

NI Group Limited
T. Mockridge
Second Statement
"TM2"
16 December 2011

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

**SECOND WITNESS
STATEMENT OF
THOMAS MOCKRIDGE**

I, Thomas Mockridge, of 3 Thomas More Square, London E98 1XY, Chief Executive Officer of NI Group Limited ("NI"), will say as follows:

1. I refer to my first witness statement dated 14 October 2011.

Internal review

2. At paragraph 6.4 of my first witness statement I explained the role of Linklaters LLP ("Linklaters") in conducting a review of journalistic practices across The Times, The Sunday Times, The Sun and, subject to the limitations in place due to the concurrent police investigation, The News of the World. At paragraph 12.3 of my first witness statement I said that NI would provide to the Inquiry relevant material as identified in Linklaters' review of data extracted from a database of historic materials and other documents relating to each of the aforementioned titles.
3. One aspect of Linklaters' review involves the review of editorial payment records. These payment records evidence both cash and non-cash payments made by each of the titles and some of these records extend as far back as 2001.
4. As a consequence of Linklaters' inquiries, which are ongoing, certain material has been identified and made available to the police and the Inquiry will be aware that a journalist at The Sun was arrested on 4 November. That individual has also been suspended by News Group Newspapers Limited ("NGN") pending further inquiries both by the police and NI.

Correction to my first witness statement

5. At paragraph 20.2 of my first witness statement I referred to a reporter at The Times who might have gained unauthorised access to a computer in 2009. At the date of my first witness statement, it was my understanding that the reporter in question had denied gaining such access. Following further enquiries, I now understand that the reporter in fact admitted the conduct during disciplinary proceedings, although he claimed that he was

acting in the public interest. The journalist was disciplined as result. He was later dismissed from the business for an unrelated matter.

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

Signed

Dated 16/12/2011