**Reputations at stake – The German Federal Court’s decision concerning Google’s liability for autocomplete suggestions in the international context**

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There is an increasing interest among scholars in the German Right of Personality going back to the important Princess Caroline of Hanover case in which the European Court of Human Rights (*ECHR*) held that respect for the private life of Princess Caroline was breached by photographs of scenes from her daily life.[[1]](#footnote-1) The digital era poses new challenges for the German courts: photos, images and potentially damaging defamatory reports can be quickly reproduced, manipulated or uploaded on the Internet which have the potential to infringe the personality rights of the depicted person. Even internet search machines may invade a person’s personality right, as recently held by the German Federal Court (*Bundesgerichtshof – BGH*) in a landmark case where Google’s autocomplete function added terms like “Scientology” or “fraud” to the plaintiff’s name when entered in the Google search engine.[[2]](#footnote-2) In another pending case the f**ormer German first lady, Bettina Wulff, -** is suing **Google over search terms that link her name to false rumours that she used to be a prostitute.**[[3]](#footnote-3)This note discusses the recent Google decision of the BGH on the liability of Internet host providers and compares it to recent case law in other jurisdictions. It will be demonstrated that, whilst many jurisdictions are still hesitant to award damages, national courts are increasingly recognising an Online Service Provider’s (OSP’s) duty to examine the search results for potential infringements of third party rights, if and when the OSP becomes aware of a violation of third party rights. In order to strengthen the protection of the defamed party, it is, however, recommended that an online operator’s duty to prevent further infringements should begin at an earlier point in time, namely once the OSP has had the opportunity to acquire without much difficulty the necessary knowledge and awareness of a potential infringement of personality.

**Elements of the German right of personality**

In Germany, a general right of personality has been recognised in the case law of the BGH since 1954 as a basic right constitutionally guaranteed by Arts 1 (1) and 2 (1) of the Basic Law (*Grundgesetz* - *GG*)[[4]](#footnote-4) and as an "other right" protected in civil law under ss. 823 (1), 1004 of the Civil Code (*Buergerliches Gesetzbuch - BGB*).[[5]](#footnote-5) The fundamental right guarantees the protection of human dignity and the right to free development of the personality. The Federal Constitutional Court (*Bundesverfassungsgericht – BVerfG*) has clarified that the personality right may include different aspects: in particular the guarantee of privacy and the protection of the right to one’s own image (ss. 22 ff. Art Copyright Act – *Kunsturhebergesetz - KUG*).[[6]](#footnote-6) The two rights are clearly separable and rest on different legal policies: the right to privacy protects against intrusion upon an individual's private sphere, whilst the image right protects against commercial injury caused by the non-consensual commercial appropriation of an individual's personality.[[7]](#footnote-7) The personality right in Arts 1 (1) and 2 (1) of the Basic Law also guarantees protection against untrue assertions and the portrayal of a distorted picture of an individual in public. In 1958 the BGH held in its *Herrenreiter* decision that the personality right was seriously injured by an advertisement, not only because it conveyed the false impression that the plaintiff had sought to commercialise his reputation as a sportsman, but also because it implied that he needed sexual stimulants.[[8]](#footnote-8)

**Duty of online forum operators**

As noted above the BGH in a recent judgment held Google responsible for the publication of autocomplete results that suggested “fraud” or “Scientology” as additional search terms when the claimants’ names were searched.[[9]](#footnote-9) Despite Google claiming their lack of influence on autocomplete results that are solely predicted by computer algorithms based on searches from previous users, the BGH stated that the publication of autocomplete results infringes the personality right, if they make a statement that is untrue. However, the BGH clarified that Google could not be held liable for every violation of personality rights by its search engine as there was no general duty to examine the search results for potential infringements of third party rights prior to publication. Such a duty can only be imposed if and when an online operator becomes aware of a violation of third party rights. In this respect an online operator has to stop publishing the offending words after being notified by the affected person (“notice and take-down”). Only in the event that the internet search engine operator ignores the take-down request from the victim of the alleged infringement, may the latter then apply for an injunction to prevent further infringements, -but not for damages.[[10]](#footnote-10)

**Argumentation of the BGH in light of earlier decisions**

This ruling of the BGH is in line with its earlier decisions concerning the liability of online forum operators such as ebay or DENIC.[[11]](#footnote-11) The decision affirms the Federal Court’s rather logical and practical approach to imposing liability so that OSP’s can only be held responsible for a failure to act after being notified by the affected person. The extent of the duty to carry out appropriate preventive measures to exclude further violation of personality rights of third parties will then be determined on a case by case basis and assessed within the limits of what is reasonable and possible. The Court mentions a possible prevention obligation in respect to certain fields such as child pornography but leaves open how far-reaching this duty should be in the individual case.[[12]](#footnote-12)

**Critique of the judgment**

The clear intention behind this judgment of the BGH is certainly to limit OSP liability within an appropriate and legitimate parameter.[[13]](#footnote-13) It would be undesirable to require search operators to ensure that an indefinite number of people were not harmed by the results of an internet search. On the other hand, the harm to someone’s reputation as a public figure well-known at home and abroad can be grave and long-lasting as seen in the Bettina Wulff case. Her name being unlawfully associated with the search term “prostitute” would immediately catch attention, jeopardise her honour as a woman and be highly prejudicial to her standing as a public figure. In previous defamation cases German courts have repeatedly stressed that a person’s personal honour must prevail if the factual information has been identified as false.[[14]](#footnote-14) This principle must apply uniformly to online defamation cases. It is therefore recommended that an online operator’s duty to prevent further infringements should begin at an earlier point of time, namely once the operator has had the opportunity of obtaining the necessary knowledge of a potential infringement of personality rights in a reasonable way and without significant difficulty. This interpretation of knowledge should for example apply when the online operators effectively close their eyes in the face of unavoidable knowledge which could be easily obtained via twitter, online reports or other media channels. It might also apply where the online operator neglects to use a rather obvious opportunity for knowledge and where claiming the lack of knowledge as a defence appears to be mere formalism. The relevant point of time can be assessed by asking whether any other person in the position of the online operator would have had the knowledge under the same concrete circumstances. Survey evidence can be used to show whether obtaining or having that knowledge would have been possible. Finally, this approach would avoid – as the BGH stressed in its recent judgment - imposing a too far-reaching preventive duty on the online forum operators to filter out bad words in general.

**Responsibility of OSP’s for defamatory content in other countries**

In its judgment, the BGH has taken a middle-path between the divergent opinions of other national courts in this matter. France and the UK have so far taken the narrowest view on the liability of OSPs, whilst a recent Australian decisions has ruled in favour of the defamed claimant and awarded injunctions and damages.

**UK**

In 2009 the High Court in England ruled that Google could not be held liable for defamatory comments that appear in news articles, blogs and forums displayed in its search results.[[15]](#footnote-15) The claimants, the Metropolitan International Schools, who offer distance learning courses in games development, took legal action over comments on the forum of a website that they found defamatory and that appeared in Google's search results. The company was of the opinion that Google was liable as a publisher of defamatory comments. Mr Justice Eady rejected the claim, arguing that Google was a "facilitator" and not a publisher of the content. It is interesting to note that the ruling excluded Google’s liability as a publisher of defamatory comments even in cases where it had been notified of potentially libellous comments in their search results. However, under such circumstances and in line with the BGH position, the court acknowledged the duty of the defendant to block or take down content if it is alerted to a complaint about a potential defamatory material in the search results.[[16]](#footnote-16)

In *Payam Tamiz v Google Inc*, the Court of Appeal recently had to decide on a libel claim arising from allegedly defamatory comments on a blog.[[17]](#footnote-17) The claimant, Payam Tamiz, alleged that he was defamed by eight specific comments on a blog named “London Muslim” hosted by Blogger.com, operated by Google Inc. Mr Tamiz first notified his complaint in April 2011 using the “Report abuse” function on the relevant web page. A letter of claim was sent on 29 June 2011 to Google UK Ltd, which was received on 5 July 2011. After considerable delay, Google wrote to the blogger with a request to remove the comments on 11 August 2011, which the blogger did three days later. Mr Tamiz sought to bring a claim in libel against Google in respect of the publication of the allegedly defamatory comments during the period prior to their removal.

**First instance**

Eady J. found that three of the comments were arguably defamatory but that Google had not published them. Even if Google was a publisher, the court found that s.1 of the Defamation Act 1996, according to which publishers can avoid liability if they can claim that they did not know of the publication, would provide it with a defence.[[18]](#footnote-18) S. 1 of the Defamation Act 1996 would apply because Google had taken reasonable care in relation to Tamiz’s complaint, despite the four months delay in removing the blog. Moreover, Google was not liable because the statements were only on the blog for a short period of time and “too trivial” to justify legal action**.**

**Court of Appeal decision**

On appeal, the Court of Appeal held that once Google had notice of the defamatory statements it could be classed as a publisher of those statements.The court found that the provision of a platform for blogs was equivalent to the provision of a notice board. Google provided tools to help a blogger design the layout of his part of the notice board and provided a service that enabled a blogger to display advertisements alongside the notices. Google made the notice board available to bloggers on terms of its own choice and it could readily remove or block access to any notice that did not comply with those terms.

As for the defence provided by s. 1 of the Defamation Act 1996, the question was whether in the period after the notification of the complaint Google did not know, and had no reason to believe, that what it did caused or contributed to the publication of a defamatory statement: S.1(1)(c). Contrary to the position of Eady J., the Court of Appeal found that Google did indeed know or had reason to believe that its actions caused or contributed to the continued publication of the comments. Therefore, if Google were found to be a publisher of the defamatory comments, s. 1 of the Defamation Act 1996 would not afford a defence.

However, the Court of Appeal agreed with Eady J. that on the facts, the case was too ‘trivial’ to be allowed to proceed. In particular, the court raised doubts as to whether a significant number of people would have read the comments in question in the period between notification and removal.

Although Mr Tamiz lost the case, the decision might be helpful to other claimants hoping to remove defamatory material from blogger platforms. OSPs will have to react fast to notification to avoid liability as a publisher of users’ defamatory postings.

However, it should be noted that Google’s role as a search engine was not affected by the Tamiz decision. As stated above, in *Metropolitan International Schools Ltd v (1) Designtechnica Corporation (2) Google UK Ltd & (3) Google Inc*. the court held Google was not a publisher of defamatory material in search results.[[19]](#footnote-19) Hence, this rule still stands and will be followed in future cases regarding the liability of search engines for defamatory content.

**France**

The French Cour de Cassation equally denied Google’s liability for predictions that appear when users type words, arguing that they do not reflect the will of the search tool.[[20]](#footnote-20) The court stated that Google, in devising its algorithm, did not knowingly intend to publish false statements of fact and therefore a violation of French press laws could not be assumed. The limited liability of Google should be seen in the light of Article 6-I-2° of law n° 2004-575 dated June 21, 2004 for confidence in the digital economy (“LCEN”) which established a system of limited liability for internet hosting servers or providers. It should be noted, that the decision of the French Supreme Court is consistent with the interpretation adopted by the Court of Justice of the European Union (CJEU) on 23 March 2010 in the AdWords case where the Court decided that Google is only an information service provider and does not infringe any trade marks; it only creates the environment in which trade mark owners and advertisers do business.

The case which has prompted the reference to the ECJ is that of *Louis Vuitton Malletier v Google.* [[21]](#footnote-21) It followed a complaint from Louis Vuitton about the use of its trade marks *Louis Vuitton* and *LV* by Google's AdWords program. Louis Vuitton claimed that when its trade marks were used as search terms in a Google search, the results that appeared included links and advertisements for counterfeit Louis Vuitton products. Louis Vuitton sued Google for trade mark infringement, unfair competition and unfair advertising practices.

Apart from specific trade mark issues, the Court ruling also analysed the possibility of applying Article 14 of the E-Commerce Directive to Google AdWords.[[22]](#footnote-22) According to Article 14, providers that store third party content on their servers may not be held liable for damages, unless they fail to block access to the information upon obtaining actual knowledge of the illegal activity or information or upon becoming aware of facts or circumstances from which illegal activity or information is apparent (“safe harbour provision”).

Specifically, the question was whether Google’s AdWords service could be regarded as an information society service as defined by Art 2(a) of the E-Commerce Directive, so that Google cannot incur liability until it has been notified by the trade mark proprietor of the unlawful use of the sign by the advertiser.

According to the Court, in order to establish whether the liability of a referencing service provider like Google may be limited under Article 14 of the E-Commerce Directive, the national court will have to examine whether the role played by that service is neutral. Such a neutral role of the provider can be assumed if its conduct is merely technical, automatic and passive, pointing to a lack of knowledge or control of the data which it stores.

If the national court concludes that this is the case, Google should not be held liable for the data which it has stored at the request of an advertiser unless, having obtained knowledge of the unlawful nature of those data or of that advertiser’s activities, it failed to remove or to disable access to the data concerned.

In summary, the Court has under certain conditions extended the sphere of application of Article 14 of the E-Commerce Directive to sponsored links services. This is an important judgment as many content service providers will now be able to rely on their lack of knowledge or control over data argument to avoid legal liability.[[23]](#footnote-23)

**USA**

The US Supreme Court has yet to make a landmark decision on the issue of Google’s autocomplete results. However, it is very likely that, in the US, Google would be protected under section 230 of the Communications Decency Act of 1996 (CDA) which prohibits online service providers from being treated as the publisher of user-generated defamatory content. In similar cases concerning the liability of OSP’s courts have generally applied a three-step test.[[24]](#footnote-24) An OSP must satisfy each of the three steps to gain the benefit of the immunity of section 230 CDA.

1. The defendant must be a "provider or user" of an "interactive computer service."

2. The content at issue was posted or contributed by a third party; and

3. The plaintiff’s cause of action attempts to treat the defendant as the speaker/provider of the content at issue.

Applying the above principles it is almost certain that the courts would deny Google’s role as a responsible content creator.[[25]](#footnote-25)

**Australia**

As noted, apart from injunctive relief most jurisdictions are currently hesitant to grant damages to avoid a flood of claims against OSP’s. The Supreme Court of Victoria in Australia, however, recently **awarded a claimant a total of AU$425,000 in damages after Google and Yahoo linked his photograph to one of Australia's most famous underworld figures.**[[26]](#footnote-26) **In the Google case,** the jury had to deal with two separate issues: the first was the publication of a photo of the claimant that appeared on Google's image search. The second concerned a URL that appeared on Google's web search that linked to a web page containing the defamatory content, which included his image. As for the URL, the jury found that the claimant had not followed the proper process of reporting offensive content by Google - which can be done by filling out a form on its website and that Google was therefore not liable.

With regard to the photo of the claimant on Google’s image search, the claimant’s solicitors had made a takedown request by letter on 22 September 2009. The letter requested Google to remove the defamatory material resulting from search results returned against the claimant by 28 September 2009. On 10 October 2009 an email was sent from “help @ Google.com”, in which it was stated:

“At this time, Google has decided not to take action based on our policies concerning content removal. Please contact the webmaster of the page in question to have your client’s name removed from the page.”

Google denied publication and pleaded defence of innocent dissemination pursuant to [s. 32](http://www.austlii.edu.au/au/legis/vic/consol_act/da200599/s32.html) of the [Defamation Act 2005](http://www.austlii.edu.au/au/legis/vic/consol_act/da200599/). This defence protects a person from liability provided the defendant “neither knew, nor ought reasonably to have known, that the matter was defamatory”. [[27]](#footnote-27)

 The jury at the Supreme Court of Victoria agreed that s. 32 of the Defamation Act would indeed provide a defence, but only up to the point when the claimant’s solicitors had contacted Google on 22 September 2009 to have the image removed. It concluded that the content should have been removed at that point, and as a result Google was liable for defamation.

Moreover, Justice Beach of the Victorian Supreme Court found **that Google Inc. was a publisher even before it had any notice from anybody acting on behalf of the claimant.** The judge argued thatEadyJ's statements in *Tamiz* that an internet service provider, who performs no more than a passive role, cannot be a publisher, could not be generalised and that those statements had to be seenin the light of the facts in each case*.[[28]](#footnote-28)* Justice Beach stated that in this case the jury were entitled to conclude that Google Inc. intended to publish the material that its automated systems produced, because that was what they were designed to do upon a search request being typed into one of Google Inc.’s search products. In that sense, the court compared Google Inc. to a newsagent that sells a newspaper containing a defamatory article.[[29]](#footnote-29) Whilst there might be no specific intention to publish defamatory material, there is a relevant intention by the newsagent to publish the newspaper for the purposes of the law of defamation. Moreover, Justice Beach stated that it was open to the jury to conclude that when the email of 10 October 2009 was written Google was aware of the defamatory material which gave rise to the claim. The Australian case can be seen as a landmark case that could have a great impact on the liability of OSP for defamatory material on the Internet. The case could open the floodgates to many others who want to protect their good name on the Internet or social media. The case shows that as soon as an OSP knows about a defamation complaint it can be held liable for what it publishes in its search results. It follows that search engines such as Google will have to be more responsive to takedown notices as their common "not our responsibility, please contact the webmaster" response may not protect them from liability.

**Conclusion**

National courts are increasingly concerned with conflicts arising from internet defamation. As seen in the recent Google cases potentially damaging or defamatory statements on the internet may generally reach a large audience quickly and a good reputation built over a lifetime can be lost overnight. Online forum operators are partly to blame for this as they provide the platform for potential infringements. The German Federal Court has rightly recognised Google’s responsibility to take down potentially defamatory content once they have been notified of the infringement. Many national courts seem to share this view but are still hesitant to open the doors for an unlimited number of claims against OSP’s arising from defamatory user content. In order to strengthen the protection of an individual’s reputation, it has been suggested that it is necessary to accelerate the relevant point of time of an online operator’s duty to prevent further infringements, namely to ask whether the operator has had the opportunity of obtaining the necessary knowledge without significant difficulty. This would help stop online defamation at an earlier stage and protect a defamed person’s reputation without imposing an unreasonable duty of examination and liability on online forum operators. In this respect, it will be interesting to await the outcome of forthcoming decisions regarding online defamation which will, hopefully, shed further light on the future path of the courts on this matter.

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 *See* Von Hannover v Germany ECHR (24 June 2004) – 59320/00 = NJW 2004, 2647 and Von Hannover v Germany (No. 2) ECHR (7 February *2012*) – 40660/08 and 60641/08. See case comments of Corinna Coors, *Headwind from Europe: The New Position of the German Courts on Personality Rights after the Judgment of the European Court of Human Rights*, 11 German Law Journal, 2010, 527-538; Judith Janna Marten, *Personality rights and freedom of expression: a journey through the development of German jurisprudence under the influence of the European Court of Human Rights* Journal of Media Law (2012), 4(2), 333-349; Franz Hofmann,*The right to publicity in German and English law*, [Intellectual Property Quarterly (2010), 3, 325-340](http://login.westlaw.co.uk.ezproxy.uwl.ac.uk/maf/wluk/app/document?src=doc&linktype=ref&&context=28&crumb-action=replace&docguid=ICE28AED1A74C11DFB425AFEF504AC682). [↑](#footnote-ref-1)
2. BGH, 14.05.2013, VI ZR 269/12. *See* case commentof Andrea Schuessler, *Germany: internet - German Supreme Court holds Google liable for "autocomplete" results*,World Communications Regulation Report (2013), 8(6), 11. [↑](#footnote-ref-2)
3. *See* <http://www.spiegel.de/international/zeitgeist/google-autocomplete-former-german-first-lady-defamation-case-a-856820.html> [Last accessed 4 October 2013]. [↑](#footnote-ref-3)
4. Constant case law since BGHZ 13, 334, 338 - *readers' letters*. [↑](#footnote-ref-4)
5. Ibid. [↑](#footnote-ref-5)
6. *See* BVerfGE 101, 361 – *Caroline von M II.* [↑](#footnote-ref-6)
7. *See* BGHZ 73 ,120; BGH 09.12.2003 - VI ZR 373/02. [↑](#footnote-ref-7)
8. BGHZ 26,349. [↑](#footnote-ref-8)
9. Supra fn 2. [↑](#footnote-ref-9)
10. *See* case comment: *Liability of search engine operator for autocomplete suggestions that infringe rights of privacy – “Autocomplete” function*, Journal of Intellectual Property Law & Practice 2013, 8(10), 797-802. [↑](#footnote-ref-10)
11. *See* BGH, 17.05.2001 - I ZR 251/99 – ambiente.de, [BGH, 11.03.2004 - I ZR 304/01](http://www.juris.de/jportal/portal/t/22qd/page/jurisw.psml?pid=Dokumentanzeige&showdoccase=1&js_peid=Trefferliste&documentnumber=4&numberofresults=4&fromdoctodoc=yes&doc.id=KORE313832004&doc.part=L&doc.price=0.0#focuspoint) – *Internet-auction.* [↑](#footnote-ref-11)
12. *See* Andrea Schuessler, *Germany: internet – German Supreme Court holds Google liable for “autocomplete results”,* World Communications Regulation Report (2013) 8 (6). [↑](#footnote-ref-12)
13. BGH, 14.05.2013, VI ZR 269/12, *see* case comment: *Liability of search engine operator for autocomplete suggestions that infringe rights of privacy – “Autocomplete” function,* Journal of Intellectual Property Law and Practice 2013, 8(10), 797-802. [↑](#footnote-ref-13)
14. BVerfGE 61 1,8; BVerfGE 85,1,15, BGHZ 31,308,318. [↑](#footnote-ref-14)
15. *Metropolitan International Schools Limited v Designtechnica, Google UK and Goolge Inc* [2009] EWHC 1765 (QB). [↑](#footnote-ref-15)
16. Supra fn 15, *see* case comment of Ashley Hurst and Tamsin Blow, E-Commerce Law Reports 2009, 9(3), 4-5. On the liability of OSP’s *see* Ian J. Lloyd (2010) *Cyber Law in the United Kingdom,* Kluwer Law International, The Netherlands, p. 162. [↑](#footnote-ref-16)
17. *Payam Tamiz v Google Inc* [[2013] EWCA Civ 68](http://www.bailii.org/ew/cases/EWCA/Civ/2013/68.html), *see* case comment of Eileen Weinert, Entertainment Law Review 2013, 24 (4), 136-139. [↑](#footnote-ref-17)
18. *See* for available defences: Victoria McEvedy, *Defamation and intermediaries: ISP defences,* Computer and Telecommunications Law Review 2013, 19 (4), 108-112. [↑](#footnote-ref-18)
19. Supra fn 15. [↑](#footnote-ref-19)
20. Cour de cassation, civile, Chambre commerciale, 29 January 2013, 11-21.011 11-24.713. [↑](#footnote-ref-20)
21. *Google* *France* SARL *v* *Louis* *Vuitton* Malletier SA; *Google* *France* SARL *v* Viaticum SA et al; *Google* *France* SARL *v* CNRRH SARL et al (C-236/08, C-237/08 & C-238/08) [2010] E.T.M.R. 30 ECJ Grand Chamber of the Court.

*See* case comments of Simone Blakeney: *Keyword advertising: will the ECJ provide an answer?* Computer and Telecommunications Law Review (2008), 14(8), 209-212; Jonathan Cornthwaite, *To key or not to key? The judgment of the European Court of Justice in the Google France Adwords cases,* European Intellectual Property Review (2010), 32(7), 352-359. [↑](#footnote-ref-21)
22. Directive 2000/31/EC of the European Parliament and of the Council of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market. [↑](#footnote-ref-22)
23. Paul Przemyslav Polanski, *Technical, Automatic and Passive: Liability of search engines for hosting infringing content in the light of the Google ruling*, Journal of International Commercial Law and Technology, Vol. 6, Issue 1 (2011) 42-50 (50). [↑](#footnote-ref-23)
24. *See* Taubel E., *The ICS Three-Step: A Procedural Alternative for Section 230 of the Communications Decency Act and Derivative Liability in the Online Setting*, Minnesota Journal of Law, Science & Technology.(2011);12(1):365-390. [↑](#footnote-ref-24)
25. *See,* e.g*., Zeran v AOL*, 129 F.3d 327, 330 (4th Cir. 1997), *Blumenthal v Drudge*, 992 F. Supp. 44, 49-53 (D.D.C. 1998). [↑](#footnote-ref-25)
26. *Trkulja v Yahoo! Inc LLC & Anor* [2012] VSC 88 and [*Trkulja v Google Inc LLC & Anor* (No 5)](http://www.austlii.edu.au/cgi-bin/sinodisp/au/cases/vic/VSC/2012/533.html?stem=0&synonyms=0&query=title%28Trkulja%20and%20Google%20Inc)  [2012] VSC 533. [↑](#footnote-ref-26)
27. S. 32 (1)(b) Defamation Act 2005. [↑](#footnote-ref-27)
28. Supra fn 17. [↑](#footnote-ref-28)
29. Paul Lambert, *Liability and publication on the internet,* Communications Law, 2013, 18 (3), 83-87. [↑](#footnote-ref-29)