

Statement made on behalf of the Claimant  
Witness: Dominique Morris  
Date of Statement: 20 October 2005

Court of Appeal Reference: A2/2005/1093  
IN THE COURT OF APPEAL (CIVIL DIVISION)  
ON APPEAL FROM THE HIGH COURT OF JUSTICE  
QUEEN'S BENCH DIVISION

Lower Court Reference:  
Claim No. HQ03X03360

ALIN TURCU

Claimant/ Appellant

- and -

NEWS GROUP NEWSPAPERS LIMITED

Defendant/ Respondent

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WITNESS STATEMENT OF DOMINIQUE MORRIS

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I, Dominique Morris, c/o David Price Solicitors & Advocates, 21 Fleet Street, London, EC4Y 1AA, WILL SAY as follows.

1. I am 33 years old. For the last three years I have worked as a security guard for a bank. Before that I worked as a parking attendant for APCOA in Wandsworth, London. I make this witness statement in support of the Claimant's appeal.
2. I began working for APCOA in 2002. While I was there I met Florim Gashi ("Florim"), who was one of my supervisors. A few months after meeting him I became his girlfriend and we had a relationship for approximately a year. We also maintained an on-off relationship for about another year after that.
3. I do not remember when it happened but one day Florim told me that he had a gun. It was certainly after Florim stopped working for APCOA which was in October 2002. He was carrying the gun around in his bag. I was really shocked but he assured me that it was not real.
4. A while later, Florim asked me if I would look after this gun for him. I did not want to but I agreed to because I was in a relationship with him and he was adamant that it was not real and that I would not be doing anything wrong. He told me the reason he wanted me to look after it was because he was concerned about being

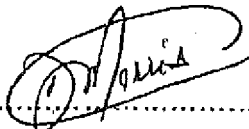
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found with the gun. I knew that he had done some work for Mazher Mahmood and the News of the World because he told me that he had done a story for them about one of our colleagues at APCOA relating to drug dealing. He was also frequently on the phone to him but was secretive about their conversations.

5. I have watched video CGB/10. It is difficult to see the gun clearly in the video. However, I can see that it is similar to the one that Florim gave me in several ways. It was a hand gun, was dark in colour and had a disc on the side. In the video the gun is described as heavy. The gun that Florim gave me was also heavy. Although I am not familiar with guns, it did not look fake, it was not like a toy gun and it looked like what I imagine a real gun would look like. I cannot say for sure that it was the same gun but there is nothing in the video or otherwise to make me think that it is not the same gun. I was not aware that Florim had any other gun.
6. I was extremely nervous about having the gun even though Florim said it was a fake. At the time I was sharing a house with a person with whom I was very close. I do not wish to identify him because he has recently died, I am very upset about it and do not want his name dragged into this. I told him about the gun and he was furious. He told me that he would take the gun and keep it. Although as soon as I gave it to him he told me that he was going to get rid of it. I have no idea what he did with it. Florim was very angry with me because he had wanted it back.
7. I believe the facts stated in this witness statement are true.

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Dominique Morris

20.10.06

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Date