

**SCHEDULE**

**Claim No. QB-2021-004098**

**IN THE HIGH COURT OF JUSTICE**

**KING'S BENCH DIVISION**

**MEDIA & COMMUNICATIONS LIST**

**B E T W E E N:**

**KATHLEEN NORRIS STARK**

**Claimant**

**-and-**

**(1) ASSOCIATED NEWSPAPERS LIMITED  
(2) GEORDIE GRIEG  
(3) GERRARD GREAVES**

**Defendants**

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**JOINT STATEMENT IN OPEN COURT**

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**Counsel for the Claimant**

1. My Lady, in this action, I appear for the Claimant, known as Koo Stark. Ms Stark is a photographer whose work has been exhibited internationally, including in the National Portrait Gallery in London and the Museum of Chicago. She is a patron of the Julia Margaret Cameron Trust. Ms Stark has also worked as a professional actress, appearing in film and television and on stage. In the early 1980s, Ms Stark was in a romantic relationship with HRH Prince Andrew, which was the subject of considerable media attention.
2. The First Defendant is the publisher of the Daily Mail newspaper and the Mail Online website, which has an extensive readership in this country. The Second and Third Defendants were the Editor and Deputy Editor respectively of the Daily Mail newspaper at the time the relevant article was published.
3. On Thursday 21 November 2019, the Daily Mail published an article entitled "Embarrassing stunts. Shocking misjudgements. And VERY shady friends. Photos that prove Andrew's always been a ... DUKE OF HAZARD".

4. The article contained defamatory statements about the Claimant. It referred to Prince Andrew having had "an astonishing relationship with a soft porn actress" and featured an image of Ms Stark captioned: "THE PRINCE AND THE PORN STAR: Actress Koo Stark in 1976 soft erotic film Emily'. The words at issue meant, and would have been understood to mean, that the Claimant is a porn actress who has made her living participating in films which are made for distribution in the pornographic market.
5. The true position is that Ms Stark has never appeared in a pornographic film or posed for pornographic photographs. None of her work could properly be described as pornographic or indeed as 'very shady'. In particular, the film 'The Awakening of Emily', is a coming-of-age drama and not a pornographic film.
6. The article was also published on the Mail Online website at 00:42 on 21 November 2019. The false description of Ms Stark was noticed and the article was promptly amended to refer to Ms Stark correctly as a former actress, at 09:46 on 21 November 2019. On 14 October 2021, at the Claimant's request and as a gesture of goodwill, the Defendant further amended the online version of the article to remove all reference to Ms Stark.
7. The Defendant's publication of the article and the false statements about her caused the Claimant very considerable distress and upset.
8. The Defendant has accepted that the article's reference to Ms Stark was defamatory and without justification and has made an offer of settlement which the Claimant has accepted. As part of this settlement, the Defendant has agreed to pay the Claimant substantial damages, to undertake not to re-publish the allegations complained of, to join in the making of this statement, and to publish an apology.

#### **Counsel for the Defendant**

9. My Lady, on behalf of the Defendant I confirm everything that my learned friend has said.
10. The Defendant through me offers its sincere apologies to the Claimant for the distress, embarrassment and upset caused to her by the publication of the Daily Mail article. The Defendant accepts there was and is no truth in the allegation advanced about the Claimant and is happy to set the record straight.

#### **Counsel for the Claimant**

11. The Claimant now considers this matter concluded.