

**In the Matter Of:**

**MICHAEL E. MANN vs NATIONAL REVIEW**

2012 CA 008263 B

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**MARK STEYN**

*October 26, 2020*

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1 SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

2 CIVIL DIVISION

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4 MICHAEL E. MANN, M.D. )

5 PLAINTIFF, )

6 -V- )

CASE NO:

7 NATIONAL REVIEW, INC., ET AL. )

2012 CA 008263 B

8 DEFENDANTS. )

9 \_\_\_\_\_ )

10  
11 ZOOM DEPOSITION OF MARK STEYN

12 BALTIMORE, MD

13 MONDAY OCTOBER 26, 2020

14 10:07 A.M.

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17  
18 JOB NO: J6122503

19 PAGES: 1-206

20 REPORTED BY: KENNETH NORRIS

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DEPOSITION OF MARK STEYN  
HELD VIA ZOOM.

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

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3 RAND SIMBERG

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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 YOU 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 CONTENTED 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 MARQUESSSES 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 PHELIM 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 CONDESCENSFION 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.)

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1 REPORTER'S CERTIFICATE

2 STATE OF MARYLAND

3 COUNTY OF BALTIMORE, TO WIT:

4 I, KENNETH NORRIS, A NOTARY PUBLIC OF  
5 THE STATE OF MARYLAND, COUNTY OF BALTIMORE, DO HEREBY  
6 CERTIFY THAT THE WITHIN NAMED WITNESS PERSONALLY  
7 APPEARED BEFORE ME AT THE TIME AND PLACE HEREIN SET  
8 OUT, AND AFTER HAVING BEEN DULY SWORN BY ME, ACCORDING  
9 TO LAW, WAS EXAMINED.

10 I FURTHER CERTIFY THE EXAMINATION WAS  
11 RECORDED STENOGRAPHICALLY BY ME AND THIS TRANSCRIPT IS  
12 A TRUE RECORD OF THE PROCEEDINGS.

13 I FURTHER CERTIFY THAT I AM NOT OF  
14 COUNSEL TO ANY OF THE PARTIES, NOR IN ANY WAY  
15 INTERESTED IN THE OUTCOME OF THIS ACTION.

16 AS WITNESS MY HAND AND NOTARIAL SEAL  
17 THIS 26TH DAY OF OCTOBER, 2020.

18 

19 KENNETH NORRIS

20 NOTARY REPUBLIC

21 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

1 Reference No.: 6122503

2

3 Case: MICHAEL E. MANN vs NATIONAL REVIEW

4

DECLARATION UNDER PENALTY OF PERJURY

5

I declare under penalty of perjury that  
6 I have read the entire transcript of my Depo-  
sition taken in the captioned matter or the  
7 same has been read to me, and the same is  
true and accurate, save and except for  
8 changes and/or corrections, if any, as indi-  
cated by me on the DEPOSITION ERRATA SHEET  
9 hereof, with the understanding that I offer  
these changes as if still under oath.

10

11

\_\_\_\_\_

Mark Steyn

12

13

NOTARIZATION OF CHANGES

14

(If Required)

15

16

Subscribed and sworn to on the \_\_\_\_\_ day of

17

\_\_\_\_\_, 20\_\_\_\_ before me,

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(Notary Sign) \_\_\_\_\_

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(Print Name) \_\_\_\_\_ Notary Public,

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in and for the State of \_\_\_\_\_

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Reference No.: 6122503  
Case: MICHAEL E. MANN vs NATIONAL REVIEW

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Mark Steyn

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Mark Steyn

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