

Claimant
Paul James Morris
First
30 November 2017

Claim no. HC-2016-002849

IN THE HIGH COURT OF JUSTICE

CHANCERY DIVISION

B E T W E E N:

SIR CLIFF RICHARD, OBE

Claimant

-and-

(1) THE BRITISH BROADCASTING CORPORATION

(2) THE CHIEF CONSTABLE OF SOUTH YORKSHIRE POLICE

Defendants

WITNESS STATEMENT OF PAUL JAMES MORRIS

I, **PAUL JAMES MORRIS**, of 51 Lincoln's Inn Fields, London WC2A 3LZ **WILL SAY** as follows:-

1. I am a solicitor and a partner in the firm of BCL Solicitors LLP, formerly known as BCL Burton Copeland ("BCL"). BCL is a specialist criminal law firm and I personally have specialised in criminal litigation work for over twenty years.
2. I make this statement from matters within my own knowledge or on the basis of information provided to me as indicated in this statement. In so far as the matters set out in this statement derive from my own knowledge, they are true. Where matters are not within my personal knowledge they are true to the best of my information and belief.

3. On the morning of 14 August 2014, at approximately 10.20am, I was in my office in Holborn when my colleague Omar Khan, received a telephone call from Gideon Benaim, a solicitor and partner of Simkins LLP. I knew Mr Benaim and had worked with him before. Mr Benaim explained to Mr Khan that he had just spoken to the Claimant's manager, Malcolm Smith, and had been informed by Mr Smith that the police were in attendance at the Claimant's property in Berkshire, and that they had a warrant to search the property. Mr Khan discussed the situation with Mr Benaim a little and, after he got off the phone, immediately informed me of what Mr Benaim had told him. Mr Khan and I agreed between us that the best thing for us to do, from the Claimant's point of view, would be for us to head to the Claimant's property straight away, to see what the police were investigating and obtain more information about why the police were at the Claimant's property, and so on, to assist the police and to ensure that the best possible advice could be given to the Claimant. At that stage we knew nothing about why the police were there or what suspected offences they were investigating.
4. Mr Khan and I immediately made preparations to leave for Sunningdale and left the office together at approximately 11am.
5. On our way there we tried to find out more. According to my own notes (in respect of which I have no authority to, and do not, waive legal professional privilege), I phoned Mr Benaim at 11.47am (whilst Mr Khan and I were still travelling), and told him that we still did not know why the police were at the Claimant's apartment and had been able to obtain no further information about what was going on.
6. We arrived at the public entrance to the property (on the perimeter of the Charters Estate) at approximately 12.15pm. For a short time we were denied access to the property by the security team as there was already a crowd beginning to gather there consisting it appeared largely of the media, and security was tight.
7. Once Mr Khan and I had been granted access, we were met at the gates by a security officer who escorted us to the apartment. We did not discuss anything with him. While we were

walking over to the apartment itself, I recall seeing a helicopter was circling above us, seemingly at a fairly low level.

8. Once Mr Khan and I had gained access to the apartment itself, we spoke to DI Mayfield of the South Yorkshire Police. She showed us the search warrant. Immediately after that I phoned Mr Benaim to tell him what we knew. From my notes, I can see that this call took place at 12.51pm and I was able to provide him with the following information at that time:

"We are getting information. 1 allegation. 1985. Said to have taken place in Sheffield. A boy, under 16 at the time. This was an Operation Yewtree investigated matter but as there is only one complaint, it has been passed by Yewtree to South Yorks Police. There was another potential matter but 'that has not been substantiated'. I will keep you updated. Police want to interview CR in due course."

9. I spoke to DI Mayfield at around 1pm and she clarified that in fact there was only one complaint against the Claimant and that South Yorkshire Police had received no other complaints.

Statement of Truth

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

Signed


Paul James Morris

Dated:

30 November 2017.

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PAUL JAMES MORRIS**

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