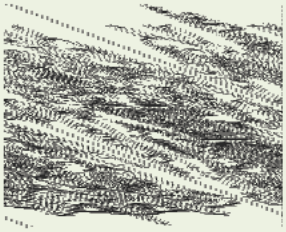

Claim Form (CPR Part 8)

In the High Court of Justice, King's Bench Division	
Claim no.	
Fee Account no.	PBA0087115
Help with Fees - Ref no. (if applicable)	H W F – –

Amended Claim Form pursuant to the Order of Tipples J dated 24 January 2025

Claimant

TELEDYNE UK LIMITED (Company number 00432014)
106 Waterhouse Lane
Chelmsford
Essex
CM1 2QU

HIGH COURT OF JUSTICE
13 Dec 2024
QUEEN'S BENCH DIVISION

KB-2024-004175

Defendant(s)

See Schedule 1

Does your claim include any issues under the Human Rights Act 1998? ☐ Yes ☑ No

Details of claim (see also overleaf)

See attached 'Details of Claim'.

Defendant's name and address

See Schedule 1

	£
Court fee	626
Legal representative's costs	TBC
Issue date	

For further details of the courts www.gov.uk/find-court-tribunal.
When corresponding with the Court, please address forms or letters to the Manager and always quote the claim number.

Claim no.	

Details of claim (continued)

Keystone Law
48 Chancery Lane, Holborn
WC2A 1JF

DX: 193 Chancery Lane

manan.singh@keystonelaw.co.uk
info.teledyne@keystonelaw.co.uk

Claimant's or claimant's legal representative's address to which documents should be sent if different from overleaf. If you are prepared to accept service by DX, fax or e-mail, please add details.

Statement of Truth

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.

☐ **I believe** that the facts stated in these particulars of claim are true.

☑ **The Claimant believes** that the facts stated in these particulars of claim are true. **I am authorised** by the claimant to sign this statement.

Signature

M Singh

☐ Claimant

☐ Litigation friend (where claimant is a child or a Protected Party)

☑ Claimant's legal representative (as defined by CPR 2.3(1))

Date

Day	Month	Year
13	12	2024

Re-dated on 27 January 2025

Full name

MANAN SINGH

Name of claimant's legal representative's firm

KEYSTONE LAW

If signing on behalf of firm or company give position or office held

PARTNER

Find out how HM Courts and Tribunals Service uses personal information you give them when you fill in a form: https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter

SCHEDULE 1 – DEFENDANTS

1. JULIAN ALLEN GAO of [redacted]
2. RUBY HAMILL of [redacted]
3. DANIEL JONES of [redacted]
4. NAJAM SHAH of [redacted]
5. RICKY SOUTHALL of [redacted]
6. AMAREEN AFZAL of [redacted]
7. SERENA FENTON of [redacted]
8. PERSONS UNKNOWN WHO ARE WITHOUT THE CONSENT OF THE CLAIMANT ENTERING OR REMAINING ON LAND AND IN OR ON BUILDINGS ON ANY OF THE SITES LISTED IN SCHEDULE 2 TO THE CLAIM FORM, THOSE BEING:

    A. THE **'SHIPLEY SITE'** (TELEDYNE UK LIMITED, AIREDALE HOUSE, ACORN PARK, SHIPLEY BD17 7SW);

    B. THE **'LINCOLN SITE'** (TELEDYNE UK LIMITED, 168 SADLER ROAD, LINCOLN LN6 3RS);

    C. THE **'WIRRAL SITE'** (TELEDYNE UK LIMITED, UNIT A, 6 TEBAY ROAD, BROMBOROUGH, BIRKENHEAD, WIRRAL CH62 3PA);

    D. THE **'CHELMSFORD SITE'** (TELEDYNE UK LIMITED, 106 WATERHOUSE LANE, CHELMSFORD CM1 2QU);

    E. THE **'PRESTEIGNE SITE'** (TELEDYNE UK LIMITED, BROADAXE BUSINESS PARK, PRESTEIGNE LD8 2UH); AND

    F. THE **'NEWBURY SITE'** (TELEDYNE UK LIMITED, REYNOLDS NAVIGATION HOUSE, CANAL VIEW ROAD, NEWBURY RG14 5UR).

9. PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE OBSTRUCTING ANY VEHICLE ACCESSING THE **'SHIPLEY SITE'** (TELEDYNE UK LIMITED, AIREDALE HOUSE, ACORN PARK, SHIPLEY BD17 7SW) FROM THE HIGHWAY

10. PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE OBSTRUCTING ANY VEHICLE ACCESSING THE HIGHWAY FROM THE **'SHIPLEY SITE'** (TELEDYNE UK LIMITED, AIREDALE HOUSE, ACORN PARK, SHIPLEY BD17 7SW)

11. PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT SCHEDULE 3 TO THE CLAIM FORM

12. CHERYL LEANAGHAN of [redacted]

13. MAIS ROBINSON of [redacted]

14. AUTUMN TAYLOR-WARD of [redacted]

15. ANABELLA BARRINGER of [redacted]

16. LARA DOWNES of [redacted]

17. GABRIELLE MIDDLETON of [redacted]

18. LUKE CARTER of [redacted]

SCHEDULE 2 – THE SITES

1. The **'Shipley Site'** (Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW);

2. The **'Lincoln Site'** (Teledyne UK Limited, 168 Sadler Road, Lincoln LN6 3RS);

3. The **'Wirral Site'** (Teledyne UK Limited, Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA);

4. The **'Chelmsford Site'** (Teledyne UK Limited, 106 Waterhouse Lane, Chelmsford CM1 2QU);

5. The **'Presteigne Site'** (Teledyne UK Limited, Broadaxe Business Park, Presteigne LD8 2UH); and

6. The **'Newbury Site'** (Teledyne UK Limited, Reynolds Navigation House, Canal View Road, Newbury RG14 5UR).

SCHEDULE 3 – THE ROADS

1. Acorn Park, Shipley.

DETAILS OF CLAIM

1. The Claimant, Teledyne UK Limited is a company incorporated in England and Wales on 28 March 1947 under company number 00432014. Its registered address is at 106 Waterhouse Lane, Chelmsford, Essex CM21 2QU.

2. The Claimant is a global leader in specialised components and subsystems for innovative solutions in medical, science, aerospace, defence and industrial applications. Specifically, the Claimant is known for its innovation in semi-conductors, high power RF, imaging and precision timing and engineered systems.

3. The Claimant holds the freehold title to:

    a. The **'Shipley Site'** (Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW), which is registered at HM Land Registry under Title Number WYK387275;

    b. The **'Chelmsford Site'** (Teledyne UK Limited, 106 Waterhouse Lane, Chelmsford CM1 2QU), which is registered at HM Land Registry under Title Number EX688035; and

    c. The **'Lincoln Site'** (Teledyne UK Limited, 168 Sadler Road, Lincoln LN6 3RS), which is registered at HM Land Registry under Title Number LL317736.

4. The Claimant also holds the leasehold title to:

    a. The **'Wirral Site'** (Teledyne UK Limited, Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA), which is registered at HM Land Registry under Title Number MS575234;

    b. The **'Presteigne Site'** (Teledyne UK Limited, Broadaxe Business Park, Presteigne LD8 2UH). Unit 1 of the site is registered at HM Land Registry under Title Number CYM839162. Units 5 and 6 are held by the Claimant pursuant to a lease dated 9

October 2024 for a term of 5 years, which is not registrable at HM Land Registry; and

c. The **'Newbury Site'** (Teledyne UK Limited, Reynolds Navigation House, Canal View Road, Newbury RG14 5UR), which is registered at HM Land Registry under Title Number BK365055.

5. The six sites shall be referred to collectively as the 'Claimant's Sites'. The Shipley, Lincoln and Chelmsford Sites hold Facility Security Clearance (formerly known as 'List X' status), which is requirement of being a UK Government defence supplier. Facility Security Clearance is required as the Claimant holds contracts with the UK Ministry of Defence which requires it to safeguard assets classified SECRET or above on it premises.

6. The Defendants are:

a. Named Defendants, as listed at Schedule 1 to this Claim Form. Each of the Named Defendants has been identified as having attended one of the Claimant's Sites and engaged in alleged acts of unlawful protest (specifically trespass, with aggravating features). Each of the Named Defendants has been arrested in connection with those acts of protest; and

b. Various defined categories of Persons Unknown (defined to capture the relevant causes of action and conduct that the Claimant seeks to prohibit).

7. Specifically, as to the Named Defendants:

a. Julian Allen Gao, Ruby Hamill, Daniel Jones and Najam Shah were all arrested at the Shipley Site on 2 April 2024;

b. Ricky Southall, Amareen Afzal and Serena Fenton were all arrested at the Shipley Site on 15 May 2024;

c. Cheryl Leanaghan, Mais Robinson, Autumn Taylor-Ward, Anabella Barringer, Lara Downes and Gabrielle Middleton were all arrested at the Wirral Site on either 5 July 2024 or 2 October 2024;

d. Luke Carter was arrested at the Shipley Site on 19 December 2024.

8. The circumstances of the arrests are further explained in the witness statement of Nicholas James Wargent, which accompanies this Claim Form.

9. The Claimant seeks injunctive relief to restrain:

a. Trespass on the Claimant's Sites;

b. Interference with the Claimant's common law right (and the right of its assigns and licensees) to access the highway from its Sites (in relation to the Shipley Site only); and

c. Public nuisance caused by obstruction of the highway (in relation to the Shipley Site only).

10. The Claimant seeks injunctive relief by reason of it being reasonably apprehended that the Defendants will engage imminently in further unlawful acts of protest at the Claimant's Sites, which will cause further significant loss and harm to the Claimant.

11. The Claimant's reasonable apprehension arises from:

a. By reason of its business, the Claimant, and the Claimant's Sites, are the likely target of protest (including unlawful direct-action protest) by those who associate with groups such as (but not limited to) 'Palestine Action' and 'Bradford Friends of Palestine';

b. The Claimant having already experienced unlawful acts of protest at its sites during 2022 and 2023, and with a notable increase in frequency throughout 2024. Typically, those protests have been carried out by persons who associate with

groups such as (but not limited to) ‘Palestine Action’ and ‘Bradford Friends of Palestine’, and have included acts of aggravated trespass (at the Shipley, Wirral, Presteigne and Chelmsford Sites) and the obstruction of access at the Shipley Site;

c. The continued deterioration of the situation in the Middle East (that being the motivating cause behind the protests);

d. The continued and active recruitment of potential activists by the group known as ‘Palestine Action’, alongside the programme of direct-action training being offered by that group at this time, and the content of the group’s so-called ‘Underground Manual’ (which instructs and advises activists how to undertake direct action, and encourages unlawful acts such as trespass, aggravated trespass and criminal damage);

e. The imminent Christmas holiday period, in which it is expected that people (including those who may be inclined to attend the Claimant’s Sites and engage in acts of unlawful direct-action protest) will have more disposable time, during which they may attend the Claimant’s Sites and engage in acts of unlawful direct-action protest.

12. The details of the loss and harm suffered by the Claimant by reason of the alleged acts of unlawful protest that have already occurred at its sites are set out in the witness statement of Nicholas James Wargent, which accompanies this Claim Form. In summary, that loss and harm includes (but is not limited to) significant property damage caused by acts of aggravated trespass, and the costs incurred in the repair and remedying of that damage. Further, losses to the Claimant include increased security costs to guard against and mitigate the harm caused by acts of unlawful protest, as well as a loss of productivity at sites where production is interfered with, whether by reason of the property damage suffered or by reason of access to the site being obstructed, and employees and visitors to the site being unable to access the site during the working day.

13. For the foregoing reasons, the Claimant reasonably apprehends further acts of unlawful protest at its sites, which will cause further significant loss and harm in the same nature of that already suffered, and seeks injunctive relief accordingly.

14. It is necessary to bring this Claim against newcomer Persons Unknown as well as named Defendants as it has not yet been possible to name all those persons who may attend the Claimant's Sites and engage in unlawful ats of protest. In particular, by reason of the continued recruitment of activists and the encouragement of unlawful acts of protest by groups such as Palestine Action, it is impossible for the Claimant to know who may attend the Claimant's Sites in the future and commit those acts.

AND the Claimant Claims:

(1) The injunctive relief set out in the draft injunction order;

(2) The alternative service orders set out in the draft injunction order;

(3) Further or other relief as the court thinks fit; and

(4) Costs.