

s to Leveson Inquiry

I, **Chris Atkins of Simons, Muirhead and Burton 8-9 Frith Street, London W1D 3JB,**
will say as follows:

1. I have made a previous statement to the Leveson Inquiry dated 28 November 2011 (my First Statement). This supplements that statement and is made at the request of the Inquiry.
2. In my First Statement I included extensive transcripts of my meetings with Nick Owens and Sarah Jellema. These transcripts incorporated all elements of the conversations with those journalists which I considered to be relevant to the matters Lord Justice Leveson is considering. This was not a legal relevance assessment but a judgement I made in good faith. It captured the content, tone and nature of my conversations with Ms Jellema and Mr Owens.
3. Subsequently members of the Inquiry team have requested that I provide to them the full recordings of my meetings with Ms Jellema and Mr Owens; and telephone conversations with Mr Owens, Ms Jellema and Mr Carlin, which I have done. They have requested the transcripts previously annexed are augmented with any omitted sections, subject to any redactions which the Inquiry and/or I have requested on privacy/security grounds.
4. My understanding is that these new sections of the transcripts are being submitted at the request of the Inquiry based on the defence that has been put forward by Nick Owens, and Mirror Group Newspapers as a whole. I will wait until I have heard Mr Owens testimony before I respond to this, but wanted to make it clear that I was not aware of this defence, such as it is, when I made the assessment of what sections to include in my evidence.
5. I annex these to this supplementary statement these transcripts.

Statement of Truth

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

DATED the 2/2/ day of February 2012

SIGNED:

