ARANEAE & OPILIONES

31st Decemeber 2021

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One Cardinal Square
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Sir Andrew Hack
British Press Association
289 Murdoch Square
London W3 H87
United Kingdom

RE: Defamation of Character and Libel by the British Press Association of the Noble False Widow spider

Dear Sir,

We represent the Noble False Widow spider (*Steatoda nobilis,* referred to as *S.nobilis* throughout) in the above matter. This letter has been sent in anticipation of our firm filing a lawsuit against you and your company, the British Press Association.

Our client has been relentlessly targeted for a decade by articles published in your papers – in 2013 there were 114 of these articles framing our client in an extremely negative light, with more misleading articles published since then[1]. Years of misinformation driven by your papers have led to our client being held responsible for causing severe public disruption including the closure of several schools after *S.nobilis* was found on the premise and 450 people admitted to A&E in 2018 fearing they had been bitten by the UK's purported 'most dangerous spider' [1,2]. The current level of targeted attack has led to eradication of our client indiscriminately despite the enormous benefit they offer humans in their pest control and small number of actual bites.

Present in the British Isles since the beginning of the 20th century, our client likely arrived accidentally on shipments from the Canary Islands and established themselves in the south of England[3]. Our client is a 'synanthrope' – meaning their preferred habitat is within proximity of humans, both urban and rural. Garden furniture or corners of outside walls are favourable habitats for *S.nobilis* due to the shelter it offers and amount of food present at these locations[1,4].

Despite the long-term presence of *S.nobilis* within the British Isles and overlapping range with humans, as of 2021 there have been only 24 confirmed bites *worldwide* involving our client, the first of which occurred in 1991[4,5]. We also have a number of character witnesses (formed of professional arachnologists who have worked with our client previously) that describe *S.nobilis* as a 'shy' species 'reluctant to bite'[6]. In response to perceived threats, our witnesses observed the most likely behaviour presented by our client has been to either retreat into a hiding place, run or 'play dead'[3]. We would refer you to *Latrodectus vs. United States* 692 U.S. 33 (2002) for further details on defence behaviour in a similar case. As well, medical professionals are notably poor at identifying spider bites and unless one was seen or caught a spider cannot be accurately confirmed[7].

We do concur that *S.nobilis* is capable of delivering an unpleasant bite. Our client has willingly worked with researchers to help better understand the risk they present and how to prevent conflict –to commit to this *S.nobilis* has been attending SPIDER counselling (*Speculating on Personal Intent, Decreasing Effects & Risks*) for the last 2 years. Symptoms caused by our client can be mild to moderate including radiating pain, nausea, and temporary reduced mobility of an affected limb. A few cases have gone on to develop infection which has resulted in hospitalisation[4,8].

Our client is, as mentioned, very reluctant to bite – recent findings discovered that most confirmed bites have occurred during sleep (8 cases) or trapped in clothing (5 cases)[8]. The average size of *S.nobilis* is between 7-14mm, when compared to the average human who is approx. 1630-1765mm, the usage of biting by our client in response to these distressing situations (frequently resulting in death for our client) is justifiable [1,3,5]. The resulting infections, while regrettable, is often because induvial do not clean the bite site. While harmful bacteria has been identified on *S.nobilis* fangs, many animals (including domestic cats and dogs) also present this risk[8].

We do not intend to downplay any symptoms or emotional impact caused by our client in court but we will be focusing on the context of these cases. Our client has been very remorseful about these bites and is currently working with our PR team to work together with those bitten, ideally to offer compensation in the form of pest control.

The perceived risk of our client has been blown out of proportion by your papers, using aggressive language such as ‘attack’ to describe an unfortunate but understandable defence response by *S.nobilis*. The fuelling of fear perpetuated by your papers is disgraceful.

Finally, on behalf of our client, we must also inform you that we strongly advise against attempting to pay for damages. Our client has no need for financial compensation, although they have stated they are open to negotiating access to undisturbed corners within your office buildings.

Respectfully,



Leah Fitzpatrick Charlotte Webb Shelob Ungoliant

References

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