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PRIVATE AND CONFIDENTIAL

Legal Departments

BY EMAIL

Our Ref: SMS/LXT/JP/CW/mp/W0151/001

10 December 2009

VERY URGENT
ON THE RECORD
STRICTLY NOT FOR PUBLICATION OR BROADCAST

Dear Sirs

ELDRICK TONT (TIGER) WOODS v X & Y (PERSON OR PERSONS UNKNOWN WHO HAVE TAKEN OR OBTAINED OR OFFERED FOR PUBLICATION PHOTOGRAPHS OF THE INTENDED CLAIMANT IN CIRCUMSTANCES DESCRIBED IN THE CONFIDENTIAL SCHEDULE TO THIS ORDER

We act for Eldrick Tont ("Tiger") Woods, the US golfer.

We enclose by way of notice on your organisation an Order granted at approximately 4.30pm today Thursday 10 December 2009 by his Honour Mr. Justice Eady at the High Court in London.

You should note that the Order prevents the publication of private and confidential information contained in the Order and confidential schedule relating to Mr Woods. You should note in particular the Penal Notice accompanying the Order attached to this letter.

For the avoidance of doubt this Order is not to be taken as an admission that any such photographs exist, and in the event that these photographs do exist, and it is not admitted, any such images may have been fabricated, altered, manipulated and or changed to create the false appearance and impression that they are nude photographs of our client. Our client is not aware of any images and in any event

SCHILLINGS 41 Bedford Square, London WC1B 3HX
Tel 020 7034 9000 • Fax 020 7034 9200
Email legal@schillings.co.uk • Online www.schillings.co.uk • DX Number 89265 (Soho Square 1)

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he would not have consented to any such photographs being taken nor would he have consented to the dissemination or exploitation of the same.

Naturally, we trust that you will abide by the Order. Now that you have notice of the Order you are bound by its terms and should ensure that your organization does not breach the terms of the Order.

Should any recipient have any query in relation to the Order, please contact either Simon Smith (simon.smith@schillings.co.uk / 07712 183996) or Laura Tyler (laura.tyler@schillings.co.uk / 07918 742114) or Schillings on +44 207 023 9000.

Due to the urgency and lateness of today's hearing, the order was not able to be sealed by the court office today. We will serve on you the sealed version of the order as soon as it is available tomorrow.

Please confirm receipt.

Yours faithfully


SCHILLINGS

Encs.

IN THE HIGH COURT OF JUSTICE

Claim No []

QUEEN'S BENCH DIVISION

BEFORE THE HONOURABLE MR JUSTICE EADY IN PRIVATE

10th December 2009

B E T W E E N :

ELDRICK TONT (TIGER) WOODS

Applicant/Intended Claimant

- and -

X & Y

(PERSON OR PERSONS UNKNOWN WHO HAVE TAKEN OR OBTAINED OR OFFERED FOR PUBLICATION WITHIN THE JURISDICTION OF THIS COURT PHOTOGRAPHS OF THE INTENDED CLAIMANT IN CIRCUMSTANCES DESCRIBED IN THE CONFIDENTIAL SCHEDULE TO THIS ORDER)

Respondent/Intended Defendants

ORDER

PENAL NOTICE

IF YOU THE RESPONDENT DISOBEY THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED

ANY PERSON WHO KNOWS OF THIS ORDER AND DISOBEYS THIS ORDER OR DOES ANYTHING WHICH HELPS OR PERMITS ANY PERSON TO WHOM THIS ORDER APPLIES TO BREACH THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

NOTICE TO ANYONE NOTIFIED OF THIS ORDER

You should read the terms of the Order and the Guidance Notes very carefully. You are advised to consult a Solicitor as soon as possible. This Order prohibits you from doing the acts set out in Paragraphs 4, 5 and 12 of the Order and obliges you to do the acts set out in Paragraph 6 and 7 of the Order. You have the right to ask the Court to vary or discharge the Order. If you disobey this Order you may be found guilty of Contempt of Court and you may be sent to prison or fined or your assets may be seized.

THIS ORDER

1. This is an Injunction with other orders as set out below made against the Intended Defendants ("the Defendants") on Thursday 10th December 2009 by the Judge identified above ("the Judge") on the application ("the Application") of the Intended Claimant ("the Claimant"). The Judge:
 - (a) read the witness statement set out in Schedule 1 at the end of this Order
 - (b) was given information orally by Counsel on behalf of the Claimant;
 - (c) considered section 12 of the Human Rights Act 1998;
 - (d) heard the Application in private pursuant to the provisions of the Civil Procedure Rules 1998 ("the CPR"), Rule 39.2(3), and
 - (e) accepted the undertakings set out in Schedules 2 and 3 at the end of this Order.
2. This Order was made at a hearing without notice to the Defendants. The Defendants (and anyone served with or notified of this Order) have a right to apply to the Court to vary or discharge the Order (or so much of it as affects them): see paragraph 11 below.

ACCESS TO DOCUMENTS ON COURT FILE

3. Pursuant to CPR 5.4C(4) the court file will be sealed and no copies of the court file including this Order or any documents subsequently created (including but not limited to witness statements, statements of case or any skeleton arguments) will be provided to a non party without further order from the Court. Any non party seeking access to or copies of the above mentioned documents from the court file must make an application to the Court, proper notice of which must be given to the Claimant's solicitors.

INJUNCTION

4. Until after the conclusion of the Trial of this claim or further Order of the Court in the meantime, the Defendants must not publish, further publish, syndicate, communicate, use or disclose to any other person (other than (i) by way of disclosure to legal advisers instructed in relation to these proceedings for the purpose of obtaining legal advice in relation to these proceedings or (ii) for the purpose of carrying this Order into effect) all or any part of the information or purported information described in the Confidential Schedule at the end of this Order,

must not cause or authorise any other person, firm or company to do any of those acts PROVIDED THAT nothing in this paragraph of this Order shall prevent the Defendants from publishing, communicating or disclosing any material that before service of this Order was already in, or that thereafter comes into, the public domain as the result of national media publication (other than as a result of breach of this Order or a breach of confidence or privacy).

PROTECTION OF HEARING PAPERS

5. The Defendants must not publish or communicate or disclose or copy or cause to be published or communicated or disclosed or copied this Order or any documents subsequently made in support of the Application including any notes made by the Claimant's solicitors' of the hearing of the Application ("the Hearing Papers") PROVIDED THAT the Defendants shall be permitted to disclose and deliver to Counsel and solicitors instructed in relation to these proceedings ("the Defendants' legal advisers") for the purpose of these proceedings copies of the Hearing Papers.
6. The Hearing Papers must be preserved in a secure place by the Defendants' legal advisers on the Defendants' behalf in order to ensure that the Defendants shall be in a position to comply with any Order the Court may subsequently make in relation to them.
7. The Defendants shall be permitted to use the Hearing Papers for the purpose of the litigation PROVIDED THAT the Defendants' legal advisers shall first inform any third party to whom the said documents are disclosed of the terms of this Order and, so far as is practicable, obtain their written confirmation that they understand and accept that they are bound by the same.

PROVISION OF DOCUMENTS AND INFORMATION TO THIRD PARTIES

8. The Claimant shall in accordance with paragraph 9 of the Practice Direction to CPR 25 provide anyone served with a copy of this Order at their request with (a) a copy of any of the materials read by the Judge and/or (b) a note of the hearing, such documents or material (and the information contained therein) not to be used or disclosed to any third party for any other purposes (including but not limited to publication in the press or media) than for making an application to the Court to vary or discharge this Order, or part thereof, without further Order of the Court.

HEARING IN PRIVATE

9. Pursuant to CPR 39.2(3)(a)(c) and (e), the hearing of the application to which this Order relates be heard in private and there be no reporting of the same save for the fact of the application itself.

COSTS

10. The costs of and occasioned by the Application are reserved.

VARIATION OR DISCHARGE OF THIS ORDER

11. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order (or so much of it as affects that person), but they must first give not less than 48 hours written notice to the Claimants' solicitors. If any evidence is to be relied upon in support of the application, the substance of it must be communicated in writing to the Claimant's solicitors in advance. The Respondent may agree with the Claimant's solicitors that this Order should be varied or discharged but any agreement must be in writing.

INTERPRETATION OF THIS ORDER

12. A Defendant who is an individual who is ordered not to do something must not do it himself or in any other way. He must not do it through others acting on his behalf or on his instructions or with his encouragement.
13. A Defendant which is not an individual which is ordered not to do something must not do it itself or by its directors, officers, partners, employees or agents or in any other way.

PARTIES OTHER THAN THE CLAIMANTS AND THE RESPONDENT

14. Effect of this order

It is a contempt of court for any person notified of this order knowingly to assist in or permit a breach of this order. Any person doing so may be imprisoned, fined or have their assets seized.

NAME AND ADDRESS OF THE CLAIMANTS' LEGAL REPRESENTATIVES

15. The Claimant's solicitors are Schillings, 41 Bedford Square, London WC1B 3HX. Telephone number during office hours 020 7034 9000. Ref: Simon Smith (Mobile 07712 183996).

COMMUNICATIONS WITH THE COURT

16. All communications to the court about this order should be sent to:

Room WG08, Royal Courts of Justice, Strand, London WC2A 2LL quoting the case number. The telephone number is 020 7947 6010. The offices are open between 10 a.m. and 4.30 p.m. Monday to Friday.

SCHEDULE 1

The Claimant relied on the witness statement of Simon Malcolm Smith, dated 10th December 2009.

SCHEDULE 2

Undertakings given to the Court by the Claimant

- (1) If the Court later finds that this Order has caused loss to the Defendants, and decides that the Defendants should be compensated for that loss, the Claimant will comply with any order the Court may make.
- (2) If the Court later finds that this Order has caused loss to any person or company (other than the Defendants) to whom the Claimant has given notice of this Order, and decides that such person should be compensated for that loss, the Claimant will comply with any Order the Court may make.
- (3) If this Order ceases to have effect, the Claimant will immediately take all reasonable steps to inform in writing anyone to whom he has given notice of this Order, or who he has reasonable grounds for supposing may act upon this Order, that it has ceased to have effect.

SCHEDULE 3

Undertakings given to the Court by the Claimant's solicitors

- (1) The Claimant's solicitors will issue a Claim Form and Application Notice claiming the appropriate relief as soon as possible after the making of this Order.

CONFIDENTIAL SCHEDULE

Information referred to in the Injunction

Any photographs, footage or images taken or obtained of the Claimant naked or any naked parts of the Claimant's body or of him involved in any sexual activity.