

**Julian Pike
Second Witness Statement
02 December 2011**

IN THE MATTER OF THE LEVESON INQUIRY

**SECOND WITNESS STATEMENT
OF JULIAN CHARLES PIKE**

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I, **JULIAN CHARLES PIKE**, of 66 Lincoln's Inn Fields, London WC2A 3LH
WILL SAY AS FOLLOWS:

Introduction

1. I am making this second witness statement in response to the Notice under section 21(2) of the Inquiries Act 2005 which was issued by the Leveson Inquiry on 14 November 2011 (the Notice).
2. I am informed by Linklaters, on behalf of the Management and Standards Committee (MSC) and also News Group Newspapers Limited (NGN), that legal privilege is not waived in relation to my and counsel's substantive legal advice and accordingly nothing in this statement should be seen as such a waiver. I understand the Inquiry has a number of relevant documents over which privilege could be claimed but in respect of which NGN has informed the Inquiry that the point will not be taken.

RESPONSES

Question 1

3. As regards numbered paragraph 1 of the Notice, details regarding my background and a brief summary of my career history are set out in my first witness statement dated 23 September 2011.

Questions 2 to 4

4. It is convenient to answer questions 2 to 4 together.
5. For a number of reasons, by the early part of 2010 I had concerns which had accumulated over the previous months that Miss Harris and Mr Lewis may be exchanging highly confidential information gained from acting for claimants (and Mr Taylor in particular) in cases against NGN in order to assist other clients in bringing further actions against NGN.

6. I shared those concerns with NGN and in March 2010 I suggested that we should consider again whether Miss Harris and Mr Lewis were in a position to continue acting. I also mentioned surveillance. I was instructed by NGN on 5 May 2010 to engage private investigators to conduct a review. This was the only investigation I commissioned on behalf of NGN regarding this matter. The investigation was limited to a search of publicly available documents.
7. By that time I was aware of the fact that NGN had put Miss Harris and Mr Lewis under surveillance. I was not informed of the nature of the surveillance.

8.

9. On 11 May 2010 the private investigators reported on these public record searches. In my initial instructions I had suggested that we may need to move to carrying out some discreet observations, but given the information reported by I did not instruct him to carry out any such observations. Also in May 2010 I sought specialist Leading Counsel's advice as to the question whether Miss Harris and/or Mr Lewis were properly able to represent other claimants.

Question 5

10. At no time did I advise NGN to place anyone else under surveillance in relation to the voicemail interception litigation.

Question 6

11. I refer to my response to questions 2 to 4 above.

Questions 7 and 8

12. I have never instructed Derek Webb on any matter, whether for NGN or any other client. I have never had any dealings with him and nor has any member of my team.
13. I accept that it is very unusual to make investigations into opposing solicitors. The concerns I and my client had were genuine and it was felt strongly that the issue whether confidential information was being wrongly shared or used should be investigated.

Statement of Truth

24. I believe that the facts stated in this Witness Statement are true.



JULIAN CHARLES PIKE

02 December 2011