

NI Group Limited  
H. R. Ellis  
First Statement  
HRE1  
4 July 2012

**IN THE MATTER OF THE LEVESON INQUIRY INTO THE CULTURE, PRACTICES AND  
ETHICS OF THE PRESS**

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**WITNESS STATEMENT OF**

**HARRIET ROSE ELLIS**

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I, Harriet Rose Ellis, c/o Linklaters LLP, One Silk Street, London, EC2Y 8HQ, will say as follows:

- 1** I am a solicitor and managing associate at the firm Linklaters LLP ("**Linklaters**") which represents NI Group Limited ("**NI**") in this Inquiry. I make this statement on the basis of information received in that capacity as set out below.
- 2** The purpose of this statement is formally to put in evidence amended exhibits to the witness statement of Keith Rupert Murdoch dated 12 April 2012 and to explain the amendments.
- 3** At paragraphs 11(h), (j) and (k) of the section 21 notice sent to Mr Murdoch dated 9 March 2012, Mr Murdoch was asked to provide details of all meetings he had held with British Prime Ministers and British Leaders of the Opposition since 1988, and all meetings and discussions he had held with the First Minister of Scotland Alex Salmond. This information was compiled by Linklaters and Williams & Connolly LLP, and was supplied in Exhibits KRM27, KRM28 and KRM29 (the "**Original Exhibits**").
- 4** At paragraph 86 of his statement Mr Murdoch explained in relation to the Original Exhibits that:

*"The information contained in these Exhibits has been compiled from calendars maintained by me and on my behalf by former and current assistants, both in the UK and in the US, spanning a 24 year period, as well as emails and hard copy records. This has involved a careful and complex reconciliation exercise, but it is obviously possible that there are meetings or calls listed which did not in the event take place; my calendars often contain references to names where I had hoped or expected to place a call or have a meeting but none took place, or it took place on a different date. Conversely it is possible that meetings and (very likely) calls which were convened at short notice were not recorded and are*

*therefore not listed. Where noted in my records, I have sought to list other attendees at these meetings but my records may be incomplete in this respect as well."*

- 5 When the Original Exhibits were published, there was some speculation in the press concerning meetings listed with David Cameron which had not appeared on the lists published by Mr Cameron. Separately, Mr Salmond's office also contacted NI to dispute some of the dates listed in KRM28. More recently, a number of the individuals listed in the Original Exhibits have submitted to the Inquiry details of their own records of meetings with Mr Murdoch, amongst others. In light of these developments, Linklaters re-reviewed the Original Exhibits and, where discrepancies were noted, re-examined the original sources of the dates. This review identified a small number of:
- (a) meetings which we considered should not on reflection have been included in the Original Exhibits (on the basis that there was insufficient evidence to suggest that any such meetings had taken place or it did not appear that in fact Mr Murdoch or the relevant politician had attended them);
  - (b) meetings which should have been included but which had not been; and
  - (c) events that were either incorrectly dated or described (including a meeting that had incorrectly been described as a telephone call).

Exhibit HRE1 contains amended versions of Exhibits KRM27, KRM28 and KRM29 (the "**Amended Exhibits**").

- 6 Of the changes made, the majority were to remove meetings from the lists, a number of which had been included on the basis of a cautious, inclusive approach.
- 7 For the avoidance of doubt, where Mr Murdoch's calendars, emails and hard copy records do not contain any record of a meeting noted by another witness and Mr Murdoch has no recollection of the meeting, such meetings have not been added to the Amended Exhibits.
- 8 For obvious reasons, the caveats set out at paragraph 86 of Mr Murdoch's statement apply equally to the Amended Exhibits.

I believe that the facts stated in this witness statement are true.

Signed ..



Dated .....

4 JULY 2012