

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

IN THE MATTER OF THE LEVESON INQUIRY

**THIRD 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 third witness statement in response to the Notice under section 21(2) of the Inquiries Act 2005 which was issued by the Leveson Inquiry on 24 November 2011 (the Notice).
 2. I set out below the questions asked in that Notice and my replies.
 3. 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 and accordingly nothing in this statement should be seen as such a waiver.
- (1) *Did you have any involvement in the instruction of Mr Derek Webb or any other private investigator in relation to the surveillance of any individual between 2003 and 2011?*

Derek Webb:

Please see paragraph 12 of my second witness statement in relation to the Inquiry's second Notice dated 14 November 2011.

Other investigators:

From memory, I think I would have instructed an investigator of my firm's choice on about two or three occasions a year on behalf of NGN during the period 2003-11. For the most part, such investigations would have involved tracing individuals and obtaining open source information (e.g. birth, death & marriage certificates).

As best as I am able to recall, I am aware of only one case since 2003 when the firm has instructed agents to carry out surveillance on behalf of NGN. This relates to the claim of Turcu v News Group Newspapers Limited.

- (2) *If so, please explain the nature of your involvement: in particular stating (a) who was targeted for such surveillance and when, (b) who at News International (this term being deployed loosely) instructed the private investigator in each instance, and (c) the purpose of and/or reasons for the surveillance operation in each instance.*

Please see 1 above. In the Turcu case referred to above the Claimant was targeted for surveillance because it was unclear whether he was intent on pursuing his claim.

- (3) *Did you have any involvement in or knowledge of the surveillance of Mr Mark Lewis and/or Ms Charlotte Harris? If so, please explain precisely the nature of your involvement.*

Please see the second witness statement I made in response to the second Notice issued by the Inquiry dated 14 November 2011.

- (4) *Did you have any knowledge of any of News International's use of private investigators, in particular Mr Derek Webb, and if so please explain precisely the nature of such knowledge and of any advice you gave?*

As regards Derek Webb, please see 1 above.

As I said in my first statement to the Inquiry, generally my firm has only acted for NGN and not NI or TNL. As regards NGN, I did not have knowledge of it using private investigators, save for the surveillance discussed in my second witness statement. I have of course also become aware that NGN instructed Mr Mulcaire, Mr Webb and Mr Whittamore, but I was not aware at the time that they were instructed.

To the best of my recollection I have never given advice to NGN regarding its use of investigators.

(5) *What confidential information, if any, was discovered or ascertained during the course of such surveillance operations, to your knowledge?*

I am aware of the result of the surveillance in the Turcu case, referred to above, but that is privileged information.

Questions (6) to (15) inclusive

I have been instructed by the Management and Standards Committee, on behalf of my client News Group Newspapers Limited, to say that whilst it has provided the files relating to the Taylor matter to the Metropolitan Police Service under a limited waiver of privilege solely for the purposes of their investigations, and it has answered certain questions of the Culture Media and Sport Select Committee under conditions of Parliamentary Privilege, it does not believe that it is appropriate, in the context of Part 1 of the Inquiry, to consent to any further waiver of privilege in relation to the Taylor litigation. I am therefore unable to assist the Inquiry in relation to its questions regarding the Taylor litigation set out in its letter of 24 November.

I am instructed that this will apply equally to any oral testimony which I am asked to give on 13 December or otherwise.

Statement of Truth

4. *A* I believe that the facts stated in this Witness Statement are true.

[Redacted signature area]

JULIAN CHARLES PIKE

02 December 2011