

The Leveson Inquiry

Witness Statement for Part 1, Module 1

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Witness statement of Mark Lewis

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I, Mark Lewis of Taylor Hampton Solicitors 218 Strand, London WC2R 1AT will say as follows:

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1. I make this statement in connection with my role as a Core Participant in the Leveson Inquiry.
2. For the purposes of this statement, I refer to a small paginated bundle of documents marked "ML1". Where I refer to page numbers in this statement, I am referring to pages in "ML1".

**Background**

3. I am a partner at London based law firm Taylor Hampton. I specialise in defamation and privacy law. The work I have become known for and the work this statement largely relates to is the phone hacking litigation – where I have acted for a large number of victims of interception. I had conduct of the first civil litigation involving phone hacking and have given evidence at two Select Committees, the Culture Media and Sport, and Home Affairs Select Committee. I have appeared in Parliament and in front of the media on a number of occasions, demonstrating the extent of the scandal.
4. I qualified as a solicitor in 1990. I joined the firm George Davies in Manchester as a Partner in 2001. I have always had a busy libel practice but before joining George Davies much of my work involved disputes concerning financial institutions, defending them as often as claiming against them. During my time at George Davies I had an increased level of exposure to the inner workings of the press. I acted for the Professional Footballers Association ("the PFA") (and some of its members) in a number of defamation claims brought against the major newspapers and the commercial cases I worked on for the organisation also received a lot of press

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coverage, especially where famous footballers were involved.

5. In 2001 I conducted one of the first major privacy cases on behalf of Garry Flitcroft. We obtained an interim injunction at first instance but were unsuccessful in the Court of Appeal. The Court of Appeal judgment in this case has been roundly criticised, especially since the law of privacy has developed in the last 10 years. With respect to the Court of Appeal, I cannot see that the exposure of Garry's private life served any legitimate public interest. This fact was demonstrated in the headline that appeared in The Daily Telegraph on 30 March 2002 – "Saga of the "love rat" footballer leaves one question: Garry who?" Similar headlines appeared in many newspapers. The argument that there was a public interest was borne out as a pretence as the papers accepted that very few people knew who he was, and more importantly all these years later there is no suggestion that the public has benefitted in any way by knowing his identity. There is no doubt in my mind that Garry should have been entitled to have that information kept private and should have been able to prevent the enormous harm and suffering that followed publication.

[Redacted]

[Redacted]

[Redacted] Hindsight has

led to investigations being commenced as to how the story was obtained. It was suggested even at the time (before anyone knew about the phone hacking scandal) that it was a curious coincidence that the second girl "D" should have been approached by a journalist. Obviously the journalist could not have told her of Garry Flitcroft's case as that would have involved a breach of an injunction.

**Phone hacking revelations In 2006 and Gordon Taylor's claim**

6. In 2006 the Metropolitan Police Service launched an investigation into the activities of Glenn Mulcaire, a private detective retained by the News of the World, and Clive Goodman, who was employed by the newspaper as its Royal Correspondent. The case started with a raid at the News of the World's premises in Wapping. I heard the news of that raid on the radio at the time. I subsequently watched with interest the TV news and press

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coverage of the arrests of these two men in connection with mobile phone voicemail interception. Initially, the police raid on Wapping was reported as a major incident but it soon seemed to be a 'damp squib'; a one off. Clive Goodman (like Mulcaire) pleaded guilty to charges of to conspiracy to intercept communications contrary to section 1(1) of the Criminal Law Act 1977 and so News Group Newspapers Limited ("NGN"), the publishers of the newspaper, and its parent company News International Limited were able to maintain that Goodman was a 'rogue reporter' acting alone and his actions had not been known to his superiors or anyone else at the newspaper. No-one else at NGN was prosecuted and no attempts were made to prosecute the company.

7. Along with members of the Royal Household, there were 5 non-royals named as victims of phone hacking. Amongst them was Gordon Taylor the Chief Executive of the PFA, the organisation I had represented on numerous occasions over the preceding five years.
8. Less than a year before the phone hacking revelations in 2006, I had acted for Joanne Armstrong (who was then the in-house Solicitor for the PFA) in a privacy claim which settled before proceedings were issued. Joanne Armstrong had been notified by a member of the public that she and Gordon Taylor were being photographed having lunch together. Gordon Taylor had confronted the photographer who indicated that he was retained by the News of the World which was accusing them of having an affair. I sent a letter to the newspaper and threatened to apply for an injunction on the basis that the allegation was untrue as well as an invasion of privacy. In my letter I asked for damages and costs as well as the injunction. During this time, I received a letter from Tom Crone, News International's Legal Manager, which said that the paper would not be publishing a story but did not accept the claim for costs or damages because the story had been obtained by "proper journalistic enquiries".

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9. When Glenn Mulcaire and Clive Goodman pleaded guilty and were sentenced, pictures were shown on the TV news of the non-royal victims including Gordon Taylor. I immediately put two and two together. [redacted]

[redacted]

10. I was sure that Gordon Taylor had a claim for misuse of private information against NGN. I advised him that we should seek Counsel's opinion and I instructed Jeremy Reed on his behalf.
11. Following Jeremy Reed's advice (which was favourable), we decided to pursue a claim and I wrote a letter before action to NGN sometime at the beginning of 2007. My letter before action did not result in any admission by NGN and so proceedings were issued. Jeremy and I discussed the tactics. [redacted]
- [redacted]
12. After I had issued proceedings, I was called by Julian Pike, a well-known Partner in the media litigation department of Farrer & Co Solicitors who were acting for NGN. Julian suggested that Tom Crone, NGN's long-serving in house lawyer, should come to see me. I was very surprised by this suggestion. I had conducted many cases involving NGN and not once had Mr Crone sought to meet me, let alone leave Wapping where he worked to come and visit me all the way up in Manchester. It was fairly obvious to me that NGN were worried about Gordon's claim. In any event, as indicated by Julian, Tom took the train up to Manchester and attended a meeting at my offices. I remember that he started the meeting with the words "we thought this had all gone away". He told me that he had asked all News of the World journalists whether they had been involved in hacking. He said that they had

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confirmed to him that they had not. In response to this statement I said to Tom that whilst I believed him, I did not believe them. He asked me how much Gordon Taylor would accept to settle his claim and I told him £250,000 was the figure that my client would accept. I suggested such a high figure because NGN seemed so worried about the claim but it was far more than I believed we would get as damages even if we were wholly successful at trial. It was intended to be a starting point for negotiations. Tom indicated that this figure was much too high and ended the meeting abruptly.

13. Tom Crone returned to London and in the weeks and months that followed, I continued to progress Gordon's claim on his behalf.
14. The Defence that was served made clear that it was "without prejudice to an application to strike out". Jeremy Reed and I had anticipated that response as there was a dearth of evidence to show that Mulcaire was linked to the News of the World. The Defence (endorsed with a Statement of Truth from Julian Pike) denied the critical link. News of the World were relying upon the position which they had stated in an editorial after Clive Goodman had been convicted, namely that he was a "rogue reporter".
15. As part of our strategy for the claim, we decided to make a non-party disclosure application against the Metropolitan Police Service ("the MPS"), the Information Commissioner and the Crown Prosecution Service.   
 The MPS had only prosecuted the royal correspondent. We therefore sought to obtain evidence held by third parties of all the illegal acts which may have been committed by News of the World so that we could show by inference that there was an endemic unlawful practice which in turn would enable us to show that it was more likely than not that they had been behind the hacking of Gordon Taylor's phone.
16. I recall that the Information Commissioner was very co-operative and allowed us to see all the documents we wanted. Those documents had been gathered as part of Operation Motorman and

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showed a widespread trade in private information by several newspaper groups.

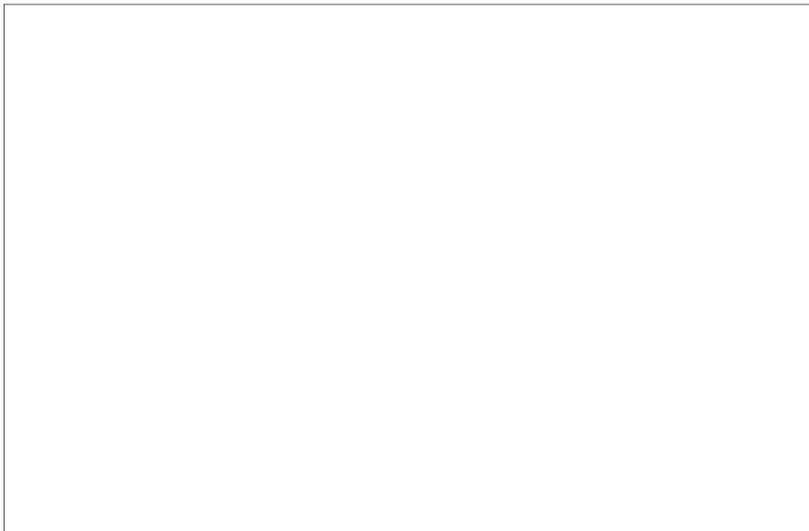
17. The MPS was not as accommodating in that it had stated neutrality. The application against the MPS was therefore listed for a hearing before Master Bragge. As the hearing commenced Master Bragge suggested that there be a very short adjournment to see whether we could agree a two stage process whereby we would obtain disclosure in a narrower form than we had sought but could come back for another chance if the first round of disclosure did not suffice.
18. Jeremy Reed and the Police's counsel discussed the Order in a waiting area outside the Master's room. Adjacent to them was the Police's solicitor who told me that he was due to go off to the opening of the Inquest into the death of Jean Charles Menezes who had been shot by the Police. I was stood next to Detective Sergeant Mark Maberly who was attending on behalf of the MPS. I was chatting to him and he said to me "you are not having everything but we will give you enough to hang them". He also said there was something "like 6,000 victims" involved. It was not clear to me whether he meant 6,000 phones had been hacked or whether he was referring to 6,000 people including the people who had left messages. It appears that DS Maberly now denies this and recalls a conversation where no figure was mentioned. He also disputes that he said "hang them", as opposed to "load your gun". Given the statement about the Inquest I am sure I would have recalled (not to mention been rather shocked) if he had used a metaphor about guns.
19. The revelation about 6000 victims was amazing because at that time the official line was that there were only a "handful" of non-royal victims. Between 2006 and the start of Operation Weeting in January 2011 the MPSs public position was that there were only a "handful" of victims or "10 -12" victims about whom it would be possible to prove a crime.

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20. Following my conversation with DS Maberly, a two stage process was agreed. The MPS agreed to give us the information on Gordon Taylor (stage one) on the basis that we could go back to them for more if necessary (stage two). Stage two never became necessary.
21. Shortly afterwards, I received two ring binders of documents. Amongst the documents was the now infamous 'for Neville email'. There was also a CD which had a recording of a conversation between [redacted] and someone who we thought at the time was called [redacted]. During the conversation [redacted] could be heard instructing [redacted] (who I now understand to be [redacted]) how to hack a phone and there were also some references to Tottenham Hotspur football club.

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24. After I had obtained the documents including the "for Neville email" I disclosed the documents to Farrers. We had not told them what we were doing and I suspect they thought that the case had gone to sleep. Once they had the documents offers to settle Gordon Taylor's claim came in quickly. They went through stages starting with a Part 36 offer of £50,000 that Gordon would not have beaten. Nevertheless, despite this almost unbeatable Part 36 offer Farrers seemed keen to negotiate and went through stages up to £250,000. That amount was offered by Julian Pike with the words "alright you can have the £250,000 that you had asked for". I replied that was before the case had started and now we wanted more.
25. The negotiations continued and, during these discussions, I clearly remember being told by Julian Pike at Farrers that I was "negotiating with Murdoch". I had not spoken to either of the Murdochs and Julian Pike did not make it clear whether he was referring to Rupert or James. I now assume he was talking about James Murdoch given his role at the time. It was a memorable statement from Julian and I was flattered that the Murdoch family would have been involved in a negotiation with me. I gave evidence to the Parliamentary Select Committee for the Department of Culture Media & Sport on 19 October 2011 to this effect – the reason I gave this evidence was because it had become an issue as to what James Murdoch's state of mind was.
26. In the end, a settlement was reached. The figure was revealed by News of the World through Farrers even though there had been much press speculation I had never divulged the amount of the settlement. The agreement entered into at the time included a stipulation that any breach of the confidentiality of the agreement by Gordon would entitle NGN to ask for the money back. He told me in 2009 that he had not breached that provision. NGN also agreed to pay Gordon's legal costs in full which, in my experience, is unique in any civil litigation. I have no doubt in my mind that the level of payments proposed to settle were due to NGN's concern to keep secret the information about the extent of hacking. I told Julian Pike that Gordon Taylor expected them to pay every penny of his costs, and they did. They did not dispute a minute of the

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time that I had spent on the case or a penny of my hourly rate.

**Other cases**

27. Following the conclusion of Gordon Taylor's case, I got a phone call from Julian Pike. He said that Tom Crone would like to meet me for lunch next time I was in London. I met Tom and a friend of his employed by Mirror Group at El Vinos on Fleet Street. We then went to a restaurant on Fetter Lane. At the end of lunch the friend left. I then told Tom that I had two further phone hacking cases and I asked whether I should write to him or Farrers. He said that I should write to Farrers and I did so shortly after our meeting. He was clearly shocked that the sums paid on Gordon Taylor's case would not be the end of the matter for NGN.
28. It was then that NGN's friendly approach to me changed. Julian Pike sought to intimidate me. He telephoned me and argued that I could not act for other people given my knowledge of the Taylor case. I was surprised by this reaction but I remained resolute and simply told him that my clients were perfectly entitled to instruct me. I made it clear that I did not agree with him but I said if I was wrong about being able to act, there was no reason why my clients would not pursue their claims anyway. I said I would simply tell them to instruct another solicitor and explain the facts to them. Needless to say, he quickly changed his mind about me not being able to act.
29. I ended up settling both cases before proceedings were issued.

**The 2009 Guardian Article and subsequent developments**

30. On 8 July 2009 The Guardian published what is now a well known article by Nick Davies: 'Trail of hacking and deceit under nose of Tory PR chief'. This concerned allegations that Glenn Mulcaire's hacking had been widely used by the News of the World in order illicitly to secure information and it referred to the Gordon Taylor settlement.
31. I clearly remember where I was when the news broke. I had gone away on a holiday to Israel and I was walking through the airport in Tel Aviv. I had just turned my phone on and saw I had messages. Before I even had a chance to listen to the messages

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I received a call from Julian Pike. He told me that the Gordon Taylor settlement had "got out" and he asked me what we were going to do. I did not think that there was anything much either him or I could do, but clearly the problem was greater for his client than it was for mine.

32. Following Nick Davies' article, I started receiving calls from other individuals who were concerned about phone hacking. They wanted to speak to me as they knew I was the lawyer who had negotiated the agreement on Gordon's case. I came back from Israel even though I was only 2 days into my holiday.
33. One such individual was Max Clifford. I went to see Max Clifford with my former assistant, Charlotte Harris who had joined a different firm JMW by then.
34. After that meeting I called my managing partner, Mark Hovell. Rather than being pleased, he said that he did not want me to act. I said that I wanted to do this for me and my partners but if not I would do it on my own. He responded that he would call me the next day (13 July 2009). At 10 am that day I received an ultimatum on my "Blackberry" to the effect that unless by 11 am I gave an undertaking that I would not act for Max Clifford or anyone else in a phonehacking claim then I would be expelled as a "good leaver" from my partnership. I responded by asking for my partnership deed to which I received a reply "too late you've been expelled". Because of George Davies' relationship with Gordon Taylor and the PFA, my fellow partners must have been extremely sensitive about me undertaking more work for hacking victims following Nick Davies' article. This was, for obvious reasons, an extremely difficult time for me. I had lost my job, and was suffering from Multiple Sclerosis. I returned to Israel. There I continued to talk to Charlotte Harris and we had discussions about joining her firm, JMW. Before I could agree anything about such a move, Farrers wrote to me and copied that letter to Bill Jones at JMW.
35. Although the consequence of that threat and the News of the World's actions meant that I was unemployed, I vowed to carry on. I contacted the Culture, Media and Sport Select Committee to offer to give evidence. I handed in the letter that I had received

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from Farrers. The letter threatened me with an injunction and I remember it saying "It was rare to have to admonish a fellow professional but there was still time for me to do the right thing and agree that I could not act for anyone else".

36. I replied to the letter from Farrers maintaining my position that I was perfectly entitled to act for other people. I said that a lawyer had to stand up for his clients and that was what I would do.

**The 2009 Culture, Media and Sport Parliamentary Select Committee and Baroness Buscombe**

37. I have never been bullied and I will never allow myself to be. It seemed that the only way that I could respond to the threat was to go public. On 2 September 2009 I explained to the Select Committee that there were three matters that affected my evidence: client confidentiality (unless matters were in the public domain), my duty as an officer of the Court regarding disclosure and the Injunction that Farrers had threatened. I told the Select Committee about the 'for Neville' email, my conversation with DS Maberly and other matters surrounding the Gordon Taylor case. Immediately before I gave evidence, Assistant Commissioner John Yates had said in his evidence that it was only possible to prove a crime in respect of 10 or 12 people – a small number of people had been victims of hacking by News of the World. Given what I knew, I was amazed that he could say this. It was just untrue. When asked, I said the documents I had referred to had come from the Police and I had not seen anything they had not. I ended my evidence to the Culture Media and Sport Select Committee in 2009 by saying that "I was always taught as a lawyer ... to be absolutely fearless of any organisation, whether it be the News of the World, Mr Murdoch himself or anybody; they are not going to frighten me".

38. On 15 November 2009, Baroness Buscombe acting in her capacity as the Chairman of the Press Complaints Commission, made a speech to the Society of Editors Annual Conference. In her speech, she made allegations that I had lied to the Select Committee. She referred to the evidence I had given about the conversation I had with Detective Sergeant Maberly and his comment that there were 6,000 victims. She then went on to say

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that the PCC had since heard from Detective Inspector Maberly (as he had become) through lawyers for the MPS and that the letter received said he had been wrongly quoted on the 6,000 figure. Baroness Buscombe stated *'the reliable evidence, we were told in an email confirming the contents of the letter, is that given by Assistant Commissioner John Yates to the Select Committee, who referred to only a handful of people being potential victims'*. Her speech would have clearly been understood to mean I had lied about what I had been told.

39. The next day I sent her a letter. I called on her to resign as she had not followed her own Code. I also asked her why she had not bothered to find out who  was. I was completely shocked that the head of the PCC was seeking to attack me for revealing the truth about what the press had been doing. I could not see any legitimate excuse for this approach. Page
40. I went on to issue libel proceedings against Baroness Buscombe, the PCC and the MPS in respect of her statement and other publications of similar material in June 2010. In order to do that I sought information from the MPS pursuant to the Data Protection Act 1998.
41. I made a Data Protection Act request of the MPS to get the documents that had been referred to by Baroness Buscombe in her Society of Editors' speech because the facts on which she based her speech had been those given to her by the police. As a result of my request, I received 3 or 4 documents including the letter and emails she had referred to.
42. It turned out that on 30 September 2009, a director of the PCC had emailed DI Maberly. He referred to the evidence given to the Select Committee by me and by John Yates and asked for an indication of the scale of the interceptions. Emma Harraway of the MPS Directorate of Legal Services took instructions from DI Maberly and then replied on behalf of the MPS that DI Maberly had been wrongly quoted by me. She stated that the correct position was set out in the evidence of Assistant Commissioner John Yates and DCS Philip Williams given to the Select Committee.

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43. The police's position was that the reliable evidence was that given by John Yates (therefore not me) and it was clear that Baroness Buscombe had made her speech on the basis of this wrong information from the MPS.

44. My libel case against the MPS is continuing. The MPS made an unsuccessful application to strike out my case and to this day continue to advance a case of justification that DS Maberley never said that there were "something like 6000 victims" and said "load your gun" rather than "hang them".

**Further phone hacking developments**

45. My career had been devastated in Manchester following the Farrers' letter. I had managed to join a firm called Stripes as a temporary measure to stop being unemployed but the impact of the Farrers' letter had made it almost impossible to get a proper paid job. In a last ditch attempt to rescue my career I had no alternative but to move to London. I joined Taylor Hampton solicitors in May 2010 and I continued to act for phone hacking victims.

46. Operation Weeting was set up in January 2011. At around this time I was called by the Guardian and asked to comment on the announcement of Operation Weeting. An article entitled 'Phone hacking: Lord Prescott named as victim as inquiry widens' was published on 9 February 2011 and in it I was quoted as saying that John Yates ought to resign, having misled Parliament in 2009. I understand that as a result of this Carter Ruck wrote to the newspaper threatening to take legal action on behalf of John Yates. Carter Ruck also wrote to me. I found this very odd as I had had a job interview with them where I had discussed phone hacking at length and it seemed to me that they were in a difficult professional position to then take instructions against me in relation to this issue. They now act for people who have been the victims of hacking as do Harbottle and Lewis Solicitors who prepared a report for News International. Whilst, as a lawyer in this area, this letter made it clear that I would not be sued (I had established a reputation as someone who would not just roll over) I was concerned by the reference to my future conduct and the reference to evidence given by me to the Home Affairs Select

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Committee. I felt that this warning was inappropriate, particularly being made on behalf of one of this country's most senior police officers.

47. I was astonished by the threat and intimidation in respect of evidence I might give. It felt like the Police were intimidating a witness to protect a criminal. I felt that I had to stand up to the threat and passed a copy of the letter to Private Eye. Private Eye printed extracts of the letter pointing out that the costs of John Yates threatening to sue me had been paid for by the Metropolitan Police Authority. Page

48. At the end of 2010 and in 2011 there were more and more revelations about the phone hacking scandal. As it became better known that I was acting for numerous victims, I was approached more and more. There were occasions when I gave my view that hacking was probably not limited to the News of the World and must have gone on at all newspapers including those owned by

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50. In April of this year, I was telephoned by Sally Dowler and I agreed to meet the Dowler family. When Sally told me their story I felt shivers go down my spine. The family were going through the

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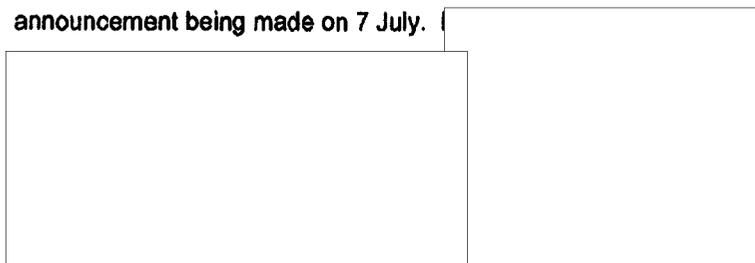
criminal trial of Levi Bellfield for the murder of their daughter Milly. It had taken 9 years to get to a prosecution. The family had decided that they wanted to pursue a claim but they said there was no way they could afford the legal fees. I said that I would take on the case regardless but there would still be the risk of an adverse costs order in respect of the other side's fees should they be unsuccessful (although this was obviously extremely unlikely). Of course the possibility of acting on a 'no win no fee' basis was available and it was agreed that I would do the case on a conditional basis. We agreed that we would not do anything about their claim in respect of the hacking of Milly's phone in 2002 until the ordeal of the criminal trial against Bellfield was over.

51. After the guilty verdict against Bellfield, the Dowlers went away for a break and when they came back I received a call from Channel 4 informing me that the Guardian was going to break the story about Milly's phone having been hacked. I spoke to Sally, took instructions and then issued a statement asking for the family to be left alone. Sally asked if I would act as the family's spokesperson and conduct all the interviews for them. I agreed.
52. Once the Dowler phone hacking story broke in the press my office got numerous calls from Dan Tench at Olswangs and I also received a letter from them.
53. When I opened the letter I thought 'here we go again', another threat to sue me. By that time I was used to receiving threats from Farrers and letters from Carter Ruck. I had also received letters from a firm called Brabner Chafe Street on behalf of Gordon Taylor who reported me to the Solicitors Regulation Authority. The allegation by BCS was completely without foundation and the complaint was rejected.
54. In fact, Olswangs were not writing to sue me but to take control of the case. They now act on all the News of the World cases in place of Farrer & Co. We had meetings and phone calls about the Dowler case and resolved it.
55. Of course, it was the revelation about Milly's phone being hacked that led to the scandal going into the stratosphere. I was contacted by international media. A new political will led to

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meetings with Nick Clegg, Ed Milliband and David Cameron and ultimately there was cross party unanimity that this Inquiry should be established.

56. The News of the World was shut down earlier this year, the announcement being made on 7 July. (



57. I should state that as a result of my involvement in the phone hacking cases a number of unpleasant things have been printed about me personally and I have been contacted by journalists from other newspapers wanting to intrude on my private life. For example, Amanda Platell has written about me in her column in the Daily Mail on two occasions and has commented that she is fed up of seeing my "sanctimonious face on the BBC". (This is clearly a snipe as very few of my TV appearances have even been on the BBC). She used her column to suggest that I was a greedy lawyer, holding out for a substantial sum in the Dowler claim even though a settlement had already been agreed (showing her barbed comment was not based on fact). I called the Daily Mail as soon as I was aware of the article. I was pleased that the Daily Mail in-house solicitors agreed to my request to take it down immediately.

58. I should also point out that it is not only my clients who have been targeted by the News of the World. I was notified by Newsnight that I had been 'hacked and tracked'. They said that they had been given this information by a former News of the World employee. I was told that a report was prepared on me and it seems that I was followed by people instructed by News of the World. Apparently, I was "Rupert Murdoch's worst nightmare". Tom Crone gave evidence to the House of Commons Culture Media and Sport just a few weeks ago where he accepted that surveillance had been carried out in relation to at least two lawyers. It has now been confirmed in October 2011 that News International have handed a dossier on me to the Police. It

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apparently includes a video and photographs. I have written a letter before action to News International and am due to see the police later this week. My privacy, and seemingly that of my family and ex-wife have been violated as part of an attempt to intimidate me by such activities. The use of investigators outside my house, intruding into the lives of my daughters is despicable. It appears that they have been followed and filmed. No apology has ever been forthcoming from News International even though it seems that a report about me was held by Tom Crone in his office.

**Conclusion**

59. The experience I have had acting in phone hacking litigation has been like being transported into a John Grisham novel. It has been challenging and exciting but it has also been difficult. For two years I earned no money as a result of speaking out and being prepared to stand up and fight. It has also been very daunting to be in the middle of the unfolding scandal which implicates those in the police, politics and the most senior figures in global media organisations.
60. At times, it has been extremely stressful, and has damaged my health further; I felt the pressure of a great many people whose interests it has served to keep this issue a secret. I have been threatened with libel, I have been libelled by the PCC and the police, I have been put under surveillance and I have received mysterious warnings. However, representing the victims of phone hacking, like the Dowlers, has been a great privilege and I will continue to act for my clients in their best interests despite all the challenges it involves.

**Statement of Truth**

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

DATED the 1<sup>st</sup> day of November 2011

SIGNED:

Mark Lewis