLE, WITH RICHARD MUELLER, I THINK WE
20 PUT PUBLIC COMMENTS BY RICHARD MUELLER, BUT I COULDN'T
21 HONESTLY -- WHICH I HAVE READ -- BUT I COULDN'T

1 HONESTLY TELL YOU RIGHT NOW WHAT PUBLIC COMMENTS BY
2 RICHARD MUELLER I WAS THINKING OF. THEY'RE PROBABLY
3 WHATEVER THE ONES ARE IN MY BOOK "A DISGRACE TO THE
4 PROFESSION" WHERE HE'S CERTAINLY QUOTED.

5 LIKEWISE WITH JOHN CHRISTY AND WITH THE
6 STORY BY STEVEN MILLOY AT FOX NEWS, I CERTAINLY READ
7 THAT. AND, SO, THESE WERE -- I THINK WE'VE GIVEN HERE
8 SPECIFIC EXAMPLES OF AT LEAST I WOULD SAY SIX YEARS OF
9 SPECIFIC READING ABOUT THE HOCKEY STICK.

10 Q. ALL RIGHT. THANK YOU.

11 NOW, SIR, DO ANY OF THOSE ARTICLES THAT
12 YOU'VE GOT THERE SAY THAT THE HOCKEY STICK WAS
13 FRAUDULENT?

14 A. I DON'T BELIEVE THEY USE THAT WORD,
15 ALTHOUGH I COULDN'T -- I THINK I'LL SAY, I CAN'T STATE
16 THAT ANY OF THEM USED THAT WORD.

17 Q. DID ANY OF THEM USE THE WORD "DECEPTIVE?"

18 A. I COULDN'T SAY. I DON'T REMEMBER ADJECTIVES
19 FROM THOSE PAPERS.

20 Q. WELL, HOW ABOUT THIS. DID ANY OF THOSE
21 ARTICLES SAY ANYTHING TO SUGGEST THAT DR. MANN HAS

1 DONE ANYTHING INTENTIONALLY TO MISLEAD ANYONE?

2 A. CAN YOU REPEAT THAT QUESTION?

3 Q. DID ANY OF THOSE ARTICLES SAY ANYTHING THAT
4 SUGGESTED THAT DR. MANN HAD DONE ANYTHING
5 INTENTIONALLY TO MISLEAD ANYONE?

6 A. I THINK IF YOU'RE PUTTING IT AS SUGGESTING
7 THAT HE MISLED ANYONE, I THINK IT'S VERY DIFFICULT TO
8 READ THE MCINTYRE AND MCKITRICK PAPERS WITHOUT PICKING
9 UP THAT SUGGESTION. AND INDEED, IN TERMS OF MANN'S
10 OWN ALLIES AND COLLEAGUES, I THINK IT'S DIFFICULT TO
11 READ THE KEITH BRIFFA PIECE.

12 I THINK IT'S ALSO DIFFICULT TO READ JUDITH
13 CURRY WITHOUT REACHING THAT CONCLUSION. IT'S
14 DIFFICULT TO READ THE CLIMATEGATE E-MAILS WHICH ARE ON
15 THAT LIST WITHOUT ACTUALLY REALIZING THAT THERE IS
16 WIDESPREAD DECEPTION.

17 Q. OKAY. SO YOU'VE READ THOSE ARTICLES AND
18 CONCLUDED THAT THEY SUGGESTED WIDESPREAD DECEPTION?

19 A. NO. AS I'VE SAID, MY VIEW HAS BEEN THAT THE
20 GRAPH IS FRAUDULENT SINCE WRITING THAT PIECE IN THE
21 TELEGRAPH AND THE NATIONAL POST OF CANADIAN ALMOST

1 20 YEARS AGO.

2 BUT WHAT HAS HAPPENED SINCE THEN -- I'M NOT
3 SURE -- IN FACT I WOULD BE ALMOST CERTAIN THAT I WAS
4 NOT AWARE THAT MANN WAS THE, AS I CALL HIM, THE
5 RINGMASTER OF THE THREE-RING CIRCUS. I WAS NOT SURE
6 THAT MANN WAS THE RINGMASTER OF THE SO-CALLED HOCKEY
7 STICK GRAPH WHEN I WROTE ORIGINALLY IN THE SUNDAY
8 TELEGRAPH AND THE NATIONAL POST OF CANADA.

9 WHAT HAPPENED OVER THE YEARS IS THAT
10 PARTICULARLY AFTER MCINTYRE AND MCKITRICK HAD SUCH
11 GREAT DIFFICULTY GETTING A STRAIGHT ANSWER FROM HIM,
12 THAT I BECAME MORE AWARE OF MANN AS A PERSON.

13 SO READING MCINTYRE AND MCKITRICK'S
14 CRITICISM NATURALLY LEADS YOU TO OTHER CRITICS OF THE
15 HOCKEY STICK SUCH AS LUBOS MOTL, THE DISTINGUISHED
16 CZECH STRING THEORIST WHO CALLED MANN A CRIMINAL.

17 AND AT THAT POINT WHEN YOU START LOOKING AT
18 WHAT SOME OF THESE OTHER SCIENTISTS SAY IT BECOMES
19 VERY HARD NOT TO CONCLUDE THAT THESE ARE NOT HONEST
20 MISTAKES, BUT ARE IN FACT INTENTIONAL.

21 Q. OKAY. THANK YOU.

1 ARE YOU AWARE OF ANY SCIENTIST WHO HAS
2 CLAIMED THAT THE HOCKEY STICK WAS FRAUDULENT?

3 A. YES. I THINK I JUST QUOTED TO YOU HAROLD
4 LEWIS WHO'S AS DISTINGUISHED AS ANY SCIENTIST WHO SAYS
5 IT'S THE GREATEST PSEUDOSCIENTIFIC FRAUD OF HIS LONG
6 LIFETIME.

7 Q. AND WHEN DID HE SAY THAT, SIR?

8 A. WELL, HE'S BEEN DEAD AT LEAST THREE OR
9 FOUR YEARS I BELIEVE. SO HE SAID THAT TO ONE OF YOUR
10 MANY EMINENT SCIENTIFIC BODIES. I THINK IT WAS AT THE
11 TIME, THEY WANTED TO MAKE MANN A FELLOW OR GIVE HIM A
12 PRIZE OR SOMETHING AT SOME SUCH BODY AS THE
13 NATIONAL -- YOU KNOW, WHATEVER IT IS, THE NATIONAL
14 ACADEMY OF SCIENCE OR THE NATIONAL ACADEMY OF PHYSICS
15 OR WHICHEVER BODY IT IS. THERE SEEM TO BE RATHER A
16 LOT OF THEM.

17 AND HE OBJECTED SAYING THIS WAS THE GREATEST
18 SCIENTIFIC FRAUD OF HIS LIFETIME.

19 Q. YEAH. ARE YOU REFERRING TO THE DOCUMENTS
20 THAT RICHARD LINDZEN PRODUCED?

21 A. I DON'T BELIEVE SO. I HAVEN'T -- I DON'T

1 KNOW OF DOCUMENTS MR. LINDZEN PRODUCED, SO I COULDN'T
2 SPEAK TO THOSE.

3 I MEAN, I UNDERSTAND THAT HE WAS DEPOSED BUT
4 I HAVEN'T SEEN HIS DOCUMENTS OR ANY SUCH THINGS.

5 Q. YOU REFERRED TO THE NATIONAL ACADEMY OF
6 SCIENCE, DID YOU NOT?

7 A. WELL, NO, I SAID IT WAS -- I COULDN'T
8 HONESTLY TELL YOU WHICH BODY IT WAS. BUT HAROLD LEWIS
9 WHO HAS -- WHO IS AN AMERICAN PHYSICIST, FOR ONE OF
10 THESE PROFESSIONAL BODIES THAT WAS PROPOSING TO HONOR
11 MANN IN SOME WAY, HAROLD LEWIS STRENUOUSLY OBJECTED
12 AND CALLED THIS THING THE GREATEST PSEUDO SCIENTIFIC
13 FRAUD OF HIS LIFETIME.

14 Q. NOW, WHAT ABOUT YOU? BEFORE WRITING
15 "FOOTBALL AND HOCKEY," DID YOU CONSULT WITH ANY
16 SCIENTISTS TO FIND OUT THEIR VIEWS AS TO WHETHER THE
17 HOCKEY STICK WAS FRAUDULENT?

18 A. WHEN YOU SAY BEFORE WRITING "FOOTBALL AND
19 HOCKEY" --

20 Q. RIGHT?

21 A. -- WHAT DO YOU MEAN?

1 ARE YOU SAYING THAT WHEN I DECIDED TO SIT
2 DOWN AND WRITE "FOOTBALL AND HOCKEY," DID I ARRANGE AN
3 APPOINTMENT WITH THE SCIENTISTS TO SPEAK TO
4 BEFOREHAND?

5 Q. NO, NO. PRIOR TO JULY 2012, DID YOU CONSULT
6 WITH ANY SCIENTIST TO FIND OUT THEIR VIEWS AS TO
7 WHETHER THE HOCKEY STICK WAS FRAUDULENT?

8 A. NO. I CERTAINLY -- I DON'T -- I COULDN'T
9 SAY I ENGAGE IN MUCH THAT RISES TO THE LEVEL
10 OF "CONSULTATION."

11 Q. THE SIMBERG ARTICLE WHICH WE HAVE AS 67, YOU
12 CAN LOOK AT IT.

13 THE SIMBERG ARTICLE SAYS THAT THE HOCKEY
14 STICK WAS DECEPTIVE. DO YOU SEE THAT?

15 A. THIS IS THE HAPPY VALLEY ONE, IS IT?

16 Q. UNHAPPY VALLEY.

17 A. YES. AND WHERE DOES IT SAY IT'S DECEPTIVE?

18 Q. JUST A SECOND PLEASE. WELL, ACTUALLY LET'S
19 GO TO YOUR "FOOTBALL AND HOCKEY?"

20 A. OKAY.

21 Q. WE CAN GO THERE BECAUSE YOU QUOTE --

1 MR. WILSON: JOHN, WHAT EXHIBIT?

2 THE WITNESS: WHAT NUMBER IS THAT?

3 MR. WILLIAMS: "FOOTBALL AND HOCKEY" IS
4 NUMBER 59.

5 (STEYN EXHIBIT NO, 59 WAS MARKED FOR
6 IDENTIFICATION.)

7 MR. WILSON: JUST FOR THE RECORD, JOHN, THIS
8 VERSION OF THE EXHIBIT IS PRINTED AT MANN STEYN 59
9 WITH THE NUMBER 109 AT THE TOP. CAN YOU JUST IDENTIFY
10 WHERE THIS CAME FROM?

11 MR. WILLIAMS: 109 IS THE COURT OF APPEALS
12 APPENDIX TYPE.

13 MR. WILSON: THANK YOU.
14 BY MR. WILLIAMS:

15 Q. MR. STEYN, YOU QUOTE FROM MR. SIMBERG'S
16 ARTICLE, SEE HOCKEY STICK DECEPTION. DO YOU SEE THAT
17 IN THE BLOCK QUOTE?

18 A. CORRECT.

19 Q. OKAY. PRIOR TO THE TIME YOU WROTE "FOOTBALL
20 AND HOCKEY," AND SO BY THAT, AGAIN, I MEAN ANY TIME UP
21 UNTIL JULY OF 2012, HAVE YOU EVER CONSULTED WITH ANY

1 SCIENTIST TO DETERMINE THEIR VIEWS ON WHETHER DR. MANN
2 HAD INTENDED TO RENDER HOCKEY STICK DECEPTIONS?

3 LET ME REPHRASE THAT.

4 MR. WILSON: JOHN, BEFORE YOU DO, I JUST
5 WANT TO OBJECT -- LET YOU KNOW THAT WE OBJECT TO
6 QUESTIONS THAT GO BEYOND THE SCOPE OF THE DATE RANGE
7 DIRECTED BY THE COURT IN ITS DECISION CONCERNING YOUR
8 MOTION TO COMPEL AND THE RECONSIDERATION OF THAT
9 MOTION.

10 SO THE RELEVANT TIME PERIOD IS DESIGNATED BY
11 THE COURT, IT'S FROM THE DISCLOSURE OF THE CLIMATEGATE
12 E-MAILS UNTIL ABOUT THREE MONTHS AFTER THE POSTING OF
13 THE "FOOTBALL AND HOCKEY" ARTICLE.

14 SO WE HAVE -- I WON'T OBJECT EVERY SINGLE
15 TIME YOU ASK OUTSIDE THAT PERIOD, BUT WE HAVE A
16 STANDING OBJECTION AND TO THE EXTENT THAT WE GO TOO
17 DEEPLY INTO PERIODS OUTSIDE THAT SCOPE, I'M GOING TO
18 REMIND YOU OF OUR OBJECTION.

19 MR. WILLIAMS: WELL, I UNDERSTAND THAT.
20 THAT HAD TO DO WITH THE PRODUCTION OF DOCUMENTS ON THE
21 BURDEN OBJECTION.

1 MR. WILSON: IT WAS ALSO ON THE BASIS THAT
2 ACTUAL MALICE IS A LEGAL CONCEPT WHICH DELINEATES A
3 DISREGARD FOR THE TRUTH OF WHAT WAS BEING STATED AND
4 IS NOT CORRELATED TO A COLLOQUIAL DEFINITION OF MALICE
5 WHICH SEEMED TO BE THE BASIS FOR YOU SEEKING DISCOVERY
6 OUTSIDE THAT PERIOD.

7 MR. WILLIAMS: NO, IT WASN'T, ANDREW. BUT
8 WE DON'T HAVE TO ADDRESS THIS RIGHT NOW.

9 WHEN I'M ASKING HIM QUESTIONS ABOUT HIS
10 KNOWLEDGE UP UNTIL THE TIME HE WROTE THIS, I AM ASKING
11 AT ANY TIME. I UNDERSTAND YOU CAN OBJECT OR SAY IT'S
12 IRRELEVANT, BUT I DO NOT UNDERSTAND RELEVANCE TO BE AN
13 APPROPRIATE OBJECTION AT A DEPOSITION.

14 SO I'M GOING TO INSIST THAT HE PROVIDE A
15 COMPLETE ANSWER.
16 BY MR. WILLIAMS:

17 Q. SO, MR. STEYN, WERE YOU AWARE OF ANY
18 SCIENTIST UP UNTIL THE TIME YOU WROTE "FOOTBALL AND
19 HOCKEY" IN JULY 2012 THAT HAS STATED THAT THE HOCKEY
20 STICK WAS INTENTIONALLY DECEPTIVE?

21 A. WELL, JUST AS MR. WILSON SAID, JUDGE

1 ANDERSON SAID IT WOULD MAKE NO DIFFERENCE IF I READ
2 EVERY SINGLE PAPER OR I HAD READ NONE AT ALL, AS YOUR
3 CLIENT IS NOT THE SOLE PROPRIETOR OF GLOBAL WARMING,
4 INC. AS SHE PUT IT.

5 IN THIS CASE, HOWEVER, I WAS AWARE THAT THE
6 -- THERE ARE REALLY TWO KINDS OF PEOPLE. THERE ARE
7 THOSE PEOPLE WHO THINK THE HOCKEY STICK IS SIMPLY
8 INCOMPETENT. AND THEN THERE ARE THOSE WHO THINK THAT
9 THE -- THAT MICHAEL MANN AND HIS STICK ARE
10 INTENTIONALLY DECEPTIVE.

11 AS YOU KNOW, I INCLINE TO THE LATTER. THERE
12 ARE PEOPLE WHO MOVE BETWEEN THE FORMER AND THE LATTER.
13 FINNISH SCIENTISTS, INCLUDING THE FORMER HEAD OF THE
14 FINNISH ACADEMY OF SCIENCE WHO WERE HORRIFIED TO
15 DISCOVER THAT MANN HAD USED THEIR DATA UPSIDEDOWN.
16 THEY ALERTED HIM TO IT, AT LEAST TWO OF THE AUTHORS OF
17 THE PAPER -- IN FACT ALL THE AUTHORS OF THE PAPER
18 ALERTED TO IT. AND THAT TWO OF THEM WERE THEN
19 HORRIFIED AND EXPRESSED THEIR HORROR AT MANN THEN
20 ABUSING THAT FINNISH DATA BY USING IT UPSIDEDOWN,
21 WHICH IS A PRETTY BASIC MISTAKE. YOU KNOW, SO INSTEAD

1 OF THIS, THEY SHOW THAT.

2 AND AFTER OF THE MULTIPLE ABUSES OF THAT
3 DATA, THE FINNISH CHAPS CONCLUDED THAT THIS COULD NOT
4 BE AN ACCIDENT, THAT THIS WAS INTENTIONAL.

5 Q. OKAY. OTHER THAN THE FINNISH CHAPS, ANYBODY
6 ELSE?

7 MR. WILSON: OBJECTION TO THE FORM.

8 THE WITNESS: YES. YES, CERTAINLY. I
9 QUOTED MANY OF THEM TO YOU BEFOREHAND. BUT WHEN, FOR
10 EXAMPLE, WITH JONATHAN JONES WHO'S A VERY RESPECTED
11 OXFORD PHYSICIST DOES NOT THINK THAT YOU CAN ELIMINATE
12 THE MEDIEVAL WARM PERIOD AS A GOOD FAITH ERROR, DENIS
13 RANCOURT, I BELIEVE YOU PRONOUNCE IT, I BELIEVE HE'S
14 POSSIBLY -- DENIS RANCOURT AT THE UNIVERSITY OF
15 OTTAWA, FOR EXAMPLE, SAYS IT'S A FRAUD.

16 THERE'S NO -- THERE'S ACTUALLY -- ALL THESE
17 WERE PEOPLE THAT I -- AS I SAID TO YOU, MANN DIDN'T
18 SWIM INTO MY FOCUS AS A HUMAN BEING UNTIL THE
19 MCINTYRE-MCKITRICK STUFF. AND AFTER MCINTYRE AND
20 MCKITRICK, I THEN BECAME AWARE JUST FROM WHAT YOU
21 MIGHT CALL A VERY CASUAL READING OF THE LITERATURE

1 THAT THERE WERE ALL KINDS OF SCIENTISTS ALL OVER THE
2 PLANET WHO REGARD THIS AS FAKE SCIENCE, AND
3 INTENTIONALLY FAKE.

4 AND THEY REGARD IT -- THEY REGARD IT AS AN
5 EMBARRASSMENT TO SCIENCE, NOT BECAUSE IT IS JUST A
6 TERRIBLE INCOMPETENT ACCIDENT BUT BECAUSE OF THE
7 INTENTIONAL COVER UP THAT'S BEEN GOING ON.

8 Q. OKAY. I JUST WANT TO MAKE SURE WHO THESE
9 PEOPLE ARE THAT SAYS IT'S INTENTIONALLY FRAUDULENT.

10 I KNOW YOU MAY HAVE GIVEN THE NAMES BEFORE
11 BUT I JUST WANT TO GET THEM AGAIN. AND I THINK YOU
12 MENTIONED HAROLD LEWIS, CORRECT?

13 A. YES.

14 Q. OKAY. AND YOU JUST MENTIONED A WOMAN, I
15 BELIEVE. WHAT WAS HER NAME?

16 A. I BELIEVE THAT WAS ROSEANNE D'ARRIGO WHO
17 SAID MANN DECEIVES THE PUBLIC.

18 Q. OKAY. AND --

19 A. I BELIEVE I MENTIONED DENIS RANCOURT WHO
20 SAID IT'S -- WHO SAID IT'S BRAZEN FRAUD.

21 Q. I JUST NEED THE SPELLINGS. ROSEANNE?

1 A. THAT'S R-O-S-E-A-N-N. D, APOSTROPHE
2 A-R-R-I-G-O.

3 Q. OKAY. AND THEN YOU MENTIONED ANOTHER WOMAN?

4 A. NO, I THINK ACTUALLY I MENTIONED DENIS
5 RANCOURT.

6 I DON'T WANT TO TAKE A SHOT AT THE FINNISH
7 BECAUSE FINNISH NAMES ARE COMPLEX ENOUGH AND FINNISH
8 SPELLINGS ARE NOT SOMETHING I'M WILLING TO DO UNDER
9 OATH.

10 Q. OKAY. FINE. ANYBODY ELSE?

11 A. I THINK I SAID JONATHAN JONES AT OXBURGH.
12 I'M TRYING TO THINK WHO ELSE I MENTIONED.

13 DID I MENTION VINCENT COURTILOT? HE'S A
14 VERY EMINENT FRENCH SCIENTIST, AND HIS VIEW IS THAT
15 BECAUSE IT'S NOT FALSIFIED, THE HOCKEY STICK IS NOT
16 FALSIFIABLE AND THEREFORE, IT'S NOT SCIENCE.

17 Q. AND WITH ALL RESPECT TO THE PEOPLE --

18 A. OH, I THINK THE OTHER LADY I MENTIONED WAS
19 JENNIFER MAROHASY. I THINK I SPELLED THAT EARLIER,
20 THE MALAGASY NAME.

21 MR. WILLIAMS: DID THE COURT REPORTER HAVE

1 THAT NAME?

2 THE REPORTER: YES, I HAVE THAT. THANK YOU.

3 THE WITNESS: THANK YOU.

4 BY MR. WILLIAMS:

5 Q. DO YOU KNOW IF DR. CHRISTY WHO YOU -- EXCUSE
6 ME, DR. CURRY WHO YOU MENTIONED HAS EXPRESSED THE VIEW
7 THAT THE HOCKEY STICK IS FRAUDULENT?

8 A. I DON'T BELIEVE -- I COULDN'T HONESTLY TELL
9 YOU WHETHER DR. CURRY HAS USED THAT WORD.

10 Q. WHAT ABOUT MR. MCINTYRE?

11 A. I CAN'T RECALL.

12 Q. AND LET ME MOVE ON.

13 COULD YOU PLEASE TURN TO EXHIBIT 48?

14 (STEYN EXHIBIT NO. 48 WAS MARKED FOR
15 IDENTIFICATION.)

16 BY MR. WILLIAMS:

17 Q. DO YOU HAVE THAT, SIR?

18 A. YES, I DO.

19 Q. IT'S ENTITLED "MICHAEL E. MANN LIAR, CHEAT,
20 FALSIFIER AND FRAUD." YOU WROTE THAT ARTICLE?

21 A. YES, THAT'S RIGHT.

1 Q. AND YOU WROTE THOSE, THE TITLE "LIAR, CHEAT,
2 FALSIFIER AND FRAUD" REFERRING TO DR. MANN, CORRECT?

3 A. THAT'S MY HEADLINE.

4 Q. THE ANSWER'S YES?

5 A. CORRECT.

6 Q. ALL RIGHT. LET'S LOOK AT PAGE -- WELL, FEEL
7 FREE TO READ THE WHOLE ARTICLE BUT I'M GOING TO DIRECT
8 YOUR ATTENTION TO PAGE 2.

9 DO YOU HAVE IT?

10 A. TO PAGE WHAT? WHAT WAS THAT?

11 Q. PAGE 2 OF THIS ARTICLE.

12 A. OKAY. PAGE 2. GOT IT.

13 Q. BEFORE WE GET THERE, ALL OF THE PEOPLE YOU
14 TALKED ABOUT BEFORE WITH THE SPELLINGS THAT WE GOT,
15 SOME EASY, SOME HARD, YOU NEVER ACTUALLY HAD ANY
16 COMMUNICATION WITH THEM PERSONALLY, DID YOU?

17 A. WELL, I'VE HAD PERSONAL INTERACTION WITH --
18 WITH DR. CURRY, NOT LEAST THAT WE WERE IN A SENATE
19 HEARING SITTING NEXT TO EACH OTHER AND WE HAD A RATHER
20 MEMORABLE ENCOUNTER WITH THE GROTESQUELY IGNORANT
21 SENATOR MARKEY FROM MASSACHUSETTS. SO JUDITH, I HAVE

1 HAD PERSONAL CONTACT WITH.

2 JENNIFER MAROHASY I REGARD AS AN AUSTRALIAN
3 FRIEND OF MINE WHO HAPPENS TO BE A DISTINGUISHED
4 CLIMATE SCIENTIST.

5 Q. SO OTHER THAN THOSE -- YOU HAD YOUR
6 CONVERSATION WITH DR. CURRY AFTER YOU WROTE THIS
7 ARTICLE, CORRECT?

8 A. THAT'S CORRECT.

9 Q. AND WHAT ABOUT THE OTHER WOMAN YOU JUST
10 MENTIONED, YOUR PERSONAL FRIEND, WHEN DID YOU SPEAK
11 WITH HER?

12 A. WELL, I'VE KNOWN HER ON AND OFF, I'VE KNOWN
13 -- I COULDN'T SAY WHEN THAT FRIENDSHIP BEGAN. MY
14 MEMORY -- I COULDN'T HONESTLY RECALL WHETHER THAT WAS
15 BEFORE OR AFTER. SHE'S INTRODUCED ME ON STAGE IN
16 AUSTRALIA BUT I COULD NOT TELL YOU WHETHER THAT WAS
17 BEFORE OR AFTER "FOOTBALL AND HOCKEY."

18 Q. THANK YOU. ALL RIGHT. SO LET'S GO TO PAGE
19 2 OF EXHIBIT 48.

20 DO YOU SEE THAT?

21 A. YES.

1 Q. OKAY. AND THIS IS ONE OF YOUR ARTICLES THAT
2 APPEARS ON YOUR WEBSITE, CORRECT, STEYN ONLINE?

3 A. CORRECT.

4 Q. AND IF YOU LOOK AT PAGE 27 RIGHT UP AT THE
5 TOP, THIS IS A PARAGRAPH WHERE YOU'RE ASKING PEOPLE TO
6 SUPPORT YOUR CAMPAIGN AGAINST DR. MANN BY GETTING A
7 GIFT CERTIFICATE?

8 A. I OBJECT TO YOUR CHARACTERIZATION THERE.
9 I'M NOT CAMPAIGNING AGAINST YOUR CLIENT, YOUR CLIENT
10 IS SUING ME.

11 Q. OKAY.

12 A. AS I SAID EARLIER, IN FUNCTIONING
13 JURISDICTIONS, THIS MATTER WOULD BE -- HAVE BEEN
14 DISPOSED OF ONE WAY OR THE OTHER SIX YEARS AGO. THE
15 FACT THAT IT HASN'T SPEAKS VERY POORLY ABOUT AMERICAN
16 QUOTE/UNQUOTE "JUSTICE."

17 BUT IN THIS CASE, IT IS NOT THAT I'M
18 CAMPAIGNING AGAINST MANN, IT'S THAT MANN IS SUING ME.
19 I'M THE DEFENDANT IN CASE YOU'RE CONFUSED ON THAT
20 MATTER, MR. WILLIAMS.

21 Q. YES. SIR, I APOLOGIZE IF I OFFENDED YOU BY

1 SAYING YOUR CAMPAIGN. I WAS SIMPLY READING WHAT YOU
2 WROTE HERE. "PEOPLE WHO SEEM TO SUPPORT MY CAMPAIGN?"

3 A. YES, THAT'S MY CAMPAIGN TO STAY AFLOAT IN
4 EIGHT YEARS OF LITIGATION IN THE MOST EXPENSIVE
5 JURISDICTION IN -- CERTAINLY IN THE COMMON LAW WORLD.
6 AS YOU KNOW, YOUR CLIENT IS DECLINING TO PAY TIM BALL
7 AFTER LOSING IN A JURISDICTION HE CHOSE, THE BRITISH
8 COLUMBIA SUPREME COURT. HIS LORDSHIP ORDERED MANN TO
9 PAY TIM BALL AND TIM BALL HASN'T DONE THAT, PRESUMABLY
10 -- AND MANN HASN'T DONE THAT. PRESUMABLY EITHER
11 BECAUSE HE'S GOT NO MONEY OR BECAUSE HE'S A DEADBEAT.

12 WHEN YOU'RE IN LITIGATION, IT'S AN EXPENSIVE
13 PROCESS AND THE CAMPAIGN INsofar AS THERE IS A
14 CAMPAIGN IS THERE -- IS A CAMPAIGN FOR FREE SPEECH.
15 BECAUSE IF IT WERE TO BE ACCEPTED THAT MATTERS SUCH AS
16 THIS COULD BE LITIGATED IN A COURT OF LAW, IT WOULD BE
17 THE BIGGEST SETBACK FOR YOUR FIRST AMENDMENT IN HALF A
18 CENTURY.

19 Q. OKAY, SIR. LET'S MOVE ON FROM CAMPAIGN A
20 LITTLE BIT TO TALK ABOUT THE VIGOROUS DEFENSE THAT YOU
21 WERE PREPARING.

1 YOU SEE THAT, ABOUT THREE LINES ABOVE THE
2 WORD "CAMPAIGN?"

3 A. YES.

4 Q. AND YOU SAY, "WE'RE PREPARING A FULL
5 VIGOROUS DEFENSE IN WHICH AN ARRAY OF WITNESSES WILL
6 TESTIFY TO THE FRAUD NECESSARY TO CREATE THE HOCKEY
7 STICK." DO YOU SEE THAT?

8 A. YES.

9 Q. AND WHO'S INCLUDED IN THIS ARRAY OF
10 SCIENTISTS THAT YOU'RE GOING TO BRING TO TRIAL TO
11 TESTIFY THAT THE HOCKEY STICK IS FRAUDULENT?

12 MR. WILSON: OBJECTION, AND TO THE EXTENT
13 THAT THIS IS -- CALLS FOR A LEGAL STRATEGY, I MEAN,
14 JOHN, YOU HAVE OUR EXPERT AND WITNESS DISCLOSURE. ARE
15 YOU ASKING FOR SOMETHING OTHER THAN THAT?

16 MR. WILLIAMS: NO, I CERTAINLY HAVE THAT.
17 BY MR. WILLIAMS:

18 Q. I'M ASKING WHEN YOU WROTE THIS, MR. STEYN,
19 WHICH I BELIEVE WAS IN 2014, WHO HAD YOU SPOKEN WITH
20 THAT WAS GOING TO -- THAT HAD TOLD YOU THAT THEY WOULD
21 TESTIFY TO THE HOCKEY STICK FRAUD?

1 A. WELL, YOU'LL NOTICE THERE THAT I'VE SAID
2 WHERE AND THAT TWO LINES DOWN I SAY AN EXCELLENT LEGAL
3 TEAM.

4 THIS IS 2014 AND AS YOU KNOW, BECAUSE I
5 BELIEVE I PUT IT IN A MOTION, THAT AT LEAST ONE AND
6 POSSIBLY TWO OF OUR WITNESSES HAVE SINCE DIED. BUT WE
7 WERE PREPARING --

8 MR. WILSON: LET'S PAUSE FOR A SECOND. I'M
9 SORRY TO INTERRUPT BUT, JOHN, THE QUESTION SEEMS TO
10 CALL FOR ATTORNEY WORK PRODUCT. THE ARTICLE SPEAKS
11 FOR ITSELF. IT GOES AS FAR AS THE DISCLOSURE DOES BUT
12 ASKING THE WITNESS TO DISCLOSE ADDITIONAL INFORMATION
13 ABOUT THE LEGAL TEAM'S DEFENSE STRATEGY IS IMPROPER.

14 AND I JUST DIRECT YOU NOT TO DISCLOSE LEGAL
15 STRATEGY BUT YOU CAN OTHERWISE ANSWER THE QUESTION.

16 THE WITNESS: WELL, I'M NOT SURE WHAT THAT
17 LEAVES.

18 BY MR. WILLIAMS:

19 Q. IT LEAVES OTHERS.

20 DO YOU KNOW WHO YOUR ARRAY OF WITNESSES WAS?

21 MR. WILSON: I DIRECT THE WITNESS NOT TO

1 ANSWER THE QUESTION. TO THE EXTENT THAT THERE WAS A
2 WORK PRODUCT AT THAT TIME DEVELOPING A POTENTIAL
3 WITNESS LIST THAT AT THAT POINT HAD NOT BEEN
4 DISCLOSED. THIS MAY OR MAY NOT HAVE INCLUDED
5 CONSULTING WITNESSES WHICH ARE OTHERWISE PROTECTED BY
6 WORK PRODUCT AND ATTORNEY-CLIENT PRIVILEGES.

7 BY MR. WILLIAMS:

8 Q. ALL RIGHT. WHO ARE THE PEOPLE THAT DIED,
9 MR. STEYN?

10 MR. WILSON: OBJECTION, DIRECT THE WITNESS
11 NOT TO ANSWER ON THE SAME BASIS.

12 BY MR. WILLIAMS:

13 Q. MR. STEYN, YOU INDICATED THAT YOU READ --
14 OR HAVE YOU READ DR. MANN'S WORK WITH BRADLEY AND HIS
15 MBH '98 AND '99?

16 A. I HAVE READ MBH '98 AND '99. I HAD NOT READ
17 THEM AT THE TIME OF MY SUNDAY TELEGRAPH PIECE.

18 Q. OKAY. HAD YOU READ THEM AT THE TIME -- BY
19 THE TIME YOU WROTE "FOOTBALL AND HOCKEY?"

20 A. YES.

21 Q. PRIOR TO THE TIME YOU WROTE "FOOTBALL AND

1 HOCKEY," HAD YOU READ THE REPORT THAT WAS PUT OUT IN
2 2006 BY THE NATIONAL ACADEMY OF SCIENCES, WHICH WAS
3 CHAIRED BY JERRY NORTH?

4 A. ASKED AND ANSWERED, COUNSELOR. WE HAD ALL
5 THIS IN THE FIRST ROUND.

6 Q. IS THE ANSWER YES OR NO, SIR?

7 A. I STAND ON THE ANSWER I GAVE YOU BEFORE,
8 THAT I TOLD YOU I HAD READ THE UNITED KINGDOM REPORTS
9 BUT THAT I HAD NOT READ THE ONES BY YOUR BEWILDERING
10 ARRAY OF ACRONYMS BEGINNING WITH N AT THAT TIME.

11 I TESTIFIED THAT I READ THEM IN FULL FOR THE
12 FIRST TIME AT THE TIME I DID MY BOOK "A DISGRACE TO
13 THE PROFESSION".

14 Q. WERE YOU AWARE OF A STUDY PRIOR TO THE TIME
15 YOU WROTE "FOOTBALL AND HOCKEY" BY JUDE WAHL AND
16 CASPER AHMED?

17 A. I KNOW MR. WAHL BECAUSE HE'S THE GUY THAT
18 WAS INSTRUCTED TO DELETE THE E-MAILS BY MANN AND DID
19 DELETE E-MAILS.

20 WHAT OF HIS WORK I HAVE READ, I'M NOT SURE.

21 IS THIS ONE OF THE -- IT THIS ONE OF THE

1 PAPERS THAT SUPPOSEDLY REPLICATES MANN?

2 Q. YES.

3 A. WELL, MY POSITION ON THAT IS BY THE GUY YOU
4 JUST MENTIONED, JERRY NORTH, THE GUY WHO DID THE 2006
5 THING. AND AS MR. NORTH SAID, MOST OF THESE
6 REPLICATIONS USE THE SAME DATA SETS AS MBH, AND SO
7 CANNOT BE CONSIDERED TRULY INDEPENDENT BY THE
8 SCIENTIFIC DEFINITION OF THAT TERM.

9 Q. THE QUESTION WAS: DID YOU READ THE WAHL,
10 AHMED LETTER?

11 A. WELL, I'VE JUST TESTIFIED TO YOU THAT MY
12 MAIN KNOWLEDGE OF WAHL IS THAT HE'S THE GUY WHO
13 DELETED THE E-MAILS UPON THE INSTRUCTION OF MANN.
14 OTHER THAN THAT, I COULD NOT RELIABLY IDENTIFY HIM
15 WITH ANY -- OR ASSOCIATE HIM WITH ANY PARTICULAR
16 PAPERS.

17 I INDICATED IN MY QUESTION, HE IS ONE OF
18 THOSE PEOPLE WHO PURPORTS TO HAVE CONFIRMED THE HOCKEY
19 STICK IN -- BY MEANS THAT ARE NOT REGARDED AS TRULY
20 INDEPENDENT AND I'VE QUOTED PROFESSOR COURTILOT TO
21 YOU, THE DISTINGUISH FRENCH SCIENTIST WHO REJECTS

1 THOSE KIND OF REPLICATIONS BECAUSE IF YOU USE THE SAME
2 -- YOU KNOW, USE THE DATA SETS AND SAME STATISTICAL
3 METHODS, IT'S NOT AN INDEPENDENT REPLICATION. AND AS
4 HE SAYS, IT'S NOT FALSIFIABLE, IT'S NOT SCIENCE.

5 Q. WHAT ABOUT ARE YOU AWARE OF SCIENTISTS WHO
6 WROTE A PAPER AND THEY WERE ON YOUR WITNESS LIST --
7 YOUR SYNCHRONIZED WITNESS LIST, VON STORCH AND ZARITA.
8 DO YOU KNOW THAT NAME?

9 A. I KNOW THEM. ZARITA IS THE GUY WHO WANTED
10 MANN BANNED FROM THE IPCC FOREVER. HE WANTED HIM
11 DISBARRED AS YOU LEGAL FELLOWS SAY, AND VON STORCH IS
12 THE ONE WHO ACTUALLY WANTED MANN BANNED FROM ALL PEER
13 REVIEW AFTER HIS CORRUPTION OF THE PEER REVIEW
14 PROCESS.

15 Q. DID YOU READ THE ARTICLE, SIR, BY VON STORCH
16 AND ZARITA?

17 A. YES, I'VE READ -- I'VE READ ARTICLES BY VON
18 STORCH AND ZARITA. BUT AS I SAID, MY MAIN MEMORY OF
19 THEM IS THEIR DAMNING CRITICISM IN CALLING FOR MANN TO
20 BE BANNED FROM THE IPCC AND FROM ALL PEER REVIEWED
21 JOURNALS. THAT'S NOT A SMALL -- THAT'S NOT A SMALL

1 PUNISHMENT TO DEMAND FOR A FELLOW SCIENTIST.

2 Q. WHAT ABOUT PETER HUYBERS, H-U-Y-B-E-R-S, DID
3 YOU READ WHAT HE WROTE?

4 A. I KNOW THE NAME BUT I DON'T BELIEVE I'VE
5 READ ANYTHING HE WROTE. I COULDN'T SAY -- I COULDN'T
6 RECALL. I MAY HAVE DONE. I RECOGNIZE THAT NAME BUT I
7 DON'T KNOW WHAT, IF ANYTHING, I'VE READ OF HIS.

8 Q. MR. STEYN, I THINK YOU SAID EARLIER YOU
9 FOLLOWED MEDIA COVERAGE ABOUT CLIMATEGATE AND THE
10 INVESTIGATIONS INTO CLIMATEGATE, CORRECT?

11 A. CORRECT.

12 Q. COULD YOU LOOK AT EXHIBIT 32, PLEASE?

13 (STEYN EXHIBIT NO. 32 WAS MARKED FOR
14 IDENTIFICATION.)

15 BY MR. WILLIAMS:

16 Q. DO YOU HAVE THAT, SIR?

17 A. YES, I DO.

18 Q. THIS WAS A REPORT BY THE ASSOCIATED PRESS.
19 DO YOU SEE THAT?

20 A. YES.

21 Q. OKAY. DID YOU READ THAT BEFORE YOU WROTE

1 "FOOTBALL AND HOCKEY?"

2 A. I COULDN'T RECALL WHETHER I READ THIS --
3 THIS REPORT. THE ASSOCIATED PRESS STYLE OF REPORTAGE
4 IS NOT SUFFICIENTLY MEMORABLE TO RECALL ONE AP REPORT
5 OVER ANOTHER.

6 Q. ALL RIGHT. LOOK AT 32.

7 A. JUST A MINUTE. WHETHER -- IF YOU HEAR THIS,
8 HAVE SOMEONE STOP ALL THAT HAMMERING. THAT'S -- SORRY
9 FOR THAT, COUNSELOR. I APOLOGIZE.

10 Q. NO PROBLEM. LOOK AT NUMBER 33, PLEASE.

11 A. YES.

12 Q. THIS IS THE GUARDIAN.

13 (STEYN EXHIBIT NO. 33 WAS MARKED FOR
14 IDENTIFICATION.)

15 BY MR. WILLIAMS:

16 Q. DO YOU RECALL READING THAT ARTICLE BEFORE
17 YOU WROTE "FOOTBALL AND HOCKEY?"

18 A. I RECALL READING ARTICLES ABOUT THE PENN
19 STATE QUOTE/UNQUOTE "CLEARING" OF MR. MANN, AND I
20 CERTAINLY KNOW SUZANNE GOLDENBERG'S NAME, BUT I CAN'T
21 RECALL READING THIS PIECE PARTICULARLY.

1 Q. OKAY. COULD YOU GO TO 34?

2 (STEYN EXHIBIT NO. 34 WAS MARKED FOR
3 IDENTIFICATION.)

4 THE WITNESS: YES.
5 BY MR. WILLIAMS:

6 Q. THIS IS AN ARTICLE BY THE UNION OF CONCERNED
7 SCIENTISTS. DO YOU SEE THAT?

8 A. YES.

9 Q. DID YOU READ THIS PRIOR TO WRITING "FOOTBALL
10 AND HOCKEY?"

11 A. I DON'T GENERALLY READ THE UNION OF
12 CONCERNED SCIENTISTS UNLESS A LINK TAKES ME THERE.
13 AND I CANNOT RECALL WHETHER I READ THIS PIECE OR NOT.

14 Q. WHAT ABOUT THE NEW YORK TIMES ARTICLE, IF
15 YOU LOOK AT EXHIBIT 35?

16 (STEYN EXHIBIT NO. 35 WAS MARKED FOR
17 IDENTIFICATION.)

18 THE WITNESS: WELL, YOU'RE ASKING ME ABOUT
19 -- PARTICULARLY WHEN IT COMES TO THE ASSOCIATED PRESS
20 OR THE NEW YORK TIMES, YOU'RE ASKING ME ABOUT BLAND
21 AND INSIPID AMERICAN JOURNALISM OUTLETS WHERE RARELY,

1 IF ANYTHING, IS THERE IS A MEMORABLE COINAGE THAT
2 WOULD CAUSE ONE TO REMEMBER IT. I MAY OR MAY NOT HAVE
3 READ THIS BUT I'M CERTAINLY NOT GOING TO TESTIFY TO
4 HAVING READ IT OR NOT HAVING READ IT UNDER OATH.

5 THERE'S SIMPLY NOTHING IN IT HERE, YOU KNOW,
6 JUSTIN GILLIS, YOU KNOW, I KNOW ANDY REVKIN AT THE NEW
7 YORK TIMES. I HAVE NO IDEA WHO JUSTIN GILLIS IS. AND
8 AS I SAID, MOST OF AMERICAN JOURNALISM OF THIS NATURE
9 IS NOT MEMORABLE, SUCH THAT ONE WOULD RECALL A
10 SPECIFIC REPORT A DECADE LATER.

11 BY MR. WILLIAMS:

12 Q. ALL RIGHT. LET ME ASK A FEW QUESTIONS ABOUT
13 YOUR BACKGROUND, SIR, IF I COULD.

14 I UNDERSTAND YOU'RE A CANADIAN CITIZEN. IS
15 THAT RIGHT?

16 A. THAT IS CORRECT.

17 Q. WHERE WERE YOU BORN?

18 A. I WAS BORN AT WELLESELY HOSPITAL IN TORONTO,
19 NAMED FOR THE DUKE OF WELLINGTON. THEY TORE IT DOWN.

20 Q. DID YOU GROW UP IN TORONTO, SIR?

21 A. YES, I GREW UP PARTLY IN TORONTO AND PARTLY

1 ELSEWHERE WITHIN HER MAJESTY'S DOMINIONS.

2 Q. WHERE DID YOU GO TO SCHOOL, SIR?

3 A. WELL, I WENT TO WHAT AMERICANS CALL HIGH
4 SCHOOL AT KING EDWARD SCHOOL IN THE UNITED KINGDOM,
5 WHICH IS J.R.R. TOLKIEN'S OLD SCHOOL, LORD OF THE
6 RINGS.

7 Q. AND I UNDERSTAND YOU DROPPED OUT AT AGE 16,
8 RIGHT?

9 A. THAT IS NOT CORRECT.

10 Q. I'M SORRY. TELL ME WHAT IS NOT CORRECT
11 ABOUT IT? I MUST HAVE MISREAD SOMETHING.

12 A. WELL, THE DROPPED OUT IS NOT CORRECT AND THE
13 16 IS NOT CORRECT.

14 Q. TELL ME --

15 A. SO THE "THAT" MAY BE CORRECT IN YOUR
16 FORMULATION, BUT THE REST OF IT DOESN'T APPEAR TO BE.

17 Q. DID YOU GRADUATE FROM THE KING EDWARD
18 SCHOOL?

19 A. NOBODY GRADUATES FROM HIGH SCHOOL IN THE
20 UNITED KINGDOM, SIR.

21 Q. DID YOU COMPLETE YOUR EDUCATIONAL

1 REQUIREMENTS AT KING EDWARD HIGH SCHOOL?

2 A. I COMPLETED MY TIME AT KING EDWARD SCHOOL.

3 Q. WELL, DID YOU GET A DIPLOMA FROM KING EDWARD
4 SCHOOL?

5 A. NO, YOU DON'T GET A DIPLOMA ANYWHERE IN THE
6 UNITED KINGDOM. THAT'S, SIR, WHAT -- THAT TOUCHES ON
7 WHAT I WAS MENTIONING EARLIER ABOUT THE OVER
8 CREDENTIALIZATION OF AMERICAN LIFE.

9 MY DAUGHTER GOT A DIPLOMA FOR GRADUATING
10 FROM AN AMERICAN NURSERY SCHOOL. THAT'S HOW OVER
11 CREDENTIALIZED THE UNITED STATES IS.

12 Q. ALL RIGHT. WHEN DID YOU START YOUR -- OR
13 STOP YOUR EDUCATIONAL PROCESS, SIR, AND START YOUR WORK
14 PROCESS?

15 A. WELL, THEY OVERLAPPED FOR A WHILE.

16 AT THE AGE OF 14, I WAS ON CAPITAL RADIO
17 WHICH I BELIEVE IS EUROPE'S BIGGEST RADIO STATION NOW,
18 BUT I WAS THERE IN THE EARLY DAYS. IT WAS SET UP BY
19 SIR RICHARD ATTENBOROUGH AND VARIOUS OTHER PERSONS.
20 THE DIRECTOR OF THE STEPFORD WIVES MOVIE AND I WAS THE
21 -- THE YOUNG DISK JOCKEY ON A CHILDREN'S PROGRAM

1 CALLED HULLABALOO. SO THAT WOULD BE THE FIRST TIME I
2 RECEIVED REMUNERATION FOR MY WORK.

3 Q. OKAY.

4 A. OTHER THAN PAPER ROUTES OR OCCASIONAL FARM
5 WORK.

6 Q. AFTER SCHOOL, WHAT WAS YOUR FIRST JOB, SIR?

7 A. LET ME -- I WANT TO BE QUITE CLEAR ABOUT
8 THIS. I DID SOME BRIEF FARM WORK IN NORTHERN ONTARIO,
9 AND THEN WORKED -- I WAS A BUSBOY AT THE WESTBURY
10 HOTEL IN TORONTO.

11 Q. UNTIL WHEN, SIR?

12 A. NOT VERY LONG. IT WAS TOO MUCH LIKE HARD
13 WORK AND I WAS TRYING TO BREAK INTO RADIO, WHICH
14 EVENTUALLY I DID.

15 Q. WHEN DID YOU BREAK INTO RADIO, WHAT YEAR?

16 A. WELL, AS I SAID, THE FIRST PROFESSIONAL
17 RADIO I DID WAS IN 1974, AS I SAID CAPITAL RADIO. I
18 WORKED FITFULLY AT -- IN SMALL CANADIAN STATIONS AND I
19 ALSO STARTED WRITING AT THAT POINT. I BELIEVE THE
20 FIRST PROFESSIONAL -- FIRST PAID PIECE OF WRITING I
21 DID WAS FOR BROADCASTER MAGAZINE IN CANADA.

1 AT THAT TIME I BELIEVE IT WAS OWNED BY MY
2 OLD FRIEND CONRAD BLACK, ALTHOUGH HE WASN'T MY OLD
3 FRIEND THEN. HE SUBSEQUENTLY BECAME A NEW FRIEND AND
4 THEN AN OLD FRIEND. BUT BROADCASTER MAGAZINE IN
5 CANADA, I WOULD BELIEVE -- I BELIEVE THAT WOULD BE
6 SOMETHING LIKE THE SUMMER OF '78.

7 Q. ALL RIGHT. HOW LONG DID YOU WORK FOR
8 BROADCAST MAGAZINE?

9 A. HOW LONG -- WHAT WAS THAT, SIR?

10 Q. HOW LONG DID YOU WORK FOR -- WHAT WAS YOUR
11 NEXT JOB AFTER BROADCAST MAGAZINE?

12 A. WELL, I JUST DID OCCASIONAL FREELANCE PIECES
13 FOR BROADCASTER. I BELIEVE THE NEXT ONE -- I BELIEVE
14 THIS IS A MATTER OF PUBLIC RECORD BECAUSE RUPERT
15 MURDOCH GAVE ME AN AWARD A FEW YEARS AGO, AND I
16 THANKED MR. MURDOCH AND SAID IT WAS A PARTICULAR
17 PLEASURE AS THE FIRST PIECE I'D EVER HAD PUBLISHED IN
18 THE TIMES OF LONDON, WHICH MR. MURDOCH OWNS. THAT WAS
19 THE FIRST PIECE I'VE EVER HAD PUBLISHED IN A
20 NEWSPAPER. AND MR. MURDOCH'S VERY EFFICIENT ACCOUNTS
21 DEPARTMENT GAVE ME A HUNDRED POUNDS.

1 IF YOU SCOUR AROUND WITH GOOGLE, I THINK YOU
2 CAN COME UP WITH AT LEAST A PHOTOGRAPH OF MR. MURDOCH
3 PRESENTING ME WITH THAT AWARD. AND HE WAS TICKLED BY
4 MY COMPLIMENTS OF HIS ACCOUNTS DEPARTMENT.

5 Q. YOU'VE WORKED FOR THE BBC AT SOME POINT,
6 CORRECT?

7 A. I WORKED FOR THE BBC FOR MANY YEARS IN THE
8 '80S AND '90S.

9 Q. AND WHAT DID YOU DO FOR THE BBC? WHAT DID
10 THAT CONSIST OF?

11 A. I HOSTED MAINLY, BUT NOT EXCLUSIVELY ARTS
12 PROGRAMS ON TV AND RADIO SUCH AS KALEIDOSCOPE AND
13 OMNIBUS WHICH WOULD BE WELL KNOWN TO ANY PATRONS OF
14 THE BBC IN THE '80S AND '90S. IN FACT, SOME OF THE
15 OMNIBUS PROGRAMS HAVE NEVER STOPPED BEING SHOWN ON
16 U.S. CHANNELS AND AROUND THE WORLD, DOCUMENTARIES AND
17 THE LIKE.

18 I DID THE MORNING SHOW AT CHANNEL 4, WHICH
19 IS ONE OF THE MAIN TWO COMMERCIAL STATIONS IN THE
20 UNITED KINGDOM.

21 I HOSTED THE LIVE OPERA BROADCAST ON CHANNEL

1 4 IN THE MID '90S.

2 I WAS THE GUEST -- YOU MAY RECALL ANN
3 ROBINSON WHO WAS BRIEFLY ON TELEVISION OVER HERE DOING
4 "YOU ARE THE WEAKEST LINK, GOODBYE." I WAS THE GUEST
5 HOST FOR ANNIE'S OTHER SHOW, POINTS OF VIEW.

6 I DID VARIOUS LIGHT ENTERTAINMENT AND
7 VARIETY SHOWS, INCLUDING A SINGING AND DANCING QUIZ
8 SHOW.

9 I DID CHANNEL 4'S -- I BELIEVE THIS WOULD BE
10 THE 1992 U.K. ELECTION COVERAGE. I COULD, YOU KNOW, I
11 COULD GO ON AND ON.

12 Q. ALL RIGHT. I UNDERSTAND THAT AT SOME POINT
13 YOU WERE FIRED FROM THE BBC. IS THAT RIGHT?

14 A. YES. I HAD ONE OF THOSE BBC VACATIONS WHERE
15 YOU DISCOVER ONCE YOU'VE TAKEN IT, THAT IT WAS A
16 ONE-WAY TICKET. AND A FELLOW CALLED HAMISH MYKURA,
17 M-Y-K-U-R-A, WHO I BELIEVE IS NOW SOME SORT OF TV
18 EXECUTIVE BECAUSE HE WANTED TO PATCH THINGS UP A FEW
19 YEARS BACK -- HAMISH DISPENSED WITH MY SERVICES FOR A
20 TALK SHOW I WAS DOING FROM NEW YORK AT THAT TIME.
21 REPLACED ME WITH AN AMERICAN WHO DESTROYED THE SHOW,

1 KILLED THE RATINGS, GOT IT CANCELLED. AND, AS IS THE
2 WAY WITH THE BBC, AFTER THEY'VE FIRED YOU FOR ONE
3 REASON OR ANOTHER, THEY'RE SOON LEAVING MESSAGES ON
4 YOUR ANSWERING MACHINE BEGGING YOU TO COME BACK AND
5 HOST A NEW FILM PROGRAM, WHICH I WAS OFFERED
6 SIX MONTHS LATER OR SOMETHING OR WHATEVER.

7 Q. WHEN DID YOU LEAVE THE BBC, SIR?

8 A. WELL, I'M -- AFTER I WAS FIRED, I WAS --
9 THEY DID A SERIES CALLED THE HUNDRED YEARS OF CINEMA,
10 WHERE THEY PICKED -- IT WAS LIKE ONE OF THESE PHONY
11 BOLOGNA ANNIVERSARIES, SOMETHING TO DO WITH THE
12 LUMIÈRE BROTHERS, PRESUMABLY. AND THEY PICKED 100
13 FILMS, ONE FROM EACH YEAR. AND I SERVED AS AN ON-AIR
14 PERSON, NOT JUST ON-AIR BUT ALSO AS EXECUTIVE PRODUCER
15 OF THAT IN -- ON A FEW OF THOSE FILMS, LIKE THE "SOUND
16 OF MUSIC," FOR EXAMPLE, WHICH HAD INCREDIBLE RATINGS.
17 THE FILM WE MADE, "THE HILLS ARE ALIVE." AND AGAIN,
18 IT'S BEEN SHOWN REPEATEDLY OVER THERE AND EVERYWHERE
19 ELSE.

20 AND I BELIEVE -- AND I DID A MUSIC SERIES
21 CALLED "THE LAND WHERE THE GOOD SONGS GO." AND -- AND

1 I TOOK PART IN MY FRIENDS DON BLACK AND GARY OSBORNE
2 WHO -- DON IS AN OSCAR WINNING, TONY WINNING SONG
3 WRITER. HE JUST GOT A BIG OLIVIER AWARD FROM THE
4 DUCHESS OF CORNWALL LAST NIGHT. AT DON AND GARY'S
5 REQUEST I DID A SHOW ABOUT PUTTING DIFFERENT LYRICS TO
6 THE SAME TUNE A FEW YEARS BACK. SO, YOU KNOW, AS I
7 SAID, AFTER SIX MONTHS OR SO THESE -- YOU GET THESE
8 RATHER TEDIOUS REQUESTS FROM PRODUCERS TO GO BACK TO
9 THE BBC.

10 Q. OKAY. JUST TIMING WISE, SIR, WHAT YEAR ARE
11 WE TALKING ABOUT? WHAT YEAR WERE YOU FIRED FROM THE
12 BBC?

13 A. WELL, MY MEMORY OF THE EXACT YEAR, I WOULD
14 SAY IT WAS END OF 1993, EARLY 1994.

15 Q. AND WHAT DID YOU DO AFTER THAT, SIR?

16 A. WELL, I'VE NEVER -- I SHOULD -- SINCE IT HAS
17 BECOME AN ISSUE IN THIS CASE, THE DEFINITION OF
18 EMPLOYEE, I SHOULD SAY THAT I WAS NEVER AN EMPLOYEE OF
19 THE BBC. I WAS AN INDEPENDENT PRESENTER AS THEY SAY
20 OVER THERE. AND RATHER -- SO THAT I -- IF YOU'RE
21 ASKING ME WHETHER I WAS FIRED UNDER THE DEFINITION OF

1 U.S. LABOR LAW, IT WASN'T THAT AT ALL. THEY -- IT WAS
2 NOT A LABOR LAW DEFINITION OF FIRING. BUT I HAVE
3 ALWAYS BEEN SELF-EMPLOYED SINCE I WOULD SAY ACTUALLY
4 SINCE CEASING TO BE A BUSBOY AT THE WESTBURY HOTEL, I
5 HAVE NEVER BEEN AN EMPLOYEE UNDER -- IN THE U.K. OR IN
6 CANADA OR IN AUSTRALIA OR ANYWHERE ELSE.

7 I'VE WORKED ALL OVER THE WORLD. I'VE WORKED
8 IN HUNGARY AND AS I SAID, I'VE DONE THAT
9 INDEPENDENTLY.

10 Q. SIR, TELL ME ABOUT THE DISPUTE YOU HAD WITH
11 CRTV.

12 A. CRTV CONTRACTED ME TO DO A SHOW, AND THEN
13 BROKE THE CONTRACT. WE WENT TO ARBITRATION AND I WAS
14 AWARDED \$4 MILLION.

15 CRTV IS A VANITY NETWORK OWNED BY A VEGAS
16 POKER PLAYER. THE VEGAS POKER PLAYER REFUSED TO PAY
17 DESPITE THE ARBITRATION -- AS YOU KNOW, YOU HAVE TO
18 GET IT CONFIRMED IN A COURT OF LAW. WE CONFIRMED IT
19 WITH JUDGE BRANSTEN IN THE NEW YORK SUPREME COURT AND
20 THEY, AT THAT POINT, STILL REFUSED TO PAY. AND IN
21 FACT, RE-SUED ME FOR PROVIDING -- FOR POSTING THE

1 JUDICIAL NOTICE OF JUDGE BRANSTEN'S AWARD, WHICH AS
2 YOU KNOW, THEY SUED ME BECAUSE I PUT A BANNER AT MY
3 WEBSITE SAYING CRTV VERSUS STEYN, THE VERDICT, WHICH
4 THEY SAID WAS IN BREACH OF ARBITRATION
5 CONFIDENTIALITY.

6 AS A RESULT OF THIS, I BECAME VERY EXPERT IN
7 THE QUESTION OF PUBLIC RECORDS.

8 YOU CAN'T SUE SOMEONE FOR -- FOR POSTING A
9 PUBLIC RECORD. IT'S ALSO RELEVANT IN THIS CASE AS
10 YOU'VE -- I'M SURE YOU KNOW IN THE NATIONAL REVIEW
11 INSTITUTE IS A 501(C)(3), AND SO OBLIGED TO DISCLOSE
12 RICH LOWRY'S AND JACK FOWLER'S SALARIES. SO RICH
13 LOWRY, IT'S A PUBLIC DOCUMENT THAT HE MAKES \$426,000 A
14 YEAR. WHY THE COURT SHOULD HAVE AGREED TO SEAL THOSE
15 DOCUMENTS -- I LEARNED WELL IN CASES IN NEW YORK,
16 NEVADA AND ANOTHER OF THE MULTIPLYING SUITS OF CARY
17 KATZ AND CRTV BUT AS ONE JUDGE PUT IT, YOU CAN'T BE
18 BOTH A PUBLIC RECORD AND NOT A PUBLIC RECORD. AND --
19 IN THE SAME WAY THAT YOU CAN'T BE A LITTLE BIT
20 PREGNANT.

21 AND, SO, CRTV -- SO AS I SAID, THAT'S -- I

1 DON'T REGARD MYSELF, WHATEVER THE COURT MAY SAY ABOUT
2 SEALING JACK FOWLER'S AND RICH LOWRY'S SALARIES,
3 SIMPLY AS A POINT OF LAW THERE, THEY'RE PUBLIC RECORDS
4 AND THEY'RE AVAILABLE AT NATIONAL REVIEW'S WEBSITE.

5 LIKEWISE CRTV AND THIS LUDICROUS LAS VEGAS
6 BILLIONAIRE POKER PLAYER SUED ME FOR DISCLOSING JUDGE
7 BRANSTEN'S JUDICIAL RULING -- RE-SUED ME, AND THEY
8 LOST ON THAT, TOO. AND THAT'S -- THAT'S ALL OUT
9 THERE. THEY LOST. I'M HAPPY TO SEND YOU JUST AS A
10 COURTESY THE SECOND ARBITRATOR'S DECISION BECAUSE IT'S
11 ONE OF THE MOST BEAUTIFUL JUDICIAL DECISIONS I'VE EVER
12 READ IN WHICH HE DEMOLISHED OVER ONE HUNDRED LUDICROUS
13 CLAIMS BY THE LAS VEGAS POKER PLAYER BEFORE FINDING IN
14 MY FAVOR.

15 THAT'S ONE OF THE THINGS THAT, AS YOU KNOW
16 IT'S EXPENSIVE WHEN YOU'RE UP AGAINST A BILLIONAIRE
17 BECAUSE HE'S GOT UNLIMITED RESOURCES AND I HAD NONE
18 FRANKLY.

19 AFTER A BILLIONAIRE'S BEEN THROUGH WITH YOU
20 A COUPLE OF TIMES, GONE A COUPLE OF ROUNDS WITH YOU,
21 WE NEVERTHELESS WON AND HE NEVERTHELESS CAME UP SNAKE

1 EYES, AS I BELIEVE THE POKER PLAYERS SAY.

2 MR. HEINTZ: JOHN, DO YOU HAVE -- DO YOU
3 HAVE A LOT MORE TO GO? DO YOU WANT TO BREAK FOR LUNCH
4 AT SOME POINT. HOW ARE YOU APPROACHING IT? I MEAN,
5 WE COULD -- IF WE CAN FINISH UP IN ANOTHER HALF HOUR
6 OR SO, THEN WE CAN JUST PUSH THROUGH OR MAYBE IF YOU
7 WANT TO GO LONGER THAN THAT, MAYBE WE SHOULD TAKE A
8 BREAK FOR LUNCH, ANOTHER FIVE OR 10 MINUTES.

9 MR. WILLIAMS: YES, IT'S GOING TO BE LONGER
10 THAN WHATEVER YOU SAID. I'M HAPPY TO CONTINUE ANOTHER
11 15, 20 MINUTES OR IF PEOPLE WOULD LIKE TO BREAK FOR
12 LUNCH, THAT'S FINE, TOO.

13 MR. HEINTZ: I MEAN, WHATEVER -- WHATEVER IS
14 A GOOD STOPPING POINT FOR YOU IN THE NEXT 20 MINUTES
15 IS FINE.

16 BY MR. WILLIAMS:

17 Q. MR. STEYN, COULD YOU TURN TO EXHIBIT 41?
18 THIS IS THE NATIONAL REVIEW BIO THAT WE JUST MENTIONED
19 A LITTLE BIT BEFORE. I JUST HAVE A FEW QUESTIONS
20 ABOUT THAT.

21 A. OKAY.

1 (STEYN EXHIBIT 41 WAS MARKED FOR
2 IDENTIFICATION.)

3 BY MR, WILLIAMS:

4 Q. MR. STEYN, DID YOU SEE THAT? THIS IS
5 SOMETHING WE JUST PULLED DOWN FROM THE NATIONAL REVIEW
6 WEBSITE. I THINK YOU INDICATED YOU DIDN'T KNOW IT WAS
7 STILL UP THERE?

8 A. YES, I HAVE NO REASON WHY IT'S STILL THERE.
9 AND I THINK IT GIVES PEOPLE THE IMPRESSION THAT I
10 SOMEHOW STILL WRITE FOR NATIONAL REVIEW, WHICH AS YOU
11 KNOW I HAVEN'T DONE FOR ALMOST SEVEN YEARS NOW.

12 Q. AND TO JUST TAKE YOU THROUGH IT. I ASSUME
13 IT'S CORRECT THAT YOU ARE AN INTERNATIONAL BEST
14 SELLING AUTHOR, CORRECT?

15 A. CORRECT.

16 Q. AND A TOP 41 RECORDING ARTIST?

17 A. THAT WAS A LITTLE JEST AT THE TIME, BECAUSE
18 AS YOU KNOW THE POP CHARTS, THE HIT PARADE IS USUALLY
19 REFERRED TO AS THE TOP 40, AND MY SINGLE HAD STALLED
20 AT POSITION NUMBER 41. BUT IN FACT SINCE THEN, I HAVE
21 ACTUALLY HAD BEST SELLERS THAT WERE WITHIN THE TOP 40.

1 THAT'S THE OTHER REASON I OBJECT TO THIS, IS BECAUSE
2 IT'S OUT OF DATE.

3 WHEN TED -- WHEN I TESTIFIED BEFORE THE
4 SENATE AND TED CRUZ INTRODUCED ME AS A TOP FIVE JAZZ
5 BEST SELLING ARTIST, IN FACT AT THAT TIME I HAD THE
6 BEST SELLING JAZZ RECORD. I WAS THE NUMBER ONE BEST
7 SELLING JAZZ ARTIST, BUT AS I WAS RIGHT AT THE
8 BEGINNING OF THE PROCEEDING, I DIDN'T THINK IT WOULD
9 LOOK GOOD TO SHOUT OBJECTION, SENATOR. SO I LET IT
10 GO.

11 Q. ALL RIGHT. LET ME JUST GO ON. IT SAYS YOU
12 ARE A LEADING CANADIAN HUMAN RIGHTS ACTIVIST AND
13 ACTIVELY TRYING TO DESTROY THE CANADIAN HUMAN RIGHT
14 COMMISSION. DO YOU SEE THAT?

15 A. CORRECT.

16 Q. AND I'M SORRY, IS THIS DATED? DID YOU
17 ALREADY DESTROY THE COMMISSION OR ARE YOU STILL
18 WORKING ON IT?

19 A. I'VE SEVERELY WEAKENED ITS POWERS. AT THE
20 TIME I STARTED TRYING TO DESTROY THEM, THEY ALL
21 THOUGHT THEY WERE LIKE 007 AND DID ALL THEIR WORK IN

1 SECRET. IN OTHER WORDS, THEY HAD SECRET TRIALS -- NOT
2 IN SAUDI ARABIA OR IN NORTH KOREA BUT IN THE DOMINION
3 OF CANADA.

4 I FOUND OUT ABOUT THAT AND WITH JULIAN
5 PORTER QC WHOM I REFERENCED EARLIER, I CALLED JULIAN
6 AFTER SUPPER -- OR DURING SUPPER, AND AFTER SUPPER HE
7 FILED A MOTION TO OPEN UP THE TRIAL, THE SECRET TRIAL
8 THEY WERE PLANNING ON HEARING IN OTTAWA LATER THAT
9 WEEK. AND THE SHAME-FACED DISGRACEFUL EXCUSE OF A
10 JURIST PRESIDING OVER THAT TRIAL HAD NO LEG TO STAND
11 ON, OPENED UP THE TRIAL TO PUBLIC SCRUTINY.

12 AND THAT DISGRACEFUL AND WRETCHED BODY HAS
13 NEVER HELD A SECRET TRIAL SINCE AND ACTUALLY HAS HELD
14 VERY FEW TRIALS SINCE. THEY ARE A PALE SHADOW OF WHAT
15 THEY WERE AND I AM HAPPY TO KEEP GOING AT THEM UNTIL
16 THEY ARE DESTROYED.

17 Q. ALL RIGHT. LET'S MOVE ON A LITTLE BIT.

18 IT SAYS HERE THAT YOU'RE A CO-HOST OF THE
19 RUSH LIMBAUGH PROGRAM. IS THAT STILL CORRECT?

20 A. I'M A GUEST HOST OF THE RUSH LIMBAUGH SHOW,
21 THAT'S CORRECT.

1 Q. AND A GUEST HOST WITH SEAN HANNITY ON FOX?

2 A. NO, I'M NOT A GUEST HOST FOR SEAN HANNITY,
3 I'M A GUEST HOST OF TUCKER CARLSON TONIGHT NOW, WHICH
4 IS THE SHOW THAT PRECEDES HANNITY.

5 Q. YOU'RE NOT ON HANNITY ANYMORE, YOU WERE?

6 A. YES, I WAS ON HANNITY UNTIL I FORGET, THREE
7 OR FOUR YEARS AGO WHENEVER TUCKER CARLSON STARTED HIS
8 SHOW AND I'VE BEEN THE GUEST HOST ON TUCKER'S SHOW
9 FOR, I WOULD GUESS THREE YEARS OR SO, SOMETHING LIKE
10 THAT.

11 Q. AND YOU -- ARE YOU ON ANY OTHER NETWORKS IN
12 THE UNITED STATES OTHER THAN FOX?

13 A. TELEVISION NETWORKS?

14 Q. YES.

15 A. NO.

16 Q. AND LOOKING DOWN HERE TO THE NEXT PARAGRAPH
17 IT SAYS IN THE UNITED STATES YOU SERVE AS NATIONAL
18 REVIEW'S HAPPY WARRIOR. DO YOU SEE THAT?

19 A. YES.

20 Q. AND IS THAT A NAME THAT THE NATIONAL REVIEW
21 GAVE TO YOU?

1 MR. WILSON: OBJECTION, FORM.

2 BY MR. WILLIAMS:

3 Q. YOU CAN ANSWER.

4 A. WELL, THE COLUMN -- AT THE TIME I AGREED TO
5 DO THE FORTNIGHTLY COLUMN, I BELIEVE THERE WAS SOME
6 DISCUSSION AS TO WHAT THE COLUMN WOULD BE CALLED. AND
7 I BELIEVE IT WAS A MAN CALLED JAY NORTHLINGER WHO WAS
8 AT THAT TIME THE NUMBER TWO AT NATIONAL REVIEW, I
9 DON'T KNOW WHAT HE IS NOW. BUT HE WAS THE NUMBER TWO
10 GUY TO RICH LOWRY AND HE'S -- I BELIEVE HE WAS THE ONE
11 WHO CAME UP WITH THE TITLE "HAPPY WARRIOR."

12 Q. IN YOUR -- WHAT DOES IT MEAN TO BE THE
13 NATIONAL REVIEW'S HAPPY WARRIOR, IN YOUR VIEW?

14 MR. WILSON: OBJECT TO THE FORM.

15 THE WITNESS: WELL, IT MEANS I DO THAT
16 COLUMN EVERY FORTNIGHT OR DID DO THAT COLUMN EVERY
17 FORTNIGHT. I'M NOT SURE IT MEANS ANYTHING MORE THAN
18 THAT.

19 I'D BE DOUBTFUL IF I COULD TAKE IT TO THE
20 FIRST NATIONAL BANK OF DEAD MOOSE JUNCTION AND GET A
21 MORTGAGE ON THE STRENGTH OF IT, BUT IT MEANS THAT I DO

1 THAT -- IT MEANS THAT I DO THAT COLUMN.

2 BY MR. WILLIAMS:

3 Q. YOU ALSO DO SOME PROMOTIONS FOR THE NATIONAL
4 REVIEW. DO YOU NOT?

5 A. OH, YES.

6 MR. WILSON: OBJECTION, VAGUE.

7 THE WITNESS: IT'S NOT IN THE LEAST BIT
8 VAGUE. I DON'T OBJECT TO IT.

9 THAT'S PARTLY WHAT I MEAN BY OVER-PERFORMING
10 THE CONTRACT. I GAVE VERY GENEROUSLY -- I MADE A LOT
11 OF MONEY FOR NATIONAL REVIEW. AS THEY TESTIFIED, I
12 THINK, IN SOME OF THE E-MAILS THEY'VE PRODUCED. YOU
13 KNOW, I VASTLY INCREASED THE NUMBER OF EYEBALLS THAT
14 CAME TO THAT WEBSITE PARTICULARLY ON WEEKENDS WHEN MY
15 SATURDAY COLUMN, I THINK IT WAS, WOULD BE POSTED.

16 I SOLD CRUISE TICKETS FOR THEM. A LOT OF
17 CRUISE TICKETS. THE NATIONAL REVIEW CRUISE BUSINESS
18 HAS DIED. WHEN I DID THE CRUISES WITH THEM, THERE
19 WERE LIKE SEVEN TO 800 CRUISE PASSENGERS. I BELIEVE
20 THE LAST ONE THEY DID ON THE ST. LAWRENCE, THEY WERE
21 DOWN TO LIKE 70 PASSENGERS. IN OTHER WORDS, IT WAS

1 BELOW A TENTH OF THAT.

2 I NEVER KNEW I WAS SUCH A BIG DRAW IN THE
3 CRUISE BUSINESS, BUT WHEN WE DID OUR SECOND MARK STEYN
4 CRUISE LAST YEAR, WE HAD OVER 600 PASSENGERS JUST WITH
5 ME, AS OPPOSED TO SEVEN TO 800 WITH NATIONAL REVIEW.
6 SO, I SOLD A LOT OF CRUISE TICKETS FOR THEM.

7 SHORTLY BEFORE THE RELATIONSHIP WENT DOWN, I
8 HAD A TRUCK ACCIDENT, A RATHER BAD ONE. AND THE
9 FOLLOWING DAY I WAS COMMITTED TO DOING A NATIONAL
10 REVIEW PROMOTIONAL EVENT AT A BREWERY IN BOSTON AND MY
11 ASSOCIATES DROVE ME ALL BANDAGED UP. I HAD BANDAGES
12 ALL OVER MY HEAD, DROVE ME DOWN TO BOSTON TO FULFILL
13 MY PROMOTIONAL DUTIES FOR NATIONAL REVIEW AT THAT
14 TIME.

15 Q. OKAY. GOOD.

16 WHAT OTHER PROMOTIONS DID YOU DO FOR
17 NATIONAL REVIEW?

18 A. WELL, I TOOK PART IN THINGS. THEY HAD
19 SOMETHING IF YOU PAID A PREMIUM, YOU COULD PARTICIPATE
20 IN A SORT OF SUPER PREMIUM MEGA-PLATINUM SUBSCRIBER
21 PANEL VIA TELEPHONE WITH ME, RICH LOWRY AND I FORGET

1 WHO THE OTHER GUY WAS ON THAT. BUT IT WAS LIKE YOU
2 PAID -- YOU PAID MONEY AND YOU GOT TO HEAR US SAY THE
3 THINGS SUPPOSEDLY THAT WE DON'T SAY IN PUBLIC.

4 AS YOU KNOW, EVERYTHING I WANT TO SAY I SAY
5 IN PUBLIC ANYWAY. SO YOU'RE NOT REALLY GETTING
6 ANYTHING EXTRA.

7 BUT THAT WAS A SPECIAL PROMOTIONAL EVENT.

8 AS I SAID, I DID THESE LIVE EVENTS. I DID
9 THINGS LIKE THESE RATHER TEDIOUS CONFERENCES ON, YOU
10 KNOW WHETHER 'CONSERVATISM?' OR WHATEVER THAT THEY HOLD
11 AFTER LOSING ELECTIONS.

12 I DID -- I'VE DONE EVENTS IN VARIOUS -- IN
13 FACT, I THINK THE VERY FIRST THING I DID FOR THEM WAS
14 AN EVENT. GOING BACK TO 1996, WHEN THE THEN EDITOR
15 JOHN O'SULLIVAN ASKED ME TO PARTICIPATE IN SOMETHING
16 THEY WERE DOING IN HOLLYWOOD. AND I SPENT A DAY ON A
17 PANEL SITTING NEXT TO LYNDA OBST WHO IS THE DELIGHTFUL
18 PRODUCER OF SLEEPLESS IN SEATTLE. BUT SO I THINK THAT
19 WAS THE VERY -- I WOULD RANK THAT AS THE VERY FIRST
20 PROFESSIONAL EVENT I DID FOR THEM.

21 Q. WERE YOU PAID SEPARATELY FOR THE -- YOUR

1 WORK ON PROMOTIONAL EVENTS?

2 A. NO, I DID IT BECAUSE, YOU KNOW, AS I SAID,
3 YOU KNOW, THEY ARE A -- ESSENTIALLY A CHARITABLE
4 ENDEAVOR, BECAUSE YOU HAVE THESE STUPID GOVERNMENT
5 NUMBERS HERE. IT'S ALL 501 (C) THIS AND 501 (C) THAT,
6 BUT IT WOULD NOT -- AND THERE IS A CERTAIN BLURRING OF
7 DISTINCTIONS BETWEEN THE MAGAZINE AND THE NATIONAL
8 REVIEW INSTITUTE WHICH I KNOW VERY LITTLE ABOUT,
9 EXCEPT THAT I'M AWARE THAT A REQUEST TO DO NATIONAL
10 REVIEW INSTITUTE EVENTS, I WAS NAIVE ENOUGH TO THINK
11 THAT WHAT WE CALL IN CANADA A REGISTERED CHARITY OR IN
12 THE U.K. A REGISTERED CHARITY HAS THE SAME MEANING IN
13 THE UNITED STATES.

14 SO I LOOKED ON IT AS LARGELY A CHARITABLE
15 VENTURE AND IT'S NOT APPROPRIATE TO SAY TO A CHARITY,
16 OKAY, I'LL COME AND TALK TO YOU GUYS. I'LL COME AND
17 TALK TO YOUR DONORS, SHOOT ME A CHECK FOR 50 GRAND.
18 THAT DOESN'T SEEM TO ME TO BE IN THE LEAST BIT MORAL.
19 SO I GAVE MY SERVICES FOR FREE TO THOSE GUYS.

20 Q. AND AT THESE EVENTS, WOULD YOU EVER BE
21 INTRODUCED AS THE NATIONAL REVIEW'S HAPPY WARRIOR?

1 A. WELL, POSSIBLY I WAS. I'M NOT -- I MEAN, I
2 DID SOME EVENT FOR THEM WHERE I INTRODUCED MITT
3 ROMNEY, A THANKLESS ENDEAVOR. I WOULD NOT RECOMMEND
4 TO YOU, COUNSELOR. BUT MY MEMORY OF THAT IS I WAS
5 JUST INTRODUCED AS MARK STEYN.

6 I DON'T KNOW THAT I COULD RELIABLY TESTIFY
7 TO BEING INTRODUCED AS THE HAPPY WARRIOR.

8 Q. OKAY. AND IT SAYS -- YOU GO BACK TO
9 EXHIBIT 41, IT SAYS YOU SERVE AS THE HAPPY WARRIOR AND
10 THEN IT SAYS YOU'RE CONTRIBUTING EDITOR AT MACLEANS?

11 A. YES.

12 Q. ALSO CHIP IN AT THE CORNER. IS THAT CORNER,
13 IS THAT WHERE YOU WROTE THE "FOOTBALL AND HOCKEY"
14 ARTICLE?

15 A. CORRECT.

16 MR. WILLIAMS: ANDREW, NOW, IS A PRETTY GOOD
17 STOPPING POINT. LET'S COME BACK AFTER LUNCH.

18 MR. WILSON: THAT SOUNDS GOOD. MAYBE
19 45 MINUTES OR SO, DO YOU WANT TO COME BACK AT 10 TO
20 2:00?

21 MR. WILLIAMS: THAT'S FINE.

1 THE VIDEOGRAPHER: OKAY. THEN WITH THAT
2 BEING SAID, WE ARE GOING OFF THE RECORD AT 1:06 P.M.

3 (WHEREUPON, A RECESS ENSUED.)

4 (AFTERNOON SESSION.)

5 THE VIDEOGRAPHER: OKAY. WE ARE BACK ON THE
6 VIDEO RECORD AT 1:51 P.M.

7 BY MR. WILLIAMS:

8 Q. WELCOME BACK, MR. STEYN.

9 A. THANK YOU.

10 Q. WOULD YOU GO TO EXHIBIT 45? THIS WOULD BE
11 THE CLOSE OUT MEMORANDUM FROM THE NATIONAL SCIENCE
12 FOUNDATION.

13 A. FORTY-FIVE?

14 Q. YES, SIR.

15 A. I'VE GET SOMETHING ELSE FOR 45. I DON'T
16 KNOW WHETHER THAT'S --

17 MR. WILSON: OUR BINDER HAS DR. MANN'S
18 "SUPER VILLAIN" AS AN ARTICLE.

19 MR. WILLIAMS: I'M SORRY. I WAS WRONG. I
20 WAS LOOKING AT A DIFFERENT EXHIBIT.

21 BY MR. WILLIAMS:

1 Q. IT WAS NUMBER 20.

2 A. ALL RIGHT.

3 Q. GOT IT, MR. STEYN?

4 A. YES, I HAVE.

5 Q. OKAY. THIS IS THE CLOSE OUT MEMORANDUM FROM
6 THE NATIONAL SCIENCE FOUNDATION. I KNOW YOU'VE
7 TESTIFIED BEFORE THAT YOU DID NOT REVIEW IT. IS THAT
8 CORRECT?

9 A. THAT'S CORRECT.

10 Q. OKAY.

11 A. I DID NOT REVIEW IT AT THE TIME I WROTE
12 "FOOTBALL AND HOCKEY."

13 Q. BUT YOU HADN'T REVIEWED IT BY THE TIME YOU
14 WROTE "FOOTBALL AND HOCKEY?"

15 A. NO. I MAY HAVE HEARD OF IT BUT I DID NOT
16 READ IT IN FULL UNTIL THE -- BEFORE I WROTE "FOOTBALL
17 AND HOCKEY."

18 Q. OKAY. AND OTHER THAN THE FACT THAT IT'S A
19 REPORT OF THE U.S. AGENCY WITH AN ACRONYM, IS THERE
20 ANY OTHER REASON YOU DID NOT CHOOSE TO REVIEW IT?

21 MR. WILSON: OBJECTION TO THE FORM.

1 THE WITNESS: THAT'S GOOD, BUT I THINK IT'S
2 SLIGHTLY MISSTATES TESTIMONY. IT'S JUST THAT, AS I
3 TESTIFIED TO YOU, I FIND THE U.K. REPORTS BEARING THE
4 NAMES OF THEIR CHAIRMAN RATHER EASIER TO REMEMBER THAN
5 WHETHER SOMETHING IS NSF, NAS, NOAA OR WHATEVER.

6 AS IT HAPPENS, THE ONLY THING I RECALL ABOUT
7 THIS IS THAT ITS STRIKING PAGE FORMATTING IS FAMILIAR
8 AND I HAVE ACTUALLY SEEN THIS PHYSICALLY.

9 BY MR. WILLIAMS:

10 Q. RIGHT. BUT NOT BEFORE THE TIME YOU WROTE
11 "FOOTBALL AND HOCKEY?"

12 A. NO.

13 Q. IT IS REFERRED TO AS AN ARTICLE, IS IT NOT?

14 A. I BELIEVE IT'S REFERRED TO BY MR. SIMBERG,
15 ISN'T IT?

16 Q. BUT DESPITE THE FACT YOU SAW IT THERE, YOU
17 CHOSE NOT TO REVIEW IT?

18 A. I DIDN'T CHOOSE NOT TO REVIEW IT. I WAS --
19 MY MAIN POINT IN "FOOTBALL AND HOCKEY," AS YOU CAN
20 REALLY TELL FROM THE TITLE IS TWO THINGS; THE CORRUPT
21 FOOTBALL PROGRAM AND THE CORRUPT SCIENCE PROGRAM.

1 AND FOR THOSE PURPOSES, IT WAS SPECIFICALLY
2 ABOUT THE COVERUP BY PENN STATE BOTH OF SANDUSKY'S
3 CRIMES AND WHAT WAS GOING ON WITH MR. MANN IN THE
4 SCIENCE DEPARTMENT.

5 SO IT WAS ABOUT TWO FORMS OF CORRUPTION, TWO
6 COVER UPS -- COVERS UP -- TWO COVERS UP, I WOULD SAY
7 AT PENN STATE; THE FOOTBALL COVERUP AND THE HOCKEY
8 COVERUP.

9 Q. YOU MEAN THE HOCKEY STICK COVERUP?

10 A. CORRECT. THE COVERUP IN THE FOOTBALL
11 DEPARTMENT AND THE COVERUP IN THE SCIENCE DEPARTMENT.

12 Q. OKAY. I'D LIKE TO ASK ABOUT SOME OF THESE
13 ARTICLES YOU HAVE WRITTEN ABOUT DR. MANN, AND WE CAN
14 GO THROUGH THESE RATHER QUICKLY.

15 IF YOU'D LOOK AT EXHIBIT NUMBER 43, PLEASE?

16 (STEYN EXHIBIT NO. 43 WAS MARKED FOR
17 IDENTIFICATION.)

18 THE WITNESS: YES.

19 BY MR. WILLIAMS:

20 Q. AND CAN JUST CONFIRM THAT IN THIS ARTICLE
21 YOU REFER TO DR. MANN AS BEING DULL WITTED?

1 A. WHERE DO I SAY HE'S DULL WITTED?

2 Q. ON PAGE 2.

3 A. PAGE 2. WHERE IS THE BIT ABOUT BEING DULL
4 -- OH, YEAH. HERE IT IS. "BECAUSE HE'S TOO INSECURE
5 AND DULL WITTED TO DEFEAT HIS OPPONENTS IN DEBATE."
6 CORRECT.

7 Q. RIGHT. NOW, LET'S GO ON TO EXHIBIT 43.

8 WILL YOU CONFIRM THAT YOU HAVE ALSO CALLED
9 DR. MANN A SERIAL LIAR?

10 A. WELL, I THINK WHEN YOU LIE CONTINUOUSLY
11 ABOUT SOMETHING AS EXTRAORDINARY AS BEING A NOBEL
12 LAUREATE, WHICH HAS BEEN GOING ON FOR A LITTLE OVER A
13 CENTURY. SO THERE ARE ACTUALLY AT ANY ONE TIME ONLY A
14 FEW DOZEN GENUINE NOBEL LAUREATES ON THE PLANET, AND
15 YET YOU MISREPRESENT YOURSELF AS A NOBEL LAUREATE.
16 THAT IS BASICALLY A CORE DEFINITION OF ACADEMIC
17 MISCONDUCT. AND I EQUATE IT TO THE EQUIVALENT OF
18 STOLEN VALOR BY PEOPLE WHO ARE NEVER ANYWHERE NEAR A
19 BATTLE FIELD BUT PRETENDING TO HAVE BEEN IN THE THICK
20 OF IT ON D DAY OR IN VIETNAM OR WHEREVER. SO, I THINK
21 THAT'S A FAIRLY SUBSTANTIAL THING.

1 HE KNOWS HE'S NOT A NOBEL LAUREATE BECAUSE
2 TO BE A NOBEL LAUREATE YOU'D BE GIVEN A MEDAL BY THE
3 KING OF SWEDEN OR THE KING OF NORWAY. SO IF YOU'VE
4 NEVER BEEN IN THE PRESENCE OF THEIR RESPECTIVE
5 MAJESTIES, YOU KNOW PRETTY WELL YOU'RE NOT A NOBEL
6 LAUREATE.

7 SO THIS IS, TO ME WHEN YOU DO IT ON THE
8 SCALE THAT MANN DID AND CONTINUES TO DO,
9 NOTWITHSTANDING YOUR AMENDED STATEMENT OF CLAIM,
10 COUNSELOR, I THINK THAT IS -- PRETTY MUCH QUALIFIES
11 FOR SERIAL LYING.

12 Q. YOU HAVE CALLED HIM A SERIAL LIAR, CORRECT?

13 A. CORRECT.

14 Q. LET'S GO TO THE NEXT ONE, EXHIBIT 44,
15 PLEASE.

16 (STEYN EXHIBIT NO. 44 WAS MARKED FOR
17 IDENTIFICATION.)

18 THE WITNESS: YES.

19 BY MR. WILLIAMS:

20 Q. YOU ALSO HAVE APPEARED TO -- EXCUSE ME.
21 REFERRED TO HIM AS MICHAEL E. FRAUDPANTS, RIGHT?

1 A. I'M NOT -- HAVE I DONE THAT? I KNOW I'M
2 CALLED HIM DR. PHRAUDPANTS. I'VE CALLED HIM DR.
3 PHRAUDPANTS WHICH I DO AT THE TOP OF THE PAGE 3. DID
4 I CALL HIM MICHAEL E. FRAUDPANTS? I'M NOT -- OH,
5 YEAH. THERE WE ARE, TOP OF PAGE 4. YES, I DID CALL
6 HIM MICHAEL E. FRAUDPANTS.

7 I WOULD LIKE TO -- BY THE WAY, I WOULD JUST
8 LIKE TO RENEW COUNSEL'S OBJECTION TO THIS AS BEING
9 WELL BEYOND -- WE ARE NOW TALKING ABOUT SOMETHING
10 THAT'S THREE AND A HALF YEARS AFTER THE ALLEGED
11 DEFAMATORY PUBLICATION.

12 Q. RIGHT. I UNDERSTAND THAT, SIR.

13 AND YOU ALSO HAVE REFERRED SINCE THE
14 DEFAMATORY PUBLICATION TO DR. MANN BEING A FRAUD,
15 CORRECT?

16 A. CORRECT.

17 Q. ALL RIGHT. AND YOU HAVE ALSO REFERRED TO
18 HIM SINCE THE DEFAMATORY PUBLICATION AS BEING A SUPER
19 VILLAIN, CORRECT?

20 A. MY MEMORY OF THAT -- CORRECT ME IF I'M
21 WRONG, IS THAT IT WAS IN REFERENCE TO THE MOTION

1 PICTURE INTERSTELLAR, WHICH FEATURES A CHARACTER
2 CALLED DR. MANN WHO IS ON SOME DISTANT PLANET
3 SOMEWHERE. AND I'M NOT ACTUALLY SURE WHETHER I
4 REFERRED TO HIM AS INDEPENDENT OF THAT.

5 WHETHER -- THERE'S SOME BEEPING, COOKING
6 BEEPING OR SOMETHING IN THE ROOM. CAN YOU SEE WHAT
7 THAT IS?

8 BUT THE -- I DON'T BELIEVE -- I BELIEVE
9 THAT'S WHAT THE SUPER VILLAIN WAS, IN THE SENSE OF A
10 MARVEL COMICS SUPER VILLAIN THAT ONE MIGHT SEE IN
11 X-MEN 37 OR CARDBOARD MAN 42, OR WHATEVER.

12 Q. WELL, IN YOUR ARTICLE "SUPER VILLAIN," YOU
13 DO REFER TO MICHAEL MANN AS A LITIGIOUS DWEEB,
14 CORRECT?

15 A. AND WHICH ARTICLE IS THIS?

16 Q. "DR. MANN, SUPER VILLAIN," EXHIBIT 45.

17 (STEYN EXHIBIT NO. 45 WAS MARKED FOR
18 IDENTIFICATION.)

19 THE WITNESS: OKAY. FORTY-FIVE. OH, YES,
20 THERE WE ARE.

21 YEAH, I ACTUALLY SAY AN INSECURE LITIGIOUS

1 DWEEB. AND I THINK THE INSECURITY, YOU KNOW, HIS
2 PRINCIPAL SKILLS, WHATEVER YOU CALL IT DOWN HERE, THE
3 RULE OF COMPLETION, I THINK WE SHOULD NOTE FOR THE
4 RECORD THAT I SAY HE'S AN, "INSECURE LITIGIOUS DWEEB
5 WHOSE PRINCIPAL SKILLS ARE BLOCKING, BANNING AND
6 HYSTERICALLY SHRIEKING THAT AMAZON.COM CRACK DOWN ON
7 ANY REVIEW AS INSUFFICIENTLY FAWNING IN THEIR REVIEWS
8 OF HIS BOOK." THAT'S WHAT I SAID.

9 BY MR. WILLIAMS:

10 Q. THANK YOU. ALL RIGHT. LET'S GO TO
11 EXHIBIT 47, PLEASE.

12 (STEYN EXHIBIT NO. 47 WAS MARKED FOR
13 IDENTIFICATION.)

14 MR. WILSON: JOHN, THIS IS ANOTHER ARTICLE
15 OUTSIDE THE SCOPE OF RELEVANCE. I JUST REPEAT OUR
16 STANDING OBJECTION.

17 MS. WILLIAMS: I UNDERSTAND. AND I THINK
18 YOU SHOULD PROBABLY -- WE CAN TALK LATER IF YOU WANT
19 TO UNDERSTAND THE RELEVANCE OF IT. BUT I THINK IT'S
20 PRETTY CLEAR.

21 BY MR. WILLIAMS:

1 Q. MR. STEYN, EXHIBIT 47, YOU SEE THAT, BIG
2 CLIMATE SLEAZY CHARLATAN, SEE THAT?

3 A. CORRECT.

4 Q. AND YOU'RE REFERRING TO DR. MANN AS A SLEAZY
5 CHARLATAN?

6 A. WELL, ACTUALLY I BELIEVE SLEAZY AND
7 CHARLATAN WERE BOTH WORDS OF ONE OF MR. MANN'S
8 SCIENTIFIC CRITICS.

9 SO I BELIEVE THAT'S ACTUALLY A REFERENCE TO
10 THE CONTENTS OF THE BOOK.

11 Q. OKAY. AND YOU ALSO IN THIS ARTICLE REFER TO
12 HIM AS A WORTHLESS PIECE OF GARBAGE, CORRECT?

13 A. WHERE IS THAT? OH, YES. YES. SO MICHAEL
14 MANN IS A SLEAZY CHARLATAN, THAT IS QUOTED HALFWAY
15 DOWN PAGE 3.

16 THAT IS QUOTED, SO THAT IS A QUOTATION.

17 WHAT WAS THE OTHER THING YOU WERE ASKING ME
18 ABOUT?

19 Q. CALLING MICHAEL MANN AND HIS SCIENCE A
20 WORTHLESS PIECE OF GARBAGE?

21 A. NOW, WHERE DO I SAY THAT?

1 Q. TWO.

2 A. PAGE 2?

3 Q. CORRECT.

4 A. NO, I ACTUALLY SAY -- THAT'S NOT ME SAYING
5 HE'S A WORTHLESS PIECE OF GARBAGE. AND AGAIN, PAUL, I
6 DON'T KNOW WHETHER YOU HAVE THE RULE OF COMPLETION
7 DOWN HERE, BUT I WOULD LIKE TO ACTUALLY CORRECT YOU
8 AND ENTER WHAT IT ACTUALLY SAYS. "THOUSANDS OF
9 EMINENT SCIENTISTS AROUND THE WORLD DISMISS MANN AND
10 HIS SCIENCE AS A WORTHLESS PIECE OF GARBAGE." AND I
11 QUOTED SOME OF THEM TO YOU PREVIOUSLY, AS YOU KNOW.

12 BUT EVEN ONE NOTES THAT EVEN MANN'S
13 CO-AUTHORS ON MBH HAVE PROBLEMS WITH HIM.

14 BUT THAT'S -- THAT THOUSAND -- I'M NOT
15 SAYING HE'S A WORTHLESS PIECE OF GARBAGE.

16 THAT'S RATHER A BOOST FOR MY CASE. BUT
17 THOUSANDS OF EMINENT SCIENTISTS HAVE SAID THAT OR
18 WORDS TO THAT EFFECT.

19 Q. WELL, IF YOU JUST LOOK UP TWO LINES FROM
20 QUOTING THE EMINENT SCIENTISTS, YOU ALSO SAY THAT
21 MICHAEL MANN AND HIS SCIENCE ARE WORTHLESS PIECES OF

1 GARBAGE, CORRECT?

2 A. OH, NO. SOMEONE ELSE IS ACTUALLY SAYING
3 HE'S A WORTHLESS PIECE OF GARBAGE THERE. AND YOU'LL
4 NOTE THAT I FOLLOW THAT CHARACTERIZATION, BUT THEN
5 REFER TO HIS RE-TWEETING OF A COMPLETELY FILTHY,
6 SCARLET, DISGUSTING POST IN WHICH HE SAYS THAT HIS
7 PROFESSIONAL COLLEAGUE, A VERY EMINENT SCIENTIST,
8 JUDITH CURRY IS LITERALLY HAVING SEX WITH ME.

9 DR. CURRY IS A HAPPILY MARRIED WOMAN AND
10 THERE IS -- THROUGHOUT THE TIGHT LITTLE WANKER
11 AMERICAN CLIMATE CARTEL, A VERY CREEPY AND DISTURBING
12 MISOGYNISTIC CHARACTER OF WHICH MANN IS BY FAR THE
13 WORST EXAMPLE, WHETHER YOU'RE TALKING ABOUT THE LIGHT
14 END OF THE SCALE WHEN FOR EXAMPLE, TAMSON EDWARDS, A
15 WELSH SCIENTIST WHO SUPPORTS 80 PERCENT OF WHAT MANN
16 SUPPORTS.

17 NEVERTHELESS HE'S EXTREMELY CONDESCENDING IN
18 MANSPLAINING TO HER IF SHE EVER VENTURES TO DISAGREE
19 WITH HIM. SO WE HAVE THAT ON THE MILDEST END,
20 SOMETHING WHICH IS ITSELF INDICATIVE OF AT LEAST A
21 CONDESCENSION AND LIGHT MISOGYNY TO THE ABSOLUTELY

1 FILTHY STUFF, THE FILTHY CHARGE, HE AMPLIFIES AND LETS
2 GO VIRAL TO ALL HIS DOTING MAN-BOYS THAT DR. CURRY AND
3 I ARE IN THE SACK TOGETHER. HE SHOULD BE ASHAMED OF
4 THAT. AND FRANKLY WORTHLESS PIECE OF GARAGE IS
5 LETTING HIM OFF LIGHTLY ON THAT.

6 Q. THANK YOU. YOU ALSO REFER IN THIS ARTICLE
7 TO DR. MANN AS A DISCREDITED HARPY?

8 A. WHERE IS THAT, WHAT PAGE?

9 Q. PAGE 3.

10 A. NO, I BELIEVE THAT THAT IS ACTUALLY, AGAIN,
11 A QUOTATION. IT'S IN QUOTATION MARKS, AND I WOULD SAY
12 THAT IS FROM -- THAT IS FROM THE PIECE BY CONRAD BLACK
13 BEFOREHAND, I WOULD ASSUME. THAT WOULD BE -- THOSE
14 WOULD BE CONRAD BLACK'S WORDS.

15 IT'S A GOOD PHRASE. BUT I CANNOT TAKE
16 CREDIT FOR IT.

17 Q. WELL, YOU CAN'T TAKE ORIGINAL CREDIT. BUT
18 YOU REPEATED IT, DIDN'T YOU?

19 A. WELL, I'M SAYING I QUOTED IT THERE. I
20 HAVEN'T EXPRESSED A VIEW ON IT ONE WAY OR ANOTHER ONE.
21 ONE CAN QUOTE "TO BE OR NOT TO BE, THAT IS THE

1 QUESTION, " WITHOUT EXPRESSING A VIEW ON IT.

2 Q. LET'S GO TO EXHIBIT 50 -- EXCUSE ME, 69.

3 A. OKAY. YES.

4 (STEYN EXHIBIT NO. 69 WAS MARKED FOR
5 IDENTIFICATION.)

6 BY MR. WILLIAMS:

7 Q. "I'M GOING TO QUASH THAT MAN RIGHT OUT OF MY
8 CARE." DO YOU SEE THAT?

9 A. YES, I DO.

10 Q. AND IN THAT ARTICLE YOU REFER TO HIM AS A
11 DOCTOR OF PHRAUDOLOGY, CORRECT?

12 A. CORRECT.

13 MR. WILSON: JOHN, WHEN YOU ARE REFERRING IN
14 THESE ARTICLES, FOR THE RECORD AND FOR THOSE OF US
15 FOLLOWING ALONG, PLEASE DIRECT US WHERE IN THE ARTICLE
16 YOU ARE. THIS IS A FOUR-PAGED ARTICLE AND YOU'RE
17 EXCERPTING IT OUT OF CONTEXT IN A WAY WHICH IS
18 MISLEADING AND HARD TO FOLLOW.

19 MR. WILLIAMS: IT'S NOT MISLEADING AND I
20 HAVE BEEN GIVING HIM THE PAGE. HE SEEMED TO KNOW IT
21 RIGHT AWAY THAT TIME.

1 BUT GO TO PAGE 2, ANDREW.

2 MR. WILSON: WHERE ON PAGE 2, JOHN?

3 MR. WILLIAMS: TOP OF THE PAGE. ARE YOU
4 THERE?

5 MR. WILSON: I SEE IT NOW, THANK YOU.

6 MR. WILLIAMS: OKAY.

7 BY MR. WILLIAMS:

8 Q. AND, MR. STEYN, IN THIS ARTICLE YOU REFER TO
9 DR. MANN AS A DOCTOR OF PHRAUDOLOGY, CORRECT?

10 A. YES. I'M --

11 MR. HEINTZ: FOR THE RECORD IT IS MICHAEL E.
12 MANN, PHD (DOCTOR OF PHRAUDOLOGY). SPELLED
13 P-H-R-A-U-D-O-L-O-G-Y.

14 MR. WILLIAMS: THANK YOU.

15 BY MR. WILLIAMS:

16 Q. YOUR WORDS, RIGHT, MR. STEYN?

17 A. YES. I DON'T THINK THEY'RE QUITE AS GOOD AS
18 DISCREDITED HARPY BUT I WAS ATTEMPTING TO FIND AN
19 ALTERNATIVE EXPLANATION FOR PHD.

20 Q. I SEE. OKAY.

21 AND ON THE FIRST PAGE YOU REFER TO HIM --

1 AND I'LL TELL YOUR COUNSEL WHERE IT IS -- THE
2 PARAGRAPH THAT STARTS, MEANWHILE IN WASHINGTON, D.C.
3 DO YOU SEE THAT?

4 A. YES.

5 Q. AND YOU REFER TO HIM AS A SELF-CONFERRED
6 NOBEL LAUREATE?

7 A. THAT'S CORRECT.

8 Q. AND A DISTINGUISHED FELLOW OF THE SCANTY,
9 SLOPPY AND SHITTY SOCIETY, RIGHT?

10 MR. HEINTZ: OBJECTION TO THE FORM.

11 THE WITNESS: JUST FOR THE RECORD,
12 COUNSELOR, THERE'S A LINK, THERE'S WHAT THEY CALL AN
13 INTERNET HYPERLINK UNDER THOSE WORDS THAT LINKS TO
14 THREE PERSONS WHO HAVE CHARACTERIZED MANN AS QUOTE,
15 "SCANTY," UNQUOTE. "SLOPPY," QUOTE/UNQUOTE AND
16 QUOTE/UNQUOTE "SHITTY." I REMEMBER THE LAST ONE
17 BECAUSE IT IS THE DISTINGUISHED SCIENTIST WALLACE
18 BROECKER, B-R-O-E-C-K-E-R, WHO CHARACTERIZED MANN'S
19 DATA SETS AS "REALLY SHITTY."

20 I RATHER OBJECT TO THE WAY YOU'RE ATTEMPTING
21 TO PUT IN MY MOUTH MERE QUOTATIONS FROM OTHERS. AND

1 CERTAINLY PROFESSOR BROECKER IS A DISTINGUISHED ENOUGH
2 PERSON, VERY DISTINGUISHED SCIENTIST, TRULY
3 DISTINGUISHED SCIENTIST AND HIS CHARACTERIZATION OF
4 MANN'S DATA SETS AS QUOTE/UNQUOTE "SHITTY" SHOULD NOT
5 BE ASCRIBED TO ME.

6 BY MR. WILLIAMS:

7 Q. ALL RIGHT. AND I THINK WE'VE ALREADY --
8 YOU'VE ALREADY ACKNOWLEDGED THAT YOU HAVE CALLED DR.
9 MANN DR. FRAUDPANTS ON OCCASION, CORRECT?

10 A. CORRECT.

11 Q. AND EXHIBIT 71, IF YOU GO TO THAT, PLEASE.

12 (STEYN EXHIBIT NO. 71 WAS MARKED FOR
13 IDENTIFICATION.)

14 THE WITNESS: YES.

15 BY MR. WILLIAMS:

16 Q. HERE WE HAVE ANOTHER --

17 MR. WILLIAMS: ANDREW, PAGE 2.

18 BY MR. WILLIAMS:

19 Q. TOP OF THE PAGE, ANOTHER DR. PHRAUDPANTS.
20 LOOK DOWN AT THE BOTTOM, MR. STEYN, YOU ALSO REFER TO
21 MICHAEL MANN AS A "THOROUGH TOP-TO-TOE FRAUD,"

1 CORRECT?

2 A. WELL, AS YOU KNOW, I DID NOT CALL MANN A
3 FRAUD IN "FOOTBALL AND HOCKEY." I SAID THE HOCKEY
4 STICK WAS FRAUDULENT. IN THE DAYS, MONTHS AND YEARS
5 AFTERWARDS, ONE IS SHOCKED TO DISCOVER THAT THE NOBEL
6 LAUREATE THING, WHICH AS I SAID, IS ABOUT AS GROTESQUE
7 AND BRAZEN FRAUD AS ONE CAN IMAGINE; PURPORTING TO BE
8 AMONG THE FEW DOZEN LIVING PERSONS WHO HAVE WON NOBEL
9 PRIZES FOR THEIR SCIENCE. THAT IS A SERIOUS FRAUD.

10 HERE WE ARE TALKING ABOUT HIS AND HIS
11 COUNSEL'S -- SO THAT WOULD BE YOU, I TAKE IT, CANDOR
12 TO THE COURT. AND THIS IS TO DO WITH YOUR CLAIM,
13 WHICH I BELIEVE YOU AUTHORED, THAT MANN HAS BEEN
14 EXONERATED BY MULTIPLE BODIES AND MULTIPLE
15 JURISDICTIONS, WHICH IS QUITE FALSE. HE HAS NO MORE
16 BEEN EXONERATED BY SIR MUIR RUSSELL REPORT THAN HE HAS
17 BEEN THE TREATY OF VERSAILLES.

18 SO I DO BELIEVE -- AND I UNDERSTAND THE
19 APPEAL TO AUTHORITY IMPRESSED THAT FIRST TRIAL JUDGE,
20 HOWEVER MANY YEARS AGO IT WAS, BUT IT DOES NOT IMPRESS
21 ME. AND I DO REGARD THAT, SIR, THE ATTEMPT TO ATTACH

1 IN EFFECT AN OFFICIAL COURT ACQUITTAL STATUS TO
2 REPORTS THAT DO NOT EVEN MENTION YOUR CLIENT TO BE A
3 FORM OF FRAUD, AT LEAST UPON THE COURT.

4 Q. I THINK THE QUESTION, SIR, WAS SIMPLY: DID
5 YOU REFER TO DR. MANN AS A FRAUD?

6 A. YEAH, ASKED AND ANSWERED, COUNSELOR. I DID.

7 Q. WELL, YOU ACTUALLY DIDN'T, SIR. THAT'S WHY
8 I JUST STATED THAT.

9 MR. HEINTZ: OBJECTION, ARGUMENTATIVE.

10 MR. WILLIAMS: WASN'T MEANT TO BE.

11 THE WITNESS: I FORGOT THAT ONE. I FORGOT
12 AN OBJECTION, ARGUMENTATIVE. MOST OF THE ONES I KNOW
13 FROM TV SHOWS, BUT I HAD FORGOTTEN THAT ONE.

14 MR. HEINTZ: MAYBE I'M GOOD FOR SOMETHING.

15 THE WITNESS: YEAH. IT'S LIKE PERRY MASON,
16 1965, BRILLIANT.

17 BY MR. WILLIAMS:

18 Q. ONE SECOND, PLEASE.

19 THE NEXT ONE IS 53.

20 (STEYN EXHIBIT 53 WAS MARKED FOR
21 IDENTIFICATION.)

1 BY MR. WILLIAMS:

2 Q. COULD YOU GO TO THAT, PLEASE?

3 A. FIFTY-THREE. OKAY.

4 Q. THIS IS CALLED "MAN, I FEEL LIKE A WARMIN."

5 A. CORRECT.

6 Q. AND HERE, COULD YOU GO TO PAGE 2? HERE YOU
7 CALL MICHAEL MANN THE "OSCAR WILDE OF CLIMATE
8 SCIENCE." DO YOU SEE THAT?

9 A. WELL, AGAIN, IN THE INTEREST OF THE DOCTRINE
10 OF COMPLETION, I SAY "SO PACE RAND SIMBERG, MANN IS
11 NOT THE 'JERRY SANDUSKY' OF CLIMATE SCIENCE BUT THE
12 OSCAR WILDE OF CLIMATE SCIENCE WITH HIS FELLOW
13 SCIENTISTS AS HIS RENT BOYS PUTTING THE GREEN IN GREEN
14 CARNATIONS."

15 Q. ALL RIGHT. AND WHAT DO YOU MEAN BY CALLING
16 HIM THE OSCAR WILDE OF CLIMATE SCIENCE WITH HIS FELLOW
17 SCIENTISTS AS RENT BOYS?

18 A. WELL, FOR EXAMPLE -- WELL, I'LL TELL YOU
19 WHAT I MEAN. AS YOU KNOW, OSCAR WILDE IS PERHAPS THE
20 MOST FAMOUS LIBEL CASE IN THE HISTORY OF LIBEL WHEN HE
21 SUED THE MARQUESS OF QUEENSBERRY.

1 AND WHAT OSCAR WILDE FAILED TO REALIZE,
2 WHICH I THINK ONE CAN -- I DON'T PRESUME TO SPEAK FOR
3 AMERICAN JURISPRUDENCE BUT CERTAINLY ONE CAN -- I CAN
4 ROUGHLY SPEAK ON -- IN THE NON-AMERICAN PARTS OF THE
5 COMMON LAW WORLD -- WHEN SOMEBODY FILES A LIBEL SUIT
6 OR DEFAMATION SUIT, THEY DON'T OFTEN REALIZE THAT IN
7 FACT THE PLAINTIFF IS THE DEFENDANT. THAT'S TO SAY
8 WHEN A PLAINTIFF SUES BECAUSE YOU CALLED HIM THIS,
9 THAT OR THE OTHER, HE IS NOT ALWAYS AWARE THAT EVEN
10 THOUGH HE'S THE PLAINTIFF, IT IS HE WHO HAS TO DEFEND
11 HIMSELF.

12 AND AS I SAID, IT'S A GENERAL OBSERVATION
13 BUT IT WAS CERTAINLY TRUE IN POOR OLD OSCAR WILDE'S
14 CASE THAT THE PLAINTIFF SUDDENLY DISCOVERS THAT HE IS,
15 IN FACT, THE DEFENDANT AS A PRACTICAL MATTER.

16 Q. YES, I UNDERSTAND. LET'S TALK ABOUT OSCAR
17 WILDE AND HIS RENT BOYS.

18 WHAT DID YOU MEAN BY RENT BOYS? BECAUSE --
19 GO AHEAD.

20 A. NO, FINISH YOUR QUESTION.

21 Q. IS THAT -- RENT BOY A REFERENCE TO MALE

1 PROSTITUTES, IS IT NOT?

2 A. YES. IT'S A BOY PROCURED FOR IMMORAL
3 PURPOSES.

4 Q. AND WHY --

5 A. AND --

6 Q. GO AHEAD.

7 A. AND AS YOU CAN SEE IN THE PREVIOUS QUOTATION
8 FROM MR. NICHOLAS HALLAM, "IF YOU CAN GET AS MANY
9 DISENCHANTED SCIENTISTS TO BEAR WITNESS TO MANN'S
10 METHODS AS THE MARQUESS OF QUEENSBERRY FOUND RENT BOYS
11 TO ATTEST TO WILDE'S, I'M CERTAIN OF YOUR SUCCESS."

12 AS YOU KNOW, LORD QUEENSBERRY IN HIS CASE,
13 GAVE DETAILED -- INTRODUCED DETAILED EVIDENCE FROM
14 BOYS WHO HAD BEEN TAKEN TO ENGLISH SEASIDE RESORTS BY
15 MR. WILDE, WHOM -- WHOM MR. WILDE HAD PUT UP AT HIS
16 CLUB IN LONDON, WHO MR. WILDE HAD HOUSED IN HIS HOME
17 IN CHELSEA, AND THESE -- AND THESE WITNESSES TESTIFIED
18 QUITE TRUTHFULLY AS ON BEHALF OF LORD QUEENSBERRY AS
19 TO THEIR RELATIONSHIPS WITH MR. WILDE.

20 AND THIS MAN, MR. HALLAM IS SAYING THAT
21 THERE ARE LIKEWISE MANY SCIENTISTS WHO WOULD TESTIFY

1 JUST AS DAMAGINGLY ABOUT A MAN AS MR. WILDE'S VARIOUS
2 YOUNG MALE FRIENDS. AS YOU KNOW IT WAS EDWARD CARSON
3 QC WHO WAS PROSECUTING THAT CASE, AND LATER BECAME THE
4 LEADER OF THE UNIONIST CAUSE IN IRELAND. BUT MR.
5 CARSON WHO WAS A BRILLIANT FORENSIC PROSECUTOR SIMPLY
6 -- SIMPLY LAID THE EVIDENCE BEFORE THE COURT OF
7 MULTIPLE YOUNG MEN WHOSE EVIDENCE CONFLICTED WITH LORD
8 QUEENSBERRY. AND NICHOLAS HALLAM -- HALLAM IS SAYING
9 THAT IF YOU PRODUCE ENOUGH DISENCHANTED SCIENTISTS TO
10 LAY EVIDENCE AGAINST MICHAEL E. MANN, IT WILL GO THE
11 SAME WAY AS IT DID FOR POOR MR. WILDE.

12 Q. THANK YOU. LET'S GO TO EXHIBIT 72.

13 (STEYN EXHIBIT NO. 72 WAS MARKED FOR
14 IDENTIFICATION.)

15 THE WITNESS: I'M ON IT. I'M GOOD.
16 BY MR. WILLIAMS:

17 Q. AND YOU HAVE A CARTOON HERE OF -- I KNOW YOU
18 DIDN'T DRAW THE CARTOON BUT YOU'RE USING A CARTOON
19 SOMEBODY ELSE DREW, CORRECT?

20 A. THAT'S BY JOSH, WHO DID THE CARTOONS TO MY
21 BOOK, "A DISGRACE TO THE PROFESSION".

1 Q. RIGHT. AND --

2 A. AND IN FACT IS A CARTOON FROM THAT BOOK.

3 Q. YES, RIGHT. AND THE TITLE ELUDES TO THE
4 NOBLE FANTASIST -- EQUALLY FANTASTIC CLAIM TO HAVE
5 BEEN EXONERATED BY FOUR SEPARATE BRITISH
6 INVESTIGATIONS. DO YOU SEE THAT?

7 A. CORRECT.

8 Q. AND WHERE DID DR. MANN CLAIM TO BE
9 EXONERATED BY FOUR SEPARATE BRITISH INVESTIGATIONS?

10 A. WELL, I BELIEVE IN EITHER YOUR ORIGINAL
11 STATEMENT OF CLAIM OR YOUR AMENDED STATEMENT OF CLAIM,
12 YOU ACTUALLY HAVE A SECTION CALLED MANN IS EXONERATED.

13 IF I'M WRONG ON THAT, I APOLOGIZE. BUT THAT
14 IS CERTAINLY MY RECOLLECTION.

15 Q. NO, I JUST WANTED TO GET THE REFERENCE.
16 THANK YOU.

17 AND LET ME ASK ABOUT THE JERRY SANDUSKY
18 REFERENCE THAT APPEARS IN "FOOTBALL AND HOCKEY."

19 A. WHERE IS THAT, AGAIN?

20 Q. "FOOTBALL AND HOCKEY."

21 A. YES. WHICH NUMBER IS THAT?

1 Q. "FOOTBALL AND HOCKEY," SIR, IS 59.

2 A. OKAY. I'M ON THAT.

3 Q. AND YOU QUOTE MR. SIMBERG TALKING ABOUT HOW
4 MICHAEL MANN COULD BE SAID TO BE THE JERRY SANDUSKY OF
5 CLIMATE CHANGE. "EXCEPT THAT INSTEAD OF MOLESTING
6 CHILDREN, HE'S MOLESTED AND TORTURED DATA IN THE
7 SERVICE OF POLITICIZED SCIENCE THAT COULD HAVE DIRE
8 ECONOMIC CONSEQUENCES FOR THE NATION AND PLANET." IS
9 THAT --

10 A. THOSE ARE MR. SIMBERG'S WORDS. THERE'S BEEN
11 ENOUGH CONFUSION OF HIS WORDS AND MINE. AND THEY
12 INCLUDE THAT FIRST INCOMPETENT TRIAL JUDGE THAT I JUST
13 WANT TO MAKE IT CLEAR FOR THE RECORD HERE, THOSE ARE
14 MR. SIMBERG'S WORDS. BECAUSE I'M MIGHTY TIRED OF
15 THIS, COUNSELOR.

16 Q. BUT DOWN AT THE BOTTOM YOU SAY, "WHETHER
17 HE'S THE JERRY SANDUSKY OF CLIMATE CHANGE, HE REMAINS
18 THE MICHAEL MANN OF CLIMATE CHANGE IN PART BECAUSE HIS
19 INVESTIGATION BY A DEEPLY CORRUPT ADMINISTRATION WAS A
20 JOKE." DO YOU SEE THAT?

21 MR. WILSON: OBJECTION. YOU MISSTATED THE

1 SENTENCE. IT IS, "WHETHER OR NOT HE'S 'THE JERRY
2 SANDUSKY OF CLIMATE CHANGE,' HE REMAINS THE MICHAEL
3 MANN OF CLIMATE CHANGE IN PART BECAUSE
4 HIS 'INVESTIGATION' BY A DEEPLY CORRUPT ADMINISTRATION
5 WAS A JOKE."

6 MR. WILLIAMS: RIGHT. OKAY.
7 BY MR. WILLIAMS:

8 Q. AND NOW, LET'S TALK ABOUT SANDUSKY.

9 YOU AS I UNDERSTAND GOT A COPY OF THE
10 INDICTMENT AGAINST JERRY SANDUSKY, DID YOU NOT?

11 A. I DON'T THINK I GOT A COPY. IF YOU'RE
12 ASSUMING SOME POLICEMAN LEAKED IT TO ME, IT WAS A
13 PUBLICLY AVAILABLE DOCUMENT.

14 Q. I WASN'T SUGGESTING THAT.

15 DIDN'T SOMEBODY IN YOUR OFFICE AT YOUR
16 REQUEST OBTAIN A COPY OF THE SANDUSKY INDICTMENT?

17 A. YES. I BELIEVE AT THE TIME THIS HAPPENED I
18 WAS IN THE TURKS AND CAICOS ISLANDS WITH NOT TERRIBLY
19 SATISFACTORY INTERNET. SO INSTEAD MY -- SO I HAD NO
20 WISH TO DOWNLOAD OVER SEVERAL HOURS THE INDICTMENT.
21 AND MY ASSISTANT IN NEW HAMPSHIRE SENT IT TO ME.

1 Q. AND SO, DID YOU READ THE SANDUSKY
2 INDICTMENT?

3 A. I DID READ THE SANDUSKY INDICTMENT.

4 Q. AND YOU READ IT PRIOR TO THE TIME YOU WROTE
5 "FOOTBALL AND HOCKEY," CORRECT?

6 A. YES. I HAD WRITTEN A COLUMN ON SANDUSKY I
7 BELIEVE ABOUT SIX OR SEVEN MONTHS. I THINK NOVEMBER,
8 SHORTLY AFTER HIS ARREST. AND THE COLUMN WAS ABOUT A
9 PENN STATE STAFFER, 28 YEARS OLD, MIKE MCQUEARY
10 WANDERING INTO THE LOCKER ROOM AT PENN STATE AND
11 SEEING SANDUSKY SODOMIZING A MIDDLE SCHOOL CHILD, A
12 CHILD THAT MCQUEARY TESTIFIED WAS APPROXIMATELY
13 10 YEARS OF AGE.

14 THE EVIL AND CORRUPT INSTITUTION FOR WHICH
15 HE AND YOUR COLLEAGUE WORKED, STARTING WITH GRAHAM
16 SPANIER AT THE TOP HAD NO CONCERN FOR THAT 10-YEAR OLD
17 BOY. THEIR ONLY CONCERN WAS TO PROTECT THE FOOTBALL
18 PROGRAM AND ANY PENN STATE LIABILITY.

19 AND AGAIN, QUITE DISGRACEFULLY THEY WERE
20 ABLE TO SPREAD THE CORRUPTION ELSEWHERE. SO THAT THE
21 STATE COLLEGE POLICE DEPARTMENT AND THE LOCAL DISTRICT

1 ATTORNEY DID THEIR BIDDING.

2 IT WAS AN EVIL INSTITUTION. IT MAY STILL BE
3 AN EVIL INSTITUTION. THERE'S A LOT OF THOSE SAME
4 PEOPLE ARE STILL HANGING AROUND THERE.

5 Q. AND SO WHAT'S AN EVIL INSTITUTION?

6 A. WELL, I DON'T THINK THERE'S ANYTHING MORE
7 EVIL THAN CORRUPTING MINORS AND RAPING MINORS. AND IN
8 THE SERVICE OF COVERING UP THE SERIAL RAPE OF MINORS,
9 CORRUPTING INSTITUTIONS THAT ARE SUPPOSED TO PROTECT
10 THOSE CHILDREN SUCH AS THE POLICE DEPARTMENT AND THE
11 DISTRICT ATTORNEY.

12 THE DISTRICT ATTORNEY AT THE TIME, STATE
13 COLLEGE, PENNSYLVANIA AND PENN STATE ARE VERY CURIOUS
14 PLACES.

15 THE DISTRICT ATTORNEY WHO DECLINED TO
16 PROSECUTE HAS SINCE DISAPPEARED AND BEEN DECLARED
17 DEAD.

18 IT IS QUITE THE WEIRDEST LITTLE COLLEGE TOWN
19 I'VE READ ABOUT. THE POLICE -- THE POLICEMEN, THE
20 POLICEMEN -- AND THIS IS EVIL -- WHO WENT ALONG WITH
21 THE COVERUP DID SO BECAUSE THEY WERE FANS OF THE

1 PATERNO-SANDUSKY FOOTBALL REGIME AND INSTEAD OF ACTING
2 ON -- INSTEAD OF INVESTIGATING THE CRIME AND ARRESTING
3 THE CRIMINAL AND GETTING THE DA TO PROSECUTE THE
4 CRIMINAL, THEY WERE DOING A LOT OF BACK SLAPPING WITH
5 SANDUSKY AND SAYING HEY, JERRY, JUST BE CAREFUL WHEN
6 YOU'RE TAKING LITTLE BOYS INTO THE SHOWERS. IT'S AN
7 EVIL INSTITUTION. I DON'T KNOW.

8 I CAN'T IMAGINE MYSELF WANTING TO WORK FOR
9 SUCH A DEPRAVED PLACE. BUT THE MAN WHO COVERED UP FOR
10 SANDUSKY, GRAHAM SPANIER IS THE MAN WHO HIRED YOUR
11 CHUM, MR. MANN.

12 Q. OKAY. SIR, THE EVIL INSTITUTION YOU'RE
13 REFERRING TO IS PENN STATE, CORRECT?

14 A. CORRECT.

15 Q. ALL RIGHT. LET'S GO TO EXHIBIT 49.

16 (STEYN EXHIBIT NO. 49 WAS MARKED FOR
17 IDENTIFICATION.)

18 BY MR. WILLIAMS:

19 Q. CALLED "STEYN DOESN'T UNDERSTAND THE
20 PICTURE."

21 A. YES.

1 Q. PAGE 2, SIR, PLEASE.

2 A. YES. I'M ON PAGE 2.

3 Q. AND FOR THE RULE OF COMPLETENESS, YOU MAY
4 READ INTO THE RECORD WHATEVER YOU CHOOSE, BUT I WANT
5 TO ASK YOU WHAT YOU MEAN BY SAYING, "MANN AT LEAST
6 SUES TO INJECT A LITTLE COURT ORDERED VIAGRA INTO HIS
7 EVER MORE FLACCID HOCKEY STICK." WHAT DOES THAT MEAN?

8 A. WELL, THIS WOULD BE -- WHAT YEAR WAS THIS?
9 THIS WAS 2014.

10 SO I'LL, AGAIN, RENEW A STANDING OBJECTION
11 THAT THIS IS BEYOND THE SCOPE OF WHAT JUDGE ANDERSON
12 HAS ORDERED.

13 AND THE SUB-POINT, I WOULD SAY THAT IS GOING
14 TO BECOME MORE OF AN ISSUE. BUT WHAT WE'RE -- WHAT
15 I'M TALKING ABOUT HERE IS BY 2013, 2014, THE STICK WAS
16 DEAD. THERE'S A WHOLE SECTION IN MY BOOK CALLED THE
17 FALL OF THE STICK WHERE YOU REALIZE IN THE -- BOTH
18 FROM THEIR PUBLIC STATEMENTS AND PRIVATE STATEMENTS,
19 THAT MANY SCIENTISTS INCLUDING THOSE WORKING ON THE
20 IPCC UPDATE REALIZED THEY GOT OVER-INVESTED IN MANN'S
21 HOCKEY STICK. IT WAS A DUD AND THEY WANT TO BACK OFF

1 THE STICK, FORGET ABOUT THE STICK.

2 86 THE STICK. STICK THE STICK WHERE THE SUN
3 DON'T SHINE. PUT IT DOWN SOMEWHERE IN THE LAST BIT OF
4 FROZEN ICE ANTARCTICA.

5 THEY WANT OUT OF THE STICK. THEY'RE
6 EMBARRASSED BY THE STICK. AND MANN IS -- MANN IS --
7 MANN'S COURT CASE APART FROM ANYTHING ELSE, I THINK
8 SEEKS TO RESTORE BECAUSE HE'S DONE NOTHING OF ANY
9 CONSEQUENCE SINCE. MANN'S -- MANN'S COURT CASE SEEKS
10 TO RESTORE THE STICK TO SOMETHING FIRST OF ALL BEYOND
11 CRITICISM, YOU CAN'T CRITICIZE IT BECAUSE HE'LL SUE
12 YOU. BUT ALSO TO GET SOME KIND OF VALIDATION BY THE
13 VARIOUS -- THE TROIKA OF TRIAL JUDGES AND THE FIVE
14 APPELLATE JUDGES OR HOWEVER MANY IT WAS, THAT IT'S NOW
15 BEEN BEFORE. IN OTHER WORDS, HE SEEKS A COURT ORDERED
16 VALIDATION TO BRING ITS RESTORATIVE PROPERTIES TO HIS
17 EVERMORE FLACCID HOCKEY STICK.

18 Q. AND THAT'S WHY YOU HAD THE VIAGRA REFERENCE
19 THERE, CORRECT?

20 A. WELL, I'VE GOT THE VIAGRA IN THE SENTENCE.
21 I'M NOT SURE WHETHER YOU'RE ASKING ME TO TESTIFY

1 WHETHER I'M ON IT, BUT IT'S IN THAT -- IT'S IN THE
2 METAPHOR.

3 Q. THANK YOU. AND NOW, LET'S GO TO ONE WE
4 LOOKED AT BEFORE, EXHIBIT 44. THIS IS THE PAGE 3.

5 A. PAGE 3?

6 Q. CORRECT.

7 A. OKAY.

8 Q. AND THERE'S A PARAGRAPH THAT STARTS WITH
9 WORDS, "YEAH, RIGHT. I'M STILL WAITING."

10 A. YES.

11 Q. AND YOU SAY, "I'M MONICA AND DR. MANN IS
12 CLINTON. HE NEVER RECIPROCATES." CAN YOU TELL ME WHY
13 WE HAVE ANOTHER SEXUAL REFERENCE THERE?

14 A. WELL, WE HAVE ANOTHER SEXUAL REFERENCE, SIR,
15 BECAUSE THAT SEEMS TO BE THE ONLY STUFF THAT MANN AND
16 HIS ACOLYTES UNDERSTAND.

17 I'M -- I WOULDN'T SAY I WORK BLUE. I WOULD
18 SAY THESE ARE IN THE NATURE OF ENGLISH WEST END
19 TROUSER-DROPPING FARCE TYPE SEXUAL REFERENCES. IF
20 YOU'RE EXCITED ENOUGH FOR THE REAL DEAL, YOU SHOULD GO
21 TO MANN'S FRIEND BARRY BICKMORE WHO HAS DONE LURID

1 POSTS ABOUT ME ABOUT ME BEING A STRIPPER WHO WANTS TO
2 BE A BALLERINA BUT CAN'T PREVENT HERSELF FROM BUMPING
3 AND GRINDING HER WAY THROUGH SWAN LAKE. IF YOU WANT
4 THE HARDCORE SEXUAL REFERENCES, INDEED BEFORE MONICA,
5 YOU CAN GO TO DAVID APPELL, DAVID APPELL, A-P-P-E-L-L.
6 ANOTHER ASSOCIATE OF MANN'S WHO SAID THAT IN THIS
7 BUSINESS, ACCUSED JOHN HINDERAKER, A DEFENDER OF MINE
8 OF FELLATING THE KOCH BROTHERS -- ALL THE KOCH
9 BROTHERS, I BELIEVE. I'M NOT SURE HOW MANY OF THEM
10 THERE ARE. I DON'T KNOW WHETHER THEY'RE AS NUMEROUS
11 AS MARX BROTHERS BUT THAT'S A LOT OF FELLATING. AND
12 THAT WAS DAVID APPELL'S THING.

13 SO JUST TO BE CLEAR HERE, SIR, AS TAMSIN
14 EDWARDS, THE WELSH SCIENTIST I MENTIONED -- THAT'S
15 TAMSIN, T-A-M-S-I-N -- ACCUSED MANN OF SAYING, WHY DO
16 YOU MISLABEL PEOPLE? WHY DON'T YOU ENGAGE WITH THE
17 POLICY POINTS THEY'RE MAKING? IT'S STRIKING TO ME
18 THAT BOTH BARRY BICKMORE, DAVID APPELL, THE GUY WHO
19 SAID I WAS FORNICATING, TO USE PRESIDENT NIXON'S WORDS
20 -- THAT I WAS FORNICATING WITH JUDITH CURRY, THEY'RE
21 THE ONES WHO ARE WORKING BLUE AS THE COMICS SAY. AND

1 I'M JUST DOING A COMPARATIVELY FAMILY FRIENDLY
2 VERSION.

3 Q. OKAY. YOU ANSWERED THE QUESTION. THANK
4 YOU.

5 LET'S GO TO EXHIBIT 57, PLEASE.

6 GOT IT?

7 A. YES.

8 (STEYN EXHIBIT NO. 57 WAS MARKED FOR
9 IDENTIFICATION.)
10 BY MR. WILLIAMS:

11 Q. OKAY. THIS IS THE ARTICLE CALLED
12 "CONGRATULATIONS PENN STATE." DO YOU SEE THAT?

13 A. CORRECT.

14 Q. AND MY UNDERSTANDING IS THAT THE PICTURE OF
15 MIKE MANN AND AN ADVERTISEMENT THAT'S WRITTEN IN THE
16 PENN STATE PAPER, THE COLLEGIAN, CORRECT?

17 A. CORRECT.

18 Q. ALL RIGHT. AND YOU WERE INVOLVED IN HELPING
19 TO EDIT THIS ADVERTISEMENT, CORRECT?

20 A. I WOULDN'T SAY THAT.

21 MY RECOLLECTION IS THAT I SAW THIS VERY LATE

1 IN THE DAY, POSSIBLY E-MAILED TO ONE OF MY ASSOCIATES
2 AND THEN PRINTED IT OUT. AND I BELIEVE THE ONLY
3 CONTRIBUTION I MADE IS THAT SOMEWHERE IN THAT
4 ADVERTISEMENT I SUGGESTED MAKING ONE OF THE -- THEY'D
5 HAD IT, I THINK, AS A REFERENCE TO MANN. AND I SAID
6 YOU SHOULD JUST PUT DR. MANN THERE BECAUSE IT SOUNDS
7 FUNNIER. I BELIEVE THAT IS MY SOLE CONTRIBUTION ABOUT
8 20 MINUTES BEFORE THE PENN STATE NEWSPAPER WENT TO
9 PRESS OR WHATEVER. THAT'S THE ONLY THING I RECALL OF
10 THAT, THAT ONE THING.

11 SO I TAKE IT THAT THAT IS PROBABLY THE "WELL
12 DONE, DR. MANN," WHICH I THINK THEY MIGHT ORIGINALLY
13 HAVE HAD AS "WELL DONE, MANN." BUT I AM RESPONSIBLE,
14 I CONTRIBUTED TWO LETTERS TO THAT THE AD COPY, D-R.

15 Q. NOW, YOUR ARTICLE, WE SEE IN THE LEFT-HAND
16 COLUMN ON PAGE 1 AND THEN OVER ONTO PAGE 2, TALKS A
17 LITTLE BIT ABOUT THE NOBEL PEACE PRIZE DOWN AT THE
18 BOTTOM. DO YOU SEE THAT?

19 A. WHERE I'M TALKING ABOUT GORE AND -- OH,
20 WHERE ANOTHER FELLOW FROM THE INTERNET IS TALKING
21 ABOUT GORE AND OBAMA AND ARAFAT AND KISSINGER.

1 Q. YES. RIGHT.

2 YOU SAY RIGHT AT THE BOTTOM OF PAGE 1 --
3 EXCUSE ME. YOU SAY, "HOWEVER THIS LINE REFERS TO THE
4 NOBEL PEACE PRIZE AND THE PEACE PRIZE IS A JOKE AND A
5 SICK JOKE AT THAT." WHAT DO YOU MEAN BY THAT?

6 MR. WILSON: OBJECTION TO THE FORM. THESE
7 ARE NOT MR. STEYN'S WORDS. THIS IS ANOTHER QUOTE.

8 THE WITNESS: THIS IS A QUOTE FROM A WEBSITE
9 CALLED THE PRUSSIAN. HERE'S IN FACT A PRO GLOBAL
10 WARMING, PRO CLIMATE CHANGE, PRO SAVE THE PLANET OR
11 WE'RE ALL GOING TO DIE GUY WHO THINKS THAT MANN IS A
12 DISCREDITABLE, UNETHICAL AND A PERSON WHOM HAS
13 INFLICTED HUGE DAMAGE ON GENUINE CLIMATE SCIENCE.

14 AND HE IS REFERENCING YOUR CLIENT'S ONGOING
15 FRAUD BECAUSE I -- I NOTICED LATE LAST YEAR, HE WAS AT
16 IT AGAIN IN AN INTERVIEW ON SOME PUBLIC RADIO STATION,
17 INTRODUCED AS A NOBEL PRIZE WINNER. ABSOLUTELY
18 EXTRAORDINARY. I DON'T EVEN KNOW WHY WE'RE HERE WHEN
19 YOU'VE GOT A MAN WHO ACTUALLY MISREPRESENTS HIMSELF,
20 EVEN IN COURT FILINGS, EVEN IN YOUR STATEMENT OF
21 CLAIM, MR. WILLIAMS, AS A NOBEL PRIZE WINNER. BUT IN

1 THIS CASE, THESE ARE NOT MY WORDS.

2 THIS GUY IS SAYING THE NOBEL PEACE PRIZE IS
3 A JOKE, AND I WOULDN'T PARTICULARLY DISAGREE WITH
4 THAT. WHICH IS WHY I THINK THE SLY ILLUSION -- MANN
5 DOESN'T EVEN PRETEND TO BE A NOBEL PEACE PRIZE WINNER.
6 HE PRETENDS TO BE A NOBEL PRIZE WINNER. SO IN OTHER
7 WORDS, PEOPLE THINK HE'S A NOBEL WINING PHYSICIST.

8 EVERYONE KNOWS THE PEACE PRIZE IS A JOKE
9 BECAUSE IT'S BEEN GIVEN TO THE EUROPEAN UNION AND ALL
10 KINDS OF OTHER -- RIGOBERTA MENCHU, YASSER ARAFAT, ALL
11 KINDS OF CHARACTERS. AND IT'S GENERALLY NOT REGARDED
12 AS A TRUE NOBEL PRICE WHICH IS WHY, AS YOU KNOW AND AS
13 YOUR SHIFTY CLIENT KNOWS, IT'S HANDED OUT BY THE KING
14 OF NORWAY AND NOT THE KING OF SWEDEN.

15 AND IN THIS CASE, MANN IS ATTEMPTING TO PASS
16 HIMSELF OFF, NOT JUST AS A WINNER OF THE JOKE PEACE
17 PRIZE BUT AS A WINNER OF A GENUINE NOBEL PRIZE.
18 BY MR. WILLIAMS:

19 Q. AND YOU ALSO QUOTE HIM HERE AS SAYING, IT'S
20 A JOKE BECAUSE PEOPLE LIKE GORE AND OBAMA WON IT.
21 PEOPLE WHO HAVE DONE NOTHING. DO YOU SEE THAT?

1 A. CORRECT.

2 Q. WHY DID YOU CHOOSE TO QUOTE THAT, MR. STEYN?

3 A. WELL, I QUOTED THAT IN THE -- I QUOTED THAT
4 JUST BECAUSE THAT IS FOR THE COMPLETENESS OF HIS
5 THOUGHTS.

6 AS IT HAPPENS, HE CALLS KISSINGER -- HE'S A
7 MAN OF THE LEFT, SO HE DOESN'T LIKE HENRY KISSINGER
8 BECAUSE HE REGARDS HENRY KISSINGER AS THE DERANGED WAR
9 MONGER DOCTOR STRANGE LOVE CHARACTER FROM THE
10 VIETNAM YEARS.

11 I'VE MET DR. KISSINGER EVERY NOW AND AGAIN
12 OVER THE YEARS. I COULDN'T CALL HIM A FRIEND, BUT
13 I'VE MET HIM EVERY TWO, THREE YEARS, HITHER AND YON,
14 AND I WOULDN'T ACTUALLY AGREE WITH THAT
15 CHARACTERIZATION OF MR. KISSINGER.

16 THE ASSUMPTION THAT BECAUSE ONE QUOTES
17 SOMETHING, ONE AGREES WITH EVERY ASPECT OF IT IS ODD
18 TO ME.

19 I QUOTE IT BECAUSE THAT'S WHAT THE FELLOW
20 WHO WROTE IT THINKS. AND UNLIKE MANN, I'M NOT SO
21 INSECURE THAT SENTIMENTS WITH WHICH I HAPPEN TO

1 DISAGREE HAVE TO BANNED FROM MY WEBSITE, AS HE DOES
2 WITH FACEBOOK AND TWITTER.

3 HE SAYS KISSINGER'S NOT A QUOTE. AS I SAID
4 I'VE CHIT CHATTED WITH HENRY FROM TIME TO TIME OVER
5 THE YEARS AND I WOULD NOT REGARD THAT AS A FULL AND
6 ACCURATE CHARACTERIZATION. BUT IT'S NOT MY WORDS,
7 IT'S HIS WORDS.

8 Q. THANK YOU. OKAY.

9 IF WE COULD GO NOW, TO THE "FOOTBALL AND
10 HOCKEY" ARTICLE, PLEASE?

11 A. AND WHICH NUMBER IS THAT, AGAIN?

12 Q. FIFTY-NINE.

13 A. FIFTY-NINE. OKAY. GOT YOU.

14 Q. AND WHILE YOU HAVE IT THERE, 67 IS THE GRAND
15 ARTICLE ENTITLED "THE OTHER SCOUNDREL IN UNHAPPY
16 VALLEY."

17 A. RIGHT.

18 Q. I ONLY WANT TO REFER TO THAT FOR A MOMENT.

19 HE HAS IN THAT, IF YOU SEE DOWN AT THE
20 BOTTOM OF THAT PAGE, THE COURT OF APPEALS IN A
21 FOOTNOTE SAYS, "THE UNDERLINING IN THE ARTICLES IN THE

1 SEGMENT INDICATE AN HYPERLINK." SEE THAT?

2 A. YES, I SEE THAT SENTENCE.

3 Q. OKAY. AND MY QUESTION IS: DID YOU CLICK ON
4 ANY OF THE HYPERLINKS IN LOOKING AT THIS SIMBERG
5 ARTICLE?

6 A. I HAVE NO RECOLLECTION OF THAT. THE FIRST
7 HYPERLINK APPEARS TO LINK TO THE FREEH REPORT, WHICH
8 I'D READ INDEPENDENTLY. THE NEXT ONE APPEARS TO BE
9 SOMETHING TO DO WITH THE CLIMATE RESEARCH UNIT, WHICH
10 I'VE ALSO READ INDEPENDENTLY. SO, I CANNOT RECALL
11 WHETHER I CLICKED ON OR DID NOT CLICK ON ANY OF THE
12 HYPERLINKS IN THE PIECE AT THE TIME.

13 Q. OKAY. ONE OF THE HYPERLINKS WE HAD MARKED
14 FOR YOU IS EXHIBIT 37. WOULD YOU GO TO THAT, PLEASE?

15 (STEYN EXHIBIT NO. 37 WAS MARKED FOR
16 IDENTIFICATION.)

17 BY MR. WILLIAMS:

18 Q. DO YOU SEE THAT, MR. STEYN?

19 A. YES, I DO.

20 Q. AND IT'S AN ARTICLE FROM THE INTERNET -- I
21 BELIEVE IT'S FROM A WEBSITE CALLED SCHOLARS AND

1 RHODES. HAVE YOU EVER LOOKED AT ANYTHING ON THAT
2 WEBSITE?

3 A. THAT DOESN'T RING ANY BELL WITH ME.

4 Q. OKAY. AND THIS IS AN ARTICLE THAT'S
5 ENTITLED: "NSF CONFIRMS RESULTS OF PENN STATE
6 INVESTIGATION EXONERATES MICHAEL MANN OF RESEARCH
7 MISCONDUCT."

8 DO YOU SEE THAT AT THE TOP?

9 A. YES, I DO.

10 Q. OKAY. DOES THIS REFRESH YOUR RECOLLECTION
11 WHETHER YOU CLICKED ONTO THIS HYPERLINK?

12 A. I HAVE -- AS I SAID, THE WEBSITE SCHOLARS
13 AND RHODES RINGS NO BELL WITH ME.

14 I'M AWARE OF HAVING SEEN MULTIPLE PIECES
15 OVER THE YEARS THAT CLAIM VARIOUS REPORTS OF ONE KIND
16 OR ANOTHER, "EXONERATING" MR. MANN.

17 BUT AS TO WHETHER THIS IS ONE OF THE ONES
18 I'VE READ OVER THE YEARS, I HAVE NO IDEA.

19 Q. AND IN LOOKING AT THE WEBSITES THAT SAID --
20 THAT USED THE WORD "EXONERATE," WAS THAT PRIOR TO THE
21 TIME YOU WROTE THIS ARTICLE, FOOTBALL AND HOCKEY?

1 A. I WAS AWARE THAT THAT WORD WAS IN THE AIR
2 MAINLY BECAUSE PERSONS LIKE STEVE MCINTYRE DISPUTED
3 IT.

4 AND I'M ALSO AWARE THAT AS I SAID, YOU HAD A
5 SECTION IN YOUR STATEMENT OF CLAIM CLAIMING THAT MANN
6 IS EXONERATED. BUT IF YOU CAN POINT ME ANYWHERE IN,
7 SAY, SIR MUIR RUSSELL'S REPORT OR LORD OXBURGH'S
8 REPORT OR THE HOUSE OF COMMONS REPORT OR EVEN THE
9 AMERICAN REPORTS THAT DECLARE THAT MANN IS -- SETTING
10 ASIDE PENN STATE, WHICH IS A RACKET ALL OF ITS OWN AND
11 WHERE PENN STATE BROKE ITS OWN RULES TO DO THAT
12 INVESTIGATION, IF YOU CAN -- IF YOU CAN SHOW ME
13 ANYWHERE -- I'M GENERALLY SPEAKING, IF I'M -- I'LL
14 JUST GIVE YOU A LITTLE BIT OF MY WORKING METHODS,
15 GENERALLY.

16 IS THAT IF SOMETHING -- IF SOMETHING CLAIMS
17 SOMETHING SPECIFIC SUCH AS THAT MANN IS EXONERATED, AS
18 YOU DO IN YOUR STATEMENT OF CLAIM, THEN MY INCLINATION
19 IS TO LOOK AT THE CORE UNDERLYING DOCUMENTS, NOT THE
20 CHINESE WHISPERS OF LINKS TO SOMETHING THAT LINKS TO
21 SOMETHING, THAT LINKS TO SOMETHING THAT LINKS TO

1 SOMETHING THAT LINKS TO SOMETHING THAT LINKS TO A
2 DECISION BY THE COURT OF QUEEN'S BENCH IN ALBERTA OR
3 WHATEVER.

4 I'D RATHER JUST GO STRAIGHT TO THE COURT OF
5 QUEEN'S BENCH IN ALBERTA AND SEE WHAT THE JUDGE SAYS.

6 WHICH IS WHY I NOTICE, FOR EXAMPLE, THAT A
7 LOT OF DR. MANN'S CHUMS WHEN HE LOST THE CASE IN --
8 AGAINST TIM BALL IN THE BRITISH COLUMBIA SUPREME
9 COURT, AND THEY SAID, WELL, THIS IS JUST SOMETHING ON
10 STEYN'S WEBSITE, WHICH IS WHY WE POSTED THE JUDGE'S
11 DECISION AT THE WEBSITE, SO THAT YOU COULD SEE THE
12 ORIGINAL CORE UNDERLYING DOCUMENT.

13 AND I'VE READ, AS I SAID, MOSTLY AT THE TIME
14 THE U.K. ONES. BUT ALSO THE PENN STATE ONE, AND I DO
15 NOT -- I DO NOT -- THE U.K. ONES DO NOT MENTION MANN
16 AND CERTAINLY DO NOT DO ANYTHING CLOSE TO EXONERATING
17 HIM.

18 AND THE PENN STATE ONE IS A JOKE AND IS ABLE
19 TO EXONERATE HIM ONLY BECAUSE THEY HAD A FRAUDULENT
20 INQUIRY AND THE EVIL GRAHAM SPANIER LIED ABOUT THE
21 NATURE OF THAT INQUIRY INCLUDING IN HIS INITIAL WORDS

1 TO -- I FORGET WHETHER IT WAS THE COLLEGIAN, THE
2 COLLEGE NEWSPAPER OR THE STATE COLLEGE LOCAL
3 NEWSPAPER. SO -- BUT I'M GENERALLY SPEAKING -- IF
4 YOU'RE ASKING ME WHETHER I SHOULD TAKE THE WORD OF
5 SOME WEBSITE THAT MANN'S BEEN EXONERATED OR WHETHER I
6 SHOULD ACTUALLY READ THE JUDGE'S DECISION, I'D RATHER
7 READ THE ORIGINAL DOCUMENT.

8 Q. YES. OKAY, SIR.

9 YOU MENTIONED EXONERATION IN THE STATEMENT
10 OF CLAIMS. THAT CAME ALONG LATER.

11 THIS IS IN 2011, SIR. DO YOU SEE THAT?

12 A. YES, I'M AWARE THAT'S BEFORE THE SUIT.

13 Q. RIGHT. OKAY.

14 AND WERE YOU --

15 A. NO. CARRY ON.

16 Q. WERE YOU AWARE OF ARTICLES THAT SAID THAT
17 DR. MANN HAD BEEN EXONERATED BY THE NSF REPORT?

18 MR. WILSON: OBJECTION TO THE FORM.

19 WHAT TIME ARE YOU TALKING ABOUT?

20 MR. WILLIAMS: BEFORE HE WROTE THE ARTICLE.

21 THE WITNESS: I THINK, YOU KNOW, I DON'T

1 WANT TO SELF OBJECT BECAUSE IT MIGHT UPSET MY COUNSEL.
2 BUT I DO THINK I'VE ANSWERED THE QUESTION REGARDING
3 YOUR AMERICAN AGENCIES MULTIPLE TIMES EVERY WHICH WAY.
4 AND I'VE SAID THAT I WAS AWARE OF THE EXISTENCE OF
5 SOME OF THESE AMERICAN INVESTIGATIONS BY AGENCIES
6 BEGINNING WITH N, BUT THAT I -- I DO NOT RECALL HAVING
7 READ THEM IN FULL UNTIL I WROTE MY BOOK, OR EDITED MY
8 BOOK.

9 BY MR. WILLIAMS:

10 Q. I UNDERSTAND THAT, SIR. THAT WAS WITH
11 RESPECT TO THE ACTUAL NSH STUDIES?

12 A. UH-HUH.

13 Q. NSF REPORT. STAY WITH ME, PLEASE.

14 I AM NOT ASKING ABOUT YOUR REVIEW PRIOR TO
15 THE TIME YOU WROTE THE ARTICLE ABOUT ARTICLES OR MEDIA
16 THAT YOU SAY YOU STAYED IN TOUCH WITH THAT USED THE
17 WORD "EXONERATE" WITH RESPECT TO MICHAEL MANN?

18 A. I'M BEING ASKED -- AS I THINK I INDICATED IN
19 A PREVIOUS RESPONSE, MY MAIN FAMILIARITY WITH THE WORD
20 "EXONERATION" ARISES FROM YOUR STATEMENT OF CLAIM.

21 UPON READING BOTH BEFORE AND AFTER "FOOTBALL

1 AND HOCKEY" BUT AFTER YOU FILED YOUR STATEMENT OF
2 CLAIM, I COULDN'T ACTUALLY FIND ANYWHERE IN SIR MUIR
3 RUSSELL REPORT THAT EXONERATED MANN.

4 I COULDN'T FIND ANYWHERE IN LORD OXBURGH'S
5 REPORT THAT EXONERATED MANN.

6 SHORTLY THEREAFTER, I BELIEVE I DID THAT
7 PIECE YOU PULLED UP 20 MINUTES AGO, WHATEVER, ABOUT
8 EVERY QUOTE EVER UTTERED BY ANYONE EXONERATES MICHAEL
9 MANN.

10 BUT MY MEMORY IS THAT THE WORD "EXONERATES"
11 IS SOMETHING WHOSE SIGNIFICANCE IN MY MIND SUCH AS IT
12 HAS, ARISES FROM YOUR STATEMENT OF CLAIM.

13 I MAY HAVE SEEN THE WORD "EXONERATE"
14 FLOATING AROUND HITHER AND YON AT THE TIME THESE
15 REPORTS WERE ISSUED, BUT IT'S NOT A WORD, UNLESS
16 YOU'RE SUED AND UNLESS THE PLAINTIFF IS ADVANCING THAT
17 AS PART OF THE ARGUMENT, I'M NOT SURE IT'S A WORD ONE
18 WOULD NECESSARILY HAVE ANY REASON TO REMEMBER.

19 Q. THAT'S FINE. AND SO I TAKE IT YOU DO NOT
20 REMEMBER CLICKING ONTO THIS HYPERLINKED ARTICLE?

21 A. AGAIN, I THINK -- I DON'T WANT TO BE

1 UNCOOPERATIVE. I'M HAPPY TO ANSWER YOUR QUESTIONS,
2 COUNSELOR, BUT I DO THINK I ANSWERED THAT BEFORE. AND
3 I DO RATHER OBJECT TO THIS AMERICAN HABIT OF ASKING
4 THE SAME QUESTION. IT SEEMS TO EXTEND TO ALL AREAS OF
5 LIFE INCLUDING BY THE BORDER GUARD GUARDING DERBY
6 LINE, VERMONT, ASKING THE SAME QUESTION SEVEN
7 DIFFERENT WAYS TO SEE IF ON THE SIXTH GO-ROUND YOU
8 ANSWER IT DIFFERENTLY AND THEREFORE, OPEN YOURSELF UP
9 TO A PIT OF HELL.

10 I'VE SAID THAT I HAVE NO RECOLLECTION OF
11 CLICKING ON THE LINKS IN RAND SIMBERG'S ARTICLE. I
12 MIGHT HAVE DONE, I MIGHT NOT HAVE DONE.

13 Q. YOU DIDN'T GET THAT -- I DIDN'T GET IT
14 BEFORE, MR. STEYN. I WANTED THAT FOR THE RECORD.
15 LET'S GO ON.

16 A. WHAT'S THAT?

17 Q. I SAID THANK YOU VERY MUCH. IF YOU THOUGHT
18 I WAS BELABORING THE QUESTION, IT WAS ONLY BECAUSE I
19 DIDN'T THINK I HAD RECEIVED AN ANSWER.

20 NOW, I'VE RECEIVED AN ANSWER. NOW, WE CAN
21 GO ON.

1 A. OKAY. WORKS FOR ME.

2 Q. SIR, DID YOU -- BACK AT THE TIME -- PRIOR TO
3 THE TIME YOU WROTE THE ARTICLE, I KNOW -- STRIKE THAT.

4 I TAKE IT THAT YOU READ ABOUT THE ARTICLE
5 WRITTEN BY MR. SIMBERG ON THE CEI WEBSITE, RIGHT?

6 A. MY MEMORY -- I'M NOT A FOLLOWER OR READER OF
7 THE CEI WEBSITE. AND MY MEMORY AS SUCH IS THAT I READ
8 THAT ON -- OR READ THE LINK TO IT AT MR. SIMBERG'S
9 PERSONAL WEBSITE.

10 SO I BELIEVE THAT WOULD HAVE BEEN ON HIS
11 TRANSTERRESTRIAL MUSINGS WEBSITE WHERE HE EITHER
12 PUBLISHED IT AT THE SAME TIME OR HE PUT A LINK TO IT.
13 BUT I -- IN EFFECT, I CAME ACROSS IT BECAUSE I
14 HAPPENED TO BE AT MR. SIMBERG'S TRANSTERRESTRIAL
15 MUSINGS WEBSITE.

16 Q. I SEE. I HAD ASKED BEFORE WHICH WEBSITES
17 YOU LOOKED AT. YOU DIDN'T MENTION MR. SIMBERG. IS
18 THAT A WEBSITE THAT YOU FREQUENTED?

19 A. I WOULDN'T CALL MR. SIMBERG'S WEBSITE A
20 CLIMATE WEBSITE, WHICH I THOUGHT I WAS ANSWERING AT
21 THE TIME YOU ASKED YOUR QUESTION.

1 MR. SIMBERG WRITES MORE ABOUT SPACE ISSUES
2 AS IN OUTER SPACE, AND MY PRINCIPAL KNOWLEDGE OF HIM
3 COMES FROM WHEN MORE GENERAL INTEREST POSTS ARE LINKED
4 TO BY A FELLOW CALLED THE INSTAPUNDIT. AND MY MEMORY
5 IS THAT THAT'S WHERE I FIRST CAME ACROSS MR. SIMBERG,
6 LINKED TO AN INSTAPUNDIT AND I WOULD CLICK ON
7 TRANSTERRESTRIAL MUSINGS FROM TIME TO TIME AND READ
8 HIS GENERAL INTEREST POSTS.

9 BUT MY UNDERSTANDING IS THAT HIS PRINCIPAL
10 INTEREST IS IN SPACE AND SUCH LIKE. SO, I WOULD NOT
11 REGARD THAT AS A CLIMATE WEBSITE, PER SE.

12 Q. ALL RIGHT. NOW, LET'S GO TO YOUR ARTICLE,
13 "FOOTBALL AND HOCKEY."

14 A. OKAY.

15 Q. AND AFTER YOU QUOTE THE PIECE FROM THE
16 SIMBERG WEBSITE, YOU SAY THAT YOU ARE NOT SURE YOU'D
17 EXTEND THE METAPHOR INTO THE LOCKER ROOM WITH QUITE
18 THE ZEAL MR. SIMBERG DOES, BUT HE HAS A POINT. WHAT
19 WERE YOU TRYING TO SAY THERE, HE HAS A POINT? WHAT
20 DOES THAT MEAN?

21 MR. WILSON: OBJECTION TO THE FORM. YOU

1 MISREAD THE SENTENCE. THE FULL QUOTE IS, "NOT SURE I
2 HAVE EXTENDED THAT METAPHOR ALL THE WAY INTO THE
3 LOCKER ROOM SHOWERS WITH QUITE THE ZEAL MR. SIMBERG
4 DOES, BUT HE HAS A POINT."

5 MR. WILLIAMS: ALL RIGHT. AND THAT'S A
6 GREAT LEAD INTO THE NEXT QUESTION.

7 BY MR. WILLIAMS:

8 Q. WHAT POINT IS IT THAT MR. SIMBERG HAS?

9 A. WELL, MR. SIMBERG, I BELIEVE THE CHRONICLE
10 OF HIGHER EDUCATION MADE A SIMILAR POINT, AND THEY SAW
11 PARALLELS BETWEEN PENN STATE, PENN STATE'S COVERUP OF
12 SANDUSKY AND PENN STATE'S COVERUP FOR MANN. IN BOTH
13 CASES THE ISSUES FOR PENN STATE WERE NOT THE DAMAGE TO
14 THE INTEGRITY OF SCIENCE OR THE GROTESQUE SERIAL RAPE
15 OF SMALL BOYS, BUT IN BOTH CASES THE PRIORITIES FOR
16 GRAHAM SPANIER AND PENN STATE WERE BRAND PROTECTION.

17 BECAUSE BOTH THE -- THE FOOTBALL DEPARTMENT
18 AND THE SCIENCE DEPARTMENT WERE VALUABLE FOR SPANIER
19 AND HIS RACKET.

20 IN FACT, ONE OF THE MINOR DIFFERENCES
21 BETWEEN THE -- THE MANN COVERUP AND THE SANDUSKY

1 COVERUP IS THAT SPANIER ACTUALLY SPELLS IT OUT IN THE
2 PENN STATE REPORT WHERE HE SAYS, YOU KNOW, MANN COULD
3 NOT HAVE BROUGHT IN ALL THIS GRANT MONEY AND RESEARCH
4 MONEY IF HIS SCIENCE WAS NOT OF THE HIGHEST INTEGRITY.

5 SO IN OTHER WORDS, SPANIER EXONERATES IN
6 YOUR WORD, MANN BECAUSE HE'S BRINGING IN ALL THE CASH.
7 THAT'S LIKEWISE WHAT HE DID WITH PATERNO AND SANDUSKY.

8 SO I WAS VERY STRUCK BY THIS POINT, BECAUSE
9 AS YOU POINT OUT, I'M A FOREIGNER AND I LEFT SCHOOL AT
10 12 OR WHATEVER YOU WERE SUGGESTING. AND SO I DON'T
11 KNOW ANYTHING ABOUT THE AMERICAN ACADEMY. AND WHAT
12 WAS THE REVELATION IN THE FREEH REPORT AND AT THE TIME
13 OF SANDUSKY'S ARREST IN THE PREVIOUS NOVEMBER 2011,
14 THE HORRIFYING THING WAS ABOUT THE LEVEL OF CORRUPTION
15 AND THE WAY THE UNIVERSITY WAS ABLE TO EXTEND THE
16 CORRUPTION TO POLICE DEPARTMENTS AND TO DISTRICT
17 ATTORNEYS.

18 AND THEN WHEN YOU READ IN THE FREEH -- IN
19 THE FREEH DOCUMENT, THE WAY THEY NOT ONLY COVERUP FOR
20 MANN, THEY NEVER GIVE A THOUGHT TO WHO THESE BOYS ARE
21 WHO HAVE BEEN RAPED. HOW ARE THEY DOING? WHAT'S

1 HAPPENED TO THEM? DO THEY NEED ANY KIND OF HELP OR
2 ANYTHING LIKE THAT?

3 THEY SIMPLY -- THEY SIMPLY LOOK AT JUST
4 FINESSING IT, WHITEWASHING IT, SANDUSKY HAD AN OFFICE
5 ON THE PENN STATE CAMPUS UNTIL THE DAY HE WAS
6 ARRESTED, AND HE HAD KEYS TO THE SHOWERS UNTIL THE DAY
7 HE WAS ARRESTED. THEY WERE FULLY IN THE TANK TO
8 PROTECT THE PENN STATE FOOTBALL DEPARTMENT AS SPANIER
9 WAS FULLY IN THE TANK TO PROTECT THE PENN STATE
10 SCIENCE DEPARTMENT.

11 TO THE POINT WHERE, YOU KNOW, THEY'RE NOT
12 ENTIRELY EQUIVALENT BECAUSE WITH SANDUSKY, FOR
13 EXAMPLE, THEY CORRUPTED THE POLICE DEPARTMENT. THEY
14 ACTUALLY -- AND THE DISTRICT ATTORNEY IN CRIMINAL
15 MATTERS. THAT'S A VERY SERIOUS BUSINESS.

16 BUT ONE WELL UNDERSTANDS FROM READING ABOUT
17 THE CULTURE AT PENN STATE, THE WORLD OF PENN STATE,
18 WHY IT WAS THEN JUST A COUPLE OF YEARS EARLIER THAT IN
19 THE MANN INQUIRY, PENN STATE BROKE ITS OWN LAWS BY NOT
20 PUBLISHING THE TRANSCRIPTS OF THE TWO WITNESSES AND OF
21 MANN HIMSELF. AND, IN FACT, OF ALSO -- THAT IN ITSELF

1 WASN'T SUFFICIENT. SPANIER HIMSELF HAD TO GO OUT AND
2 LIE TO THE STATE COLLEGE NEWSPAPER THAT THEY'D
3 INTERVIEWED MULTIPLE WITNESSES FROM ALL SIDES OF THE
4 DISPUTE.

5 THAT WAS A FLAT OUT LIE FROM AN UTTERLY
6 DISCREDITED MAN, ONE OF THE HUGEST DISGRACES IN THE
7 AMERICAN ACADEMY. AND AS I SAID, THE CHRONICLE OF
8 HIGHER EDUCATION AND MR. SIMBERG BOTH MADE -- BOTH
9 MADE THE POINT BETWEEN SPANIER AND PENN STATE'S
10 BEHAVIOR IN THE SANDUSKY MATTER. AND SPANIER AND PENN
11 STATE'S BEHAVIOR IN THE MANN MATTER.

12 Q. I'M SORRY. I HAD YOU ON MUTE, SIR. I WAS
13 THINKING OF SOMETHING.

14 LET'S GO, IF WE COULD, TO EXHIBIT 60,
15 PLEASE.

16 (STEYN EXHIBIT NO. 60 WAS MARKED FOR
17 IDENTIFICATION.)

18 THE WITNESS: I'M THERE.
19 BY MR. WILLIAMS:

20 Q. THIS IS CALLED -- ANOTHER ARTICLE --
21 "BLOCKING IN A LEGAL WONDERLAND."

1 A. THAT'S CORRECT.

2 Q. AND I TAKE IT THIS WAS SOMETHING YOU WROTE
3 RIGHT AFTER INITIAL DECISION CAME DOWN FROM THE COURT
4 OF APPEALS?

5 A. WELL, I'M WRITING IT A COUPLE OF DAYS BEFORE
6 CHRISTMAS 2016. AND TO BE HONEST, AS THE YEARS ROLL
7 BY, I KNOW THERE WAS THE ORIGINAL DECISION BY THE
8 COURT OF APPEALS. AND THEN I BELIEVE A COUPLE OF
9 YEARS LATER THEY AMENDED TWO FOOTNOTES OR SOMETHING.

10 I TAKE IT -- I TRUST THIS IS THE ORIGINAL
11 COURT OF APPEALS RULING, IS IT?

12 Q. I THINK IT IS.

13 A. OKAY. BECAUSE AS I SAID, I'VE LOST TRACK OF
14 IT NOW.

15 BUT IF THIS IS A PIECE REFERRING TO THE
16 ORIGINAL INTERLOCUTORY APPEAL, SO BE IT.

17 Q. YOU WEREN'T A PARTY TO THE APPEAL, RIGHT?
18 IN FACT, YOU SAY IT RIGHT HERE.

19 A. NO, THAT'S NOT. I'M OLD SCHOOL. IF YOU SAY
20 TO ME, CAN WE DO LEGAL MANEUVERING OR -- FOR EIGHT
21 YEARS OR CAN WE GO THE TRIAL IN TWO MONTHS TIME, I'D

1 RATHER GO TO TRIAL IN TWO MONTHS TIME. SO I DIDN'T
2 WANT ANYTHING -- ONCE IT BECAME CLEAR THAT AS THE
3 SECOND TRIAL JUDGE RATHER DISCRETELY PUT IT, BUT IN
4 EFFECT WHAT HE SAID WAS THAT THE FIRST TRIAL JUDGE HAD
5 PROCEDURALLY BOLLOCKSED THE CASE, I'D RATHER JUST GO
6 TO TRIAL AND GET IT OVER WITH. AND I THINK I'VE
7 RATHER BEEN VINDICATED ON THAT BY MY -- BY THE
8 PATHETIC RESULTS THE CO-DEFENDANTS ACHIEVED WITH THIS
9 UNNECESSARY INTERLOCUTORY APPEAL.

10 Q. WHAT DO YOU MEAN? IF YOU WANTED TO GO TO
11 TRIAL, WHY DID YOU SAY "THEY'VE LEFT A LUMP OF COAL IN
12 MY STOCKING?"

13 A. WELL, BECAUSE THIS IS IN THEORY IF THE
14 INTERLOCUTORY APPEAL, IF I FOLLOWED THE LOGIC OF MY
15 CO-DEFENDANTS, THE APPELLATE COURT HAD THE POWER TO
16 BURY THIS THING SIX FEET UNDER FOR GOOD, AND THEY
17 DIDN'T DO THAT.

18 SO ALL THAT HAPPENED IS WE WERE BACK TO
19 SQUARE ONE BUT FOUR YEARS LATER, WHICH IS RIDICULOUS
20 EVEN BY THE STANDARDS OF AMERICAN JUSTICE, IT'S
21 COMPLETELY RIDICULOUS.

1 SO WE'RE -- SO WE HAVE AN URGENT -- AN
2 INTERLOCUTORY APPEAL, WHICH YOU KNOW THE MEANING OF,
3 I'M SURE. AND IF IT'S AN INTERLOCUTORY APPEAL, ONE
4 WOULD ASSUME THAT AN APPELLATE COURT WOULD ACT ON IT
5 WITH SOME URGENCY, GIVEN THAT THE TRIAL JUDGE IS
6 WAITING TO RESUME IT. THAT'S WHAT I THOUGHT. I
7 DIDN'T WANT TO BE PART OF THE APPEAL BUT I DIDN'T
8 THINK IT WOULD TAKE FOUR YEARS.

9 THEN OF COURSE WHEN I TESTIFIED AT THE
10 UNITED STATES SENATE, I BROUGHT UP THE FACT THAT ONE
11 OF THESE JUDGES WHEN IT COMES TIME TO -- RENEW HER
12 TERM OR WHATEVER YOU DO DOWN THERE, ACTUALLY HAD A
13 RECORD OF TAKING TWO YEARS TO SIT ON -- TO SIT ON
14 THESE THINGS, WHICH IS INCREDIBLE. IT'S INCREDIBLE.

15 I MENTIONED, BY THE WAY, THE SECRET TRIAL
16 THAT I GOT ENDED AT THE CANADIAN HUMAN RIGHTS
17 COMMISSION.

18 AS I SAID, I CALLED MY QC IN TORONTO. WE
19 DID THAT -- I GOT HIM WHILE HE WAS HAVING DINNER. HE
20 SAID, DO YOU MIND, I'M HAVING DINNER WITH MY WIFE.
21 I'LL LOOK AT IT AFTERWARDS.

1 HE FILED A MOTION THAT EVENING AND BY THE
2 FOLLOWING DAY, THE CANADIAN HUMAN RIGHTS COMMISSION
3 HAD ENDED ITS -- HAD AGREED TO END ITS SECRET TRIALS.

4 IN THIS CASE WE'LL GO TO SCLEROTIC -- A
5 SCLEROTIC APPELLATE COURT THAT TAKES TWO YEARS TO RULE
6 ON AN INTERLOCUTORY MOTION, AND THEN ANOTHER TWO YEARS
7 TO AMEND TWO FOOTNOTES. AND AS I TESTIFIED TO THE
8 UNITED STATES SENATE, THAT ONE JUDGE IN PARTICULAR IS
9 A DISGRACE AND SHE SHOULD CERTAINLY NOT BE ON ANY
10 APPELLATE COURT, BECAUSE BY THE TIME YOU GET TO A
11 APPELLATE COURT, THE UNFORTUNATE PARTY HAS ALREADY
12 BEEN IN THAT VISCERAL BUSINESS FOR SOMETIME.

13 Q. OKAY. LET ME ASK YOU ABOUT SOMETHING YOU
14 WROTE IN THIS ARTICLE. YOU REFER TO RICH LOWRY THERE.

15 DO YOU SEE DOWN AT THE BOTTOM?

16 A. YES.

17 Q. AND YOU REFER TO HIM AS THE NATIONAL REVIEW
18 EDITOR AND MY OLD BOSS. DO YOU SEE THAT?

19 A. CORRECT.

20 Q. WHAT DID YOU MEAN BY REFERRING TO HIM AS
21 YOUR OLD BOSS?

1 A. WELL, I REFERRED TO HIM AS MY OLD BOSS OR MY
2 FORMER BOSS, AND ACTUALLY EVEN OCCASIONALLY PERHAPS MY
3 BOSS MULTIPLE TIMES. HE'S THE HEAD HONCHO AT NATIONAL
4 REVIEW.

5 Q. AND DID YOU CONSIDER THE FACT YOU WORKED FOR
6 HIM?

7 A. WELL, I WOULDN'T NECESSARILY SAY THAT I
8 WORKED FOR HIM AT ANY ONE TIME. I DID ALL KINDS OF
9 THINGS ALL OVER THE PLANET. BUT CERTAINLY WITH
10 RESPECT TO NATIONAL REVIEW, HE'S THE BOSS OF NATIONAL
11 REVIEW AND I'M NOT.

12 Q. OKAY. WITH RESPECT -- WE TALKED A LITTLE
13 BIT ABOUT THE POSTING ABILITY. YOU NEED -- IN ORDER
14 TO POST TO NATIONAL REVIEW ONLINE, YOU NEEDED SEPARATE
15 SPECIAL CREDENTIALS, CORRECT?

16 A. WELL, THERE'S A WEB EDITOR AND YOU NEED TO
17 HAVE -- I THINK YOU NEED A USER NAME AND A PASSWORD,
18 WHICH IS STANDARD.

19 MY, I THINK MY FIRST ACQUAINTANCE WITH THIS
20 WAS DURING THE TRIAL OF ANOTHER OLD BOSS OF MINE IN
21 CHICAGO, THE RIGHT HONORABLE THE LORD BLACK OF

1 CROSSHARBOUR -- FOR THE COURT REPORTER I SHOULD SAY
2 CROSSHARBOUR IS SPELT IN THE CANADIAN MANOR,
3 C-R-O-S-S-H-A-R-B-O-U-R -- AND THAT WAS -- I BASICALLY
4 LIVE BLOGGED THAT TRIAL IN CHICAGO. I BELIEVE THAT
5 MAY ACTUALLY BE THE FIRST AMERICAN TRIAL TO BE LIVE
6 BLOGGED, AND I WAS GIVEN A USERNAME AND A PASSWORD TO
7 ACCESS THE MACLEANS WEBSITE IN CANADA.

8 A SIMILAR ARRANGEMENT WAS MADE FOR NATIONAL
9 REVIEW. ALTHOUGH I SHOULD SAY INITIALLY THAT WHEN I
10 DIDN'T HAVE A CONTRACTUAL OBLIGATION TO THE CORNER,
11 EVERY ONCE IN A WHILE I'D SEE SOMETHING ON THE CORNER
12 THAT I WANTED TO RESPOND TO. JAY NORDLINGER WAS
13 MAKING A POINT, I BELIEVE, ABOUT PAUL NEWMAN'S PASTA
14 SAUCE AND BEN & JERRY'S ICE CREAM, AND I SENT IN A --
15 I WROTE A RESPONSE TO THAT. I BELIEVE ON ELECTION
16 NIGHT ONE NIGHT, DEAR OLD NICK CLOONEY WHO'S A LOVELY
17 MAN IN KENTUCKY WAS RUNNING FOR THE HOUSE OF
18 REPRESENTATIVES. AND NATIONAL REVIEW REFERRED TO NICK
19 CLOONEY AS GEORGE CLOONEY'S DAD. AND I SAID FOR
20 PETE'S SAKE, THIS IS SUPPOSED TO BE A CONSERVATIVE
21 WEBSITE. NICK CLOONEY IS ROSEMARY CLOONEY'S BROTHER.

1 AND IN THOSE DAYS I WOULD SEND -- IF I HAD
2 LITTLE THINGS LIKE THAT I WANTED TO SAY, I WOULD SEND
3 THEM TO -- TO, I BELIEVE A LADY CALLED KATHLEEN LOPEZ
4 AT NATIONAL REVIEW AND SHE WOULD PUT THEM UP ON THE
5 WEBSITE.

6 ONCE I ENTERED INTO A FORMAL ARRANGEMENT
7 WITH THEM, THEY GAVE ME A -- WHATEVER IT WAS, A
8 PASSWORD AND USERNAME IN ORDER TO BE ABLE TO BYPASS
9 KATHLEEN AND POST DIRECTLY TO THE WEBSITE.

10 Q. I SEE. AND THAT WAS WHEN? AFTER YOU
11 ENTERED INTO YOUR CONTRACT WITH THEM?

12 A. I COULDN'T HONESTLY TELL YOU THE YEAR FOR
13 THAT. BUT CERTAINLY APART FROM THOSE OCCASIONAL
14 THINGS, THE ROSEMARY CLOONEY AND THE PAUL NEWMAN PASTA
15 SAUCE, ONCE I BECAME A REGULAR THERE, I HAD A SYSTEM
16 THAT WHERE I COULD ENTER IT DIRECTLY INTO THE WEB
17 EDITOR AS I WOULD AT STEYN ONLINE OR MACLEANS IN
18 CANADA, OR WHEREVER.

19 Q. OKAY. WOULD YOU LOOK AT EXHIBIT 74, MR.
20 STEYN, PLEASE?

21 (STEYN EXHIBIT NO. 74 WAS MARKED FOR

1 IDENTIFICATION.)

2 BY MR. WILLIAMS:

3 Q. YOU HAVE THAT, SIR?

4 A. YES, I HAVE.

5 Q. OKAY. AND IF YOU LOOK DOWN AT THE BOTTOM OF
6 THE PAGE IT SAYS, STEYN PROPOSAL. DO YOU SEE THAT?

7 A. YES.

8 Q. AND WHAT WE HAVE BEEN TOLD IS THAT THAT IS
9 THE SUM TOTAL OF YOUR CONTRACT WITH THE NATIONAL
10 REVIEW. IS THAT CORRECT?

11 A. I HAVE NO IDEA.

12 MR. WILSON: OBJECTION, MISSTATES THE
13 RECORD.

14 BY MR. WILLIAMS:

15 Q. EXPLAIN TO ME WHAT YOUR -- WHAT ARE THE
16 TERMS OF THE CONTRACT WITH NATIONAL REVIEW AS YOU
17 UNDERSTAND IT?

18 MR. HEINTZ: OBJECTION TO THE FORM.

19 GO AHEAD.

20 THE WITNESS: WELL, AS I UNDERSTAND THEM, I
21 DON'T UNDERSTAND THEM. I DON'T DEAL WITH THIS KIND OF

1 MATTER.

2 AND GENERALLY SPEAKING, ASIDE FROM ONE OF MY
3 ASSOCIATES GOING THROUGH WHAT THE BURDEN UPON ME WOULD
4 BE, FOR EXAMPLE, WHETHER IT'S, YOU KNOW, FIVE CORNER
5 POSTS A WEEK OR 37 CORNER POSTS A WEEK, ASIDE FROM
6 GIVING ME THE UPSHOT OF THE BURDEN UPON ME, I -- THESE
7 ARE NUMBERS, YOU KNOW, THERE'S PROMOTIONAL THINGS HERE
8 THAT, YOU KNOW, THE LIFT LETTER TO BE USED FOR
9 NATIONAL REVIEW SUBSCRIPTIONS, THE CRUISE OBLIGATIONS,
10 THE DINNERS, THE -- I BELIEVE THEY AS PART OF THE
11 AGREEMENT, THEY USED TO PUBLISH A FULL PAGE AD IN
12 NATIONAL REVIEW ADVERTISING MY BOOKS. BUT AGAIN,
13 THOSE THINGS ARE NOTHING I WOULD HAVE ANY KNOWLEDGE
14 OF. I WOULDN'T BE IN ON THE NEGOTIATIONS FOR THEM. I
15 WOULDN'T BE IN ON THE DISCUSSIONS FOR THEM. I
16 WOULDN'T BE IN ON THE REMUNERATION FOR THEM.

17 I WOULD HAVE NO IDEA OF ANY OF THOSE THINGS.

18 Q. WHEN YOU SAY YOU WOULDN'T BE INVOLVED IN THE
19 REMUNERATION --

20 A. UH-HUH.

21 Q. -- YOU WOULD BE RECEIVING COMPENSATION FROM

1 THEM, CORRECT?

2 A. WELL, I WOULD ASSUME THAT. BUT I MEAN, I'LL
3 JUST GIVE YOU A GENERAL EXAMPLE.

4 SOMETIMES YOU GET ASKED TO APPEAR IN MOOSE
5 JAW AND THEY OFFER YOU A HUNDRED DOLLARS. AND
6 THREE DAYS LATER YOU'RE ASKED TO APPEAR IN MALIBU AND
7 THEY OFFER YOU A HUNDRED THOUSAND DOLLARS.

8 DO I KNOW WHICH I'M GETTING A HUNDRED
9 DOLLARS FOR AND WHICH I'M GETTING A HUNDRED THOUSAND
10 FOR? NO, BECAUSE IT'S NOT CONDUCIVE TO ONE'S
11 PERFORMANCE.

12 YOU DON'T GO ON THE STAGE AND SAY, OKAY, I'M
13 GETTING 1,000TH IN MOOSE JAW OF WHAT I'M GETTING IN
14 MALIBU, SO I'M ONLY GOING TO GIVE A PERFORMANCE THAT'S
15 ONLY 1,000TH AS GOOD.

16 IT'S NOT IN THE LEAST BIT USEFUL TO KNOW
17 THOSE THINGS. AND SO I LEAVE IT TO MY BUSINESS
18 MANAGERS AND HOPE BY THE END OF THE YEAR, THAT I'VE
19 GOT ENOUGH TO PAY MY TAXES AND TO ENJOY THE VERY
20 MODEST HOBBIES I HAPPEN TO HAVE.

21 BUT OTHER THAN THAT, I TAKE NO -- I DON'T

1 NEGOTIATE HOW MUCH COMPENSATION I GET WITH RESPECT TO
2 ONE OFFS OR WITH RESPECT TO LONG TERM CONTRACTS.

3 Q. ALL RIGHT. I GUESS I UNDERSTAND THAT.

4 DID NATIONAL REVIEW IN YOUR VIEW HAVE THE
5 ABILITY TO FIRE YOU?

6 A. OH, YES. IN FACT THAT'S ONE OF THOSE THINGS
7 I DISLIKE ABOUT THAT DISGRACEFUL MOTION OF THEIRS, IS
8 THE IMPLICATION. I DON'T KNOW, WHAT WAS THAT? WAS
9 THAT MORDANT LAUGHTER FROM SOMEWHERE?

10 Q. IT WASN'T FROM HERE, SIR. SO LET'S
11 CONTINUE.

12 A. NO, NO. I UNDERSTAND THAT. I DON'T KNOW
13 BUT IF ONE OF THE OTHER FOLKS IS CRACKING UP AT THIS,
14 I TELL YOU IT ISN'T FUNNY TO ME TO HAVE LIES TOLD
15 ABOUT YOU.

16 AND THE IMPLICATION THERE, BY THE WAY, WHICH
17 IS COMPLETELY FALSE IN NATIONAL REVIEW'S DREADFUL
18 MOTION, IS THAT I -- I BROKE MY CONTRACT AND WAS
19 TERMINATED, OR IN THE VERNACULAR FIRED OR SACKED.

20 AND I DON'T -- THAT'S DEEPLY TROUBLING TO
21 ME, AND I CERTAINLY REJECT THAT AS AN OUTRIGHT LIE.

1 I SAID EARLIER THAT I WAS FIRED BY THE BBC.
2 AND I SAID THAT WHETHER THAT MET THE DEFINITION OF
3 D.C. LABOR LAW OR WHATEVER, YOU KNOW, AS A PRACTICAL
4 MATTER, IF YOU'RE FIRED, YOU'RE SACKED, YOU'RE TOLD --
5 YOU KNOW, I HAD IT HAPPEN TO ME WHEN I WAS A KID IN
6 RADIO. I THINK I WAS STILL A TEENAGER WHERE I WAS
7 QUOTE/UNQUOTE "FIRED." AND I WASN'T REALLY BECAUSE I
8 WAS A FREELANCE PRESENTER.

9 BUT I REMEMBER AS I LEFT THE BUILDING, THE
10 RECEPTIONIST TURNING BEHIND HER TAKING MY PHOTOGRAPH
11 OFF THE WAHL AND SAYING, HERE, YOU MIGHT AS WELL HAVE
12 THIS. AS A PRACTICAL MATTER, THAT'S FIRED. AND IN
13 THAT SENSE, NATIONAL REVIEW CERTAINLY HAD THE RIGHT TO
14 FIRE ME IN THAT SENSE.

15 AND -- AND IN THE APPALLING MOTION HAVE
16 MANAGED TO GIVE THE IMPRESSION THAT I DID SOMETHING
17 WRONG WORTHY OF FIRING.

18 MR. WILSON: I INTENDED TO ASSERT AN
19 OBJECTION TO THE PRIOR QUESTION BUT WAS UNABLE TO
20 BEFORE THE WITNESS ANSWERED.

21 JUST OBJECT TO FIRED AS VAGUE AND CALLS FOR

1 SPECULATION.

2 BY MR. WILLIAMS:

3 Q. SIR, AS I UNDERSTAND IT THERE WAS SOME
4 CONCERNS THAT YOU AND/OR YOUR STAFF HAD WITH RESPECT
5 TO THE EDITING OF YOUR ARTICLES BY THE NATIONAL
6 REVIEW. DO YOU RECALL THAT?

7 A. I RECALL IT FROM SOME OF THESE EXHIBITS.

8 Q. CAN YOU EXPLAIN WHAT THE ISSUE WAS WITH
9 RESPECT TO THE EDITING OF YOUR ARTICLES?

10 A. WELL --

11 MR. HEINTZ: OBJECTION.

12 THE WITNESS: CAN YOU REPEAT YOUR OBJECTION?

13 MR. HEINTZ: OBJECTION, VAGUE AS TO
14 ARTICLES.

15 BY MR. WILLIAMS:

16 Q. I THINK YOU CAN ANSWER, SIR.

17 A. I HAVE GENERALLY HAD WHAT THEY CALL IN THE
18 -- IN THE COMMONWEALTH COUNTRIES I HAVE MAINLY WORKED
19 IN, BARBED WIRE AROUND MY COLUMNS. IN OTHER WORDS, IF
20 I SUBMIT A COLUMN TO THE DAILY TELEGRAPH IN LONDON OR
21 TO THE AUSTRALIAN OR TO THE NATIONAL POST OF CANADA, I

1 EXPECT IT TO APPEAR AS WRITTEN -- OR TO THE IRISH
2 TIMES OR WHATEVER. I EXPECT IT TO APPEAR AS WRITTEN.
3 BARBED WIRE.

4 AND WE DIDN'T ACTUALLY SPECIFY THAT, I
5 BELIEVE, OR I HAVE A VAGUE RECOLLECTION THAT SOMEBODY
6 HAS TESTIFIED TO THAT EFFECT, BUT I MAY BE WRONG. BUT
7 WE NEVERTHELESS REQUIRED BARBED WIRE, AND THERE WAS A
8 LITTLE BIT OF -- A LITTLE BIT OF OVER-EDITING GOING ON
9 AND WE HAD CALLS IN THAT PERIOD TO ALERT THEM TO IT
10 OVER THE YEARS.

11 Q. THANK YOU.

12 AND GOING BACK TO EXHIBIT 74, THAT WAS WHAT
13 I REFERRED TO AS A CONTRACT. DO YOU WANT TO LOOK AT
14 THAT, PLEASE?

15 A. YOU MEAN THE LOWER -- THE E-MAIL AT THE
16 BOTTOM OF THE PAGE?

17 Q. CORRECT, YES.

18 SO DID YOU HAVE AN UNDERSTANDING THAT
19 NATIONAL REVIEW WAS GOING TO ASSIST IN SOME WAY IN
20 SELLING YOUR BOOKS?

21 A. NO. MY -- MY UNDERSTANDING OF THAT CAME

1 FROM THE FACT THAT WHEN THE MAGAZINE CAME, I BELIEVE
2 ON THE PAGE BEFORE MY COLUMN OR POSSIBLY EARLIER IN
3 THE MAGAZINE, THERE WOULD BE A FULL PAGE, FULL COLOR
4 AD FOR MY BOOKS. AND I ASSUME THAT WAS SOMETHING --
5 AND I NOTICED THAT A FORTNIGHT LATER, IT WAS ALSO
6 THERE. SO I ASSUMED IT WAS SOMETHING THAT ONE OF MY
7 ASSOCIATES HAD NEGOTIATED, BUT I DIDN'T ATTACH ANY
8 SIGNIFICANCE TO IT ONE WAY OR THE OTHER.

9 Q. IT REFERS TO ONE NR CRUISE PER ANNUM?

10 A. YES.

11 Q. IS THAT CORRECT? YOU WENT ON ONE CRUISE
12 EVERY YEAR?

13 MR. WILSON: OBJECTION TO THE FORM.
14 BY MR. WILLIAMS:

15 Q. DID YOU GO ON A CRUISE?

16 A. I WENT ON -- I DON'T KNOW WHETHER IT WAS ONE
17 PER ANNUM. I WENT ON SEVERAL CRUISES IN THIS PERIOD
18 THAT -- I WENT ON THEIR BRITISH ISLES CRUISE, I WENT
19 ON THEIR SO-CALLED MEXICAN RIVIERA CRUISE, I WENT ON
20 SEVERAL CARIBBEAN CRUISES. AND MY RECOLLECTION IS
21 THAT IT WAS CERTAINLY AROUND THIS PERIOD.

1 Q. AND YOU WENT -- IS IT CORRECT THAT YOU WENT
2 TO AN ANNUAL DINNER WITH RESPECTIVE DONORS?

3 MR. WILSON: OBJECTION.

4 THE WITNESS: I WENT TO DONOR EVENTS AND TO
5 NATIONAL REVIEW EVENTS. I WENT -- I WENT TO EVENTS
6 WHERE YOU'RE SITTING HAVING SOME CHICKEN AROUND THE
7 TABLE WITH PEOPLE THAT YOU WERE SUPPOSED TO ENTERTAIN
8 AND CHARM TO THE POINT WHERE THEY GIVE MONEY TO
9 NATIONAL REVIEW. THAT'S CERTAINLY CORRECT.

10 BY MR. WILLIAMS:

11 Q. AND HOW DID YOU DO?

12 MR. HEINTZ: OBJECTION TO THE FORM.

13 THE WITNESS: WELL, I WAS -- LOOK, AS I
14 TESTIFIED EARLIER, I MADE MONEY FOR NATIONAL REVIEW.
15 I BROUGHT THEM SUBSCRIBERS, I BROUGHT THEM ONLINE
16 EYEBALLS, I BROUGHT THEM CRUISE PASSENGERS.

17 SO I DON'T THINK I COULD HAVE DONE THAT
18 BADLY.

19 I MENTIONED THE ONE WHERE I WAS ALL BASHED
20 UP FROM MY TRUCK ACCIDENT AND WAS ALL BANDAGED AND I
21 WAS -- I WAS A LITTLE WOOZY AND OUT OF FOCUS THAT

1 EVENING. THE PEOPLE SEEMED TO ENJOY IT AND SUDDENLY I
2 ACQUITTED MYSELF WELL BY COMPARISON WITH THE NATIONAL
3 REVIEW STAFFERS WHO WERE ON THAT -- ON THAT DATE.

4 BY MR. WILLIAMS:

5 Q. AND IT SAYS THAT YOU WERE GOING TO WRITE --
6 I THINK IT SAYS YOU WERE GOING TO WRITE A LIFT LETTER
7 TO BE USED FOR NR CRUISES?

8 A. YES. I'M NOT -- YOU KNOW, I DON'T WANT TO
9 GIVE THE IMPRESSION -- AS I SAID, YOU KNOW, THIS IS --
10 THESE ARE CHARITABLE ENDEAVORS, WHICH IS WHY I THINK
11 THAT LOWRY AND FOWLER GETTING THE COURT TO SEAL THEIR
12 PUBLICLY AVAILABLE SALARIES IS SO DISREPUTABLE.

13 BUT I CERTAINLY -- I CERTAINLY, FOR EXAMPLE,
14 WHEN THEY HAD THINGS LIKE THEIR WEB-A-THONS, I WOULD
15 WRITE LIKE AN OPEN LETTER TO NATIONAL REVIEW
16 SUBSCRIBERS SAYING WHY THEY SHOULD RE-UP AND SUBSCRIBE
17 TO THE MAGAZINE BECAUSE YOU'VE GOT LOTS OF TERRIFIC
18 WRITING ON THIS, THAT AND THE OTHER. SO AS I SAID, I
19 REGARD THAT AS CHARITABLE ENDEAVORS FOR WHEN NATIONAL
20 REVIEW WERE HAVING THESE FUNDRAISERS.

21 Q. MR. STEYN, THANK YOU VERY MUCH. I DON'T

1 HAVE ANY FURTHER QUESTIONS.

2 A. THANK YOU, COUNSELOR.

3 MR. DELAQUIL: NO QUESTIONS FOR COMPETITIVE
4 ENTERPRISES OR RAND SIMBERG.

5 MR. HEINTZ: NO QUESTIONS FROM NATIONAL
6 REVIEW.

7 I'LL JUST NOTE THAT A FEW OF THE EXHIBITS
8 USED IN THE DEPOSITION WERE MARKED CONFIDENTIAL
9 PURSUANT TO THE TERMS OF THE PROTECTIVE ORDER.

10 THANK YOU, MR. STEYN.

11 THE REPORTER: ALL PARTIES WANT COPIES?

12 THE VIDEOGRAPHER: DO ALL PARTIES WANT A
13 COPY OF THE VIDEO?

14 MR. DELAQUIL: COMPETITIVE ENTERPRISE
15 INSTITUTE DOES NOT.

16 THE VIDEOGRAPHER: OKAY.

17 MR. WILSON: THIS IS ANDREW WILSON FOR MARK
18 STEYN. WE CAN ORDER IT LATER.

19 VIDEOGRAPHER: OKAY. AND, MR. HEINTZ?

20 MR. HEINTZ: YES, PLEASE.

21 MR. WILSON: READ AND SIGN.

1 THE VIDEOGRAPHER: I'M SORRY. JUST TWO MORE
2 QUESTIONS FOR MR. WILLIAMS AND MR. HEINTZ, WOULD YOU
3 LIKE THAT SYNCED WITH THE AUDIO TRANSCRIPT?

4 MR. WILSON: YES, PLEASE.

5 MR. HEINTZ: YES, PLEASE.

6 THE VIDEOGRAPHER: ALL RIGHT. WELL, THEN,
7 IF THERE ARE NO FURTHER QUESTIONS, THIS CONCLUDES THE
8 VIDEO CONFERENCE DEPOSITION OF MARK STEYN.

9 WE ARE GOING OFF THE RECORD ON OCTOBER 26,
10 2020 AT 3:23 P.M.

11 (THE DEPOSITION CONCLUDED AT 3:23 P.M.)
12
13
14
15
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21

REPORTER'S CERTIFICATE

STATE OF MARYLAND

COUNTY OF BALTIMORE, TO WIT:

I, KENNETH NORRIS, A NOTARY PUBLIC OF
THE STATE OF MARYLAND, COUNTY OF BALTIMORE, DO HEREBY
CERTIFY THAT THE WITHIN NAMED WITNESS PERSONALLY
APPEARED BEFORE ME AT THE TIME AND PLACE HEREIN SET
OUT, AND AFTER HAVING BEEN DULY SWORN BY ME, ACCORDING
TO LAW, WAS EXAMINED.

I FURTHER CERTIFY THE EXAMINATION WAS
RECORDED STENOGRAPHICALLY BY ME AND THIS TRANSCRIPT IS
A TRUE RECORD OF THE PROCEEDINGS.

I FURTHER CERTIFY THAT I AM NOT OF
COUNSEL TO ANY OF THE PARTIES, NOR IN ANY WAY
INTERESTED IN THE OUTCOME OF THIS ACTION.

AS WITNESS MY HAND AND NOTARIAL SEAL
THIS 26TH DAY OF OCTOBER, 2020.



KENNETH NORRIS

NOTARY REPUBLIC

MY COMMISSION EXPIRES: 7-07-22

CERTIFICATE OF DEPONENT

I HEREBY CERTIFY THAT I HAVE READ AND
EXAMINED THE FOREGOING TRANSCRIPT, AND THE SAME IS A
TRUE AND ACCURATE RECORD OF THE TESTIMONY GIVEN BY ME.

ANY ADDITIONS OR CORRECTIONS THAT I
FEEL ARE NECESSARY, I WILL ATTACH ON A SEPARATE SHEET
OF PAPER TO THE ORIGINAL TRANSCRIPT.

MARK STEYN

Reference No.: 6122503

Case: MICHAEL E. MANN vs NATIONAL REVIEW

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my Deposition taken in the captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Mark Steyn

NOTARIZATION OF CHANGES
(If Required)

Subscribed and sworn to on the _____ day of

_____, 20____ before me,

(Notary Sign)_____

(Print Name) _____ Notary Public,

in and for the State of _____

Reference No.: 6122503

Case: MICHAEL E. MANN vs NATIONAL REVIEW

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Page No. _____ Line No. _____ Change to: _____

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Mark Steyn

Reference No.: 6122503

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Reason for change: _____

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SIGNATURE: _____ DATE: _____

Mark Steyn

	6122503 Mar k.Steyn. EXHIBIT41	6122503 Mar k.Steyn. EXHIBIT59	\$426,000 120:13	109 6:18,20 89:9,11
6122503 Mar k.Steyn. EXHIBIT1	122:17 123:1 132:9	6122503 Mar k.Steyn. EXHIBIT60	(10:07 9:4
13:9,14 36:5 81:9	6122503 Mar k.Steyn. EXHIBIT43	185:14,16	(C) 131:5	11 25:1
6122503 Mar k.Steyn. EXHIBIT2	136:15,16 137:7	6122503 Mar k.Steyn. EXHIBIT62	0	11:40 80:13
37:20,21	6122503 Mar k.Steyn. EXHIBIT44	6122503 Mar k.Steyn. EXHIBIT63	007 124:21	11:50 80:15
6122503 Mar k.Steyn. EXHIBIT26	138:14,16 164:4	6122503 Mar k.Steyn. EXHIBIT64	008263 9:10	11:55 80:18
58:4,5	6122503 Mar k.Steyn. EXHIBIT45	6122503 Mar k.Steyn. EXHIBIT67	1	12 183:10
6122503 Mar k.Steyn. EXHIBIT28	133:10 140:16,17	6122503 Mar k.Steyn. EXHIBIT69	1	123 7:5
40:20,21	6122503 Mar k.Steyn. EXHIBIT47	27:14,18	6:10 13:9,14 15:1 36:5 38:15 81:9 167:16 168:2	13 6:10 36:11 37:7
6122503 Mar k.Steyn. EXHIBIT32	141:11,12 142:1	6122503 Mar k.Steyn. EXHIBIT71	1,000TH 195:13,15	136 7:6
107:12,13	6122503 Mar k.Steyn. EXHIBIT48	146:4	10 25:1 80:6,9 122:8 132:19 159:13	138 7:7
6122503 Mar k.Steyn. EXHIBIT33	96:13,14 98:19	6122503 Mar k.Steyn. EXHIBIT72	10-YEAR 159:16	14 36:5,12, 15 37:2, 8,10 112:16
108:13	6122503 Mar k.Steyn. EXHIBIT49	155:12,13	100 117:12	140 7:9
6122503 Mar k.Steyn. EXHIBIT34	161:15,16	6122503 Mar k.Steyn. EXHIBIT74	107 6:16	141 7:11
109:2	6122503 Mar k.Steyn. EXHIBIT53	192:19,21 199:12	108 6:17	1432 56:8
6122503 Mar k.Steyn. EXHIBIT35	151:20			
109:15,16	6122503 Mar k.Steyn. EXHIBIT57	\$ \$4 119:14		1437 50:2
6122503 Mar k.Steyn. EXHIBIT37	166:5,8			146 8:9
172:14,15				

149 8:10	1992 116:10	2001 38:8 40:11	26 6:13 58:4,5 204:9	108:10,13 34 6:18 109:1,2
15 122:11	1993 118:14	2006 31:4 104:2 105:4	26TH 9:5	35 6:20 109:15,16
151 7:18	1994 118:14	2010 26:6	27 8:7 46:18 99:4	37 6:12,21 140:11 172:14,15 194:5
155 8:12	1996 130:14	2011 26:6 176:11 183:13	270 82:11	38 46:19
16 36:6,7,12 111:7,13	19TH 46:13	2012 9:10 88:5 89:21 91:19	28 6:14 40:20,21 159:9	3:23 204:10,11
161 7:16	1:06 133:2	2013 162:15	29.95 21:14	4
166 7:20	1:51 133:6	2014 29:13 58:9 76:3 101:19 102:4 162:9,15	2:00 132:20	4 115:18 116:1 139:5
172 6:21	2	2015 29:13	3 139:3 142:15 145:9 164:4,5	4'S 116:9
1837 49:10	2 6:12 37:20,21 38:15 41:6 97:8,11, 12 98:19 137:2,3 143:2 147:1,2 149:17 152:6 162:1,2 167:16	2016 186:6	30 17:6 82:10	40 6:14 123:19,21
185 8:2		2018 33:9	30-PAGE 23:1	40S 45:2,4 47:4,6
1853 49:9		2020 9:5 204:10	30-YEAR 42:6,7,8, 15,19	41 7:5 122:17 123:1,16, 20 132:9
19 39:20		20TH 42:3,15, 21 44:14, 21 45:7, 14,17	32 6:16 107:12,13 108:6	42 140:11
192 8:14		230 76:6	33 6:17	43 7:6 8:4, 5,6
1922 81:3	2.0 8:11			
1957 81:3	20 37:15 62:15 82:10 85:1 122:11,14 134:1 167:8 178:7			
1965 151:16				
1970S 42:19				
1974 113:17				
1978 50:4				

136:15,16	59	74	103:15,16	ACADEMIC
137:7	8:1 89:4,	8:14		137:16
44	5,8 157:1	192:19,21	A	ACADEMY
7:7		199:12		86:14
138:14,16	6	78	A-P-P-E-L-L	87:5
164:4		114:6	165:5	92:14
45	60		A-R-R-I-G-O	104:2
7:9 12:4	8:2 17:6	8	95:2	183:11
132:19	185:14,16		A.M.	185:7
133:10,15	600	8	9:4	ACCEPTABLE
140:16,17	129:4	15:18	80:13,18	80:3
47	62	80	ABILITY	ACCEPTED
7:11	8:4 43:6,	144:15	190:13	100:15
141:11,12	8	800	196:5	ACCESS
142:1	63	128:19	ABREAST	78:10
48	8:5 43:7,	129:5	16:14	191:7
7:13	8	80S	17:7	ACCESSIBLE
96:13,14	64	56:18	ABSOLUTE	23:21
98:19	8:6 43:8	115:8,14	55:5	ACCIDENT
49	67	86	ABSOLUTELY	93:4 94:6
7:16	8:7	163:2	48:12	129:8
161:15,16	27:14,18	88	59:5	201:20
4E	28:1	8:1	64:17	ACCOUNTING
81:11	88:11		70:5	79:8
	171:14	9	144:21	ACCOUNTS
5	69		168:17	114:20
	8:9	9	ABSOLUTIST	115:4
50	146:2,4	6:3	76:16	ACCURATE
131:17	7	900	ABSTRACT	171:6
146:2		45:21	21:19,20	ACCUSATION
501		52:21	ABSTRUSE	19:1
131:5	70	90S	72:10	ACCUSED
501(C)(3)	128:21	115:8,14	ABSURD	18:19
120:11	70S	116:1	51:12	82:5
53	45:4 47:7	96	60:19	165:7,15
7:18	71	7:13	65:9	ACHIEVED
151:19,20	8:10	98	ABUSES	187:8
57	149:11,12	50:5	93:2	ACKNOWLEDGE
6:13 7:20	72	103:15,16	ABUSING	D
166:5,8	8:12	99	92:20	149:8
	155:12,13			

ACOLYTES	200:4	71:10	52:11	153:3
164:16	ADDITIONAL	177:3,5	81:13	174:9
ACQUAINTANCE	13:18	AGENCY	ALLEGED	177:3,5
E	102:12	134:19	31:6	179:3
29:6	ADDRESS	AGREE	139:10	183:11
34:18	91:8	28:21	ALLIES	185:7
35:8	ADJECTIVES	170:14	84:10	187:20
190:19	83:18	AGREEABLE	ALPHABET	191:5
ACQUAINTANCESHIP	ADJUSTING	79:6	29:3	AMERICANS
30:9,14,	44:20	AGREED	ALTERNATIVE	32:5
16 31:8,	ADMINISTRAT	12:20	147:19	111:3
10	ION	120:14	AMAZON.COM	AMOUNT
ACQUAINTED	157:19	127:4	141:6	65:20
31:18	158:4	189:3	AMEND	AMPLIFIES
ACQUIT	ADVANCE	AGREEMENT	189:7	145:1
151:1	68:17	194:11	AMENDED	AMUSING
ACQUITTED	69:4	AGREES	138:9	69:21
202:2	ADVANCING	170:17	156:11	AND/OR
ACRONYM	75:17	AHEAD	186:9	198:4
35:19	178:16	41:14	AMENDMENT	ANDERSON
134:19	ADVERTISEME	73:17	100:17	92:1
ACRONYMS	NT	153:19	AMERICA	162:11
29:3	166:15,19	154:6	12:19	ANDREW
30:12	167:4	193:19	56:5 68:7	5:1 10:2
35:17	ADVERTISING	AHMED	AMERICAN	91:7
104:10	194:12	104:16	25:12	132:16
ACT	AFFIDAVIT	105:10	29:3,5	147:1
188:4	70:7	AIR	30:4	149:17
ACTING	AFLOAT	38:11	31:6,20	203:17
161:1	100:3	174:1	34:19	ANDY
ACTIVELY	AFTERNOON	ALBERTA	35:7,16	110:6
124:13	133:4	175:2,5	54:4	ANGLIA
ACTIVIST	AGE	ALERT	56:3,4,16	44:2
124:12	10:11	199:9	66:20	ANN
ACTUAL	42:21	ALERTED	67:6,10,	72:6
91:2	44:6 48:4	92:16,18	12 87:9	116:2
177:11	111:7	ALIVE	99:15	ANNIE'S
AD	112:16	70:21	109:21	116:5
167:14	159:13	117:17	110:8	ANNIVERSARI
194:11	AGENCIES	ALLEGATION	112:8,10	ES
			116:21	117:11
			144:11	

ANNUAL	APPARENTLY	APPLE	151:9,12	39:20
201:2	46:5	40:6		41:3,7
	69:21		ARISE	58:13
ANNUM	70:16	APPLIES	68:6	70:11
200:9,17		49:6	ARISES	73:4,10,
ANSWER 'S	APPEAL	APPLY	177:20	11 88:11,
97:4	77:8	49:6 71:8	178:12	13 89:16
	150:19			90:13
ANSWERING	186:16,17	APPOINTMENT	ARIZONA	96:20
117:4	187:9,14	88:3	53:14	97:7,11
180:20	188:2,3,7	APPROACHING	AROSE	98:7
ANSWERS	APPEALS	122:4	77:15	102:10
6:11	58:17	APPROXIMATE	ARRANGE	106:15
11:16	59:1	LY	88:2	108:16
13:3,5	72:15	16:12	ARRANGEMENT	109:6,14
14:3,7	89:11	46:20	191:8	132:14
15:19	171:20	159:12	192:6	133:18
24:21	186:4,8,			135:13
36:6,13	11	APRIL	ARRAY	136:20
81:9	APPEARANCE	40:11	101:5,9	140:12,15
ANTARCTICA	53:14	ARABIA	102:20	141:14
163:4	APPEARANCES	125:2	104:10	142:11
ANTHONY	64:3	ARAFAT	ARREST	145:6
17:13	APPEARED	167:21	159:8	146:10,
ANYBODY 'S	138:20	169:10	183:13	15,16
45:8	APPEARS	ARBITRATION	ARRESTED	147:8
ANYMORE	99:2	119:13,17	184:6,7	166:11
45:21	156:18	120:4	ARRESTING	167:15
126:5	172:7,8	ARBITRATOR 'S	161:2	171:10,15
AP	APPELL	121:10	ARRIVED	172:5,20
108:4	18:12	AREA	12:6	173:4,21
APOLOGIZE	165:5,18	49:6	ARTICLE	176:20
50:15	APPELL 'S	51:15	6:12,14,	177:15
99:21	165:12	AREAS	18,20,21	178:20
108:9	APPELLATE	179:4	7:9,11,	179:11
156:13	72:4	ARGUMENT	13,16,18,	180:3,4
APOSTROPHE	163:14	65:5	20 8:2,7,	181:12
95:1	187:15	75:17	9,10 16:7	185:20
APPALLING	188:4	76:6	22:2	189:14
197:15	189:5,10,	178:17	26:10,14	ARTICLES
APPARENT	11	ARGUMENTATI	27:5,10,	7:6 14:8,
15:19	APPENDIX	VE	11,14	9,14,16
	89:12		29:14	19:13
			38:5,10	21:9
				22:17
				24:11

25:1	ASSISTANT	112:19	AUTHORIZE	
81:12	66:21	ATTENTION	71:3	B
82:16	158:21	97:8	AUTHORS	
83:11,21	ASSOCIATE	ATTEST	92:16,17	B-R-O-E-C-
84:3,17	105:15	154:11	AUTOMOBILES	K-E-R
99:1	165:6	ATTORNEY	54:6	148:18
106:17	ASSOCIATES	102:10	AVERAGE	BACK
108:18	129:11	160:1,11,	17:2	16:11
136:13	167:1	12,15	AVID	24:2
146:14	194:3	184:14	15:20	26:5,12
171:21	200:7	ATTORNEY-	16:1,3,12	34:18
176:16	ASSUME	CLIENT	AW	42:4
177:15	27:10	103:6	17:16	47:17
198:5,9,	123:12	ATTORNEYS	AWARD	64:2
14	145:13	32:11	114:15	67:18
ARTIST	188:4	183:17	115:3	71:1
123:16	195:2	AUDIO	118:3	80:5,8,
124:5,7	200:4	9:16,17	120:1	14,17,20
ARTS	ASSUMED	22:9	AWARDED	116:19
115:11	29:16,17	204:3	119:14	117:4
ASCRIBED	200:6	AUDIT	AWARE	118:6,8
149:5	ASSUMING	17:11	16:7	130:14
ASHAMED	158:12	AUSTRALIA	31:2,14	132:8,17,
145:3	ASSUMPTION	17:19	33:13	19 133:5,
ASPECT	170:16	40:5	34:21	8 161:4
170:17	ASSURE	98:16	48:1 62:9	162:21
ASPECTS	59:19	119:6	70:9	180:2
66:1	ASTOUNDED	AUSTRALIAN	85:4,12	187:18
ASSENT	51:17	24:6	86:1	199:12
77:11	ATTACH	40:16	91:17	BACKBENCHER
ASSERT	150:21	98:2	92:5	77:9
197:18	200:7	198:21	93:20	BACKER
ASSERTION	ATTEMPT	AUTHOR	104:14	75:16
62:4	54:7	123:14	106:5	BACKGROUND
ASSESSMENT	150:21	AUTHORED	131:9	110:13
44:7	ATTEMPTING	150:13	153:9	BAD
ASSHOLE	147:18	AUTHORITY	173:14	129:8
63:20	148:20	150:19	174:1,4	BADLY
72:16	169:15	AUTHORIZATI	176:12,16	201:18
ASSIST	ATTENBOROUGH	ON	177:4	BAKER
199:19	H	71:8		10:7
				BALKAN
				72:11,21

BALL	201:19	BED	BEWILDERING	27:17
100:6,9		18:20	29:2	35:16
175:8	BASIC		104:9	37:18
	92:21	BEEPING		67:12
BALLERINA		140:5,6	BICKMORE	76:11
165:2	BASICALLY		18:14	78:1
	44:3	BEG	164:21	100:20
BALLS	46:15	47:4	165:18	120:19
44:17	49:18	63:17		122:19
46:10	51:17	69:14	BIDDING	125:17
	59:10		160:1	128:7
BANANA	65:7	BEGAN		131:18
40:6	66:10	42:5 48:7	BIG	137:3
	67:2 75:6	98:13	7:11 28:1	163:3
BANDAGED	78:7		41:8,12,	167:17
129:11	137:16	BEGGING	16 75:16	174:14
201:20	191:3	64:2	118:3	190:13
		117:4	129:2	195:16
BANDAGES			142:1	199:8
129:11	BASIS	BEGINNING		
	16:19	35:17,19		
BANK	39:21	76:2	BIGGER	
127:20	52:11	104:10	67:20	
	91:1,5	124:8		BIZARRE
BANNED	103:11	177:6	BIGGEST	18:15
106:10,			100:17	
12,20	BATTLE	BEGINS	112:17	BLACK
171:1	77:17	9:6 35:11		114:2
	78:5		BILLIONAIRE	118:1
BANNER	137:19	BEHALF	121:6,16	145:12
120:2		10:5,7		190:21
	BAUBLES	154:18	BILLIONAIRE	
BANNING	68:11		'S	BLACK'S
141:5		BEHAVIOR	121:19	145:14
	BBC	69:7 70:2		
BANTER	115:5,7,	185:10,11	BINDER	BLADE
69:19	9,14		13:9,11	51:8
78:21	116:13,14	BELABORING	133:17	
	117:2,7	179:18		BLAND
BARBED	118:9,12,		BINLADEN	109:20
198:19	19 197:1	BELIVE	18:10	
199:3,7		13:4		BLEND
			BIO	49:3
BARRISTER	BEAR	BELL	7:5	
12:20	74:16	173:3,13	70:16,19	BLOCK
	154:9		71:2,4,	89:17
BARRY		BEN	11,14	
18:14	BEARING	191:14	122:18	BLOCKING
164:21	135:3			8:2 141:5
165:18		BENCH	BISHOP	185:21
	BEAUTIFUL	175:2,5	17:16	
BASES	55:20			BLOGGED
52:15	56:1	BERLIN	BIT	191:4,6
	121:11	52:6	17:12	BLOODY
BASHED				

77:5	200:4	182:15	BRING	63:20
BLUE	BOOM	183:20	101:10	72:17
164:17	53:1	BRADLEY	163:16	BUILDING
165:21	BOOST	103:14	BRINGING	38:20
BLURRING	143:16	BRAND	17:6	40:7
131:6	BORDER	182:16	183:6	197:9
BODIES	179:5	BRANSTEN	BRITISH	BUMPING
86:10	BORIS	119:19	100:7	165:2
87:10	67:3,4,9	BRANSTEN'S	156:5,9	BUNGALOW
150:14	BORN	120:1	175:8	38:19
BODY	110:17,18	121:7	200:18	40:8
86:12,15	BOSS	BRAZEN	BROADCAST	BUNK
87:8	189:18,21	94:20	114:8,11	55:5
125:12	190:1,2,	150:7	115:21	BURDEN
BOG	3,10,20	BREACH	BROADCASTER	90:21
44:19,21	BOSTON	63:11	113:21	194:3,6
BOIL	129:10,12	120:4	114:4,13	BUREAU
16:2	BOTTOM	BREACHED	BROECKER	66:21
BOLLOCKSED	38:15	63:7,15	148:18	BURLINGTON
187:5	149:20	79:2	149:1	12:8
BOLOGNA	157:16	BREACHES	BROKE	BURNING
117:11	167:18	63:8	66:6	55:3
BOOK	168:2	BREAK	119:13	BURY
8:12	171:20	80:2	174:11	187:16
14:19	189:15	113:13,15	184:19	BUSBOY
22:5 23:5	193:5	122:3,8,	196:18	113:9
24:14	199:16	11	BROKEN	119:4
27:1,3,16	BOUGHT	BREEZE	14:10	BROther
28:1	23:7	72:8	BROther	BUSINESS
29:7,10	BOUNCED	BREWERY	191:21	66:1,10
30:1,11	19:14	129:10	BROTHERS	128:17
83:3	BOY	BRIEFLY	117:12	129:3
104:12	153:21	11:2	165:8,9,	165:7
141:8	154:2	116:3	11	184:15
142:10	159:17	BRIFFA	BROUGHT	189:12
155:21	BOYS	82:14	183:3	195:17
156:2	78:21	84:11	188:10	BUSTED
162:16	152:13,17	BRILLIANT	201:15,16	65:7
177:7,8	153:17,18	151:16	BRUISE	74:18
BOOKS	154:10,14	155:5	69:20	BUY
194:12	161:6	BRING	BUCKLEY	21:21
199:20				22:2

BYPASS	50:21	CAMPAIGNING	CAPITAL	CASE
192:8	56:16	99:9,18	112:16	9:10 11:1
	57:5		113:17	19:9
C	58:18	CAMPUS		23:18
	85:16	184:5	CARD	59:15
	87:12		21:21	60:9
C-R-O-S-S-	113:1	CANADA	CARDBOARD	65:10,11
H-A-R-B-O-	116:16	17:20	140:11	68:18,19
U-R	117:9,21	24:6 48:1		74:4
191:3	125:5	55:18	CARE	75:15
C230	127:6,7	64:10	67:10	82:4 92:5
61:1	137:8	74:6 75:4	146:8	99:17,19
CA	138:12	77:5 85:8	CAREFUL	118:17
9:10	139:2	113:21	161:5	120:9
CABLE	140:2	114:5	CARIBBEAN	143:16
75:6	149:8	119:6	200:20	152:20
CAICOS	152:4	125:3	CARICATURE	153:14
158:18	153:8	131:11	50:7	154:12
	156:12	191:7	CARLSON	155:3
	161:19	192:18	126:3,7	163:7,9
CALL	162:16	198:21	CARNATIONS	169:1,15
11:5	166:11	CANADA'S	152:14	175:7
12:2,3,18	168:9	75:8 81:3		187:5
18:3 20:1	172:21	CANADIAN	CARRY	189:4
40:7	181:4	11:7,20	176:15	CASES
43:21	185:20	12:5,17		64:7 74:7
55:11	188:18	29:17	CARSON	75:4
61:21	192:3	52:19	155:2,5	120:15
85:4	CALLING	81:2,5,6	CARTEL	182:13,15
93:21	72:16	84:21	144:11	CASH
102:10	106:19	110:14		183:6
111:3	142:19	113:18	CARTOON	CASPER
131:11	152:15	124:12,13	8:12	104:16
139:4,5	CALLS	188:16	50:6,10	CASUAL
141:2	19:18	189:2	155:17,18	29:6 32:8
148:12	101:13	191:2	156:2	93:21
150:2	170:6	CANADIANS	CARTOONS	CAT
152:7	197:21	33:16	155:20	22:11,14
170:12	199:9	CANCELLED	CARVIN	CATCH
180:19	CAMPAIGN	117:1	70:6	40:12
198:17	99:6	CANCELLING	CARVIN'S	CATCHES
CALLED	100:1,2,	76:15	63:14	6:15 41:4
7:20	3,13,14,	CANDOR	CARY	CAUGHT
18:12,14	19 101:2	61:21	120:16	
41:4		150:11		
43:11				

40:13	157:5,17,	131:11,	157:6	CINEMATIC
CAUSED	18 158:3	12,15	160:10	34:12
45:3	168:10	CHARLATAN	CHILDREN'S	CIRCUMSTANC
CEASED	CHANGE, '	7:12	112:21	ES
70:18	158:2	142:2,5,	CHINESE	64:5
71:14	CHANGED	7,14	174:20	CIRCUS
CEASING	77:5	CHARM	CHIP	85:5
119:4	CHANNEL	201:8	132:12	CITED
CEI	115:18,21	CHARMING	CHIT	24:17
180:5,7	116:9	79:6	171:4	CITES
CELSIUS	CHANNELS	CHARMS	CHOOSE	24:15
46:12	115:16	76:13	134:20	CITIZEN
CEMETERY	CHAP	CHARTS	135:18	110:14
81:6	69:8	123:18	162:4	CIVIL
CENTRAL	CHAPS	CHATTED	170:2	9:9
40:4	93:3,5	171:4	CHOSE	CLAIM
CENTURIES	CHARACTER	CHEAT	100:7	138:9
49:14	140:1	7:14	135:17	150:12
CENTURY	144:12	96:19	CHOSEN	156:4,8,
42:3,16,	170:9	97:1	49:13	11 168:21
21 44:15,	CHARACTERIZ	CHECK	53:8	173:15
21 45:5,	ATION	19:16	CHRISTMAS	174:5,18
7,14	79:11	66:4 79:4	186:6	177:20
46:13	99:8	131:17	CHRISTOPHER	178:2,12
48:7	144:4	CHECKING	63:19	CLAIMED
100:18	149:3	16:16,18	72:16	65:6 86:2
137:13	170:15	19:19	CHRISTY	CLAIMING
CERTIFICATE	171:6	CHELSEA	83:5 96:5	174:5
99:7	CHARACTERIZ	154:17	CHRONICLE	CLAIMS
CHAired	ED	CHICAGO	182:9	78:13
104:3	37:5	190:21	185:7	121:13
CHAIRMAN	148:14,18	191:4	CHUM	174:16
35:14	CHARACTERS	CHICKEN	161:11	176:10
135:4	169:11	201:6	CHUMS	CLEAR
CHANGE	CHARGE	CHIEF	175:7	52:16
15:21	21:13	66:21	CHÂTELAIN	57:10
16:4,18	145:1	CHILD	75:9	65:13
17:4,9	CHARITABLE	159:11,12	CINEMA	113:7
23:19	131:3,14	CHILDREN	117:9	141:20
29:21	202:10,19	54:19,20		157:13
72:7	CHARITY			165:13
				187:2

CLEARING	181:11	CO-HOST	65:17	71:21
108:19		125:18	73:18	97:16
	CLIMATEGATE		127:4,5,	COMMUNICATI
CLICK	15:15	COAL	6,16	ONS
172:3,11	16:15	187:11	128:1,15	74:6
181:6	19:21	COCKPIT	159:6,8	COMPARATIVE
	20:15	65:8	167:16	LY
CLICKED	23:10	74:18	198:20	166:1
172:11	25:9 51:2	COINAGE	200:2	COMPARISON
173:11	82:14	110:1	COLUMNS	202:2
CLICKING	84:14	COLD	24:4	COMPATIBLE
178:20	90:11	38:11	198:19	53:21
179:11	107:9,10	COLLAPSE	COMICS	COMPEL
CLIENT	CLIMBED	47:10	140:10	90:8
45:19	46:1	COLLAPSING	165:21	COMPENSATIO
46:4	CLINTON	42:9	COMMENT	N
56:21	164:12	COLLEAGUE	21:18	194:21
78:5 92:3	CLOONEY	11:7,20	76:8	196:1
99:9	191:16,	12:5,17	COMMENTS	COMPETITIVE
100:6	19,21	17:21	61:17	10:8
151:2	192:14	144:7	82:20	203:3,14
169:13	CLOONEY'S	159:15	83:1	COMPLETE
CLIENT'S	191:19,21	COLLEAGUES	COMMERCIAL	43:1
168:14	CLOSE	84:10	115:19	61:4,15
CLIMATE	133:11	COLLEGE	COMMISSION	62:2 69:5
7:11	134:5	159:21	124:14,17	91:15
15:20	175:16	160:13,18	188:17	111:21
16:4,18	CLOSELY	176:2	189:2	COMPLETED
17:4,9,	51:6	185:2	COMMITTED	112:2
11,15	CLOTHES	COLLEGIAN	129:9	COMPLETELY
20:21	57:2	166:16	COMMON	50:10
23:19	CLUB	176:1	100:5	56:8
29:21	154:16	COLLOQUIAL	153:5	77:14
44:1,10	CO-AUTHORS	91:4	COMMONS	144:5
45:19	143:13	COLOR	25:17,19,	187:21
49:5 57:3	CO-	49:9	20 77:11	196:17
72:7 98:4	DEFENDANT	200:3	174:8	COMPLETENES
142:2	64:9,12	COLUMBIA	COMMONWEALT	S
144:11	CO-	9:9 100:8	H	162:3
152:7,11,	DEFENDANTS	175:8	198:18	170:4
12,16	64:10	COLUMN	COMMUNICATI	COMPLETION
157:5,17,	187:8,15		ON	
18 158:2,				
3 168:10,				
13 172:9				
180:20				

141:3	144:21	80:11	CONTEXT	CONTRIBUTIN
143:6	CONDUCTIVE	CONSEQUENCE	146:17	G
152:10	195:10	46:3	CONTINUE	68:4,10
COMPLEX	CONFERENCE	163:9	59:2	132:10
54:8 95:7	204:8	CONSEQUENCE	122:10	CONTRIBUTIO
COMPLIMENTS	CONFERENCES	S	196:11	N
115:4	130:9	157:8	CONTINUED	167:3,7
COMPOUND	CONFIDENTIA	CONSERVATIS	65:16	CONVERSATIO
43:16	L	M? 'OR	CONTINUES	N
CONCEPT	12:10	130:10	138:8	11:4
91:2	203:8	CONSERVATIV	CONTINUING	34:1,13
CONCERN	CONFIDENTIA	E	41:16	72:11
81:20	LITY	77:21	CONTINUOUSL	73:1 98:6
159:16,17	120:5	191:20	Y	COOKING
CONCERNED	CONFIRM	CONSIDERABL	137:10	140:5
6:19	75:2	Y	CONTRACT	COOLING
67:17,19	136:20	23:16	62:5,6,7,	42:3,7
71:13	137:8	CONSIDERED	21 63:5,	45:4
109:6,12	CONFIRMED	105:7	8,11,15	46:21
CONCERNS	105:18	CONSIST	65:12,13,	47:1,3,5,
12:11	119:18	115:10	17 66:4,	7 48:6
198:4	CONFIRMS	CONSULT	6,7,11	COPIES
CONCLUDE	7:1 173:5	87:15	67:21	203:11
85:19	CONFLICTED	88:5	69:6,9	COPY
CONCLUDED	155:7	CONSULTATIO	70:5	158:9,11,
84:18	CONFUSED	N	78:19	16 167:14
93:3	81:17	88:10	79:2	203:13
204:11	99:19	CONSULTED	119:13	CORE
CONCLUDES	CONFUSION	89:21	128:10	137:16
204:7	157:11	CONSULTING	192:11	174:19
CONCLUSION	CONGRATULAT	103:5	193:9,16	175:12
41:19,21	IONS	CONTACT	196:18	CORNER
45:12,16	7:20	34:4 98:1	199:13	53:1 61:3
47:12,14	166:12	CONTENDED	CONTRACTED	74:10
48:9	CONNECTION	36:16	119:12	76:9 77:1
84:13	13:1	CONTENTION	CONTRACTS	78:10,15
CONDESCENDI	CONRAD	36:19	196:2	132:12
NG	114:2	CONTENTS	CONTRACTUAL	191:10,11
144:17	145:12,14	6:1	65:15	194:4,5
CONDESCENSF	CONSENTS	142:10	191:10	CORNWALL
ION			CONTRIBUTED	118:4
			167:14	CORPORATE

64:8,9, 10,12	148:7	COSTAR	58:17,21	61:1
CORRECT	149:9,10	34:10	60:15	161:9
15:21	150:1	COTERIE	61:7,9	COVERING
18:7 25:2	152:5	32:21	62:20	160:8
27:7,8,12	155:19	COUNSEL	64:13	COVERS
28:3	156:7	9:18	70:6	136:6
29:15	159:5	11:5,8,11	72:4,15	COVERUP
34:6 35:5	161:13,14	12:2 15:6	82:4,7	50:18
37:17	163:19	32:5,7	89:11	136:2,7,
38:6,8,9,	164:6	72:5 80:7	90:7,11	8,9,10,11
12 39:4,	166:13,	148:1	95:21	160:21
14,18	16,17,19	177:1	100:8,16	182:11,
42:1	170:1	COUNSEL 'S	119:18,19	12,21
47:16	186:1	139:8	120:14	183:1,19
52:14	189:19	150:11	121:1	CRACK
55:9	190:15	COUNSELOR	150:12	141:6
56:13	193:10	29:4	151:1,3	CRACKING
58:11,13	195:1	104:4	155:6	196:13
89:18	199:17	108:9	162:6	CRAZY
94:12	200:11	132:4	163:7,9,	74:17
97:2,5	201:1,9	138:10	15 168:20	CREAM
98:7,8	CORRECTLY	148:12	171:20	191:14
99:2,3	23:13,14	151:6	175:2,4,9	CREATE
107:10,11	CORRELATE	157:15	186:3,8,	101:6
110:16	50:3 51:5	179:2	11 187:15	CREDENTIALS
111:9,10,	55:14	203:2	188:4	D
12,13,15	56:4	COUNTRIES	189:5,10,	41:9,16
115:6	CORRELATED	198:18	11 191:1	112:11
123:13,	91:4	COUPLE	202:11	CREDENTIALI
14,15	CORRUPT	30:4	COURTESY	ZATION
124:15	135:20,21	60:14	9:15 24:7	112:8
125:19,21	157:19	65:6	121:10	CREDENTIALS
132:15	158:4	72:2,7	COURTILLOT	190:15
134:8,9	159:14	77:12	95:13	CREDIT
136:10	CORRUPTED	79:10	105:20	21:21
137:6	184:13	82:11	COURTROOM	145:16,17
138:12,13	CORRUPTING	121:20	72:14	CREEPY
139:15,	160:7,9	184:18	COVER	144:11
16,19,20	CORRUPTION	186:5,8	94:7	CRIME
140:14	106:13	COURT	136:6	161:2
142:3,12	136:5	9:9,13,19	COVERAGE	
143:3,7	159:20	11:13,17	107:9	
144:1	183:14,16	24:8	116:10	
146:11,12		40:13	COVERED	
147:9				

CRIMES	CRUZ	DAILY	18	DECEIVES
136:3	124:4	16:19		94:17
CRIMINAL	CULTURE	61:18	DAY	
85:16	184:17	198:20	10:5	DECEPTION
161:3,4	CUNNINGLY	DAMAGE	16:16	57:20
184:14	61:12	14:21	17:2,6	84:16,18
CRITICISM	CURIOUS	24:19	58:17,21	89:16
16:8	160:13	33:1	72:14	DECEPTIONS
85:14	CURRY	168:13	73:1,17	90:2
106:19	18:1,20	182:13	129:9	DECEPTIVE
163:11	82:14	DAMAGINGLY	130:16	71:12
CRITICIZE	84:13	155:1	137:20	83:17
163:11	96:6,9	DAMNING	167:1	88:14,17
CRITICS	97:18	106:19	184:5,6	91:20
85:14	98:6	DANCING	189:2	92:10
142:8	144:8,9	116:7	DAYS	DECIDED
CROCK	145:2	DATA	112:18	65:13
57:4	165:20	39:7,10	150:4	78:4 88:1
CROSSED	CUT	40:2	186:5	DECISION
60:12	19:6	48:19,20	192:1	90:7
CROSSHARBOU	69:10	49:11,12,	195:6	121:10
R	CZECH	13 50:13	DEAD	175:2,11
191:1,2	85:16	51:5	86:8	176:6
CRTV		52:13,14	127:20	186:3,7
119:11,	D	55:9,11,	160:17	DECISIONS
12,15		14 92:15,	162:16	121:11
120:3,17,	D'ARRIGO	20 93:3	DEADBEAT	DECLARE
21 121:5	57:12,15,	105:6	100:11	66:11
CRUISE	21 94:16	106:2	DEAL	174:9
33:4,9	D-R	148:19	193:21	DECLARED
128:16,	167:14	149:4	DEAR	160:16
17,19	D.C.	157:6	32:3 33:7	DECLINED
129:3,4,6	58:17,21	DATE	191:16	62:8
194:9	72:15	90:6	DEATH	67:15
200:9,11,	148:2	124:2	44:11	160:15
15,18,19	197:3	202:3	DEBATE	DECLINES
201:16	DA	124:16	137:5	44:18
CRUISES	69:20	DAUGHTER	DECADE	DECLINING
128:18	161:3	112:9	110:10	100:6
200:17,20	DAD	DAVID	DECADES	DEEP
202:7	191:19	18:12	46:15,20	31:5
		165:5,12,	82:11	DEEPLY

90:17	203:3,14	182:17,18	DESTROYED	85:11
157:19	DELETE	184:8,10,	46:1	DINNER
158:4	104:18,19	13	116:21	188:19,20
196:20	DELETED	DEPARTMENTS	125:16	201:2
DEFAMATION	105:13	183:16	DETAIL	DINNERS
64:7	DELIGHTFUL	DEPARTURE	14:4,6	194:10
153:6	130:17	73:21	DETAILED	DIPLOMA
DEFAMATORY	DELIGHTFULL	DEPO	154:13	112:3,5,9
7:7	Y	12:21	DETERMINATI	DIRE
139:11,	33:10	DEPOSED	ON	157:7
14,18	DELINEATES	63:13	37:11	DIRECT
DEFEAT	91:2	87:3	DETERMINE	34:4 97:7
137:5	DELINGPOLE	DEPOSITION	90:1	102:14,21
DEFEND	17:17	9:6,14	DETERMINED	103:10
153:10	19:5	11:3,6	47:18	146:15
DEFENDANT	DEMAND	12:4,10	DEVELOPED	DIRECTED
10:5	79:15	15:5	54:1	90:7
99:19	107:1	91:13	DEVELOPING	DIRECTLY
153:7,15	DEMANDED	203:8	103:2	192:9,16
DEFENDANTS	66:5	204:8,11	DEVELOPMENT	DIRECTOR
10:7	DEMANDS	161:9	S	112:20
DEFENDER	79:16,19	DEPUTY	16:16	DISAGREE
165:7	DEMOLISHED	66:21	DIE	144:18
DEFENSE	32:19	DERANGED	168:11	169:3
19:9	121:12	170:8	DIED	171:1
100:20	DEMONSTRATE	DERBY	75:5	DISAGREED
101:5	40:1,2	179:5	102:6	68:14
102:13	53:9	DESERVED	103:8	DISAPPEARED
DEFINE	DENIS	33:16	128:18	160:16
31:9	93:12,14	DESIGNATED	DIFFERENCE	DISAPPEARS
DEFINITION	94:19	25:19	92:1	51:7
91:4	95:4	90:10	DIFFERENCES	DISBARRED
105:8	DEPARTED	DESIRE	182:20	106:11
118:17,21	64:5	69:14	DIFFERENTLY	DISCLOSE
119:2	DEPARTMENT	DESPERATE	179:8	102:12,14
137:16	114:21	63:5 70:3	DIFFICULT	120:11
197:2	115:4	DESTROY	84:7,10,	DISCLOSED
DEGREES	136:4,11	124:13,	12,14	103:4
53:17	159:21	17,20	DIFFICULTY	DISCLOSING
DELAQUIL	160:10		11:9,13	121:6
10:6				

DISCLOSURE	29:8,10	DISREGARD	DOCUMENT	DOUBLES
90:11	64:6 83:3	91:3	120:13	57:18
101:14	104:12	DISREPUTABL	158:13	DOUBT
102:11	155:21	E	175:12	40:13
DISCOVER	189:9	202:12	176:7	57:20
77:20	DISGRACEFUL	DISTANT	183:19	DOUBTFUL
92:15	125:9,12	140:2	DOCUMENTARI	127:19
116:15	196:7	DISTINCTION	ES	DOWNLOAD
150:5	DISGRACEFUL	S	115:16	22:17
DISCOVERS	LY	131:7	DOCUMENTS	158:20
153:14	18:21	DISTINGUISH	13:20	DOZEN
DISCOVERY	159:19	35:13,20	14:18	137:14
91:5	DISGRACES	50:16	15:2	150:8
DISCREDITAB	185:6	105:21	23:9,16,	DRAMATIC
LE	DISGUSTED	DISTINGUISH	21 24:3	16:17
168:12	44:9	ED	36:18	DRAW
DISCREDITED	DISGUSTING	32:6	81:18	47:13
145:7	19:1	56:16	86:19	129:2
147:18	144:6	85:15	87:1,4	155:18
185:6	DISHONEST	86:4 98:3	90:20	DREADFUL
DISCRETELY	55:12	148:8,17	120:15	196:17
187:3	61:20	149:1,2,3	174:19	DREW
DISCUSSED	DISK	DISTRICT	DOLLARS	41:18
26:15	112:21	9:9	195:5,7,9	45:16
DISCUSSION	DISLIKE	159:21	DOMINION	48:9
32:2	196:7	160:11,	125:2	155:19
38:13	DISMISS	12,15	DOMINIONS	DRIVEL
127:6	143:9	183:16	111:1	57:5,8
DISCUSSIONS	DISPENSED	184:14	DON	DROPPED
15:6	116:19	DISTURBING	118:1,2,4	111:7,12
31:19	DISPOSED	74:1 78:2	DONNA	DROVE
194:15	29:18	144:11	17:21	129:11,12
DISENCHANTE	99:14	DIVISION	DONOR	DRYERS
D	DISPUTE	9:10	201:4	54:6
154:9	20:17	DOCTOR	DONORS	DUBIOUS
155:9	23:19	8:9	131:17	50:4
DISGRACE	69:17	146:11	201:2	DUCHESS
8:13	119:10	147:9,12	DOTING	118:4
14:20	185:4	170:9	145:2	DUCK
22:5 23:5	DISPUTED	DOCTRINE	DOUBLED	76:10
24:17	174:2	152:9	57:9	
27:3				

DUD	128:12	69:18	46:5	ENDEAVOR
162:21	EARLIER	74:10		131:4
DUKE	26:19	78:4,8,9	ELUDES	132:3
110:19	42:4	130:14	156:3	
DULL	77:13	132:10	EMBARRASSED	ENDEAVORS
136:21	95:19	189:18	163:6	202:10,19
137:1,3,5	99:12	190:16	EMBARRASSME	ENDED
DULY	107:8	192:17	NT	77:18
10:11	112:7	EDUCATED	94:5	188:16
	125:5	46:6		189:3
DUMMY	184:18	EDUCATION	EMBLEM	ENDORSED
11:6	197:1	182:10	56:2	73:3
12:3,17,	200:2	185:8	EMINENT	ENGAGE
21 15:5	201:14	EDUCATIONAL	32:4	88:9
DUTIES	EARLY	111:21	86:10	165:16
129:13	112:18	112:13	95:14	
	118:14	EDWARD	143:9,17,	ENGLAND
DWEEB	EASIER	81:11	20 144:7	12:13,15
140:13	35:13,20	111:4,17	EMPEROR'S	ENGLISH
141:1,4	135:4	112:1,2,3	57:1	154:14
DYNASTY	EAST	155:2	EMPIRE	164:18
76:10	44:2	EDWARDS	38:20	ENJOY
	EASY	144:14	40:7	195:19
E	23:2	165:14	EMPLOYEE	202:1
	97:15	EFFECT	118:18	ENJOYS
E-MAIL	ECCENTRIC	70:8	119:5	12:19
20:2	59:15	143:18	ENCOUNTER	ENSIGN
34:3,8	ECONOMIC	151:1	33:20	81:2
69:20	157:8	180:13	97:20	ENSUED
73:21	ECONOMY	187:4	END	80:16
199:15	42:9	199:6	12:1	133:3
E-MAILED	47:11	EFFICIENT	22:10	ENTER
167:1	EDIT	114:20	24:4 40:6	143:8
E-MAILS	166:19	ELECTION	42:21	192:16
20:3,5,	EDITED	116:10	45:5	ENTERED
14,15,16	14:19	191:15	65:18	192:6,11
21:1 51:2	177:7	ELECTIONS	76:2 77:9	ENTERPRISE
63:20	EDITING	130:11	79:12	10:8
75:7	198:5,9	ELIMINATE	118:14	203:14
82:14	EDITOR	93:11	144:14,19	ENTERPRISES
84:14	68:3,4,10	ELIMINATED	164:18	203:4
90:12		45:20	189:3	ENTERTAIN
104:18,19			195:18	
105:13				

201:7	54:2	EXAMPLES	96:13,14	177:17
ENTERTAINMENT	81:6,7	83:8	98:19	178:13
116:6	EUROPE'S	EXCELLENT	107:12,13	EXONERATED
ENTITLED	112:17	102:2	108:13	150:14,16
6:21 7:9	EUROPEAN	EXCERPTING	109:2,15,	156:5,9,
8:7 26:10	54:2	146:17	16 122:17	12 174:6,
27:5,11	169:9	EXCITED	123:1	17 176:5,
29:14	EVENING	46:17	132:9	17 178:3,
30:4	189:1	164:20	133:10,20	5
96:19	202:1	EXCLUSIVELY	136:15,16	EXONERATES
171:15	EVENT	115:11	137:7	7:3 173:6
173:5	129:10	EXCUSE	138:14,16	178:8,10
EPA	130:7,14,	14:16	140:16,17	183:5
30:5,14	20 132:2	24:11	141:11,12	EXONERATING
35:9	EVENTS	36:4 96:5	142:1	173:16
EQUALLY	130:8,12	125:9	146:2,4	175:16
156:4	131:1,10,	138:20	149:11,12	EXONERATION
EQUATE	20 201:4,	146:2	151:20	31:2
137:17	5	168:3	155:12,13	176:9
EQUIVALENT	EVENTUALLY	EXECUTIVE	161:15,16	177:20
60:20	18:16	116:18	164:4	EXPECT
137:17	113:14	117:14	166:5,8	199:1,2
184:12	EVERMORE	EXHAUSTED	172:14,15	EXPECTED
ERA	163:17	77:17	185:14,16	52:2
49:15,18,	EVIDENCE	EXHIBIT	192:19,21	EXPENSIVE
20 54:3	154:13	6:10,12,	199:12	100:4,12
ERROR	155:6,7,	13,14,16,	EXHIBITS	121:16
52:8	10	17,18,20,	6:9 14:16	EXPERIENCE
93:12	EVIDENT	21 7:5,6,	70:15	82:8,12
ESCALATOR	56:15	7,9,11,	198:7	EXPERT
67:19	EVIL	13,16,18,	203:7	41:9,16
ESQUIRE	54:20	20 8:1,2,	EXISTED	101:14
9:14	159:14	4,5,6,7,	31:11	120:6
ESSENTIALLY	160:2,3,	9,10,12,	EXISTENCE	EXPERTISE
50:6	5,7,20	14 13:9,	29:6	29:2
68:21	161:7,12	14 27:14,	30:9,17	EXPIRED
131:3	175:20	18 36:5	31:18	65:17
ESTABLISH	EXACT	37:20,21	34:21	EXPLAIN
15:19	118:13	40:20,21	177:4	73:8
EUROPE	EXAMINATION	43:6,8	EXISTS	193:15
	6:2 10:14	58:4,5	62:12	198:8
		81:9	EXONERATE	
		89:1,5,8	173:20	
			175:19	

EXPLAINING		196:6	106:4	FEATURES
76:11	F	200:1		140:1
EXPLANATION		FACTS	FALSIFIED	FEBRUARY
147:19	FACE	38:11	95:15	65:18,20
	32:2		FALSIFIER	66:4 76:3
EXPRESSED	60:20	FAILED	7:14	79:4,13
39:21		62:4,7,20	96:20	
92:19	FACEBOOK	63:3	97:2	FEEL
96:6	60:21	65:12		7:18 97:6
145:20	61:15	66:3,11	FAMILIAR	152:4
	65:4	70:4	30:19	
EXPRESSING	74:20	75:20	135:7	FEET
146:1	171:2	153:1	FAMILIARITY	187:16
EXTEND			177:19	FELL
23:17	FACT	FAILING		78:14
179:4	30:20	78:18	FAMILY	
181:17	34:9 42:4		75:11	FELLATING
183:15	50:1 51:3	FAINT	166:1	165:8,11
	52:12	77:2		
EXTENDED	55:13	FAIR	FAMOUS	FELLOW
182:2	57:6,8,18	12:14	33:15	18:12,14,
	62:6 63:4	16:21	51:14	19 86:11
EXTENDS	66:13	24:13	75:8 82:4	107:1
61:11	67:20	31:11	152:20	116:16
EXTENT	68:7	34:20	FANCY	148:8
77:16	70:13		21:20	152:12,16
90:16	75:13,19	FAIRLY		167:20
101:12	78:13	137:21	FANS	170:19
103:1	79:16	FAITH	160:21	181:4
EXTRA	85:3,20	51:9 52:7	FANTASIES	FELLOWS
130:6	92:17	93:12	18:15	74:11
	99:15	FAKE	FANTASIST	76:10
EXTRAORDINA	115:14	94:2,3	156:4	106:11
RY	119:21			
62:14	123:20	FALL	FANTASTIC	FELT
66:8,10	124:5	162:17	156:4	77:4
137:11	130:13	FALLING	FARCE	FIELD
168:18	134:18	78:8	164:19	137:19
EXTREMELY	135:16	FALSE	FARENHEIT	FIERCELY
144:17	153:7,15	79:12	46:11	74:9
	156:2	150:15		
EYEBALLS	168:9	196:17	FARM	FIFTY-NINE
128:13	182:20		113:4,8	171:12,13
201:16	184:21	FALSEHOOD	FAVOR	FIFTY-THREE
EYES	186:18	69:5	121:14	152:3
122:1	188:10	FALSIFIABLE	FAWNING	FIGHT
	190:5	95:16	141:7	78:5

FILE	61:5	80:21	73:3 82:9	FORGOT
70:7	80:8,10	81:3,5	87:15,18	151:11
	95:10		88:2,19	
FILED	122:12,15	FLAT	89:3,19	FORGOTTEN
9:8 32:3	132:21	185:5	90:13	50:16
62:10	178:19	FLAWS	91:18	151:13
79:10		57:9,17,	98:17	
125:7	FINESSING	19	103:19,21	FORM
178:1	184:4		104:15	22:21
189:1	FINISH	FLEW	108:1,17	25:3
	122:5	65:8	109:9	28:11
FILES	153:20	74:18	132:13	43:14
153:5			134:12,	60:2 69:2
FILING	FINISHED	FLIES	14,16	71:6 72:1
68:14	28:14	81:5	135:11,	73:5 93:7
		FLOATING	19,21	127:1,14
FILINGS	FINNISH	178:14	136:7,10	134:21
168:20	92:13,14,		150:3	148:10
	20 93:3,5	FOCUS	156:18,20	151:3
FILM	95:6,7	93:18	157:1	168:6
34:10		201:21	159:5,17	176:18
72:7	FIRE		161:1	181:21
117:5,17	196:5	FOLKS	171:9	193:18
	197:14	196:13	173:21	200:13
FILMS			177:21	201:12
117:13,15	FIRED	FOLLOW	181:13	
	116:13	17:16	182:17	FORMAL
FILTHY	117:2,8	18:2,3,10	184:8	192:6
144:5	118:11,21	35:17		
145:1	196:19	144:4	FOOTNOTE	FORMALLY
	197:1,4,	146:18	171:21	25:18
FINAL	7,12,21		FOOTNOTES	
62:9 63:1		FOLLOWER	186:9	FORMATTED
64:20	FIRING	180:6	189:7	39:6
66:4	119:2			
	197:17	FOOTBALL		FORMATTING
FIND		8:1 26:10		135:7
23:2	FIRM	27:11	FOREIGNER	
35:12,16,	10:7	29:15	183:9	FORMS
19 51:17		30:7,8,13		136:5
69:1,2	FITFULLY	32:13	FORENSIC	FORMULATION
87:16	113:18	33:12	155:5	111:16
88:6	FIVETHIRTYE	34:2 35:5	FOREVER	FORNICATING
135:3	IGHT	47:14	106:10	165:19,20
147:18	19:16	48:10		
178:2,4		58:12	FORGET	FORTIER
	FLACCID	59:3,6,	126:6	67:9
FINDING	162:7	11,18	129:21	
121:13	163:17	70:10,20	163:1	FORTNIGHT
		71:18	176:1	127:16,17
FINE	FLAG			200:5
33:18				

FORTNIGHTLY	145:4	84:20	FRIENDS	99:12
65:17	FRANTICALLY	86:2	18:10	FUNDAMENTAL
127:5	78:16	87:17	32:3 72:7	LY
FORTUNATE	FRAUD	88:7 94:9	118:1	62:11
34:13	7:15 8:11	96:7	155:2	FUNDRAISERS
FORTY-FIVE	56:17,21	101:11	FRIENDSHIP	202:20
133:13	60:15	150:4	98:13	FUNNIER
140:19	61:6,9	175:19	FRINGES	167:7
FORWARDED	62:19	FREE	72:14,20	FUNNY
34:3	70:6	74:3,4,9,	FRONT	196:14
FOUND	86:5,18	15 75:4,	49:12	
125:4	87:13	12,16	FROZEN	G
154:10	93:15	76:5,16,	163:4	
FOUNDATION	94:20	20 77:2,	FRUIT	GARAGE
26:16	96:20	17,19	69:20	145:4
28:9 35:9	97:2	78:1 97:7	FRY	GARBAGE
133:12	101:6,21	100:14	43:1 48:5	142:12,20
134:6	139:14	131:19	53:2	143:5,10,
FOUNDER	149:21	FREEH	FULFILL	15 144:1,
44:1	150:3,7,9	172:7	65:16	3
FOUR-PAGED	151:3,5	183:12,	129:12	GARY
146:16	168:15	18,19	FULL	118:1
FOWLER	FRAUDPANTS	FREELANCE	21:15,17,	GARY'S
63:13,19	138:21	114:12	21 22:8	118:4
69:16	139:4,6	197:8	23:7	GASPÉ
71:18	149:9	FRENCH	24:16	51:15,18,
72:3,13	FRAUDULENCE	95:14	30:10	21 52:1,
78:20	39:21	105:21	59:20	3,4
202:11	40:9	FREQUENTED	101:4	55:18,20
FOWLER'S	56:14	180:18	104:11	56:2
120:12	FRAUDULENT	FRIEND	134:16	GAVE
121:2	36:16	17:19	171:5	14:1,2
FOX	37:5	18:15	177:7	15:1
83:6	39:16	33:7 40:3	182:1	18:16
126:1,12	42:1 46:4	64:4	194:11	40:12
FRAME	47:18	67:3,4	200:3	41:19
23:15	48:16	72:18	FULLY	45:11
FRANKLY	50:14	98:3,10	184:7,9	58:20
59:15	52:12,17	114:2,3,4	FUN	104:7
60:10,14	53:6	164:21	58:16	114:15,21
121:18	54:13	170:12	FUNCTIONING	126:21
	56:11	FRIENDLY	29:19	128:10
	81:14	166:1		
	83:13			

131:19	GIAEVER	GO-TO	GRADUATES	GRAVES
154:13	56:19	31:12	111:19	81:5,7
192:7	57:1	32:14,17		
GENERAL	GIANT	GOLDENBERG'	GRADUATING	GREAT
19:6 20:9	51:7	S	112:9	14:6 44:8
32:11		108:20	GRAHAM	45:9
35:12	GIFT	GOOD	159:15	47:3,5
42:2,6	99:7	9:3 10:16	161:10	85:11
153:12	GILLIS	13:8,17	175:20	182:6
181:3,8	110:6,7	20:12	182:16	GREATER
195:3	GIRLS	25:7 30:2	GRAND	50:7
GENERALLY	34:10,14	33:11	131:17	GREATEST
16:7 23:1	GIST	51:9	171:14	56:17
35:14	62:15	52:7,9	GRANDFATHER	86:5,17
39:21		56:9	S	87:12
55:1 56:5	GIVE	93:12	32:10	GREEN
67:11,13	14:9	117:21		72:3
80:2	40:14	122:14	GRANT	152:13
109:11	53:14	124:9	183:3	
169:11	61:5 69:9	129:15	GRAPH	GREG
174:13,15	80:12	132:16,18	8:4,5,6	18:10
176:3	86:11	135:1	16:9,14	GREW
194:2	174:14	145:15	36:2,16	110:21
198:17	183:20	147:17	37:5,12,	GRINDING
	195:3,14	151:14	13 38:19	165:3
GENEROUSLY	197:16	155:15	39:3,16	
128:10	201:8	187:16	41:17	GROTESQUE
GENUINE	202:9	195:15	42:17	150:6
56:20	GIVING	GOODBYE	43:4,11,	182:14
137:14	146:20	116:4	12 44:3,6	GROTESQUELY
168:13	194:6	GOOGLE	46:4	97:20
169:17		115:1	48:20	
GEORGE	GLANCE	GORE	49:7,17	GROUND
191:19	15:1	167:19,21	52:19,21	60:9
GERALD	GLOBAL	169:20	53:2	GROW
30:20	42:9 44:6	GOVERNMENT	81:14	55:2
31:3	47:11	77:6	84:20	110:20
GERMAN	53:3,9,	131:4	85:7	
65:7	10,20	GRADE	GRAPHING	GUARD
	55:3	54:21	49:5	179:5
GEST	57:14	GRADUATE	GRAPHS	GUARDIAN
69:21	92:3	111:17	43:19	6:17
GETTA	168:9		45:8 49:4	108:12
69:20	GO-ROUND		51:6	GUARDING
	179:7			179:5

GUESS	139:10	184:1	HE 'LL	HELL
11:5 12:3	HALFWAY	187:18	163:11	61:1
34:12	142:14	HAPPENING	HEAD	179:9
126:9	HALLAM	52:21	92:13	HELPING
196:3	154:8,20	HAPPILY	129:12	166:18
GUEST	155:8	144:9	190:3	HENRY
33:4	HAMISH	HAPPY	HEADLINE	170:7,8
116:2,4	116:16,19	11:15	97:3	171:4
125:20	HAMMERING	70:7	HEAR	HEY
126:1,2,	108:8	88:15	11:12,14	161:5
3,8	HAMPSHIRE	121:9	76:17,19	HIGH
GUY	53:13,15,	122:10	108:7	111:3,19
31:12	16,18	125:15	130:2	112:1
32:14,17	63:17	126:18	HEARD	HIGHER
57:18	69:13	127:11,13	22:11,14	182:10
63:7	158:21	131:21	66:2	185:8
74:17	HAND	132:7,9	78:19	HIGHEST
104:17	6:13	179:1	134:15	183:4
105:3,4,	HANDED	HARD	HEARING	HIGHS
12 106:9	169:13	23:13	11:10	44:17
127:10	HANG	38:11	72:4	HILL
130:1	72:19	85:19	97:19	17:16
165:18	HANGING	97:15	125:8	HILLS
168:11	64:1	113:12	HEARTS	117:17
169:2	72:13	146:18	77:2	HINDERAKER
GUYS	160:4	HARDCORE	HEINTZ	165:7
32:19	HANNITY	35:16	10:4	HINDSIGHT
57:5 74:1	126:1,2,	HAROLD	60:2,3	75:2
131:16,19	4,5,6	56:15	73:6,12,	HIRED
H	HAPPEN	86:3	13 80:10	161:10
H-U-Y-B-E-	170:21	87:8,11	122:2,13	HISTORY
R-S	195:20	94:12	147:11	53:11
107:2	197:5	HARPER	148:10	152:20
HABIT	HAPPENED	77:7	151:9,14	HIT
179:3	45:21	HARPY	193:18	123:18
HALF	50:17	145:7	198:11,13	HITS
11:6 12:2	69:11	147:18	201:12	38:11
39:20	77:12	HAT	203:5,19,	HOBBIES
49:14	85:2,9	38:19	20 204:2,	195:20
80:2	158:17		5	
100:17	180:14		HELD	
122:5			125:13	

HOCKEY	101:6,11,	51:10	76:11	189:2
8:1 14:21	21 103:19	85:19	HOTEL	HUNDRED
16:8,14	104:1,15	186:6	113:10	53:17
24:13,18	105:18	HONESTLY	119:4	114:21
26:10	108:1,17	14:5,10	HOTTER	117:9
27:11	109:10	20:2 21:5	53:17	121:12
29:15	132:13	35:10	HOURL	195:5,7,
30:7,8,14	134:12,	52:7	11:6	8,9
32:13,20	14,17	70:19	12:2,4	HUNDREDS
33:13	135:11,19	82:21	80:1	21:6
34:2 35:5	136:7,9	83:1 87:8	122:5	HUNGARY
36:1,2,16	150:3	96:8	HOURS	119:8
37:12	156:18,20	98:14	15:8,9	HUYBERS
38:14	157:1	192:12	82:8	107:2
39:3,16	159:5	HONOR	158:20	HYPERLINK
44:4	162:7,21	33:17	HOUSE	148:13
47:15,18	163:17	87:10	25:17,19,	172:1,7
48:11,15	171:10	HONORABLE	20 77:11	173:11
50:9	173:21	190:21	174:8	HYPERLINKED
51:8,18	178:1	HOPE	191:17	178:20
52:11,17,	181:13	195:18	HOUSED	HYPERLINKS
18,20	HOCKEY0	HORRIFIED	154:16	172:4,12,
54:7 55:4	81:20	92:14,19	HOUSEHOLDER	13
57:7	HOLD	HORRIFYING	52:20	HYSTERICALL
58:13	130:10	183:14	HUBERT	Y
59:4,7,	HOLLYWOOD	HORROR	44:1,8,12	141:6
11,18	130:16	92:19	45:8	
65:2	HOME	HOSPITAL	HUGE	I
67:18	59:9 67:5	110:18	55:3	
70:11,20	154:16	HOST	168:13	ICE
71:18	HOME PAGE	116:5	HUGEST	42:20
73:4	59:13	117:5	185:6	44:6,17
81:14	HOMOPHOBIC	125:20	HULLABALOO	46:9 48:4
82:9	69:19	126:1,2,	113:1	163:4
83:9,12	78:20	3,8	HUMAN	191:14
85:6,15	HOMOSEXUALI	HOSTED	49:19	IDEA
86:2	TY	115:11,21	53:11	45:2 56:6
87:15,17,	76:13	HOSTETLER	74:6	64:21
19 88:2,	HONCHO	10:7	93:18	68:2
7,13,19	190:3	HOT	124:12,13	70:4,16
89:3,16,	HONEST	38:11	188:16	110:7
20 90:2,	49:17			173:18
13 91:19	50:17			
92:7				
95:15				
96:7				
98:17				

193:11	154:2	INCLUSIVE	INFLICTED	INSTITUTION
194:17	IMPEACHING	15:5	168:13	S
IDENTIFICATION	46:17	INCOMPATIBLE	INFORMATION	160:9
13:15	IMPLICATION	39:7,10	102:12	INSTRUCTED
27:19	196:8,16	40:2	INITIAL	104:18
38:1 41:1	IMPLYING	INCOMPETENT	175:21	INSTRUCTION
43:9 58:6	61:14	92:8 94:6	186:3	105:13
89:6	IMPORTANT	157:12	INITIALLY	INSUFFICIENTLY
96:15	74:4	INCORRECT	60:11	141:7
107:14	IMPRESS	39:6	191:9	INTEGRITY
108:14	150:20	48:15	INJECT	182:14
109:3,17	IMPRESSED	INCREASED	162:6	183:4
123:2	150:19	128:13	INNOCENT	INTENDED
136:17	IMPRESSION	INCREDIBLE	57:11	53:5
138:17	123:9	117:16	INQUIRY	54:18
140:18	197:16	188:14	175:20,21	55:13
141:13	202:9	INDEPENDENT	184:19	90:2
146:5	IMPROPER	105:7,20	INSECURE	197:18
149:13	102:13	106:3	137:4	INTENTIONAL
151:21	IMPROPERLY	118:19	140:21	50:18
155:14	50:13	140:4	141:4	57:21
161:17	INCLINATION	INDEPENDENTLY	170:21	85:20
166:9	174:18	119:9	INSECURITY	93:4 94:7
172:16	INCLINE	172:8,10	141:1	INTENTIONALLY
185:17	92:11	INDICATIVE	109:21	84:1,5
193:1	INCLUDE	144:20	INSIST	91:20
IDENTIFIED	25:15	INDICTMENT	91:14	92:10
14:8	157:12	158:10,	INSTAPUNDIT	94:3,9
IDENTIFY	INCLUDED	16,20	181:4,6	INTERACTION
36:18	101:9	159:2,3	INSTITUTE	97:17
89:9	103:4	INDIVIDUAL	10:8	INTEREST
105:14	INCLUDES	64:8	120:11	20:9
IDEOLOGICAL	22:6	INDUCE	131:8,10	35:18
75:10,13	INCLUDING	54:18	203:15	152:9
IGNORANT	15:9	INFERNO	INSTITUTION	181:3,8,
97:20	92:13	55:3	77:21	10
ILLUSION	116:7	INFLICT	159:14	INTERESTED
169:4	162:19	33:1	160:2,3,5	75:3
IMAGINE	175:21		161:7,12	INTERFERENCE
150:7	179:5			E
161:8				
IMMORAL				

22:9	64:2	IRRELEVANT	69:18	101:14
INTERLOCUTORY	INTRODUCED	91:12	73:20	102:9
186:16	32:9	ISLANDS	76:8,21	122:2
187:9,14	98:15	158:18	78:3	130:15
188:2,3	124:4	ISLES	JAW	141:14
189:6	131:21	200:18	195:5,13	146:13
INTERNATIONAL	132:2,5,7	ISSUE	JAY	147:2
123:13	154:13	48:18,19	127:7	165:7
INTERNET	168:17	49:1	191:12	JOHNSON
23:2 35:1	INVESTIGATING	75:12	JAZZ	67:3,4
75:7	161:2	118:17	124:4,6,7	JOKE
148:13	INVESTIGATING	162:14	JENNIFER	157:20
158:19	ON	198:8	40:3,15	158:5
167:20	7:2 25:9	ISSUED	95:19	168:4,5
172:20	157:19	26:8,13	98:2	169:3,8,
INTERROGATORY	158:4	178:15	JERRY	16,20
6:10	173:6	ISSUES	104:3	175:18
13:3,5	174:12	16:14	105:4	JON
14:3,7	INVESTIGATIONS	181:1	152:11	10:4 60:3
15:16	31:4,6	182:13	156:17	73:13
24:21	34:19	IVAR	157:4,17	JONATHAN
36:5,9,	107:10	56:19	158:1,10	57:4
10,11,21	156:6,9	57:1	161:5	93:10
81:9,11	177:5		JERRY'S	95:11
INTERRUPT	INVESTIGATIVE	J	191:14	JONES
102:9	26:11	J.R.R.	JEST	10:4
INTERSECTION	INVOLVED	111:5	123:17	57:4,7
52:13	166:18	JACK	JOB	93:10
55:8	194:18	63:13,19	113:6	95:11
INTERSTELLAR	IPCC	69:16	114:11	JOSH
140:1	44:3,7	72:3,13	JOCKEY	155:20
INTERVIEW	50:20	78:20	112:21	JOURNAL
168:16	52:19	120:12	JOE	22:20
INTERVIEWED	106:10,20	121:2	17:19	JOURNALISM
31:1	162:20	JAKARTA	JOHN	109:21
185:3	IRELAND	66:21	9:21	110:8
INTRODUCE	155:4	JAMES	10:16	JOURNALISTS
	IRISH	17:17	36:21	67:10
	72:7	19:5	80:10	JOURNALS
	199:1	JASON	83:5	20:8
			89:1,7	21:12,13
			90:4	106:21

JR. 'S	JUMP	KATZ	138:3	
19:17	15:17	120:17	169:13,14	L
JUDE	63:17	KAZAKHSTAN	KINGDOM	
104:15	69:13	56:7	17:17,18	LA
JUDGE	78:19	KEEPING	25:12,14	75:9
23:15	JUNCTION	16:13	26:4,20	LABOR
69:3	127:20	KEITH	104:8	119:1,2
91:21	JUNIOR	82:13	111:4,20	197:3
119:19	19:10	84:11	112:6	LACK
120:1,17	JURISDICTION	KENNETH	115:20	61:21
121:6	N	9:13	KISSINGER	LADY
150:19	100:5,7	KENTUCKY	167:21	79:6
157:12	JURISDICTION	191:17	170:6,7,	95:18
162:11	NS	KEYS	8,11,15	192:3
175:5	29:19	184:6	KISSINGER'S	LAFRAMBOISE
187:3,4	99:13	KID	171:3	18:1
188:5	150:15	197:5	KNEW	LAI
189:8	JURISPRUDEN	KILLED	31:11	155:6
JUDGE'S	CE	117:1	48:16	LAKE
175:10	153:3	KIND	52:3 62:1	165:3
176:6	JURIST	18:13	63:1	LAMB
JUDGES	125:10	34:11	70:12	8:4,5,6
163:13,14	JUSTICE	48:19	72:20	43:11,21
188:11	99:16	49:5	129:2	44:1,8
JUDICIAL	187:20	50:18	KNITS	45:9
120:1	JUSTIFIES	60:18	68:13	LAMB'S
121:7,11	76:2	106:1	KNOWLEDGE	44:12
JUDITH	JUSTIN	163:12	31:6	LAND
18:1,20	110:6,7	173:15	91:10	117:21
82:14		184:1	105:12	LANDED
84:12		193:21	181:2	53:16
97:21	K	KINDS	194:13	LARGE
144:8		31:13	KOCH	54:4
165:20	KAI	49:11	165:8	68:3,10
JULIAN	5:2 9:11	54:5 92:6	KOREA	LARGELY
32:3,6,9	KALEIDOSCOPE	94:1	125:2	30:18
33:7,21	115:12	169:10,11	KORNSTEIN	131:14
125:4,5	KATHLEEN	190:8	15:12	LARGER
JULY	72:5	KING	72:5,9	56:3
88:5	192:3,9	72:9		LAS
89:21		111:4,17		
91:19		112:1,2,3		

121:5,13	67:20	185:21	76:1	109:12
LATE	182:6	186:20	196:14	116:4
47:7	LEADER	LETS	LIFE	148:12
166:21	155:4	145:1	29:4	172:7
168:15	LEADING	LETTER	35:14	180:8,12
LATEST	124:12	105:10	49:7,19	LINKED
63:14	LEADS	194:8	51:16	31:17
64:4	85:14	202:6,15	112:8	181:3,6
LAUGHTER	LEAK	LETTERS	179:5	LINKS
196:9	20:16	81:4	LIFETIME	148:13
LAUREATE	LEAKED	167:14	56:17	174:20,21
56:20,21	20:18,19	LETTING	82:8	175:1
137:12,15	158:12	145:5	86:6,18	179:11
138:1,2,6	LEARNED	LEVEL	87:13	LIST
148:6	120:15	88:9	LIFT	24:21
150:6	LEAVE	183:14	194:8	33:15
LAUREATES	117:7	LEWIS	202:6	84:15
137:14	195:17	56:15	LIGHT	103:3
LAW	LEAVES	86:4	116:6	106:6,7
10:7	102:17,19	87:8,11	144:13,21	LITERALLY
77:5,8,	LEAVING	94:12	LIGHTLY	18:20
14,18	117:3	LIABILITY	145:5	144:8
100:5,16	LED	159:18	LIKEWISE	LITERATURE
119:1,2,	73:21	LIAR	69:16	93:21
18 121:3	LEFT	7:14	83:5	LITIGATED
153:5	53:13,15,	96:19	121:5	100:16
197:3	18 81:1	97:1	154:21	LITIGATION
LAWFUL	170:7	137:9	183:7	100:4,12
10:11	183:9	138:12	LIMBAUGH	LITIGIOUS
LAWRENCE	187:11	LIBEL	125:19,20	140:13,21
128:20	197:9	152:20	LINDSAY	141:4
LAWS	LEFT-HAND	153:5	34:14	LITTERED
184:19	167:15	LIE	LINDZEN	66:13
LAWTON	LEG	137:10	86:20	LIVE
5:1 12:18	125:10	185:2,5	87:1	53:12
15:11	LEGAL	196:21	LINES	115:21
LAWYERS	8:2 91:2	LIED	101:1	130:8
60:19	101:13	175:20	102:2	191:4,5
LAY	102:2,13,	LIES	143:19	LIVED
155:10	14 106:11	64:12	LINK	53:11,19
LEAD		67:19,20	59:10,12	54:4
			70:14,21	

LIVES	122:7,9	175:7	LYING	11 131:7
53:21			29:20	200:1,3
54:5	LOOKED	LOTS	138:11	202:17
	14:5	202:17		
LIVING	27:1,2	LOVE	LYNDA	MAGAZINES
76:18	41:17	51:16	130:17	20:10
150:8	66:2	170:9	LYRICS	42:20
	67:14		118:5	75:9
LOCAL	131:14	LOVELY		MAIL
159:21	164:4	34:15		61:18
176:2	173:1	191:16	M	
LOCATION	180:17	LOWER		MAIN
12:10		199:15	M-A-R-O-H-	19:5
LOCKER	LOPEZ		A-S-Y	35:14
69:19	192:3	LOWRY	40:16,17	49:12
78:21	LORD	63:12,16	M-Y-K-U-R-A	68:16
159:10	26:2	69:12,15	116:17	105:12
181:17	35:15	71:18		106:18
182:3	111:5	72:2	MACHINE	115:19
	154:12,18	73:17	117:4	135:19
LOGIC	155:7	78:19	MACHINES	177:19
187:14	174:7	120:13	54:5	MAINSTREAM
LOHAN	178:4	127:10	MACLEAN'S	75:8
34:14	190:21	129:21	74:5	MAINTAINED
LONDON	LORDSHIP	189:14	MACLEANS	37:15
6:12 24:5	100:8	202:11	132:10	39:15,19
37:14	LOSE	LOWRY'S	191:7	40:10
38:7	35:18	120:12	192:17	MAJESTIES
61:18	LOSING	LUBOS	MADE	138:5
82:7	100:7	85:15	37:13	MAJESTY'S
114:18	130:11	LUDICROUS	42:13,14	77:6
154:16	LOST	56:8	57:10	111:1
198:20	121:8,9	75:17	68:12	MAJOR
LONG	175:7	121:5,12	72:7	77:21
15:4	186:13	LUMIÈRE	117:17	MAKE
38:19	LOT	117:12	128:10	35:12
40:7	49:4 51:3	LUMP	167:3	73:17
77:6,10,	76:16	187:11	182:10	86:11
17 82:6	86:16	LUNCH	185:8,9	92:1 94:8
86:5	122:3	122:3,8,	191:8	157:13
113:12	128:10,16	12 132:17	201:14	MAKES
114:7,9,	129:6	LURID	MAGAZINE	120:13
10 196:2	160:3	164:21	67:1,7	MAKING
LONGER	161:4		113:21	10:17
15:7 16:2	165:11		114:4,8,	
65:14				

42:10	MANN	14,19	163:7,9	MARKEY
65:5	7:3,6,8,	143:9,21	164:21	97:21
165:17	9,13 8:10	144:12,15	165:6	MARKS
167:4	9:7 10:1	145:7	175:7	145:11
191:13	14:21	147:9,12	176:5	MAROHASY
MALAGASY	18:3,4,5,	148:14	MANOR	40:3,5,15
40:17	6,15,21	149:9,21	191:2	95:19
95:20	19:14	150:2,13	MANSPLAININ	98:2
MALE	22:6	151:5	G	MARQUESS
153:21	23:10	152:7,10	144:18	152:21
155:2	24:18	155:10	MARK	154:10
MALIBU	31:2	156:8,12	6:2 9:7	MARQUESSES
195:6,14	32:21	157:4,18	10:3,6,10	68:8
MALICE	41:17	158:3	33:4,9	MARRIED
91:2,4	42:18	161:11	129:3	144:9
MAN	49:13	162:5	132:5	MARVEL
7:18 44:8	50:5	163:6	203:17	140:10
45:9 46:1	51:12,18	164:11,15	204:8	MARX
127:7	52:3	165:15	MARKED	165:11
140:11	57:9,15	166:15	13:14	MASON
146:7	58:1	167:5,6,	27:18	151:15
152:4	65:19	12,13	37:21	MASSACHUSET
154:20	83:21	168:11	40:20,21	TS
155:1	84:4	169:4,15	43:9 58:5	97:21
161:9,10	85:4,6,	170:20	89:5	MASTHEAD
168:19	12,16	173:6,16	96:14	66:17
170:7	86:11	174:5,9,	107:13	67:7,8,15
185:6	87:11	17 175:15	108:13	MASTHEADS
191:17	89:8 90:1	176:17	109:2,16	66:19
MAN-BOYS	92:9,15,	177:17	123:1	MATTER
145:2	19 93:17	178:3,5,9	136:16	9:7 29:18
MANAGED	94:17	182:12,21	138:16	42:3
197:16	96:19	183:2,6,	140:17	77:15
MANAGERS	97:2	20	141:12	99:13,20
195:18	99:6,18	184:19,21	146:4	114:14
MANAGING	100:8,10	185:11	149:12	153:15
69:18	104:18	MANN'S	151:20	185:10,11
74:10	105:1,13	44:4 84:9	155:13	194:1
78:4,8,9	106:10,	103:14	161:16	197:4,12
MANEUVERING	12,19	133:17	166:8	MATTERS
186:20	108:19	142:7	172:13,15	79:8
	136:3,13,	143:12	185:16	
	21 137:9	148:18	192:21	
	138:8	149:4	203:8	
	139:14	154:9		
	140:2,13,	162:20		
	16 142:4,			

100:15	MCQUEARY	97:20	MERETRICIOUS	140:13
184:15	159:9,12	108:4	S	142:13,19
MAX	MEANING	110:1,9	60:18	143:21
15:8,9	131:12	MEMORANDUM	MERGE	147:11
MBH	188:2	133:11	49:2	149:21
50:5	MEANINGLESS	134:5	MERGED	152:7
103:15,16	68:6	MEMORY	50:13	155:10
105:6	MEANS	98:14	MESSAGE	157:4,18
143:13	31:10	106:18	53:5,6	158:2
MCADAMS	73:8	118:13	MESSAGES	173:6
34:10,15	105:19	132:4	117:3	177:17
MCALEER	127:15,	139:20		178:8
72:6	17,21	178:10	MET	MID
MCELHINNEY	128:1	180:6,7	32:12	46:13
72:6	MEANT	181:4	33:5,7,8	116:1
	151:10	MEN	170:11,13	MIDDLE
MCINTYRE	MEDAL	155:7	197:2	41:7,10
31:14,15,	138:2	MENCHU	METAPHOR	159:11
19 32:2,	MEDIA	169:10	164:2	MIDMORNING
15 33:1	15:20	MENTION	181:17	80:2
34:11,16	16:4	95:13	182:2	MIDWAY
35:1	107:9	151:2	METEOROLOGICAL	75:5
82:13	177:15	175:15	50:8 51:1	MIGHTY
84:8	MEDIEVAL	180:17	METHODS	157:14
85:10,13	44:5	MENTIONED	106:3	MIKE
93:19	93:12	26:9	154:10	18:6
96:10	MEET	57:14	174:14	159:9
174:2	49:2	94:12,14,	MEXICAN	166:15
MCINTYRE'S	MEETING	19 95:3,	200:19	MILDEST
17:11,20	11:7,8	4,12,18	MICHAEL	144:19
33:2	12:5 15:9	96:6	7:3,13	MILLENNIUM
MCINTYRE-MCKITRICK	34:5 57:3	98:10	8:10 9:7	45:10
93:19	MEGA-	105:4	10:1	47:8
MCKITRICK	PLATINUM	122:18	14:21	MILLION
32:19	129:20	165:14	24:18	119:14
33:1	MELTDOWN	176:9	41:17	MILLOY
82:13	18:13	188:15	42:18	83:6
84:8	MEMBERS	201:19	44:4 72:9	MIND
85:10	61:13,15	MENTIONING	92:9	23:18
93:20	74:21	112:7	96:19	35:20
MCKITRICK'S	MEMORABLE	MERE	138:21	63:10
85:13		148:21	139:4,6	74:16

178:11	MISLEAD	51:9,10	MONKEYING	78:7
188:20	84:1,5	92:21	44:16	79:10
MINE	MISLEADING	MISTAKES	MONTENEGRO	90:8,9
11:7 98:3	146:18,19	57:11	72:12	102:5
157:11	MISLEADS	85:20	MONTFORD'S	125:7
165:7	57:15	MISUNDERSTA	17:16	139:21
190:20	58:1	ND	MONTH	189:1,6
MINISTER	MISLED	76:6	16:13	196:7,18
32:8 67:4	84:7	MITCHELL	17:1 62:9	197:15
77:7	MISOGYNISTI	72:6	MONTHS	MOTL
MINOR	C	MITT	63:1	85:15
72:11,21	144:12	132:2	77:13	MOUNTAIN
182:20	MISOGYNY	MODERN	78:16	65:9
MINORS	144:21	49:15,18	90:12	MOUNTAINS
160:7,8	MISREAD	54:3	117:6	74:19
MINUTE	111:11	MODEST	118:7	MOUTH
27:14	182:1	195:20	150:4	148:21
71:2	MISREPRESEN	MODIFIED	159:7	MOVE
78:14	T	81:4	186:21	15:14
108:7	64:18	MOLESTED	187:1	77:8,9
MINUTE'S	137:15	157:6	MOOSE	92:12
41:19	MISREPRESEN	MOLESTING	127:20	96:12
MINUTES	TED	157:5	195:4,13	100:19
12:4 17:6	64:14,20	MOMENT	MORAL	125:17
45:12	MISREPRESEN	46:10	131:18	MOVED
62:15	TS	59:16	MORDANT	66:8
80:5,6,9	168:19	80:12	196:9	MOVIE
82:10	MISSTATE	171:18	MORNING	112:20
122:8,11,	62:16	MONEY	9:3 10:16	MUELLER
14 132:19	MISSTATED	65:21	115:18	82:19,20
167:8	157:21	75:15	MORTGAGE	83:2
178:7	MISSTATES	100:11	127:21	MUIR
MISCHARACTE	36:21	128:11	MOTHER	25:15
RIZES	135:2	130:2	33:10	35:15
64:5	193:12	183:3,4	MOTION	150:16
MISCONDUCT	MISSTATING	201:8,14	59:17	174:7
7:4	62:11	MONGER	60:13	178:2
137:17	MISTAKE	170:9	61:8	MULTIPLE
173:7	28:7	MONICA	62:10,11,	22:6
MISLABEL	50:17	164:11	19 63:14	42:15
165:16		165:4	64:4,21	79:16,18
			77:8,9	93:2

150:14	135:5	11,17	NEGOTIATED	NIGHTS
155:7	NATE	129:5,9,	200:7	55:1
173:14	19:15	13,17	NEGOTIATION	NIXON'S
177:3	NATION	131:7,9,	S	165:19
185:3	53:19	21 133:11	194:14	NOAA
190:3	59:21	134:6	NEIGHBOR	30:5,15
MULTIPLYING	157:8	189:17	34:9,16	35:9
120:16	NATIONAL	190:3,10,	NETWORK	44:20
MURDOCH	7:5 9:8	14 191:8,	119:15	135:5
114:15,	10:5	18 192:4	NETWORKS	NOBEL
16,18	17:21	193:9,16	126:11,13	56:20
115:2	24:5	194:9,12	NEVADA	137:11,
MURDOCH'S	26:15	196:4,17	120:16	14,15
114:20	28:8 35:8	197:13	NEWMAN	138:1,2,5
MUSIC	48:1	198:5,21	192:14	148:6
117:16,20	59:10,12,	199:19	NEWMAN'S	150:5,8
MUSINGS	14 60:3	201:5,9,	191:13	167:17
180:11,15	61:12,16	14 202:2,	NEWS	168:4,17,
181:7	62:1,8,13	15,19	42:19	21 169:2,
MUTE	63:2,18	203:5	66:1 83:6	5,6,7,12,
9:16	64:2,4,6	NATIONALREV	NOBER	17
185:12	65:8,19	IEW.COM	17:19	
MYKURA	66:6,14,	59:19	NEWSPAPER	NOBILITY
116:16	16 67:7,	NATURAL	61:19	68:7
	15,16	45:19	114:20	NOBLE
	70:1,6,10	46:6,8	167:8	156:4
N	71:3,13	47:9 53:6	176:2,3	
	73:2,14,	NATURALLY	185:2	NON-
NAIVE	18 74:18	85:14	NEWSPAPERS	AMERICAN
131:10	75:13	NATURE	20:10,11	153:4
NAMED	77:15	22:20	NEWSWEEK	NONAGENARIA
19:9	78:10,17	34:12	58:20	N
35:14	81:3	110:8	NICHOLAS	33:10
110:19	84:21	164:18	154:8	NONSENSE
NAMES	85:8	175:21	155:8	54:21
9:18	86:13,14	NECESSARILY	NICK	61:15
67:14	87:5	16:19	191:16,	68:21
94:10	104:2	178:18	18,21	NORDLINGER
95:7	120:10	190:7	NIGHT	191:12
135:4	121:4	NEEDED	27:21	NORRIS
NAS	122:18	190:14	118:4	9:13
28:6,18	123:5,10	NEGOTIATE	191:16	
	126:17,20	196:1		
	127:8,13,			
	20 128:3,			

NORTH	NR	130:15	141:16	OBTAIN
30:20	200:9		148:10	158:16
31:3 54:3	202:7	OATH	151:9,12	OBVIOUS
56:3,5		95:9	157:21	41:18
104:3	NSF	110:4	162:10	45:16
105:4,5	6:21	OBAMA	168:6	47:12,13
125:2	28:8,20	167:21	176:18	57:5,7
	135:5	169:20	181:21	
NORTHERN	173:5	OBFUSCATED	193:12,18	OCCASION
12:15	176:17	57:9	197:19	149:9
54:1,2	177:13	OBJECT	198:11,	OCCASIONAL
56:4	NSH	28:11	12,13	113:4
113:8	177:11	90:5,14	200:13	114:12
NORTHLINGER	NUANCED	91:11	201:3,12	192:13
127:7	54:8	99:8	OBJECTIONS	OCCASIONALL
NORWAY	NUMBER	124:1	37:10	Y
138:3	9:10 14:8	127:14	OBLIGATION	21:8
169:14	29:3	128:8	24:2,8	190:2
NOS	36:9,10	148:20	191:10	OCTOBER
43:8	37:2	177:1	OBLIGATIONS	9:5 204:9
NOTE	43:5,6	179:3	65:15	ODD
6:13	81:12	197:21	75:20	71:15
141:3	89:2,4,9	OBJECTED	194:9	78:11
144:4	108:10	86:17	OBLIGED	170:17
203:7	123:20	87:11	65:15	OFFENDED
NOTES	124:6	OBJECTION	120:11	99:21
143:12	127:8,9	12:9 25:3	OBSCURE	OFFER
NOTICE	128:13	31:21	51:3	63:10
21:16	134:1	36:20	55:13	68:12
79:8,9	136:15	39:8	57:19	195:5,7
102:1	156:21	43:14	OBSCURING	OFFERED
120:1	171:11	49:12	52:13	66:17
175:6	NUMBERS	60:2 71:6	55:8	67:16
NOTICED	36:11	72:1	OBSERVATION	68:1
66:3	131:5	73:5,6,12	35:12	117:5
168:15	194:7	90:16,18,	153:12	OFFICE
200:5	NUMEROUS	21 91:13	OBSERVED	158:15
NOTWITHSTAN	165:10	93:7	46:13	184:4
DING	NURSERY	101:12	48:21	OFFICES
138:9	112:10	124:9	51:4	70:1
NOVEMBER		127:1	55:15	OFFICIAL
159:7	O	128:6	OBST	151:1
183:13		134:21	130:17	
	O'SULLIVAN	139:8		

OFFS	OPPONENTS	OTTAWA		83:19
196:2	137:5	93:15	P	84:8
		125:8		105:1,16
OLIVIER	OPPOSED		P-H-R-A-U-	PARADE
118:3	129:5	OUTER	D-O-L-O-G-Y	123:18
		181:2	147:13	PARAGRAPH
OMNIBUS	OPPOSITE	OUTLETS	P.M.	99:5
115:13,15	43:1	109:21	133:2,6	126:16
ON-AIR	63:4,16	OUTRIGHT	204:10,11	148:2
117:13,14	ORDER	196:21	PACE	164:8
ONCE-OVER	68:17		152:10	PARALLELS
14:1,2	69:4	OVER-	PACK	182:11
ONE'S	190:13	EDITING	64:12	PARDON
195:10	192:8	199:8	76:1	47:4
	203:9,18	OVER-	PAGES	PARIS
ONE-WAY	ORDERED	INVESTED	25:1	52:5
116:16	24:8	162:20	PAID	PART
ONGOING	100:8	OVER-	79:9,13	40:8
168:14	162:6,12	PERFORMING	113:20	48:20
	163:15	128:9	129:19	54:14
ONLINE	ORGANIZATIO	OVERCHARGIN	130:2,21	77:8
41:3	N	82:5	PAINTER	118:1
59:20	50:9 51:1	OVERLAPPED	82:5	129:18
61:13,16	ORIGINAL	112:15	PALE	157:18
99:2	145:17	OWING	125:14	158:3
190:14	156:10	65:21	PANEL	178:17
192:17	175:12	OWNED	129:21	188:7
201:15	176:7	114:1	130:17	194:10
ONTARIO	186:7,10,	119:15	PAPER	PARTIAL
15:12	16	OWNS	21:15	60:19
32:11	ORIGINALLY	114:18	22:1	PARTICIPATE
113:8	59:11	OXBURGH	92:2,17	129:19
OPEN	85:7	35:15	106:6	130:15
61:13	167:12	95:11	113:4	PARTIES
74:21	OSBORNE	OXBURGH'S	166:16	203:11,12
78:13	118:1	26:2	PAPERS	PARTLY
125:7	OSCAR	174:7	20:7	110:21
179:8	118:2	178:4	21:11,18	128:9
202:15	152:7,12,	OXFORD	22:7	PARTNER
OPENED	16,19	57:4	23:5,6	34:11
125:11	153:1,13,	93:11	24:15,16	PARTS
OPERA	16		82:3	
115:21	OSCILLATION			
OPERATIONAL	43:13			
66:1				

53:21	191:13	108:18	160:4	PERSONAL
153:4	192:14	136:2,7	165:16	24:4
PARTY	PAUSE	159:9,10,	169:7,20,	97:17
186:17	102:8	18 160:13	21 201:7	98:1,10
189:11		161:13	202:1	180:9
	PAY	166:12,16		
PASS	21:17	167:8	PERCENT	PERSONALLY
169:15	62:8	173:5	144:15	76:13
	65:20	174:10,11		97:16
PASSENGERS	66:3,12	175:14,18	PERFORM	PERSONS
128:19,21	75:21	182:11,	62:4,7,20	112:19
129:4	79:20	12,13,16	63:3	148:14
201:16	100:6,9	183:2	65:12	150:8
PASSING	119:16,20	184:5,8,	66:11	174:2
77:10	195:19	9,17,19	67:21	
		185:9,10	69:6 70:5	PETE'S
PASSWORD	PAYING		75:20	191:20
190:17	79:20,21	PENNSYLVANI	78:18	
191:6		A		PETER
192:8	PAYMENT	160:13	PERFORMANCE	107:2
	66:4,5		195:11,14	
PAST	79:17,19	PEOPLE		PETERSBURG
69:3		18:9	PERFORMED	52:6
	PDF	21:17	62:6,21	
PASTA	22:4,21	45:20	65:12	PHD
191:13	23:1	46:6	66:7	9:7
192:14		53:5,12		147:12,19
	PEACE	54:10,19	PERFORMING	
PATCH	167:17	57:13,14	69:8	PHELIM
116:18	168:4	61:5 62:7		72:6
	169:2,5,	63:12	PERIOD	PHOENIX
PATENT	8,16	64:3 66:5	16:15	53:16,17
81:4		74:5,8	39:17	
	PEER	75:6	44:5 69:7	PHONY
PATENTLY	20:8	76:17	90:10,15	117:10
51:12	21:11,12	77:1	91:6	
	22:7	92:6,7,12	93:12	PHOTOGRAPH
PATERNO	23:4,6	93:17	199:9	115:2
183:7	24:15	94:9	200:17,21	197:10
PATERNO-	106:12,	95:17		
SANDUSKY	13,20	97:13	PERIODS	PHRASE
161:1		99:5	90:17	145:15
	PENINSULA	100:2		
PATHETIC	51:15,19,	103:8	PERRY	PHRAUDOLOGY
75:17	21 55:18	105:18	151:15	8:9
187:8		122:11		146:11
	PENN	123:9	PERSON	147:9,12
PATRONS	7:2,21	137:18	85:12	
115:13	26:11		117:14	PHRAUDPANTS
	31:1		149:2	139:2,3
PAUL	82:15		168:12	149:19
143:5				

PHYSICALLY	PIELKE	PLEASURE	183:16	200:2
135:8	19:10,14, 17	114:17	184:13	POST
PHYSICIST		POINT	POLICEMAN	17:21
56:16	PILOT	32:20	158:12	18:13
87:9	65:7	35:18	POLICEMEN	24:5
93:11	PIT	42:10,13, 14 49:2	160:19,20	47:3,5
169:7	179:9	51:5	POLICY	48:1
PHYSICS	PLACE	52:15	165:17	49:19
86:14	161:9	53:11	POLITICIZED	59:10,20
PICKED	PLACES	54:9	157:7	61:2,14, 16 74:10
117:10,12	160:14	57:10	POOR	77:1
PICKING	PLAINTIFF	85:17	153:13	78:3,15
84:8	153:7,8, 10,14	103:3	155:11	82:9
PICTURE	178:16	113:19	POORLY	84:21
7:17	PLANE	115:5	99:15	85:8
140:1	63:17	116:12	POP	144:6
161:20	69:13	119:20	123:18	190:14
166:14	74:19	121:3	PORTER	192:9
PIECE	78:20	122:4,14		198:21
32:13	PLANET	132:17	POSTED	
40:10	33:16	135:19	32:4,6	59:7,11
47:21	46:2 94:2	174:6	33:8,21	128:15
50:6	137:14	181:18,19	125:5	175:10
84:11,20	140:2	182:4,8, 10 183:8, 9 184:11	PORTRAIT	POSTING
103:17	157:8	185:9	82:6,7	90:12
108:21	168:10	191:13	POSEUR	119:21
109:13	190:9	201:8	56:20	120:8
113:20	PLANNING	POINTED	POSEURS	190:13
114:17,19	125:8	57:9,17	74:2,11	POSTS
142:12,20	PLATFORM	POINTS	POSITION	35:1
143:5,10, 15 144:3	60:21	116:5	36:2	165:1
145:4,12	65:3	165:17	37:15	181:3,8
172:12	68:20	POKER	39:16,19	194:5
178:7	74:20	119:16	56:10,11, 13 76:5	POT
181:15	75:18	121:6,13	105:3	16:2
186:15	78:12	122:1	123:20	POTENTIAL
PIECES	PLAYER	POLEMIC	POSSIBLY	103:2
20:10	119:16	81:21	35:2 53:9	POUNDS
34:15	121:6,13	POLICE	93:14	114:21
61:17	PLAYERS	159:21	102:6	POWER
114:12	122:1	160:10,19	132:1	187:15
143:21			167:1	
173:14				

POWERS	115:3	PRICE	PRIVILEGES	128:12
124:19	PRESIDENT	169:12	78:14	PRODUCER
PRACTICAL	165:19	PRIME	103:6	117:14
153:15	PRESIDING	32:8 67:4	PRIZE	130:18
197:3,12	125:10	77:7	86:12	PRODUCERS
PRACTICING	PRESS	PRINCE	167:17	118:8
12:19	6:16	72:12	168:4,17,	PRODUCT
PRECEDES	107:18	PRINCIPAL	21 169:2,	102:10
126:4	108:3	141:2,5	5,6,8,17	103:2,6
PREDICTING	109:19	181:2,9	PRIZES	PRODUCTION
48:4	167:9	PRINCIPLE	150:9	23:9,11
PREGNANT	PRESUME	74:9	PRO	90:20
120:20	153:2	PRINCIPLED	18:3,5	PROFESSION
PREMIUM	PRETEND	74:15	168:9,10	8:13
129:19,20	169:5	PRINT	PROBE	14:20
PREPARATION	PRETENDING	22:2,17	82:15	22:5 23:6
13:2	72:17	23:3	PROBLEM	24:17
PREPARE	74:20	42:13	10:19	27:4 29:8
11:2	137:19	PRINTED	56:2	83:4
PREPARING	PRETENDS	89:8	68:16	155:21
15:4	169:6	167:2	108:10	PROFESSION"
100:21	PRETTY	PRIOR	PROBLEMS	29:11
101:4	92:21	30:6	143:13	104:13
102:7	132:16	33:12	PROCEDURALL	PROFESSIONA
PREPOSTEROU	138:5,10	35:4	Y	L
S	141:20	48:10	187:5	24:7
50:10	PREVAIL	76:5 82:1	PROCEEDING	87:10
59:15	59:17	88:5	124:8	113:16,20
60:1,11	PREVAILED	89:19	PROCESS	130:20
68:17,19	68:19	103:21	100:13	144:7
PRESENCE	PREVENT	104:14	106:14	PROFESSOR
138:4	165:2	109:9	112:13,14	40:5 57:7
PRESENT	PREVIOUS	159:4	PROCURED	105:20
5:1 23:15	11:15	173:20	154:2	149:1
39:18	63:7	177:14	PRODUCE	PROGRAM
PRESENTER	154:7	180:2	23:17	112:21
118:19	177:19	197:19	155:9	117:5
197:8	183:13	PRIORITIES	PRODUCED	125:19
PRESENTING	PREVIOUSLY	182:15	24:10	135:21
53:4	143:11	PRIVATE	86:20	159:18
		162:18	87:1	PROGRAMS
				115:12,15

PROGRESS	PROTECTIVE	114:14	PULLED	167:6
77:10	203:9	120:7,9,	123:5	180:12
PROMOTIONAL	PROUDLY	13,18	178:7	187:3
129:10,13	74:9	121:3	PUNISHMENT	192:4
130:7	PROVE	125:11	107:1	PUTS
131:1	52:18	130:3,5	PUNK	64:12
194:7	PROVIDE	162:18	73:17	PUTTING
PROMOTIONS	24:2	168:16	PURCHASE	84:6
128:3	91:14	PUBLICATION	21:9,14	118:5
129:16	PROVIDED	7:7 82:1	22:19	152:13
PRONOUNCE	13:3 24:4	139:11,	PURCHASED	
93:13	75:6	14,18	20:6 22:7	Q
PROPERLY	PROVIDING	PUBLICATION	PURPORTING	QC
39:6	119:21	S	75:18	32:4 33:8
PROPERTIES	PROXIES	24:1,7	150:7	125:5
163:16	53:8	66:18	PURPORTS	155:3
PROPOSAL	PROXY	81:20	40:1	188:18
8:14	39:13	PUBLICIST	52:18	QUALIFIES
193:6	48:20	72:5	105:18	138:10
PROPOSING	50:2,4	PUBLICLY	PURPOSES	QUASH
87:10	52:13	23:20	136:1	146:7
PROPRIETOR	55:11,14	24:3	154:3	QUEBEC
92:3	PRUSSIAN	158:13	PURSUANT	55:20
PROSECUTE	168:9	202:12	203:9	QUEEN'S
160:16	PSEUDO	PUBLISH	PUSH	32:4
161:3	56:17	75:7	122:6	175:2,5
PROSECUTING	87:12	194:11	PUSHBACK	QUEENS
155:3	PSEUDOSCIEN	PUBLISHED	32:21	32:6
PROSECUTOR	TIFIC	16:8	PUT	QUEENSBERRY
155:5	86:5	21:12	12:21	152:21
PROSTITUTES	PUBLIC	24:1,12	27:20,21	154:10,
154:1	37:13	32:13	65:1 67:7	12,18
PROTECT	40:10	61:17	69:21	155:8
159:17	53:14	73:15	71:1	QUEENSLAND
160:9	57:3,16	114:17,19	82:20	40:4
184:8,9	58:1	180:12	92:4	QUESTION
PROTECTED	61:13,16	PUBLISHER	102:5	28:15,17
103:5	64:3	60:10	104:1	30:3
PROTECTION	74:21	67:6	120:2,17	43:16
182:16	82:20	68:20	148:21	48:8
	83:1	69:16	154:15	
	94:17	PUBLISHING	163:3	
		184:20		

50:11	QUOTE	RACHEL	109:21	82:3,13,
58:2 84:2	26:15	34:10	RATE	21 83:6
102:9,15	58:14,20	RACKET	21:17	84:8,11,
103:1	88:21	174:10	RATINGS	12,14,17
105:9,17	89:15,17	182:19	117:1,16	92:1,2
120:7	145:21	RACQUETS	RE-SUED	97:7
146:1	148:14	34:11	119:21	103:13,
151:4	157:3	RADIO	121:7	14,16,18
153:20	168:7,8	112:16,17	RE-TWEETED	104:1,8,
166:3	169:19	113:13,	18:21	9,11,20
172:3	170:2,19	15,17	RE-TWEETING	105:9
177:2	171:3	115:12	144:5	106:15,17
179:4,6,	178:8	168:16	RE-UP	107:3,5,
18 180:21	181:15	197:6	202:16	7,21
182:6	182:1	RAISED	REACH	108:2
197:19	QUOTE/	75:15	45:12	109:9,11,
QUESTION'S	UNQUOTE	76:6	REACHED	13 110:3,
59:2	31:1	RAN	37:12	4 121:12
QUESTIONED	63:21	71:20	REACHING	134:16
76:4	99:16	72:2 75:6	84:13	159:1,3,4
QUESTIONS	108:19	RANCOURT	REACT	160:19
10:20	148:15,16	93:13,14	78:6	162:4
90:6 91:9	149:4	94:19	REACTING	172:8,10
110:12	197:7	95:5	57:6	173:18
122:19	QUOTED	RAND	READ	175:13
179:1	31:16	5:3 10:8	14:11,12	176:6,7
203:1,3,5	35:3 83:4	152:10	17:15	177:7
204:2,7	86:3 93:9	179:11	20:1,2,3,	180:4,7,8
QUICK	105:20	203:4	9 21:3,6	181:7
15:1	142:14,16	RANGE	22:8 23:2	183:18
QUICKLY	143:11	90:6	24:14,16	203:21
81:10	145:19	RANK	25:8,10	READER
136:14	170:3	130:19	26:1,2,5,	15:20
QUIZ	QUOTES	RAPE	11,12,16,	16:3,12
116:7	41:13	160:8	20,21	17:10,13
QUOTATION	170:16	182:14	27:9,10	180:6
42:11,12	QUOTING	RAPED	29:4	READING
142:16	143:20	183:21	30:6,7,10	19:20
145:11	R	RAPING	31:7 33:3	25:12
154:7	R-O-S-E-A-	160:7	35:1	83:9
QUOTATIONS	N-N	RARELY	62:18	85:13
148:21	95:1			93:21
				100:1
				108:16,
				18,21
				177:21

184:16	108:2,4,	156:14	39:12,13	REFERRED
READY	16,18,21	166:21	42:5	19:12
9:17	109:13	172:6	44:21	35:2 87:5
63:16	110:9	173:10	45:13,17	123:19
REAL	116:2	179:10	55:15	135:13,14
	135:6	199:5	120:7	138:21
26:20	167:9	200:20	121:3	139:13,17
31:16	172:10	RECOMMEND	RED	140:4
164:20	177:6	132:3	81:2	190:1
REALIZE	198:6,7	RECONSIDERA	REFER	191:18
153:1,6	RECEIVED	TION	27:5	199:13
162:17	113:2	90:8	136:21	REFERRING
REALIZED	179:19,20	RECORD	140:13	18:5
74:1	RECEIVING	9:4	142:11	20:14
75:12	194:21	44:14,19	144:5	21:2,19
162:20	RECENT	45:7	145:6	27:7
REALIZING	59:17	46:13	146:10	28:10,13
84:15	60:13	48:2	147:8,21	38:5 39:2
REASON	61:7	49:15,21	148:5	43:4,13,
39:5,17	64:21	50:3	149:20	17,20
55:17	RECENTLY	53:3,10,	151:5	58:12
67:3	32:8	20 54:2	171:18	60:6 69:8
73:18	RECEPTIONIS	55:12	189:14,17	86:19
117:3	T	56:3,4	REFERENCE	97:2
123:8	197:10	62:12,16	40:3 45:6	142:4
124:1	RECESS	80:13,18	76:9	146:13
134:20	80:16	89:7	139:21	161:13
178:18	133:3	114:14	142:9	186:15
REASONS	RECIPROCATE	120:9,18	153:21	189:20
54:13	S	124:6	156:15,18	REFERS
REBUKED	164:12	133:2,6	163:18	28:18
76:21	RECOGNIZE	141:4	164:13,14	168:3
RECALL	42:12	146:14	167:5	200:9
18:19	107:6	147:11	REFERENCED	REFRESH
19:2	RECOGNIZED	148:11	23:5	14:13
23:13,14,	32:18,19	157:13	31:15	173:10
15 24:1	RECOLLECT	162:4	125:5	REFUSED
25:12	25:5	179:14	REFERENCES	119:16,20
28:17	RECOLLECTIO	188:13	22:6	REGARD
34:3,9	N	193:13	164:19	14:13
68:15	14:13	204:9	165:4	51:11
96:11	29:12	RECORDING	REFERENCING	52:7
98:14		123:16	168:14	60:15
107:6		RECORDS		62:10

71:12	RELATIONSHI	REMUNERATIO	106:1	151:2
94:2,4	PS	N	REPORT	173:15
98:2	154:19	113:2	6:16	174:9
121:1	RELEASE	194:16,19	25:15,17,	178:15
150:21	26:7	RENDER	19,20	REPRESENT
171:5	RELEVANCE	90:2	26:2,15	9:19
181:11	91:12	RENEW	28:6,7,8,	10:1,3
202:19	141:15,19	78:17	9,18,19	49:14
REGARDED	RELEVANT	139:8	30:15,18	REPRESENTAT
105:19	20:4,7	162:10	44:7	IVES
169:11	65:2	188:11	104:1	191:18
REGIME	90:10	RENT	107:18	REPRESENTED
161:1	120:9	152:13,17	108:3,4	72:9
REGISTERED	RELIABLY	153:17,	110:10	REPRESENTIN
131:11,12	105:14	18,21	134:19	G
REGULAR	132:6	154:10	150:16	9:14 32:7
17:10,13	RELIED	REPEAL	172:7	REQUEST
19:18	37:11	77:18	174:7,8	118:5
20:7	81:19	REPEALED	176:17	131:9
192:15	RELIES	77:14	177:13	158:16
REGULARLY	51:18	REPEAT	178:3,5	REQUESTS
18:14	RELY	11:15,19	183:2,12	118:8
REJECT	81:12,21	22:15	REPORTAJE	118:8
196:21	REMAINS	84:2	108:3	REQUIRE
REJECTED	157:17	141:15	9:13,19	49:7
68:11	158:2	198:12	11:13,17	REQUIRED
REJECTS	REMARKING	REPEATED	40:13	23:17
105:21	76:12	145:18	58:21	199:7
RELATE	REMEMBER	REPEATEDLY	95:21	REQUIREMENT
23:10	9:16 21:9	117:18	96:2	S
RELATED	35:10	REPHRASE	191:1	112:1
16:14	83:18	90:3	203:11	RESEARCH
RELATIONSHI	110:2	REPLACED	25:9,11,	7:4 20:21
P	135:4	116:21	13,14	37:11
62:12	148:16	REPLICATES	26:7,11	44:1,10
64:15,19	178:18,20	105:1	29:5	172:9
70:3	197:9	REPLICATION	30:4,6,	173:6
75:19,20	REMINDE	106:3	10,17	183:3
79:12	90:18	REPLICATION	31:13,15,	RESORTS
129:7	REMOTE	S	20 35:7,	154:14
	9:11	105:6	13,20	RESOURCES
			104:8	121:17
			135:3	

RESPECT	7:1 173:5	135:17,18	RHODES	RISING
19:20	187:8	141:7	173:1,13	38:11
60:16	RESUME	177:14	RICH	RIVIERA
95:17	188:6	189:17	63:12,16	200:19
177:11,17	REVEALED	190:4,10,	69:12,15	ROB
190:10,12	51:2	11,14	72:2	57:2
196:1,2	REVELATION	191:9,18	73:17	ROBINSON
198:4,9	65:19	192:4	78:19	116:3
RESPECTED	183:12	193:10,16	120:12	ROCK
93:10	REVIEW	194:9,12	121:2	75:11
RESPECTIVE	7:5 9:8	196:4	127:10	ROCKETING
138:4	10:5	197:13	129:21	53:1
201:2	13:2,20	198:6	189:14	ROGER
RESPOND	14:18	199:19	RICHARD	19:9,16
191:12	20:8	201:5,9,	82:19,20	ROGERS
RESPONSE	21:12	14 202:3,	83:2	74:6
37:4	59:10,12,	15,20	86:20	75:5,11
81:11	14 60:3	203:6	112:19	ROLL
177:19	61:13,16	REVIEW'S	RIDICULOUS	186:6
191:15	62:1,8,13	59:21	187:19,21	ROMANIA
RESPONSES	63:2,18	64:4	RIGHT-HAND	72:10
15:16	64:2,6	65:19	53:1	ROME
RESPONSIBIL	65:8	121:4	RIGHTS	52:5
E	66:6,14,	126:18	124:12	ROMNEY
167:13	16 67:8,	127:13	188:16	132:3
RESPONSIBIL	15,17	131:21	189:2	ROOM
ITY	70:1,6,10	196:17	RIGOBERTA	34:1
61:2	71:3,13	REVIEWED	169:10	69:19
REST	73:2,14,	14:17	RING	78:21
44:18	19 74:18	21:11	22:20	140:6
76:15	75:13	22:7	51:5	159:10
111:16	77:15	23:4,6	173:3	181:17
RESTORATIVE	78:10,17	24:15	RINGMASTER	182:3
163:16	106:13	29:7	85:5,6	ROOMS
RESTORE	120:10	106:20	RINGS	72:3
163:8,10	122:18	134:13	44:16	ROSEANNE
RESULT	123:5,10	REVIEWING	46:9	57:12,15,
120:6	126:20	28:18	49:20	21 94:16,
RESULTANT	127:8	REVIEWS	111:6	21
38:19	128:4,11,	141:7	173:13	ROSEMARY
RESULTS	17 129:5,	REVKIN	RISES	
	10,13,17	110:6	88:9	
	131:8,10	REVOKED		
	134:7,11,	78:10,14		
	20			

191:21	178:3	191:14	86:14	SCIENTISTS
192:14	RUSSELL'S	192:15	87:6	6:19
ROSS	174:7	SAUDI	92:14	14:20
32:18		125:2	94:2,5	24:18
ROUGHLY	S	SAVE	95:16	48:17
153:4		168:10	106:4	57:16
ROUND	SACK	SCALE	133:11	85:18
104:5	145:3	138:8	134:6	87:16
ROUNDS	SACKED	144:14	135:21	88:3
121:20	196:19	SCANDAL	136:4,11	92:13
ROUTES	197:4	8:8	142:19	94:1
113:4	SAKE	SCANDALOUS	143:10,21	101:10
ROYAL	191:20	19:1	150:9	106:5
77:11	SALARIES	SCANTY	152:8,11,	109:7,12
ROYALTY	120:12	148:8,15	12,16	143:9,17,
72:11,21	121:2	SCARED	157:7	20
RUBBISH	202:12	48:3,4,6	168:13	152:13,17
61:4 62:3	SALARY	SCARLET	182:14,18	154:9,21
RULE	79:14	144:6	183:4	155:9
141:3	SANDUSKY	SCHOLARS	184:10	162:19
143:6	152:11	172:21	SCIENCES	SCLEROTIC
162:3	156:17	173:12	104:2	189:4,5
189:5	157:4,17	SCHOOL	SCIENTIFIC	SCOPE
RULES	158:2,8,	111:2,4,	16:8 19:7	90:6,17
174:11	10,16	5,18,19	20:6	141:15
RULING	159:1,3,	112:1,2,	56:17	162:11
121:7	6,11	4,10	86:10,18	SCOTTISH
186:11	161:5,10	113:6	87:12	57:2
RUNNING	182:12,21	159:11	105:8	SCOUNDREL
68:8	183:7	183:9	142:8	19:2 27:6
70:10	184:4,12	186:19	SCIENTIST	171:15
191:17	185:10	SCHOOLS	40:4,16	SCOUR
RUPERT	SANDUSKY'S	54:21	51:13	115:1
114:14	136:2	SCIENCE	57:3	SCRUTINY
RUSH	183:13	6:14 15:1	86:1,4	125:11
125:19,20	SATISFACTOR	22:20	88:6 90:1	SEAL
RUSSELL	Y	24:19	91:18	120:14
25:15	SATURDAY	26:16	95:14	202:11
35:15	128:15	28:9 35:8	98:4	SEALING
150:16	SAUCE	41:4 50:6	105:21	121:2
		57:2	107:1	SEAN
			144:7,15	126:1,2
			148:17	
			149:2,3	
			165:14	

SEARCHED 20:5	SENATOR 97:21 124:9	SERVE 126:17 132:9	165:4 SHADOW 125:14	20,21 118:5 119:12 125:20
SEASIDE 154:14	SEND 22:4,21 79:4 121:9 192:1,2	SERVED 117:13	SHAME-FACED 125:9	126:4,8 174:12
SEATTLE 130:18	SENDING 69:17,18	SERVICE 75:7 157:7 160:8	SHARED 37:14	SHOWED 48:2
SECRET 125:1,7, 13 188:15 189:3	SENIOR 68:4,9	SERVICES 116:19 131:19	SHARP 31:13	SHOWERS 161:6 182:3 184:6
SECTION 76:6 156:12 162:16 174:5	SENSE 23:21 53:4 71:8 74:5 140:9 197:13,14	SESSION 11:20 12:17 15:6 133:4	SHIFTY 169:13	SHOWN 115:15 117:18
SECURITY 12:11	SENTENCE 158:1 163:20 172:2 182:1	SET 112:18	SHIT 57:4	SHOWS 43:13 44:5 45:1 52:21 53:6 116:7 151:13
SEEKING 91:5	SENTIMENTS 170:21	SETBACK 100:17	SHITTY 148:9,16, 19 149:4	
SEEKS 163:8,9, 15	SEPARATE 47:19 66:8 75:2 156:5,9 190:14	SETS 39:7,10 40:2 50:13 105:6 106:2 148:19 149:4	SHOCKED 150:5	SHRANK 23:15
SEGMENT 172:1	SEPARATELY 130:21	SETTING 174:9	SHOOT 131:17	SHRIEKING 141:6
SELF-CONFERRED 148:5	SEPARATING 76:2	SETTLED 41:4	SHOOTING 72:8	SIC 18:12
SELF-EMPLOYED 119:3	SERIAL 137:9 138:11,12 160:8 182:14	SEX 144:8	SHORT 33:15	SICK 168:5
SELLERS 123:21	SERIES 76:15 117:9,20	SEXUAL 18:15 164:13, 14,19	SHORTLY 37:13 129:7 159:8 178:6	SIDE 38:20 78:9
SELLING 123:14 124:5,6,7 199:20		SEVERELY 124:19	SHOT 95:6	SIDES 185:3
SENATE 97:18 124:4 188:10 189:8			SHOUT 124:9	SIGN 63:6 203:21
			SHOW 49:18 93:1 115:18 116:5,8,	SIGNIFICANCE 178:11

200:8	54:8,9	110:13,20	SKILLS	25:11,13
SILENT	SIMPLY	111:2,20	141:2,5	30:21
17:12	31:7	112:6,13,	SLAPPING	55:10
SILVER'S	41:17	19 113:6,	161:4	60:21
19:15	45:6	11 114:9	SLEAZY	77:21
SIMBERG	50:12	117:7	7:12 71:9	78:12
5:3 10:8	58:8	118:10,15	142:2,4,	85:6
26:14	79:19	119:10	6,14	200:19
27:5,14	82:18	133:14	SOCIETY	
28:7	92:7	139:12	SLEEPLESS	76:18,19
88:11,13	100:1	150:16,21	55:1	148:9
135:14	110:5	151:4,7	130:18	SODOMIZING
152:10	121:3	157:1	SLIGHT	159:11
157:3	151:4	161:12	45:1	SOLD
172:4	155:5,6	162:1	SLIGHTLY	128:16
180:5,17	184:3	164:14	65:5 81:4	129:6
181:1,5,	SINGING	165:13	135:2	SOLDIERS
16,18	116:7	174:7	SLIPS	81:5
182:3,8,9	SINGLE	176:8,11	69:3	SOLE
185:8	20:2	177:10	SLOPPY	92:3
203:4	53:19	178:2	148:9,15	167:7
SIMBERG'S	90:14	180:2	SLY	SOLUTIONS
89:15	92:2	185:12	169:4	9:14
157:10,14	123:19	193:3	SMALL	SOMEPLACE
179:11	SIR	196:10	61:11	12:13
180:8,14,	15:18	198:3,16	66:13	SONG
19	23:12	SISTER	67:19	118:2
SIMILAR	24:20	33:10	106:21	SONGS
182:10	25:15	SIT	113:18	117:21
191:8	26:9 29:9	88:1	182:15	SOPHISTICAT
SIMPLE	35:15	SITE	SMOOTH	ED
45:18	36:8	17:14	49:3	54:8
59:2	43:13	SITES	SMOOTHING	SOPHISTRY
SIMPLER	54:13	18:8	55:10	60:18
50:11	56:11	SITTING	SMOOTHINGS	75:18
58:3	81:18	97:19	44:17	SORT
SIMPLIFICAT	82:1	130:17	SMOOTHs	11:20
ION	83:11	201:6	57:19	32:8 41:7
54:14	86:7	SITUATION	SNAKE	47:3
SIMPLIFIES	96:17	46:11	121:21	60:17
57:19	99:21	SIXTH	SO-CALLED	69:19
SIMPLIFY	100:19	179:7		
	104:6			
	106:15			
	107:16			

80:21	SPECIAL	17:3	STANDARD	136:2,7
116:17	130:7	SPENDING	44:19,21	159:9,10,
129:20	190:15	17:6	190:18	18,21
SOULMATES	SPECIFIC	SPENT	STANDARDS	160:12,13
75:13	14:14	78:16	187:20	161:13
SOUND	83:8,9	130:16	STANDING	166:12,16
117:15	110:10	SPOKEN	90:16	167:8
SOUNDS	174:17	33:19	141:16	173:5
132:18	SPECIFICALL	34:7	162:10	174:10,11
167:6	Y	71:17	STAPLING	175:14,18
SOUP	136:1	101:19	40:7	176:2
29:3	SPECIFICS	SPREAD	START	182:11,
SPACE	20:13	159:20	10:20,21	13,16
181:1,2,	SPECTATOR	SPRY	53:9	183:2
10	67:5,8	33:10	85:17	184:5,8,
SPAN	SPECULATION	SQUARE	112:12,13	9,17,19
49:19	198:1	187:19	STARTED	185:2
SPANIER	SPEECH	SQUEEZE-A	22:16	STATE'S
159:16	74:3,4,9,	69:20	44:20	182:11,12
161:10	15 75:4,	ST	72:13	185:9,11
175:20	12,16	52:6	74:17,19	STATED
182:16,18	76:5,16	128:20	113:19	50:5
183:1,5	77:2,17,	STAFF	124:20	91:3,19
184:8	19 78:1	198:4	126:7	151:8
185:1,9,	100:14	STAFFER	STARTING	STATEMENT
10	SPELL	159:9	47:6,7	40:9
SPEAK	40:14	STAFFERS	62:3	81:13,19
9:17 87:2	SPELLED	202:3	159:15	138:9
88:3	95:19	STAGE	STARTS	156:11
98:10	147:12	98:15	38:14	168:20
153:2,4	SPELLINGS	195:12	148:2	174:5,18
SPEAKERS	94:21	STALLED	164:8	176:9
71:11	95:8	123:19	STATE	177:20
SPEAKING	97:14	STAND	7:2,21	178:1,12
9:16	SPELLS	56:12	9:18	STATEMENTS
71:10	183:1	58:9 59:3	26:11	162:18
174:13	SPELT	73:11,19	31:1	STATES
176:3	191:2	74:8,15	38:20	53:13
194:2	SPEND	104:7	40:7	71:10
SPEAKS	15:4	125:10	54:18	77:20
99:15	16:13		82:15	112:11
102:10			83:15	126:12,17
			108:19	131:13
				188:10

189:8	13:2,12,	155:13	96:7	STRENGTH
STATION	14 14:15	161:16,19	101:7,11,	127:21
112:17	16:11	166:8	21 105:19	STRENUOUSLY
168:16	22:14	170:2	136:9	87:11
STATIONS	27:18	172:15,18	150:4	STRIKE
113:18	33:4,9	179:14	162:7,15,	180:3
115:19	36:3	185:16	17,21	STRIKES
STATISTICAL	37:11,21	192:17,	163:1,2,	60:19
106:2	40:21	20,21	5,6,10,17	STICKING
STATUS	41:3,4	193:6	STICKING	STRIKING
151:1	43:8	202:21	40:6	135:7
STAY	45:12	203:10,18	STOCKING	165:17
63:18	48:14	204:8	187:12	STRING
69:14	52:10	STEYN'S	STOLEN	85:16
100:3	58:5,8	168:7	137:18	STRIPPER
177:13	59:20	175:10	STOOD	165:1
STAYED	60:6	STICK	73:10	STRUCK
177:16	61:10	14:21	STOP	183:8
STEORTS	62:17	16:8,14	64:1	STUDIES
69:18	68:1 70:9	24:13,19	108:8	22:21
73:20	74:14	32:20	112:13	24:12
76:8,21	80:3,20	36:1,2,16	STOPPED	177:11
78:3	89:5,8,15	37:12	115:15	STUDY
STEPFORD	91:17	38:14	STOPPING	104:14
112:20	96:14	39:3,16	122:14	STUFF
STEPHEN	99:2	44:4	132:17	29:20
31:14	101:18	47:18	STOPS	61:7 62:2
77:7	103:9,13	48:15	49:8	93:19
STEVE	107:8,13	50:9	STORCH	145:1
17:11,20	108:13	51:8,18	106:7,11,	164:15
32:2,9,12	109:2,16	52:11,17,	15,18	STUPID
33:2	120:3	19,21	STORY	67:11
174:2	122:17	54:7 55:4	83:6	68:3,5
STEVEN	123:1,4	57:7 65:2	STRAIGHT	131:4
83:6	129:3	67:18	85:11	STYLE
STEYN	132:5	81:14,20	175:4	67:8
6:2,15	133:8	83:9,12	STRANGE	108:3
7:16 8:14	134:3	85:7,15	170:9	SUB-POINT
9:7 10:3,	136:16	86:2	STRATEGY	162:13
10,16	138:16	87:17	101:13	SUBJECT
11:12	140:17	88:7,14	102:13,15	7:11 8:10
	141:12	89:16		
	142:1	90:2		
	146:4	91:20		
	147:8,16	92:7,9		
	149:12,20	95:15		
	151:20			

37:10	SUE	SUN	SUPPOSEDLY	
54:8	120:8	163:2	105:1	T
72:21	163:11	SUNDAY	130:3	
SUBMIT	SUED	37:14	SUPREME	T-A-M-S-I-N
198:20	120:2	48:18	100:8	165:15
	121:6	85:7	119:19	
SUBSCRIBE	152:21	103:17	175:8	TABLE
202:16	178:16			201:7
SUBSCRIBER		SUPER	SURPRISED	TAKES
20:8	SUES	7:10	68:18	109:12
21:13	153:8	129:20	70:15	189:5
129:20	162:6	133:18		
		139:18	SUSPECT	TAKING
SUBSCRIBERS	SUFFICIENT	140:9,10,	59:16	161:6
201:15	185:1	12,16	SUSTAINED	188:13
202:16	SUFFICIENTL	SUPERIOR	32:21	197:10
SUBSCRIPTIO	Y	9:9	SUV	TALK
NS	108:4		46:1	32:15
194:9	SUGGEST	SUPPER		36:1
	83:21	125:6	SUZANNE	38:18
SUBSEQUENTL		SUPPLEMENTA	108:20	76:14
Y	SUGGESTED	L	SWAN	100:20
114:3	84:4,18	6:10 14:3	165:3	116:20
SUBSTANCE	167:4	15:16	SWEAR	131:16,17
15:14	SUGGESTING	24:21	9:20	141:18
30:18	84:6	36:4,12		153:16
67:12	158:14		SWEDEN	158:8
SUBSTANTIAL	183:10	SUPPLEMENTE	138:3	
137:21	SUGGESTION	D	169:14	TALKED
	84:9	13:5		32:16
SUBTLE		SUPPORT	SWIM	97:14
6:14	SUING	81:13	93:18	190:12
SUBTLER	99:10,18	99:6	SWITCH	TALKING
65:5	SUIT	100:2	51:13	17:1 20:4
	32:3 34:2	SUPPORTING	SWORN	26:18
SUCCESS	153:5,6	36:19	10:11	44:14
66:9	176:12			45:9
154:11		SUPPORTS	SYNCED	118:11
	SUITS	144:15,16	204:3	139:9
SUCCESSORS	80:4		SYNCHRONIZE	144:13
44:10	120:16	SUPPOSE	D	150:10
		32:5	106:7	157:3
SUDDENLY	SUM	SUPPOSED		162:15
34:21	193:9	160:9	SYSTEM	167:19,20
51:1 63:9	SUMMER	191:20	53:10,20	176:19
67:16	114:6	201:7	192:15	
153:14				TALKS
202:1				

28:6	129:21	46:3 94:6	THANKED	22:19
167:16	TELEVISION	TERRIBLY	114:16	31:14
TAMSIN	72:3	158:18	THANKLESS	47:20
165:13,15	116:3	TERRIFIC	132:3	51:11
TAMSON	126:13	202:17	THEFT	54:20
144:14	TELLING	TERRIFICATI	20:15,17	61:12,14
TANK	52:1	ON	THEORIST	76:17
184:7,9	63:19	54:14,15,	85:16	87:4
TAUGHT	TELLS	16	THEORY	116:18
54:21	55:4	TERRIFIED	59:15	121:15
TAXES	TEMPERATURE	42:20	65:3	129:18
195:19	39:12	TERRIFIES	68:18,19	130:3,9
TEAM	42:5	54:9	187:13	135:20
102:3	44:14,19	TERRIFY	THERMOMETER	188:14
TEAM'S	45:13,16	53:5	44:21	190:9
102:13	46:13	TERROR	45:7	192:2,14
TED	48:2	54:19	THERMOMETER	194:7,13,
75:4,5	49:15,21	TESTIFIED	S	17 195:17
124:3,4	50:3	10:13	44:15	196:6
TEDIOUS	52:1,4,5,	29:4 82:8	49:16	202:14
118:8	14 53:3,	104:11	THICK	THINKING
130:9	10,17,20	105:11	137:19	13:7 83:2
TEENAGER	54:2	124:3	THING	185:13
197:6	55:12	128:11	27:2	THINKS
TEENS	56:7	134:7	45:21	168:11
45:1	TEMPERATURE	135:3	60:8,18	170:20
TELEGRAPH	S	154:17	66:20	THOUGHT
6:12 24:5	48:21	159:12	72:16	29:21
37:14	51:4 56:5	188:9	75:5	41:19
38:7	TENTH	189:7	76:10	45:12
39:20	129:1	199:6	87:12	48:15
47:21	TERM	201:14	105:5	60:10
48:18	105:8	TESTIFY	130:13	63:2,7
84:21	188:12	70:13	135:6	124:21
85:8	196:2	101:6,11,	137:21	179:17
103:17	TERMINATED	21 110:3	142:17	180:20
198:20	196:19	132:6	150:6	183:20
TELEPHONE	TERMS	154:21	165:12	188:6
11:4 12:2	84:9	163:21	167:9,10	THOUGHTS
15:12	193:16	TESTIMONY	183:14	170:5
34:6,7	203:9	135:2	187:16	THOUSAND
TERRIBLE			THINGS	143:14
			17:7 20:5	195:7,9
				THOUSANDS

143:8,17	63:4,15,	6:20	104:8	TOTALLY
THREE-RING	21 67:1,	16:20	193:8	64:4
85:5	5,7 76:5	42:15	196:14	TOUCH
THRUST	77:6,10	56:12	197:4	177:16
19:6	79:5	61:18	TOLKIEN'S	TOUCHES
TICKET	86:11	72:3	111:5	112:6
116:16	89:19,20	109:14,20	TONIGHT	TOWN
TICKETS	90:10,15	110:7	126:3	160:18
128:16,17	91:10,11,	114:18	TONY	TRACK
129:6	18 103:2,	121:20	118:2	49:20
TICKLED	17,18,19,	177:3	TOP	186:13
115:3	21	190:3	8:11 53:1	TRAINED
TICKLES	104:10,	199:2	62:3 79:7	51:12
21:20	12,14	TIMING	89:9 99:5	TRANSCRIPT
TIGHT	112:2	118:10	123:16,	204:3
144:10	113:1	TIRED	19,21	TRANSCRIPTS
TIM	114:1	157:14	124:4	184:20
100:6,9	116:20	TITLE	139:3,5	TRANSTERRES
175:8	123:17	38:10	147:3	TRIAL
TIME	124:5,20	66:14,16,	149:19	180:11,14
9:4 14:11	127:4,8	17 67:16	159:16	181:7
16:1,3,6,	129:14	68:1,3	173:8	TREATY
11,13	134:11,13	97:1	TOP-TO-TOE	45:3
17:3	135:10	127:11	149:21	150:17
18:11	137:13	135:20	TORE	TREE
19:17	146:21	156:3	110:19	22:20
23:15	158:17	TITLED	TORONTO	44:16
25:10,13	159:4	28:6	31:14	46:9
26:1,5,20	160:12	TITLES	32:4,7	49:20
27:1	171:4	67:11	33:21	51:5,14,
30:7,11,	172:12	68:6,7	34:5	18,20,21
13,17	173:21	TODAY	110:18,	52:3
31:16	175:13	9:12	20,21	55:18
32:12,16	176:19	10:18	113:10	56:3,4
33:2,5,12	177:15	11:3	188:18	TREES
35:4	178:14	TOES	TORTURED	56:1
39:17	180:2,3,	62:3	157:6	TREND
42:5	12,21	TOLD	TORTURING	42:8
46:14	181:7	31:20	22:11	45:1,4,5
47:20	183:12	63:15	TOTAL	46:21
48:10	186:21	67:14	193:9	47:1,2,3,
50:8,20	187:1	69:4		
61:8	188:11	101:20		
	189:10			
	190:8			
	TIMES			

4,5,6,7	TRUTH		55:6	109:6,11
48:6	10:12,13	U	56:10	169:9
	91:3		59:7 87:3	
TRENDS			90:19	UNIONIST
42:6,7,8,	TRUTHFULLY	U.K.	91:11,12	155:4
15,19	154:18	19:5	110:14	UNIT
46:18	TUCKER	25:17	111:7	20:21
	126:3,7	31:7	116:12	44:2,10
TRIAL		35:13,20	139:12	172:9
29:17	TUCKER'S	47:21	141:17,19	UNITED
101:10	126:8	64:11	150:18	17:17
125:7,10,	TUNE	67:5,6	153:16	25:11,14
11,13	17:4,5,9	116:10	158:9	26:4,20
150:19	118:6	119:5	161:19	53:13
157:12	TURKS	131:12	164:16	71:10
163:13	158:18	135:3	177:10	77:20
186:21	TURN	175:14,15	193:17,	104:8
187:1,3,	36:3 41:6	U.S.	20,21	111:4,20
4,6,11	96:13	18:2	196:3,12	112:6,11
188:5,15	122:17	115:16	198:3	115:20
190:20	TURNED	119:1	UNDERSTANDI	126:12,17
191:4,5	50:7 67:2	134:19	NG	131:13
TRIALS	TURNING	UH-HUH	46:6	188:10
125:1,14	197:10	177:12	166:14	189:8
189:3	TV	194:20	181:9	UNIVERSITY
TRIBUNAL	42:13	ULTIMATELY	199:18,21	40:4 57:5
62:1	75:6	73:21	UNDERSTANDS	93:14
TROIKA	115:12	UNABLE	184:16	183:15
163:13	116:17	197:19	UNDERSTOOD	UNKNOWN
TROUBLE	151:13	UNCOOPERATI	77:1	30:18
51:3	TWITTER	VE	UNDOCUMENTE	UNLIKE
TROUBLING	60:21	179:1	D	170:20
196:20	65:4	UNDERLINING	12:20	UNLIMITED
TROUSER-	74:21	171:21	UNETHICAL	121:17
DROPPING	171:2	UNDERLYING	168:12	UNMUTE
164:19	TWO-PERSON	174:19	UNFORTUNATE	9:17
TRUCK	78:12	175:12	189:11	UNNECESSARY
129:8	TYPE	UNDERSTAND	UNHAPPY	187:9
201:20	89:12	7:17 16:5	8:8 27:6	UNPUBLISHED
TRUE	164:19	43:2,3	88:16	73:16
153:13	TYPES	48:14	171:15	UNQUOTE
169:12	43:19	49:10	UNION	148:15
TRUST		52:10	6:18	
186:10		54:12		

UNTRUTHS	199:5	VERSUS	187:7	191:12
66:13		9:8 120:3		192:2
UPDATE	VALIDATION	VIAGRA	VIRAL	WANTING
162:20	163:12,16	162:6	145:2	67:7
UPS	VALLEY	163:18,20	VISCERAL	72:17
136:6	8:8 27:6		189:12	161:8
UPSET	88:15,16	VIDEO	VISCOUNTS	WAR
177:1	171:16	133:6	68:8	47:3,5
UPSHOT	VALOR	203:13	VOLUME	49:19
194:6	137:18	204:8	15:1	81:7
UPSIDEDOWN	VALUABLE	VIETNAM	VON	170:8
92:15,20	182:18	137:20	106:7,11,	WARM
URGENCY	VANITY	170:10	15,17	44:5
188:5	119:15	VIEW		93:12
URGENT	VARIABILITY	42:2	W	WARMIN
188:1	45:19	52:16		7:19
USELESS	46:7,8	60:1 65:9	WAHL	152:4
51:21	47:9 53:7	68:6	104:15,17	WARMING
USER	VARIETY	84:19	105:9,12	42:3,6,8
190:17	116:7	95:14	197:11	45:1,5
USERNAME	VASTLY	96:6	WAITING	46:21
191:6	128:13	116:5	164:9	47:2,3,5,
192:8	VEGAS	127:13	188:6	6 57:14
UTTERED	119:15,16	145:20	WALK	92:3
178:8	121:5,13	146:1	78:4	168:10
UTTERLY	VENTURE	196:4	WALLACE	WARNING
44:9	131:15	VIEWS	148:17	69:9
185:5	VENTURES	87:16	WANDERING	WARRIOR
UZBEKISTAN	144:18	88:6 90:1	159:10	126:18
56:7	VERDICT	VIGOROUS	WANKER	127:11,13
	120:3	VILLAIN	67:10,12	131:21
	VERMONT	7:10	144:10	132:7,9
V	179:6	133:18	WANTED	WARS
	VERNACULAR	139:19	43:3	81:7
VACATIONS	196:19	140:9,10,	69:13	WASHING
116:14	VERSAILLES	12,16	78:19	54:5
VAGUE	45:3	VIMY	86:11	WASHINGTON
73:6	150:17	81:6	106:9,10,	72:19
128:6,8	VERSION	VINCENT	12 116:18	148:2
197:21	50:9 89:8	95:13	156:15	WATCHING
198:13	166:2	VINDICATED	179:14	46:16
			187:10	

WATER	173:2,12	WESTERN	43:10,18	185:19
76:11	175:10,11	54:1	58:7 60:4	193:2,14
	176:5	WHICHEVER	71:16	198:2,15
WATSON	180:5,7,	86:15	73:9	200:14
57:2	9,11,15,	WHIP	74:13	201:10
WATT'S	18,19,20	21:21	80:7,14,	202:4
17:13	181:11,16	WHISPERS	19 89:3,	204:2
WATTS	191:7,21	174:20	11,14	WILSON
17:14	192:5,9	WHISTLER	90:19	10:2
WAYS	WEBSITES	82:5,7	91:7,16	11:8,11,
179:7	16:19	WHIT	95:21	18 12:6,9
WEAKENED	17:4,9	68:9	96:4,16	15:10,11
124:19	18:4	WHITEWASHIN	99:20	25:3
WEAKEST	19:3,20	G	101:16,17	28:11
116:4	21:17	184:4	102:18	31:21
WEATHER	173:19	WIDESPREAD	103:7,12	36:20
51:20	180:16	84:16,18	107:15	39:8
53:10	WEEK	WIFE	108:15	43:14
WEB	11:4 12:1	188:20	109:5	71:6 72:1
18:8	16:20	WILDE	110:11	73:5 80:8
190:16	125:9	152:7,12,	122:9,16	89:1,7,13
192:16	194:5	16,19	123:3	90:4
WEB-A-THONS	WEEKENDS	153:1,17	127:2	91:1,21
202:14	128:14	154:15,	128:2	93:7
WEBSITE	WEEKS	16,19	132:16,21	101:12
17:11,15,	60:14	155:11	133:7,19,	102:8,21
16 18:1,	79:10	WILDE'S	21 135:9	103:10
11 19:13,	WEIRDEST	153:13	136:19	127:1,14
15,16,17	160:18	154:11	138:19	128:6
32:18	WELLESELY	155:1	141:9,17,	132:18
33:3,13	110:18	WILLIAMS	21 146:6,	133:17
59:8	WELLINGTON	6:3 9:21	19 147:3,	134:21
61:19	110:19	10:15,17	6,7,14,15	141:14
70:11,19	WELSH	12:12	149:6,15,	146:13
71:1,4,14	144:15	13:16	17,18	147:2,5
99:2	165:14	22:13	151:10,17	157:21
120:3	WEST	25:6	152:1	168:6
121:4	164:18	28:2,12,	155:16	176:18
123:6	WESTBURY	14,16	158:6,7	181:21
128:14	113:9	37:1 38:2	161:18	193:12
168:8	119:4	39:11	166:10	197:18
171:1		41:2	168:21	200:13
172:21			169:18	201:3
			172:17	203:17,21
			176:20	204:4
			177:9	
			182:5,7	

WINING	150:8	198:19	WORST	136:13
169:7	169:20		144:13	159:6
WINNER	WONDERING	WORK		166:15
168:17,21	43:12	102:10	WORTH	180:5
169:5,6,		103:2,6,	42:9	199:1,2
16,17	WONDERLAND	14 104:20	WORTHLESS	
	8:3	112:13	68:11	WRONG
WINNING	185:21	113:2,5,	142:12,20	50:13
118:2		8,13	143:5,10,	133:19
WIRE	WOOZY	114:7,10	15,21	139:21
198:19	201:21	124:21	144:3	156:13
199:3,7	WORD	131:1	145:4	197:17
	20:17	161:8		199:6
WISE	54:15	164:17	WORTHY	
118:10	73:19		197:17	WROTE
WISHED	83:14,16,	WORKED		16:6
65:14	17 96:9	113:9,18	WRETCHED	27:10
	101:2	115:5,7	125:12	29:14
WISHING	173:20	119:7		30:7,13
67:11	174:1	159:15	WRITE	33:12
WITNESSES	176:4	190:5,8	29:10	35:4 41:3
10:21	177:17,19	198:18	65:16	47:14,20
19:8,9	178:10,		82:10	48:10
30:21	13,15,17	WORKING	88:2	58:8,9
63:13	183:6	124:18	123:10	59:3 62:2
101:5		162:19	202:5,6,	85:7
102:6,20	WORDS	165:21	15	89:19
103:5	44:15	174:14		91:10,18
154:17	69:3		WRITER	96:20
184:20	82:11	WORKS	64:8	97:1 98:6
185:3	125:1	60:7	118:3	100:2
	128:21	180:1		101:18
WITTED	142:7	WORLD	WRITES	103:19,21
136:21	143:18	17:15	181:1	104:15
137:1,5	145:14	49:19		106:6
	147:16	50:8,21	WRITING	107:3,5,
WIVES	148:13	54:1	42:2	21 108:17
112:20	157:10,	66:19	70:18	132:13
	11,14	81:7	71:14	134:11,
WOMAN	163:15	100:5	84:20	14,16
94:14	164:9	115:16	87:14,18	135:10
95:3 98:9	165:19	119:7	109:9	159:4
144:9	168:7	143:9	113:19,20	170:20
WOMEN'S	169:1,7	153:5	202:18	173:21
75:9	171:6,7	184:17		176:20
WON	175:21	WORLD'S	WRITTEN	177:7,15
121:21	183:5	14:20	6:13 7:6	180:3
		24:18	20:11	186:2
			56:12	
			58:3	

189:14	85:1,9	11:11
191:15	86:9	YOUNG
	99:14	79:6
X	100:4	112:21
	114:15	155:2,7
	115:7	
X-MEN	116:19	
140:11	117:9	Z
	118:6	
Y	123:11	ZARITA
	126:7,9	106:7,9,
	139:10	16,18
YASSER	150:4,20	
169:10	159:9,13	ZEAL
	170:10,	181:18
YEAR	12,13	182:3
33:4	171:5	
50:2,3	173:15,18	ZEALAND
51:17	184:18	52:20
56:7	186:6,9,	
113:15	21 187:19	ZONE
117:13	188:8,13	49:5
118:10,	189:5,6	
11,13	199:10	
120:14		
129:4	YESTERDAY	
162:8	12:6	
168:15	13:18	
192:12	15:7,10	
195:18		
200:12	YON	
	170:13	
YEARS	178:14	
14:12		
23:14,17,	YORK	
18 29:19,	6:20	
20 33:8	12:3,6	
37:15	61:18	
39:20	72:18	
45:21	109:14,20	
46:18,19	110:7	
52:21	116:20	
63:21	119:19	
65:6 66:9	120:15	
70:17	YOST	
71:14	5:2 9:11	
82:3,12		
83:8	YOU-ALL	