

1. The Claimant
2. Simon Hughes
3. 1st Witness Statement
4. Signed 17 October 2025
5. Revised 16 January 2026

CLAIM NO: KB-2022-003340

IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
MEDIA AND COMMUNICATIONS LIST

B E T W E E N:

SIR SIMON HUGHES

Claimant

-and-

ASSOCIATED NEWSPAPERS LIMITED

Defendant

TRIAL WITNESS STATEMENT OF SIMON HUGHES

I, **SIMON HUGHES**, of [address available to the Judge], **WILL SAY** as follows:

1. I am the Claimant in this action. I make this statement in support of my claim for damages against the Defendant ("Associated"), the publishers of the *Daily Mail* and the *Mail on Sunday*.
2. Unless I have made it clear to the contrary, the facts and matters set out in this witness statement are within my own knowledge and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified and facts and matters from such other sources are true to the best of my knowledge and belief.
3. Since June 2025, I have had numerous meetings in person as well as telephone discussions with my solicitor, Mark Thomson, in relation to this statement.

4. During our discussions, I have been shown various documents, a list of which is included in the appendix to this witness statement.

Background

5. I am now 74 years old. I graduated in law from Cambridge University, following which I studied at the College of Europe in Bruges, gaining a postgraduate Certificate of Advanced European Studies (equivalent to a master's degree). In 1974 I was called to the Bar by the Inner Temple and practised as a barrister as a member of chambers at 13 King's Bench Walk, Temple, London, from 1977 to 1987. In February 1983, I was elected to Parliament as MP for Southwark, Bermondsey in a by-election.
6. Between 1983 and 2015, I was the Liberal and then Liberal Democrat Member of Parliament for Southwark, Bermondsey, later Southwark and Bermondsey, Bermondsey and North Southwark, and Bermondsey and Old Southwark. During this period, I also held additional roles within the party, namely as Liberal Democrat Shadow Home Secretary in the House of Commons between 1999 and 2003, Federal President of the Liberal Democrats from 2004 to 2008 and Deputy Leader of the Liberal Democrats from 2010 until 2014. Between 2013 and May 2015, I was the Minister of State for Justice and Civil Liberties in HM Government.
7. I was a Core Participant in the Leveson Inquiry which commenced in July 2011 and submitted evidence to the Inquiry and gave oral evidence to the Inquiry on 28 February 2012.
8. As I explain in more detail below, I brought claims against the *News of the World* in 2011 and *The Sun* newspaper in 2019. Both claims were settled by NGN.
9. From 2016 until 2017, I worked at The Open University leading on policy and engagement with government and continued to work with The Open University until 2018. I have been Chancellor of London South Bank University since 2018 as well as UK strategic advisor for Talgo, a high-speed train manufacturing company, since 2017.

Events of the 2000s

10. In early January 2006, Charles Kennedy, the then Leader of the Liberal Democrats, admitted he was ill and resigned from leadership. At the time, I was President of the party and friend to Mr Kennedy. This meant that I was heavily involved in the discussions up to and following his resignation, including communicating with his family, the wider party and the press about developments.

11. Following Mr Kennedy's resignation, a leadership contest was called, and I decided to become a candidate myself. At an early stage, I became the favourite to win the leadership contest.
12. However, on 26 January 2006, I was contacted by a phone call to my office by Trevor Kavanagh, the Political Editor of *The Sun*, to ask for a meeting. I met him in Portcullis House, a House of Commons building, with my then solicitor from Bates Wells & Braithwaite and with two parliamentary colleagues.
13. Mr Kavanagh told me that *The Sun* had obtained evidence of private telephone calls by me which showed that I had called a gay chatline and that the paper had the intention to 'out' me. Although I thought then, and still believe, that my sexuality is a private matter, and that I had committed no offence, I believed that *The Sun* would publish an article with or without my agreement. As a result, I felt I had no choice but to co-operate. I did not then and nor do I now believe that on becoming a member of the House of Commons I ever waived my right to a private life, nor that my position in parliament gave journalists or third parties instructed by them justification to use unlawful means to target me in the pursuit of finding private information to publish.
14. As a result of my co-operation with Mr Kavanagh, a front-page article was published in *The Sun* newspaper on the following day, 27 January, entitled "*I'm Gay too*" stating that I had confirmed that I had had relationships with men as well as women. Unsurprisingly the story was also then of interest to many other newspapers, and a massive number of other articles were published in the months that followed. Nearly all these stories were commenting or reporting on my sexuality because of *The Sun's* article.
15. The publication of the front-page article of 27 January 2006 in *The Sun* which 'outed' me in the middle of the Liberal Democrat leadership election had an immediate and profound effect on my leadership bid. On the day after the article was published, I distinctly recall that the BBC reported that my poll rating had fallen and that I was no longer the favourite. Instead, I was now the four-to-one outsider. After publication of *The Sun* article, I lost my lead in the campaign for election as leader and at the beginning of March 2006 Sir Menzies Campbell was elected leader of the Liberal Democrats.
16. I believed then, and still believe now, that the intrusive publication in *The Sun* and all the other publications following from it had an adverse effect on my leadership chances as immediately the polls took me from first place to third place, where I remained. This was an important Liberal Democrat leadership election, as Labour was at the time losing popularity and the Liberal Democrats could hold significant power or influence in future governments. This turned out to be correct because

after the May 2010 General Election no party had a House of Commons majority, and a coalition government was formed by Conservatives and Liberal Democrats.

17. At some point in April 2006, my friend HJK told me that he was doorstepped by a journalist from Associated. I presumed then and for a long time afterwards that Associated had located HJK by following me because, in the light of *The Sun* article and for what felt like many months afterwards, my personal life was of increased interest to the media. I had no basis then or for many years later to suspect illegality connected with these activities. On several occasions, photographers positioned themselves outside my home in Bermondsey and sometimes even on my short drive alongside my house.
18. In August 2006 I was aware of the media coverage of the arrest of the *News of the World* Royal Correspondent Clive Goodman and another individual Glenn Mulcaire connected with interception of communications of members of the Royal Household.
19. On 2 October 2006 I was informed in person by Metropolitan Police officers that I had been subject to unlawful voicemail interception of my mobile phone voicemail messages. I had heard that there had been two arrests, but the police officers were reticent about giving me any further information. I was informed there were other parliamentary victims but that they were reluctant to come forward. To assist the police, I provided a short prosecution statement confirming that I had not authorised anyone to access my voicemails on my mobile phone. At the time, I was not shown any documents by the police and until 2011 did not see any of the underlying evidence (for reasons I will explain later).
20. In November 2006, Glenn Mulcaire and Clive Goodman pleaded guilty to charges of illegally intercepting voicemail messages, and in January 2007 they were both sentenced. I had said that I was willing to give evidence but because I was informed that they intended to enter guilty pleas I did not attend either court hearing. I have been shown a transcript of the sentencing hearing and note that the Judge stated that in respect of the other counts Mulcaire "*had not dealt with Goodman but with others at News International*". This meant that in respect of Mr Mulcaire's interception of my voicemails, he had dealt with other journalists at News International. That was the last I heard about voicemail interception until July 2009 when *The Guardian* published an article about *News of the World* phone hacking.
21. Although there had been news stories about phone hacking in 2009 and 2010, particularly in *The Guardian* newspaper, I recall that it was only in January 2011 that the Metropolitan Police commenced Operation Weeting, an investigation into phone hacking at the *News of the World*.

22. In May 2011, after my office was telephoned by police officers from Operation Weeting and before I met them, I instructed Mark Thomson, my current solicitor, in relation to a possible claim against News Group Newspapers. Following discussions with my solicitor, I agreed to meet with the police together with a solicitor from Atkins Thomson for the purpose of my claim.

23. Later that month, I met two officers from Operation Weeting and was for the first time shown Glenn Mulcaire's handwritten notes ('the Mulcaire notes') which had my name on them and other names in the top left-hand corners of some of the pages including 'Ian', 'Greg' and 'Neville', namely Ian Edmondson, Greg Miskiw and Neville Thurlbeck, who were all working at the *News of the World*. I was also shown transcripts of messages which had been left on my voicemail, as well as a schedule of call data which showed phone calls made by Mr Mulcaire to my mobile phone. I was very shocked when I saw these documents.

24. Following numerous revelations of victims targeted by *News of the World*, and ahead of *News of the World* publishing its last edition on 10 July 2011, there were questions and speeches in Parliament about the subject. On 6 July 2011 I spoke in the emergency House of Commons debate on phone hacking and expressed support for an inquiry, the strong view that all those with responsibility at all levels of all the organisations concerned should be investigated and brought to account, and revulsion at the targeting and exploiting of ordinary members of the public when they were at their most vulnerable and traumatised. I said that police investigations should be not just into those most visibly involved, but also into those who commission them and benefit from their activities and those who know about activity but pretend that they do not. Police must investigate the 'big guys' and not just the 'little guys'.

25. A public inquiry into the culture, practices and ethics of the press was announced by Prime Minister David Cameron in July 2011 and started later that year.

My claim against NGN and Glenn Mulcaire

26. On 9 August 2011 my proceedings were issued against NGN and Glenn Mulcaire and on 16 September 2011 I was provided with extensive disclosure by the Metropolitan Police Service ("**MPS**") of Mulcaire notes and other documents and later subsequently a further page of disclosure.

Mulcaire notes

27. On page (NSF1 p34Q), the Second Defendant in these proceedings had recorded my mobile number, my direct dial number, an account number which I believe may have been my mobile phone account number at the time, the password for my mobile phone account which I was using in 2005/2006 and the name of my network.

28. One of the pages is dated '25/4/06' in the top left-hand corner (NSF7 p20Q). On this page, there is written 'Hughes completed awaiting photos'. I assumed that this related to a story which the *News of the World* was writing about me at that time.
29. Another page is headed up 'Hughes' and has a series of telephone numbers which all relate to me (NSF31 p75Q). The numbers include the number for the main switchboard of Liberal Democrat headquarters in Westminster; my direct House of Commons telephone line which was a very private number available to very few people; a phone number which was the private 'hotline' through to my constituency office only used by colleagues and few others; the public Bermondsey constituency office number and the number for the local party office in Bermondsey. In addition to this, there is reference to 'data', the date '10 Dec 2004' and a reference to '10.39 - 41 sec' next to my telephone number. Mr Mulcaire must have obtained data about my use of my home telephone or, perhaps, my mobile.
30. One of the pages has the name 'IAN' in the top left-hand corner with the date 26/1/2006 (NSF31 p143Q). I assumed that this related to instructions given to the Second Defendant by Ian Edmondson, at that time the Assistant News Editor at the '*News of the World*'.
31. There is another page of notes which has 'IAN' in the top left-hand corner (NSF31 p156Q). Again, I assumed that this was a reference to Ian Edmondson, the person working for the First Defendant giving instructions to the Second Defendant. The document contains the telephone number for Liberal Democrat headquarters and my name, mobile number and private home number.
32. There is also a page with the name 'Neville' in the top left-hand corner, which is dated 27 February 2006 (WAB 92 p170Q). I assumed that this referred to Neville Thurlbeck of the First Defendant and indicated that he was the individual instructing the Second Defendant to obtain information about me on that date. This page contains private and confidential information.
33. Another page has 'Greg' in the top left-hand corner and the date '10/01/2002' (WAB 95 p35Q). I assumed that this was Greg Miskiw of the First Defendant who must have been giving instructions to the Second Defendant on that date to obtain information about me. The only item on this page which appears to be of relevance to me is the words 'Hughes and half-sister'. I did then have a half-sister (in-law), with the surname Hughes, who was married to my half-brother David.
34. The final page of notes contains my name and names of other 'targets', including Sadie Frost, the name of a family member of a victim of crime, and some of those in the royal household (NSF4 p9).

My Particulars of Claim against the News of the World

35. After provision of the documents from the MPS, my Particulars of Claim against NGN and Glenn Mulcaire were served on 28 September 2011.
36. My claim centred on Glenn Mulcaire and various journalists at the *News of the World*, and the fact that I understood Mr Mulcaire had worked with and been paid by the *News of the World* to obtain private information about and from me (and many others). The journalists involved were all from the *News of the World* news desk and some, namely Greg Miskiw, Ian Edmondson and Neville Thurlbeck, were mentioned in the corner of the Mulcaire notes that I had obtained from the police.
37. *The Sun* was also mentioned in the Particulars of Claim but only in the context of unlawful information gathering by the *News of the World*. I had concerns that although the police had told me that it was the *News of the World* and Glenn Mulcaire who had carried out intensive unlawful information gathering about me, in fact it was *The Sun* which published the story in 2006 about my sexuality.
38. At the time, and for a long time afterwards, I did not know how *The Sun* had obtained the highly personal information they had about me in 2006. I was aware that the *News of the World* was interested in me around the same time as the article in *The Sun* was published, as there was a Mulcaire note (shown to me by the police in 2011) with the date of 26 January 2006 and the corner name 'Ian' in the top left-hand corner of the note as well as further undated pages. The *News of the World* claim therefore included the allegation that information obtained using unlawful means by Glenn Mulcaire under the arrangement between him and the *News of the World* "was, from time to time, passed to journalists working for another newspaper published by the First Defendant, *The Sun*".
39. I prepared and served a witness statement in the *News of the World* claim in December 2011 to which I exhibited the MPS disclosure I had received, and went through some of the details of the pages including the corner names that were not redacted which were "Ian" [Ian Edmondson], "Neville" [Neville Thurlbeck] and "Greg" [Greg Miskiw] who were all referred to and believed to be journalists at the *News of the World* instructing Glenn Mulcaire at the time of the note.

Settlement of the claim against NGN and Glenn Mulcaire

40. While neither NGN nor Glenn Mulcaire served any Defence in autumn of 2011, I felt it was of paramount importance to me to obtain full disclosure and to ensure the ongoing disclosure obligations of NGN were met. I therefore insisted on disclosure and obtained this from NGN on 16 January 2012. The disclosure was very limited, and I had concerns about that.

41. NGN made extensive admissions about Glenn Mulcaire and about the *News of the World* dated 13 December 2011. In relation to my claim, these admissions included the words “*Between 16 February and 16 June 2006, the Second Defendant [Glenn Mulcaire] intercepted voicemail messages left on the mobile telephone of Simon Hughes MP and provided unlawfully obtained information to the First Defendant [NGN].*”
42. The admissions also included “*an email from Journalist B (referred to in the Confidential Schedule to these Admissions) to the Second Defendant extending the agreement of 1 July 2005 until 2007*”. This meant that NGN admitted still to being in an agreement with Mulcaire during and beyond the period I complained of.
43. After receiving disclosure, I settled this claim and entered into an agreement set out in a Tomlin Order dated 3 February 2012. Both the Tomlin Order and my statement read in open court (approved by the Court) included a continuing obligation on NGN to undertake further searches and provide further disclosure to me to find what really happened at NGN. NGN also provided an undertaking to carry out further searches for disclosure concerning Trevor Kavanagh.
44. On 8 February 2012, when I was present, some other Claimants and I had agreed with NGN for joint statements to be read in open court before Mr Justice Vos (as he then was). These other Claimants included football agent Sky Andrew, footballer Paul Gascoigne and *Mail on Sunday* journalist Dennis Rice, his wife and sister. I understand that it is common ground that other journalists at Associated were notified by the police that their voicemails had been intercepted by Mr Mulcaire. Paragraph 11 of my statement read in Court confirmed that NGN apologised in relation to the *News of the World*.

The Andrew Marr Show

45. On 12 February 2012 (and before I gave my evidence at the Leveson Inquiry) I appeared on the *Andrew Marr Show* as one of two people to review the Sunday papers. Associated has previously suggested in this litigation that I made allegations about the *Daily Mail* and the *Mail on Sunday* during my appearance on the *Andrew Marr Show* in what it has called an interview.
46. Whilst I cannot now recall exactly what I said on the *Andrew Marr Show* in 2012, I have now been shown a transcript of my appearance on the show, and I am clear that it was not an interview with me at all. I was in fact reviewing the papers alongside the *Daily Mail* journalist, Amanda Platell. It should be noted that the ‘transcript’ of the Andrew Marr Show from Associated is not a full transcript and is accompanied by no explanation of how it was produced.

47. Associated has alleged¹ that during my appearance on the show I “*made allegations that the Daily Mail and The Mail on Sunday “were getting hold of information that they shouldn’t have”*”. This quotation is taken out of context; if the Defendant’s own transcript is properly read, it makes clear that I was referring to the Information Commissioner’s findings (i.e. Operation Motorman). The part of the transcript, produced by the Defendant, read in its proper context states:

Simon Hughes: “...I was clear also that it was not just the *News of the World*, it was a variety of different activities - hacking by *The Sun*, blagging, **getting hold of information that they shouldn't have done was being done by the Mail, the Mail on Sunday**, by *The Sun*, there was a whole list, the Information Commissioner said so.”

Amanda Platell: “**Do not say that The Mail has been phone hacking please because our editor has categorically said it has [not] nor has the Mail group.**”

Simon Hughes: “**Amanda you are right.**”

(Emphasis added.)

48. It is clear from that part of the *Andrew Marr Show* transcript that I was saying that *The Mail* and *Mail on Sunday* had obtained information in a way they should not have done – which was a finding made by the Information Commissioner in the 2003 ICO investigation Operation Motorman into various allegations of offences under the Data Protection Act by the press.

49. I did not say and did not believe the Mail Group had phone hacked my voicemails. When Amanda Platell, the *Daily Mail* journalist with whom I was reviewing the papers, said that The Mail and the Mail group had not phone-hacked and the Editor has been categorical about this I agreed with her by saying “*Amanda you are right.*”

50. This was not an ‘interview’ to discuss my civil action against NGN but rather a review of the papers - which was a regular part of the *Andrew Marr Show*.

51. The context of my appearance on the show is also expressly relevant as it had been reported the previous day that five journalists from *The Sun* had been arrested, so we were reviewing the papers in light of that serious development which Andrew Marr had described as “extraordinary” and Amanda Platell said was

¹ Paragraph 8.81 of the First Witness Statement of Francesca Richmond dated 20 January 2023

“fairly shocking” and said the fact it was “all the way across the paper” (former managing editor, chief reporter, head of news, executive editor, picture editor) was “quite terrifying”.

The Leveson Inquiry

52. In 2011 and 2012 I was one of the core participant victims in Modules 1, 2 and 3 of the Leveson Inquiry. I submitted formal evidence for Module 2 of the Inquiry in the form of a witness statement dated 20 February 2012 and gave oral evidence on the morning of 28 February 2012.

53. I made clear that it was really important that both the hacking of phones, which the police had come to me about and which had clearly also been happening to other people, and also the general abuse of data, purchasing, selling, blagging and all those other things was unacceptable and I was determined to do everything I could, personally as well as politically, to try to deal with that, and I was frustrated even then that there wasn't comprehensive action taken. I said then that a lot of pain and grief could have been spared if the police, on the evidence that there was and if it was strong enough and if it had stood up adequately, had prosecuted all those who clearly were in the frame - or at least gone to the CPS and seen what was appropriate or encouraged the Information Commissioner to do the same.

54. I also said that we had already lost three or four years in which illegal activity could have continued and that the more serious offence was that employees of national newspapers were behaving like this. Those who were employed were not pursued, and I referred in my evidence to the Inquiry to the email from the lawyer to Andy Coulson, sent in September 2006, which made clear that from September 2006 and at the highest level the *News of the World* knew about this. My evidence at the Inquiry made clear that at that time all my media focus was on News Group/NGN.

55. In my evidence before the Inquiry, I also referred to two personal friends who were not in public life whose names were in the Mulcaire notes and that “the *News of the World*, Mr Mulcaire and others, were trying to stand up stories in relation to each of them”. The reference to “others” is to other *News of the World* journalists. I understood that I was not allowed to name those journalists because of the police investigations at the time as part of Operation Weeting.

56. At the time of the Inquiry, I was aware HJK had been ‘pursued by the press’ and I was told by HJK that a *Daily Mail* or *Mail on Sunday* person had approached HJK in late April 2006. At the time that I gave my evidence to the Leveson Inquiry, it was not at all known to me how *The Sun* had obtained its information in January 2006 which led to its article on 27 January 2006, or what led to the fact that the *Daily Mail* or *Mail on Sunday* had approached HJK at the end of April 2006.

57. In 2006 I was told by the police that Mulcaire was involved and, when I asked if anyone else was involved, the police told me that they were just pursuing Mr Mulcaire. In addition when I received disclosure from the MPS on 16 September 2011, I was specifically informed in the covering letter *“that there is no documentation that falls to be disclosed under this paragraph”* (referring to paragraph 1.8 of the Order of Chief Master Winegarten dated 30 August 2011, whereby I was to be provided with *“All documents showing or evidencing the identity of the persons to whom Mr Mulcaire (or any servant or agent or associate of Mr Mulcaire) sent any information about [me] and/or gave information to which enables them to access [my] voicemails”*).
58. I stated to the Inquiry that the notes appeared to have been made by journalists at the *News of the World*. One of the pages with a corner name of “Greg” recorded a date in 2002, which I had assumed was the time around which I had been of interest to Greg Miskiw. Indeed, NGN did not defend my claim against it, made a formal admission verified by a statement of truth in December 2011, and in its joint statement in open court (read in February 2012) accepted responsibility for my claim on behalf of the *News of the World*. From the date of that admission, I was even more clear that it was *News of the World* employees who were responsible for the commissioning of illegal activity in my case.
59. Similarly, when I said to the Inquiry that the police suggested Mr Mulcaire’s notebooks revealed *“a whole range of people clearly acting in concert, either directly or indirectly, illegally, and they were not touched”* (28 February 2012 p.27, 15-17), again I was not referring to Associated but to a number of other journalists at the *News of the World*, in addition to Clive Goodman, and to Glenn Mulcaire, and particularly to Greg Miskiw, Ian Edmondson and Neville Thurlbeck. My evidence was correct.
60. This is clear when reading the full Leveson transcript and providing the proper context for my evidence. For example I stated: *“What I didn’t know [in 2006], because I was not shown the evidence which was the basis of the Mulcaire prosecution, was that the same evidence clearly revealed that other people who were journalists at News of the World were clearly involved, whether they were involved directly or indirectly...”* (28 February 2012, p.8, 15-20). I distinctly remember this point. It later became obvious that from 2006 there was plainly enough evidence to implicate other journalists at the *News of the World*, but the police only charged the royal correspondent Clive Goodman.
61. I understand that there is a reference to a second witness statement from me in the transcript which was provided to the Leveson Inquiry but was never published. I do not recall the detail of this, but it appears from the transcript of the Inquiry that it was in relation to my *News of the World* claim.

My Claim against *The Sun* newspaper

62. In 2017, I was approached to be a generic witness for the then Claimants in the Mobile Telephone Voicemail Interception Litigation (MTVIL) - which I agreed to be. I subsequently provided a witness statement in support of the Claimants' cases against NGN dated 22 November 2017.
63. After carefully and fully considering in 2019 the available evidence of serious unlawful activity undertaken by journalists at *The Sun* newspaper, on 25 September 2019 I issued a Claim Form in relation to NGN's unlawful information gathering at *The Sun* and then served my Particulars of Claim on 13 March 2020.
64. NGN served its Defence on 4 May 2020 where various defences, including limitation and compromise, were put forward.
65. At the beginning of February 2021, a few days after NGN had provided me with standard disclosure, NGN issued an application to strike out the claim on the grounds of compromise and abuse of process - in essence contending that the compromise in 2011 encompassed claims against *The Sun* newspaper.
66. Both the Tomlin Order and my statement in open court from the *News of the World* claim recorded NGN's continuing obligation of disclosure, and yet it was clear from disclosure that NGN had not provided documents which it could have done in 2012.
67. Shortly after service of my extensive responsive evidence on 11 May 2021, in response to the allegation of compromise and abuse, and shortly before the hearing of NGN's application for summary judgment, NGN effectively abandoned its application to strike out and for summary judgment and offered to pay substantial damages and to agree to a unilateral statement in open court.
68. On 10 June 2021, my unilateral statement in open court was approved by the Managing Judge and read out. I confirm the content is accurate.
69. My action against *The Sun*, together with the statement in open court, enabled me to understand how *The Sun* had also obtained my private information and why they had targeted me, and enabled me to reach closure on this matter. This further confirmed for me that NGN had been responsible for the illegality in 2006.

2016 – Emails and April 2016 meeting

70. I first came to know Dr Evan Harris in about 1997 when he was a candidate and then became Liberal Democrat Member of Parliament for Oxford West and Abingdon. He continued as an MP until 2010. During this time, we became good colleagues, and I recollect that Evan was a supporter of my party leadership

campaign in 2006. On many subjects and issues from 1997 onwards Evan would contact colleagues including me out of the blue by phone or in other ways seeking an answer or conversation and often saying he wanted to talk urgently. Contact from him could come during the day, evening or night. I would not always respond immediately, sure that if there was real urgency Evan would have made that clear in his message or that he would repeat that request. Sometimes I did not respond at all but left it to Evan to contact me again. If I felt that a face-to-face meeting was preferable to telephone contact, I would say so. Over the thirteen years when we were in parliament together, we saw each other often.

71. From 2010 when Evan left parliament, he was in contact with me during the 2010-15 parliament when I was first the Liberal Democrat Deputy Leader and later the Liberal Democrat Minister of State for Justice and Civil Liberties. Our contacts were principally but not only about Liberal Democrat issues and the new government's strategy, actions and responses to press intrusion issues, and the setting up and conduct of the Leveson Inquiry, the Leveson Report in November 2012 and the follow-up to it, and my role in parliament and at the Inquiry and in the Liberal Democrats and government about these things. Of course, during this period, in 2011 I started my action against the *News of the World* and Glenn Mulcaire and in 2012 settled that claim. After I lost my seat at the 2015 general election I was not involved in these issues in parliament or government. I continued to be involved in Liberal Democrat matters (as the local prospective parliamentary candidate for two years) as well as in many local organisations and began full-time work with The Open University based in Milton Keynes in early 2016.
72. In February 2016 Evan texted me asking to speak to me about 'your hacking case' and suggesting a meet for coffee. We eventually spoke on the phone in late February, between 26th and 29th (although I have no note of exactly when or of our conversation). I have over the years kept a 'daybook' but not a diary, mainly for notes of work-related meetings or those of organisations I was involved in, but my 'daybook' does not have records of all meetings or phone calls, and only those where I felt it important at the time to make notes. I also have used these 'daybooks' to note actions which I need to take. Having checked my daybook there is no mention of the call or what was said to me. Indeed, I have no notes of calls or meetings with Evan for 2016.
73. The late February phone call was followed by a text request by Evan on 29 February for 1) a copy of my statement to the Leveson Inquiry and 2) a 'further copy of your Weeting disclosure (Mulcaire notes) from the Met'. I replied to this and later text messages with a holding reply on 8 March.
74. On 3 March 2016, Evan alerted me by email to a Liberal Democrat Rights-Liberties-Justice meeting on the Leveson Inquiry and related issues at the National Liberal Club the following Monday (7 March) and suggested we meet then to talk – 'so kills

2 birds' – or that I 'suggest a slot for our chat about the Mail business'. I told him on the same day that I would not be able to attend the meeting or meet him on 7 March and that I would be in Edinburgh for work (with The Open University). He suggested the following Tuesday or Wednesday.

75. I did not reply to that email. Separately on 8 March 2016 Evan contacted me to ask me if I would work with Hacked Off, an organisation of which he was then the Joint Executive Director, and with other victims of voicemail interception by News International to seek Victim Right to Review the CPS decision in *R v News Group Newspapers*. This email request also referred to voicemail issues concerning Mirror Group, with which I had not been involved. No other media groups or companies were referred to.

76. I believe the reference to the "Mail business" on 3 March 2016 by text message must relate to a question which Evan must have asked me on the phone on or before 4 April but no earlier than the end of February (but of which I have no specific recollection) seeking the name of the journalist who had tried in 2006 to link HJK and me. This is because on 4 April I asked HJK by email if he knew the answer to this question, to which he replied 'Sorry', and that he did not know because he had destroyed the business card of the journalist who had doorstepped him. But HJK also told me that Evan had asked him the same question. I explained to HJK that I 'am meeting Evan tomorrow' and that 'I have no clear recollection of the name'. Given the developments in the MTVIL litigation, I presumed that this question from Evan might also relate to *The Sun* and its targeting of me.

77. In our email exchange on 4 April 2016, HJK said 'I know he had a source that the DM or MOS was implicated. However, I doubted Evan's source as the source had had access to my litigation files and could therefore just be replaying this'. HJK continued that 'If it is proved correct Tamsin, my lawyer is ready to pounce once we see the evidence which we have not yet seen'. The fact that HJK had or may have known from the business card or been told that Associated was or might have been responsible for doorstepping him was not new information to me as I recalled that HJK had previously told me that it had been an Associated journalist who had doorstepped him in 2006. For reasons I explain below, whilst I was concerned that a friend had become involved, I saw this as an extension of the press intrusion to which I had had to become accustomed, particularly after *The Sun* article in January 2006 revealing private information about my sexuality.

78. From the time when HJK told me he was doorstepped and I was also approached I assumed that this was the result of more conventional investigative journalism and numerous articles about me which had, since the article in *The Sun* of January 2006, involved journalists watching or following me and that one of them may have seen me on one of the occasions I had visited HJK – although these were no more than three as I remember. I had since my by-election campaign in 1982/3 and from

time to time quite frequently been doorstepped myself and had photographers outside my home and/or been followed within and outside my constituency. I never considered at the time or for many years later that door stepping of HJK was connected to voicemail interception. It was not until 2011 that I became aware that my mobile voicemail had been intercepted on the instruction of the *News of the World*, which led to my initial claim in 2011. The 2016 suggestion that Evan Harris may have had a source that Associated was implicated was doubted by HJK and not pursued by him and therefore I did not think about this further. From my perspective I had found the publication to blame for illegal activity against me, namely the *News of The World*.

79. The meeting originally requested by Evan in February 2016 eventually happened when I met Evan and Graham Johnson on 5 April 2016 at the 'Mr Cappuccino' café on Jamaica Road in Bermondsey. There is a text message the day before to confirm the meeting.

80. I understand from the Defence and correspondence from Associated that it makes much of this meeting, but I do not recall anything significant being said. In particular I have no recollection of any 'Mail business' being discussed. I have checked thoroughly and do not have any contemporaneous notes of this meeting, or of related emails, texts or phone calls with Evan in the previous two months or shortly afterwards. I believe this meeting was the first time I met Graham Johnson, who came with Evan, and that Evan's reference to Graham as "bringing my whistleblower friend" was in relation to matters relating to *The Sun*, as my recollection is that Dr Harris brought him along to show how thoroughly he and/or Hacked Off were pursuing these issues. As it was *The Sun* which published the initial article about me, my continuing particular interest was in the possibility of bringing that paper and those involved with that article to account. At this time, there were many steps to take before *The Sun* and its employees were able to be held to account.

81. I believe that Evan spoke at this meeting about *The Sun* and Mulcaire and HJK and that there were other individuals possibly bringing claims against *The Sun*. The only relevance of Associated seemed to be to HJK, and it did not seem at the time to be being pursued by anyone and was not something at the time that I linked to me or interception of my voicemails which appeared then to be entirely an NGN activity. I do not recall being shown any material in relation to Associated nor told of any evidence in relation to any claim by anyone against Associated. I do not believe that there were any points for me to follow up from the meeting but rather saw it as an updating and a briefing.

82. Later, in April 2016, the MTVIL managing judge at the time, Mr Justice Mann, handed down his judgment allowing claims in relation to the unlawful activities of *The Sun* to proceed in the MTVIL litigation.

2019 Emails

83. The next relevant email was that from Evan Harris to me, with the subject attached memo, dated 3 March 2019 (at 20:14) and marked privileged and confidential. I accept that I must have received it, but I do not remember seeing, reading or considering this email or the memo attached, and have checked that I did not forward it to anyone else, or indeed to myself which I sometimes do if I consider it important and to remind me to deal with it. On media and legal matters, I was focusing at the time on my claim against *The Sun* newspaper and in the first week of March was in touch with and preparing to meet my legal advisers to discuss that claim, and that meeting happened later in March. I was also extremely busy and preoccupied with my work as Strategic Advisor to Talgo SA, the Spanish high-speed train manufacturer, as I was one of those leading on the company's proposed bid for the HS2 rolling stock contract. Whatever the exact reason or reasons at the time the 3 March 2019 email which I was sent I did not attend to. I am also informed by my solicitor Mark Thomson and believe that he also received this email but only recently located the email in one of his folders of emails for my NGN claims. He tells me that he does not recall reading it or acting on it.
84. The next relevant email was from Evan Harris to me on the subject *Daily Mail Hacking [REDACTED]* dated 11 July 2019. This email I did see but I did not do anything about this at this time because this was at exactly the time when I was making a job application for an important public post and I did not wish at the time to do anything that would bring any publicity to what for me were historic and difficult issues which could prejudice this job application. I confirm I was not party to or involved in any scheme to camouflage limitation issues.
85. The next relevant email was from Graham Johnson to Evan Harris and me on *MAIL ON SUNDAY HACKING [REDACTED]* dated 11 July 2019.
86. The last of this series of emails was an email from Evan Harris to me with the subject *Mail on Sunday Investigations Articles* dated 20 July 2020.
87. Several Byline Articles about me were published in July 2020. I was only aware of these articles because I was sent these by email, and I did not read them online. I made no comment privately or publicly about any of them at the time as I had not seen any original evidence, the email suggested that the grounds for claim did not yet exist ("*The Mail hacking claims are being developed*"), and I did not want to pick up this issue at the time for other career-related reasons. I took no proactive steps to follow up these Articles during the rest of 2020.

My claim against Associated

88. I am by character, instinct and nature and for many reasons a reluctant litigant and so have never taken decisions to initiate legal action without the clearest and

strongest grounds. I was also at all times up to then very mindful of the very strong denials at Leveson by some of the most senior representatives of Associated that they were involved in unlawful activity, which denials I believed, and the admissions of NGN in December 2011.

89. It was during early 2022 that I was presented with, saw, and analysed evidence from Graham Johnson and information from Glenn Mulcaire, which clearly implicated ANL. This included the email exchanges between Greg Miskiw and Chris Anderson of the *Mail on Sunday*.
90. In addition to these email exchanges between Greg Miskiw and Chris Anderson, I also received information in 2022 through my solicitor from Glenn Mulcaire with Mr Mulcaire's explanation of the 'Mulcaire notes', and the activities he had undertaken.
91. I also saw a payment record from Greg Miskiw with my name on it. The wording of this payment record, which appears to have been obtained by the police from a technical search of Greg Miskiw's computer records, (although I do not know on which date) shows a payment by the *Mail on Sunday* ('MoS') in respect of the Sadie Frost and Simon Hughes stories.
92. The new information also explained some previously confusing references in the 'Mulcaire notes' and some of the number of episodes of Mulcaire call data previously provided to me by the MPS (which was call data from January 2006, March 2006, early April 2006 and late April 2006).
93. Although HJK and I had been doorstepped by journalists in April 2006, I believed at the time and in the absence of any positive evidence of something different and based on my experience of the immense media interest which followed in the early months after the sensational front-page splash in *The Sun* and the enormous impact it had that journalists had probably followed me to locate the address of HJK. That was what I was experiencing at the time. I did not suspect it was the result of illegal activity. I certainly had no reason or evidence to believe that Glenn Mulcaire was also working for the *Mail on Sunday* as well as working for the *News of the World*. This new evidence completely changed the picture and revealed how the *Daily Mail* had obtained unlawfully gathered information about me and my contacts and why they had pursued me when they did.
94. After receiving legal advice in March 2022, I decided to take legal action.
95. I was never provided by ANL with notification of this evidence of wrongdoing. This is unlike the position in my first News Group claim in 2011 where notification was provided by the police in May 2011 and unlike *The Sun* claim when I was notified of the evidence of wrongdoing after I agreed to be a generic witness in 2017, as I have mentioned above.

My Particulars of Claim against Associated

96. Having considered the material available to me, including evidence of wider unlawful activity of Associated, my Particulars of Claim were prepared. I issued proceedings against Associated on 6 October 2022. Since issuing proceedings Associated has continued to make robust denials that any phone hacking took place at or for *The Mail* and/or *The Mail on Sunday*.

97. I found shocking the possibility that the targeting of me was part of wider behaviour by Associated in targeting individuals unlawfully. This was even more unacceptable in the light of the aggressive denials by all those connected with Associated who gave evidence to the Leveson Inquiry, and which I believed.

98. My Particulars of Claim were then served on 4 November 2022, and my Amended Particulars of Claim were served on 13 October 2025.

Disclosure by Associated

99. The reason why I brought this claim when I did, and similarly to the two earlier claims which I initiated against NGN, is that I was only ever willing to bring a claim once it became clear to me that there were sufficient items of evidence to bring a worthwhile claim. I also did so because I have always believed that those who were responsible for these wrongdoings should not be allowed to get away with them without being forced to accept responsibility. As my speeches and other interventions in parliament and elsewhere and my evidence to the Leveson Inquiry made clear I saw this as necessary, not principally in my own self-interest but to make sure that those who were victims of illegality by large and influential organisations in the media and those working for them and who do not have influential positions themselves have the chance to change this imbalance and abuse of power and to be protected against it, not just for now but also for the future.

100. It is distressing to realise – having seen the evidence and disclosure provided by Associated – that, like other newspapers, Associated targeted me as well as others using unlawful means and the use of private investigators for the purposes of their own profit. The fact that they have remained completely unapologetic for this illegal behaviour is also distressing.

STATEMENT OF TRUTH

I understand that the purpose of this witness statement is to set out matters of fact of which I have personal knowledge.

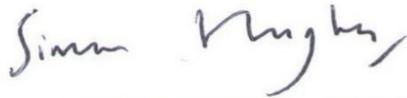
I understand that it is not my function to argue the case, either generally or on particular points, or to take the court through the documents in the case.

This witness statement sets out only my personal knowledge and recollection in my own words.

On points that I understand to be important to the case, I have stated honestly (a) how well I recall matters and (b) whether my memory has been refreshed by considering documents, if so how and when.

I have not been asked or encouraged by anyone to include in this statement anything that is not my own account, to the best of my ability and recollection, of events I witnessed or matters of which I have personal knowledge.

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

A handwritten signature in blue ink that reads "Simon Hughes". The signature is written in a cursive style with a horizontal line underneath it.

Sir Simon Hughes

Dated: 16 January 2026

I hereby certify that:

1. I am the relevant legal representative within the meaning of Practice Direction 57AC.
2. I am satisfied that the purpose and proper content of trial witness statements, and proper practice in relation to their preparation, including the witness confirmation required by paragraph 4.1 of Practice Direction 57AC, have been discussed with and explained to Sir Simon Hughes.
3. I believe this trial witness statement complies with Practice Direction 57AC and paragraphs 18.1 and 18.2 of Practice Direction 32, and that it has been prepared in accordance with the Statement of Best Practice contained in the Appendix to Practice Direction 57AC.

Signature:



Name: Mark Thomson

Position: Solicitor Advocate

Date: 16 January 2026

APPENDIX 1

Documents I have referred to, or been referred to, for the purposes of this statement

No.	Document Description	Source
1.	[SSH 26] An article in the Sun entitled ' <i>A Second Limp-Dem Confession: I'm gay too</i> ', an exclusive by Trevor Kavanagh dated 26 January 2006	Sir Simon Hughes Disclosure 21 March 2025
2.	[SSH 39-196] Third Party Publications as exhibited to the First Witness Statement of Sir Simon Hughes dated 24 February 2023	Sir Simon Hughes Disclosure 21 March 2025
3.	[SSH 25] MG11 Witness Statement of Simon Hughes dated 2 October 2006	Sir Simon Hughes Disclosure 21 March 2025
4.	[SSH 375] House of Commons Hansard – Emergency Debate dated 6 July 2011	Sir Simon Hughes Disclosure 22 September 2025
5.	[SSH 9-24] Disclosure from the MPS to Sir Simon Hughes on 16 September 2011	Sir Simon Hughes Disclosure 21 March 2025
6.	[SSH 3-4] Simon Hughes MP v (1) News Group Newspapers Limited (2) Glenn Mulcaire (2011) (News of the World) Particulars of Claim dated 28 September 2011	Sir Simon Hughes Disclosure 21 March 2025
7.	[SSH 341] Simon Hughes MP v (1) News Group Newspapers Limited (2) Glenn Mulcaire (2011) (News of the World) Witness statement of Simon Hughes dated 14 December 2011	Sir Simon Hughes Disclosure 25 July 2025
8.	[SSH 8] Admissions of NGN dated 13 December 2011	Sir Simon Hughes Disclosure 21 March 2025
9.	Simon Hughes MP v (1) News Group Newspapers Limited (2) Glenn Mulcaire (2011) (News of the World) Tomlin Order dated 3 February 2012	Sir Simon Hughes Disclosure 17 October 2025
10.	[SSH 5] Simon Hughes MP v (1) News Group Newspapers Limited (2) Glenn Mulcaire (2011) (News of the World) Statement in Open Court dated 8 February 2012	Sir Simon Hughes Disclosure 21 March 2025
11.	[SSH 6] Simon Hughes MP v (1) News Group Newspapers Limited (2) Glenn Mulcaire (2011) (News of the World) Transcript of Proceedings (Reading of Statement in Open Court) dated 8 February 2012	Sir Simon Hughes Disclosure 21 March 2025
12.	[SSH 308] Witness Statement of Simon Hughes to the Leveson Inquiry dated 20 February 2012	Sir Simon Hughes Disclosure 21 March 2025

13.	[SSH 309] Transcript of Morning Hearing – Evidence of Simon Hughes to the Leveson Inquiry dated 28 February 2012	Sir Simon Hughes Disclosure 21 March 2025
14.	[SSH 331] Email exchange between Evan Harris and Sir Simon Hughes, with the subject <i>Re: Privacy, Press Freedom and Press Complaints R-L-J Discussion meeting Mon</i> dated 3 March 2016	Sir Simon Hughes Disclosure 21 March 2025
15.	[SSH 332] Email exchange between HJK and Sir Simon Hughes with the subject <i>Re: Old tricks [REDACTED]</i> dated 4 April 2016	Sir Simon Hughes Disclosure 21 March 2025
16.	[SSH 333] Text message exchange between Evan Harris and Sir Simon Hughes [REDACTED] dated 4 April 2016	Sir Simon Hughes Disclosure 21 March 2025
17.	[SSH 30-31] Simon Hughes MP v News Group Newspapers Limited (2019) (The Sun) Particulars of Claim dated 13 March 2020	Sir Simon Hughes Disclosure 21 March 2025
18.	[SSH 38] Simon Hughes MP v News Group Newspapers Limited (2019) (The Sun) Statement in Open Court dated 10 June 2021	Sir Simon Hughes Disclosure 21 March 2025
19.	[SSH 355] Email from Evan Harris to Sir Simon Hughes with the subject <i>Daily Mail Hacking [REDACTED]</i> dated 11 July 2019	Sir Simon Hughes Disclosure 1 August 2025
20.	[SSH 356] Email from Graham Johnson to Evan Harris and Sir Simon Hughes with the subject <i>MAIL ON SUNDAY HACKING [REDACTED]</i> dated 11 July 2019	Sir Simon Hughes Disclosure 1 August 2025
21.	[SSH 273] Byline Investigates article entitled “ <i>‘SWARMED’: Former Justice Minister Simon Hughes was phone hacked for the Mail on Sunday – After being blackmailed by The Sun with illegally-obtained phone bills</i> ” - by Graham Johnson dated 20 July 2020	Sir Simon Hughes Disclosure 21 March 2025
22.	[SSH 274] Byline Investigates article entitled “ <i>‘TWO of Britain’s most prolific illegal private investigators targeted ex-Justice Minister Simon Hughes for TWO Papers – The Mail on Sunday and The Sun</i> ” - by Graham Johnson dated 22 July 2020	Sir Simon Hughes Disclosure 21 March 2025
23.	[SSH 275] Byline Times article entitled “ <i>‘Former Lib Dem Deputy Leader Simon Hughes was Phone Hacked for the Mail on Sunday</i> ” - by Graham Johnson dated 23 July 2020	Sir Simon Hughes Disclosure 21 March 2025
24.	[SSH 276] Byline Investigates article entitled “ <i>‘Private investigator Glenn Mulcaire reveals how he hacked ex-Lib Dem MP Simon Hughes for the Mail on Sunday</i> ” - by Graham Johnson dated 27 July 2020	Sir Simon Hughes Disclosure 21 March 2025

25.	[SSH 277] Byline Investigates article entitled <i>“Phone hacker emailed Mail on Sunday executive Chris Anderson with updates during complex eavesdropping operation on Simon Hughes MP”</i> - by Graham Johnson dated 28 July 2020	Sir Simon Hughes Disclosure 21 March 2025
26.	[SSH 326 and 374] Email correspondence between Greg Miskiw and Chris Anderson with the subject Simon Hughes dated 19 April 2006 to 2 May 2006	Sir Simon Hughes Disclosure 21 March 2025 and 8 August 2025
27.	[SSH 324] Unredacted Mulcaire Notes disclosed by the Claimants on 14 December 2022 in Response to the Defendant’s CPR 31.14 Request	Sir Simon Hughes Disclosure 21 March 2025
28.	[SSH 325] Record of payment to Greg Miskiw – Deleted “Expenses” type record from unallocated space (free space) dated 7 June 2006	Sir Simon Hughes Disclosure 21 March 2025
29.	Particulars of Claim dated 4 November 2022 (and amended 13 October 2025)	Pleadings
30.	Defence dated 26 April 2024 (and amended 16 July 2025)	Pleadings
31.	Defendant’s Response to Requests For Information dated 28 June 2024	Pleadings
32.	Reply dated 6 September 2024 (and amended 13 October 2025)	Pleadings
33.	Rejoinder dated 18 October 2025	Pleadings
34.	[ANL-0001426] Aide Memoire by Peter Wright dated 18 October 2011	Defendant’s Disclosure 13 June 2025
35.	[ANL-0000315] Atex entry - abook (extract) (Contact List of David Dillon) dated 19 August 2003	Defendant’s Disclosure 21 March 2025
36.	[SSH 269] An article in the Daily Mail entitled <i>“Worth a try? Job centre gets unemployed women playing rugby on intensive fitness course in bid to boost their confidence in search for work”</i> by Sean Poulter dated 12 November 2018	Defendant’s Disclosure 21 March 2025
37.	[ANL-0001000] – List of Payments to John Ross	Defendant’s Disclosure 21 March 2025
38.	[ANL-0000128] - Mail on Sunday article entitled <i>“Robbers target Queen’s cousin for second time”</i> dated 11 November 2011	Defendant’s Disclosure 21 March 2025
39.	[ANL-0000269] - Article entitled <i>“Knifewoman Terrorises Jemima Outside Home”</i> dated 16 February 2003	Defendant’s Disclosure 21 March 2025