

QUEEN'S BENCH DIVISION

BETWEEN:

NICOLA HERON

Claimant

- and -

THE CLAY PIGEON SHOOTING ASSOCIATION LIMITED

Defendant

AGREED STATEMENT IN OPEN COURT

Claimant's solicitor – Sarah Webb

In this matter I appear on behalf of the Claimant Nicola Heron who has distinguished herself nationally and internationally in a number of shooting disciplines. She has been a member of the Defendant for over twenty years and from 2007 until February 2011 served as a board member of the Defendant and Director of the South East Region. She currently sits on both the South East Regional Committee and the CPSA Berkshire County Committee. She is also internationally known, having received medals in 6 of the last 7 years in World and European Championships, on the GBR Ladies team. She is also highly regarded for her work in promoting the highest professional and disciplinary standards in shooting. The Defendant, The Clay Pigeon Shooting Association Limited, is represented by Nicholas Wilcox.

On 29 August 2011 the Defendant sent to its board members and acting Chief Executive an email which contained defamatory statements about Ms Heron. This ~~was~~ email was subsequently circulated at the direction of the Defendant to eighteen County representatives sitting on the Defendant's South East Regional Committee.

The email made a number of defamatory allegations about Ms Heron, in particular that:

1. Ms Heron had been guilty of bullying and harassing behaviour and could not be trusted to communicate directly with the Defendant's staff;
2. An apology given by the Defendant to Ms Heron in respect of a previous libel complaint was undeserved; and
3. Ms Heron had lied to the representatives of the South East Regional Committee by claiming that she resigned because of the allegations which were the subject of her previous libel complaint when in fact there was some underlying reason for her resignation.

The allegations published by the Defendant are untrue. The Defendant is here today to apologise to Ms Heron unreservedly and to withdraw the defamatory allegations which it made against her. It has also

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agreed to pay her a sum in damages together with her legal costs and has undertaken not to repeat the allegations.


Defendant's solicitor

On behalf of the Defendant I accept all that my friend has said. The Defendant acknowledges that the allegations made against Ms Heron are untrue and has agreed to give the undertakings referred to above. The Defendant apologises sincerely and unreservedly for the distress and embarrassment caused to Ms Heron.

Claimant's solicitor

It only remains for me to ask for the Court to make an Order in the terms of the draft handed up.

[] February 2012


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