

**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

- (12) **The Chief Constable of Merseyside Police**

Respondent

SECOND WITNESS STATEMENT OF MANAN SINGH

I, **Manan Singh**, of Keystone Law, 48 Chancery Lane, London WC2A 1JF will say as follows—

- 1. I am a Partner at Keystone Law. Keystone Law represents the Claimant in these proceedings, Teledyne UK Limited (company no. 00432014). I am authorised to make this statement on behalf of the Claimant.
- 2. I make this witness statement in support of the Claimant’s application for third party disclosure under CPR 31.17 against the Chief Constable of Merseyside Police.
- 3. The facts and matters set out by me in this witness statement are either known by me directly and are true, or are known by me indirectly and are believed to the best of my knowledge to be true. In relation to matters falling into the latter category, I have set out the source of my knowledge and belief. This statement was prepared through video calls,

telephone calls and email correspondence with officers and employees of the Claimant, and the Claimant's external legal representatives.

4. I exhibit to this witness statement a bundle of documents marked **MS2**. All references to that exhibit are in the format **MS2/page number**.
5. The evidence in support of the Claimant's application seeking disclosure of documents identified in the accompanying draft Order is set out within the application notice dated 20 December 2024.
6. The Claimant invited the Respondent's agreement to the terms of the draft Order, which the Respondent has agreed to as per the email exhibited at **MS2/1**. The draft Order has thus been jointly produced with the Respondent.
7. As the email from the Respondent also makes clear, the Respondent adopts a neutral position in relation to the Claimant's application.

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.

M Singh

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Manan Singh

Dated this 20th day of December 2024