

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

Claim No.: KB-2025-001120

BETWEEN:

GOOD LAW PROJECT LIMITED

**Claimant/
Respondent**

-and-

REFORM UK PARTY LIMITED

**Defendant/
Applicant**

**SECOND WITNESS STATEMENT OF
JOLYON TOBY DENNIS MAUGHAM KC**

I, **JOLYON TOBY DENNIS MAUGHAM KC**, of Good Law Project Limited, 5th Floor, 167-169 Great Portland Street, London, W1W 5PF, **WILL SAY** as follows:

A. INTRODUCTION

1. I am a barrister and the Founder and Executive Director (and an employee) of Good Law Project Limited (“**Good Law Project**”), a non-profit company limited by guarantee (company registration number: 10556197), which is the Claimant in these proceedings. I am duly authorised to make this witness statement on its behalf in relation to the application issued by the Defendant on 30 June 2025 for strike-out under CPR r.3.4 and/or summary judgment under CPR r.24.2 (the “**Application**”).
2. The reply evidence served by the Defendant in respect of the Application, in the form of the First Witness Statement of Keeley Louise Parry dated 23 October 2025 (“**Parry 1**”), advances a number of assertions and inferences that are incorrect. I address the most material of those here to assist the Court. For convenience, unless otherwise defined, I adopt the defined terms used in Parry 1.

3. Except where otherwise stated, the facts and matters contained in this witness statement are based upon my own knowledge, and are true. Where facts and matters are not within my own knowledge, I identify the source of that information and confirm that those facts or matters are true to the best of my knowledge and belief.
4. This witness statement was prepared following discussions conducted in person and over email, with Good Law Project's solicitors, Pallas Partners LLP ("**Pallas**"). Nothing in this witness statement is intended to constitute a waiver of privilege by the Claimant in respect of any documents or communications.
5. There is now shown to me marked "**JTDM2**" a bundle of copy documents to which I refer in this statement by page numbers in square brackets. References in the form [**JTDM1/page**] are to documents exhibited to my first witness statement in these proceedings.

B. RESPONSES TO MATTERS REFERRED TO IN PARRY 1

Charity status of Good Law Project

6. Paragraph 3.10(3) of Parry 1 states that "*Good Law Project was registered as a charity*". This is incorrect. It appears to be a misreading of the cited article, Article 3A.5 of Good Law Project's 2019 Articles of Association [**JTDM1/80-104**], which contains a charity registration number in respect of The Public Law Project, not Good Law Project. Good Law Project has never been registered as a charity, nor has it ever sought such registration.

Good Law Practice Limited

7. In paragraph 3.11 of Parry 1, reference is made to Good Law Practice Limited ("**GLPL**"). GLPL's relevance to the Application is not understood, including because GLPL is no longer operative, as is set out in publicly available information available at the time of service of Parry 1:

7.1 On 6 September 2024, Good Law Project announced that GLPL would close [**JTDM2/15-17**].¹

7.2 GLPL's accounts for the year ended 31 January 2025, published on 22 July 2025, stated: "*[T]he company ceased trading during the financial year*" [**JTDM2/18-21**].²

¹ See 'Good Law Practice to Close', *Good Law Project* (Web Page, 6 September 2024) <<https://goodlawproject.org/good-law-practice-to-close>>.

² See, second note on page 1 [**JTDM2/19**].

8. Since Parry 1 was served, GLPL has applied to be struck off the Companies Register and dissolved [JTDM2/22]. The Registrar of Companies has given notice that, unless cause is shown, GLPL will be struck off the register and dissolved on a date not less than two months from 2 December 2025 [JTDM2/22].
9. Parry 1 states at paragraph 3.11: “*As can be seen from Article 14 of [GLPL’s] Articles of Association, Mr Maugham is entitled to such remuneration as he determines.*” I have never received any remuneration from GLPL.

The Political Parties Campaign

10. Parry 1 proceeds on the assumption that messages sent as part of the Political Parties Campaign were sent to different political parties on a random basis (paragraphs 5.3, 5.4.1, 6.3) and/or that the Political Parties Campaign “*targeted the Defendant*” (paragraph 6.5). This is incorrect. Paragraphs 19-26 of the First Witness Statement of Duncan McCann dated 10 October 2025 (“**McCann 1**”) explain the basis of the Political Parties Campaign.
11. The Political Parties Campaign was publicised by Good Law Project to its supporter base through standard communications channels (email and various social media platforms, including Facebook, X (formerly Twitter), LinkedIn, and Instagram) in the lead-up to the 2024 general election. For illustrative purposes, I exhibit a copies of: (a) an example of one of the email communications which was made to Good Law Project’s supporter base [JTDM2/10-11]; and (b) posts from Facebook [JTDM2/13], X (formerly, Twitter) [JTDM2/14], LinkedIn [JTDM2/9] and Instagram [JTDM2/12], which demonstrate that users were presented with the choice of which political party or parties to contact.
12. Via those channels, Good Law Project provided access to a free tool created by it through which participants could, entirely voluntarily and in exercise of their legal rights, contact any one or more of the five major political parties in the UK³ to request that such party or parties (a) disclose what of the participant’s personal data it had collected; and (b) cease processing such personal data, particularly in connection with election marketing.
13. I exhibit here copies of the archived version of the Political Parties Campaign website [JTDM2/3-8]. As can be seen from the landing page of the website, individuals were at liberty to choose any of the five major political parties [JTDM2/3]. Upon click-through of the links to the any of the five political parties, individuals were taken to a page which allowed them to

³ Polling above ten per cent at the end of May 2024 or with ten or more seats [JTDM2/3].

complete a Data Subject Access Request directed to the political party they selected. This page for each political party was identical, save for the name of the political party [JTDM2/4-8]. After submitting a request to one political party, a participant could (if they wished) return to the landing page and click through to the page for another political party in order to submit a request to that party. As explained at paragraph 23 of McCann 1, the majority of individuals chose to contact the Conservative Party. Approximately 10% of participants chose to contact the Defendant.

My remuneration

14. Paragraph 6.4.4 of Parry 1 discusses my remuneration. I here clarify the position:

14.1 As I stated, I pledged that my salary would never exceed the amount received by a backbench member of parliament. That has remained the case since I founded Good Law Project. The current annual salary of a backbench MP is £93,904.

14.2 My salary is adjusted by Good Law Project's Finance Director, Siham Bortcosh, around the time when MPs' salaries are adjusted, which typically occurs annually. Siham is a qualified accountant and experienced finance director, and has been involved with Good Law Project since 2019.


14.3 The last date my salary was adjusted was 1 April 2025.

14.4 Aside from my salary, I receive a standard employee benefits package, no different from any other employee of Good Law Project.

14.5 I have never received any other direct or indirect benefits from Good Law Project (including, as referred to in Parry 1, interest on loans or rent for premises). As noted in my previous witness statement, Good Law Project's constitution prohibits me from taking any dividends or other distributions from it.

Statement of Truth

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.

Signed: 

Name: Jolyon Toby Dennis Maugham KC

Position: Executive Director

Date: 16 December 2025