

**AMENDED List of Documents  
Standard Disclosure**

**Notes:**

- The rules relating to standard disclosure are contained in Part 31 of the Civil Procedure Rules
- Documents to be included under standard disclosure are contained in Rule 31.6
- A document has or will have been in your control if you have or have had possession, or a right of possession, of it or a right to inspect or take copies of it.

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| <b>In the High Court of Justice<br/>Queen's Bench Division</b>   |
| <b>Claim No. HQ04X01798</b>  |
| <b>Claimant (including ref)</b><br><br>LANCE ARMSTRONG<br><br>(ref: KS/GB/MH/JR/A113/1)  |
| <b>Defendant (including ref)</b><br><br>(1)TIMES NEWSPAPERS LIMITED<br>(2) DAVID WALSH<br>(3)ALAN ENGLISH<br><br>(ST/ARM/04/GEP) |

**Disclosure Statement**

I Gillian Phillips, Solicitor employed by Times Newspapers Limited state that I have carried out a reasonable and proportionate search to locate all the documents which the Defendants are required to disclose under the order made by Eady J on 17 December 2004. I searched for all documents relevant to the issues between the parties other than those which have already been disclosed. Searches were made at the First and Third Defendants' offices at Pennington Street and at the Second Defendant's home.

I certify that I understand the duty of disclosure and to the best of my knowledge I have carried out that duty. I further certify that the list of documents set out in or attached to this form, is a complete list of all documents which are or have been in the Defendants' control and which the Defendants are obliged under the order to disclose.

I understand that I must inform the court and the other parties immediately if any further document required to be disclosed by Rule 31.6 comes in to the Defendants' control at any time before the conclusion of the case.

I have not permitted inspection of documents within the category or class of documents (as set out below) required to be disclosed under Rule 31(6)(b) or (c) on the grounds that to do so would be disproportionate to the issues in the case. On the basis of proportionality, the Defendants have not included material from their internal and external databases, save to the extent that it relates specifically to a pleaded issue which is in dispute. By way of example, they have not therefore included in this list copies of every article that may have been written about the Claimant.

Signed Gillian Phillips.  
For and on behalf of the Defendants  
Re-served - Gillian Phillips  
For and on behalf of the Defendants

Date 27 May 2005

20th September 2005