

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

CLAIM NO. KB-2024-004175

BETWEEN:

TELEDYNE UK LIMITED

Claimant

-and-

(1) JULIAN ALLEN GAO

(2) RUBY HAMILL

(3) DANIEL JONES

(4) NAJAM SHAH

(5) RICKY SOUTHALL

(6) AMAREEN AFZAL

(7) SERENA FENTON

(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**

**Defendants**

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**SECOND WITNESS STATEMENT OF  
NICHOLAS JAMES WARGENT**

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I, **NICHOLAS JAMES WARGENT**, of 106 Waterhouse Lane, Chelmsford, Essex, CM1 2QU, state as follows:

1. I am a director of the Claimant, Teledyne UK Limited ('**Teledyne UK**'). Teledyne UK is a wholly owned subsidiary of Teledyne Technologies Incorporated, a New York Stock Exchange listed company (together the '**Teledyne Technologies Group**'). The Teledyne Technologies Group's operations are primarily located in the United States, the United Kingdom, Canada, and Western and Northern Europe.
2. I am also an in-house solicitor and General Counsel for the Europe, Middle East and Africa, and Asia-Pacific regions for the Teledyne Technologies Group, and I am duly authorised to make this witness statement on behalf of Teledyne UK.
3. I make this witness statement to update the Court as to an incident that occurred at the Shipley Site (as defined in the Claim) on 19 December 2024.

4. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief. This witness statement has been made following exchanges of emails with Teledyne UK's legal advisers.
5. There is now produced and shown to me a paginated bundle of true copy documents marked **NJW-2**. All references to documents in this statement are to Exhibit **NJW-2**. References are in the format **NJW-2/page number**.

**19 December 2024**

6. As the Court will be aware, on 19 December 2024 at 2pm, the Application for interim relief was due to be heard; however, upon attending the hearing, the Claimant was informed by the Judge listed to hear the matter that he was required to recuse himself. I am informed by Teledyne UK's legal advisers that counsel informed the Judge that a protest was currently taking place at the Shipley Site, but that the protest was peaceful (which it at that time was). Unfortunately, matters then changed and the protest became aggravated.
7. The account of the protest that I shall give below has been passed to me by the Site Manager at the Shipley Site; I shall refer to them as the 'Site Manager' hereafter. The Site Manager was present at the Shipley Site during the described incident. They have not provided this statement themselves because, as the Court will by now be aware, some of the protests experienced by Teledyne UK are aggravated, and Teledyne UK is anxious that its staff should not be unnecessarily exposed to risk of repercussions if their names become known in the public domain.
8. I should add in the interest of full and frank disclosure that some protestors are aware of the identity of the Site Manager at the Shipley Site, as they have given evidence in criminal proceedings in relation to incidents that have occurred at the Shipley Site.

### **The protest**



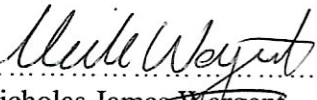
9. The group known as Bradford Friends of Palestine published a post on Instagram on or around 10 December 2024, asking supporters to assemble at 12 noon on the corner of Acorn Park and Otley Road (that being the main A-Road – the A6038 – from which Acorn Park is accessed). Regrettably, this information had not been passed to me until Tuesday 17<sup>th</sup> December 2024; therefore, I personally was unaware of this planned protest, and it did not feature in my first witness statement dated 13 December 2024. I now understand from the Site Manager that they saw the post on 10 December 2024. I exhibit at **NJW-2/1** a screen shot of the Instagram post, which has been re-posted since 10 December 2024.
10. I am informed by the Site Manager that they were unsure what form the protest would take; however, as is clear from my first witness statement, recent protests have taken the form of blockades of the Shipley Site (and are apparently now also supported by a group known as the Yorkshire Palestine Collective).
11. As Teledyne UK could not be sure what form the protest would take and given that previous protests have involved a blockade, it was arranged that police officers from West Yorkshire Police would attend the Shipley Site on the morning of 19 December 2024. Whilst the protest was seemingly planned for 12 noon, on a previous occasion (that being 30 October 2024, which I cover in my first witness statement), a protest had been advertised for 12 noon, but the protestors arrived early and blockaded the Shipley Site from 06.30am for five hours. Therefore, an early police presence was arranged. In the event, no early blockade protest occurred on 19 December 2024.
12. I am informed by the Site Manager that approximately eight to twelve protestors assembled either side of the junction of the Otley Road and Acorn Park. The protestors conducted themselves in a lawful manner: they stood on the kerb whilst holding posters and waving Palestinian flags. Police officers were in attendance. The protest then dispersed at around 1:40pm, upon which the police officers also departed. Teledyne UK takes no issue with this lawful protest; the right to protest in this way should be protected, and should not (and will not) fall within the scope of the injunction order that is being sought.

13. I am informed by the Site Manager that at approximately 2pm, a lone male drove his car on to the Shipley Site – he parked his car on the area between the gate to the Site and the highway (he did not drive through the gate, which was closed, but was parked on land that is within Teledyne UK's freehold title). His car had 'FREE GAZA' painted on the side in red paint. I exhibit at **NJW-2/2** a photograph of the parked car.
14. I am further informed by the Site Manager that the lone male unfurled a Palestinian flag, and began shouting pro-Palestinian slogans and abusing Teledyne UK staff with insults such as "murderous bastards". The male then proceeded to play loud Arabic-style music, and he used a steel chain to lock himself to the steering wheel of his vehicle. Officers from the West Yorkshire Police re-attended the site with an 8 minute response time.
15. The male had not hidden the key to the lock on the chain, such that police officers were able to release him from the chain with relative ease. The male was arrested (the Site Manager understands that this was for locking-on offences, breaches of the National Security Act 2023 – the Shipley sites has Facility Security Clearance status, attempted criminal damage and resisting arrest).
16. The vehicle was then removed from the front of the gate by police officers and searched. I am informed by the Site Manager that two zombie style knives were recovered from the car, along with a brand-new sledgehammer. An overnight bag was also recovered from the front passenger seat, which contained personal belongings and cans of red paint.
17. I am informed by the Site Manager that they gave a witness statement to the police, as well as CCTV footage from the Shipley Site.
18. The identity of the male is not yet known. His identity will however be included within the scope of the CPR 31.17 third-party disclosure order sought by Teledyne UK (which I respectfully ask the Court to make on 20 December 2024, to facilitate the addition of this person as a Named Defendant to these injunction proceedings).

19. Throughout the course of the incident involving the lone male and his car, the Shipley Site was locked-down. Fortunately, the quick response of the West Yorkshire Police meant that staff at the Shipley site were only delayed in leaving the site by approximately 40 minutes at the end of the working day.

**Statement of Truth**

I believe that the facts set out 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.

  
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Nicholas James Wargent  
Dated this 19<sup>th</sup> day of December 2024