KING'S BENCH DIVISION

**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

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28 29 <b>G</b>	20 December 2024 and 23 December 2024  Certificate of Service - Wirral, Shipley, Lincoln and Presteigne  Certificate of Service - Chelmsford and Newbury  Certificates of Service re service of Orders by email to Defendants 8-11 on 20 December 2024  Certificate of Service - info@palestineaction.org  Certificate of Service - Service -	13 January 2025  13 January 2025  Date  13 January 2025  13 January	611 - 618 619 - 623 Pages

34	Certificate of Service - info@palestinecampaign.org	13 2025	January	636 - 638
35	Certificate of Service - palestinesolidaritybradford@gmail.com	13 2025	January	639 - 641
36	Certificate of Service - pscchelmsford@gmail.com	13 2025	January	642 - 644
37	Certificate of Service - lincolnpalestine@gmail.com	13 2025	January	645 - 647
38	Certificate of Service - liverpoolfopal@gmail.com	13 2025	January	648 - 650
39	Certificate of Service - pscshrop@gmail.com	13 2025	January	651 - 653
40	Certificate of Service - bfdfriendsofpalestine@yahoo.com	13 2025	January	654 - 656
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41	Certificate of Service - media@palestinecampaign.org	13 2025	January	657 - 659
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### In the matter of an injunction sought pursuant to CPR 25

Before the Honourable Mr Justice Bourne 20 December 2024

BETWEEN:

#### TELEDYNE UK LIMITED



-and-

- (1) JULIAN ALLEN GAO
  - (2) RUBY HAMILL
  - (3) DANIEL JONES
  - (4) NAJAM SHAH
- (5) RICKY SOUTHALL
- (6) AMAREEN AFZAL
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- (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).
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	<b>Defendants</b>
INJUNCTION ORDER	

#### **PENAL NOTICE**

IF YOU, THE ABOVE NAMED DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

**UPON** the Claimant's claim brought by way of a Part 8 Claim Form dated 13 December 2024 (the 'Claim')

**AND UPON** the Claimant making an application for interim injunctive relief by way of an Application Notice dated 13 December 2024 (the 'Application')

**AND UPON** the Court reading the Application and the witness statements listed in Schedule 2 to this Order

**AND UPON** the Court being satisfied pursuant to s12(2)(b) of the Human Rights Act 1998 that the Claimants had compelling reasons why the Named Defendants should not be notified of the Application prior to the Court hearing the Application (but with short notice of this hearing having in any event been given to the Defendants by way of email to the email address listed at paragraph 3(ii) of this Order)

**AND UPON** the Court having particular regard to the importance of the Defendants' Article 10 and Article 11 Convention rights to freedom of expression and freedom of lawful assembly

AND UPON the Court being satisfied that the Order does not prohibit peaceful protest

**AND UPON** the Court considering its discretion to grant injunctive relief pursuant to s37(1) of the Senior Courts Act 1981 and considering it just and convenient to do so

AND UPON the Court accepting the undertakings given in Schedule 3 to this Order

**AND UPON** hearing Natalie Pratt of counsel for the Claimant, without attendance by the Defendants

#### IT IS ORDERED THAT:

#### **Definitions**

- 1. For the purpose of this Order:
  - i. The 'Shipley Site' shall mean Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW, as marked in red on the plans at Annexe 1 to this Order;
  - ii. The **'Lincoln Site'** shall mean Teledyne UK Limited, 168 Sadler Road, Lincoln LN6 3RS, as marked in red on the plan at Annexe 2 to this Order;
  - iii. **'Wirral Site'** shall mean Teledyne UK Limited, Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA, as marked in red on the plan at Annexe 3 to this Order;
  - iv. The **'Chelmsford Site'** shall mean Teledyne UK Limited, 106 Waterhouse Lane, Chelmsford CM1 2QU, as marked in red on the plan at Annexe 4 to this Order;
  - v. The **'Presteigne Site'** shall mean Teledyne UK Limited, Broadaxe Business Park, Presteigne LD8 2UH, as marked in red on the plans at Annexe 5 to this Order;
  - vi. The 'Newbury Site' shall mean Teledyne UK Limited, Reynolds Navigation House, Canal View Road, Newbury RG14 5UR, as marked on red on the plan at Annexe 6 to the Claim Form.

#### **INJUNCTION**

2. Until and subject to any further order of the Court, the Defendants and each of them (whether by themselves or by instructing, encouraging, or allowing any other person) are <u>forbidden</u> from:

- i. Entering or remaining on the following sites and/or entering or remaining in or on buildings on the following sites:
  - a) the Shipley Site, as marked in red on the plans at Annexe 1 to this Order;
  - b) the Lincoln Site, as marked in red on the plan at Annexe 2 to this Order;
  - c) the Wirral Site, as marked in red on the plan at Annexe 3 to this Order;
  - d) the Chelmsford Site, as marked in red on the plan at Annexe 4 to this Order;
  - e) the Presteigne Site, as marked in red on the plans at Annexe 5 to this Order; and
  - f) the Newbury Site, as marked in red on the plan at Annexe 6 to this Order.
- ii. Depositing any item or substance on the following sites, affixing themselves or any other item to any building, structure or fixture on the following sites, and/or defacing or damaging any building, structure or fixture on the following sites:
  - a) the Shipley Site, as marked in red on the plans at Annexe 1 to this Order;
  - b) the Lincoln Site, as marked in red on the plan at Annexe 2 to this Order;
  - c) the Wirral Site, as marked in red on the plan at Annexe 3 to this Order;
  - d) the Chelmsford Site, as marked in red on the plan at Annexe 4 to this Order;
  - e) the Presteigne Site, as marked in red on the plans at Annexe 5 to this Order; and
  - f) the Newbury Site, as marked in red on the plan at Annexe 6 to this Order.
- iii. Blocking, slowing down, obstructing or otherwise interfering with vehicular access to or from the highway at the Shipley Site (as marked in red on the plans at Annexe1 to this Order);
- iv. Approaching, slowing down or obstructing any vehicle moving along or accessing the road known as Acorn Park, Shipley (as marked in purple on the plans at Annexe 1 to this Order) for the purpose of:
  - a) disrupting vehicular access to or from the Shipley Site (as marked in red on the plans at Annexe 1 to this Order); and
  - b) protesting.

- v. Affixing themselves or any other item to, or leaving or depositing any item on, the road known as Acorn Park, Shipley (as marked in purple on the plans at Annexe 1 to this Order) for the purpose of:
  - a) disrupting vehicular access to or from the Shipley Site (as marked in red in the plans at Annexe 1 to this Order); and
  - b) protesting.
- vi. Affixing themselves or any other items to any vehicle on, entering or exiting the Shipley Site (as marked in red on the plans at Annexe 1 to this Order), where that affixation is done for the purpose of protesting.

#### Service and notification

- 3. Pursuant to CPR rules 6.15 and 6.27, the Claimant has permission to serve the First to Seventh Defendants with, and permission to notify the Eighth to Eleventh Defendants (Persons Unknown) of, the Claim Form, Application for interim relief, evidence in support of the Claim and Application, this Order and any further documents in the Claim by (with 3(i) 3(iv) to be treated conjunctively):
  - i. **Website:** placing a copy of the documents to be served on a website or webpage operated by the Claimant, a link to which shall be placed on the Claimant's main website; and
  - ii. **Email:** sending a copy of the documents to be served to Palestine Action, Bradford Friends of Palestine and the Palestine Solidarity Campaign (including the relevant local branches) at the following email addresses

info@palestineaction.org; media@palestinecampaign.org; info@palestinecampaign.org; pscchelmsford@gmail.com; liverpoolfopal@gmail.com; bfdfriendsofpalestine@yahoo.com; actions@palestineaction.org; branches@palestinecampaign.org; palestinesolidaritybradford@gmail.com; lincolnpalestine@gmail.com; pscshrop@gmail.com;

and providing a link by which the webpage or website mentioned in paragraph 3(i) above can be accessed.

- iii. **Post:** where an address of a Named Defendant is known to the Claimant, by posting a copy of the documents to be served together with a covering letter by way of first-class post;
- iv. **Signs:** placing signs on the perimeter of the Shipley Site, Lincoln Site, Wirral Site, Chelmsford Site, Presteigne Site and Newbury Site, which advise that a High Court injunction is in force that restricts some protest activities, and which provide a weblink and QR code by which the website or webpage mentioned in paragraph 3(i) above can be accessed;

- v. **Where requested by a Defendant:** the documents to be served may be served by email where the Defendant has requested that they be served by email, by sending the email to the address provided by the Defendant; or
- vi. **Lawyers:** by serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.
- 4. The deemed date of service of any documents referred to in paragraph 3 above shall be the day on which service of the document or documents is completed in accordance with paragraph 3 above.
- 5. The Defendants shall acknowledge service of the Claim Form 56 days after the deemed date of service and file any written evidence in defence by the same date.

## Liberty to apply

- 6. The Defendants or any other person affected by this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person, but they must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of that application, that evidence must be served on the Claimant's solicitors 48 hours in advance of the hearing.
- 7. Any person applying to vary or discharge this Order must provide their full name and address for service.

#### Return date hearing

- 8. The continuation of this Order shall be considered at a hearing before a Judge of the King's Bench Division on 24 January 2025, with a time estimate of 1 day, to include 1.5 hours judicial pre-reading.
- 9. Any evidence in support of or opposition to the continuation of this Order shall be filed by 4pm on 17 January 2025.
- 10. The Claimant shall file, and serve in accordance with paragraph 3 above, a hearing bundle for use at the return date hearing by 4pm on 20 January 2025.
- 11. The Claimant shall file, and serve in accordance with paragraph 3 above, its skeleton argument by 4pm on 21 January 2025. Any other person who wishes to be heard at the return date hearing should also file and serve on the Claimant a skeleton argument by 4pm on 21 January 2025.

#### Communications with the Claimant and the Court

- 12. All communications with the Claimant about this Order should be sent by email to the Claimant's solicitors, Keystone Law, at <a href="mailto:info.teledyne@keystonelaw.co.uk">info.teledyne@keystonelaw.co.uk</a>.
- 13. All communications with the Court about this Order should be sent to KBJudgesListing@justice.gov.uk or Room E03 Royal Courts of Justice, Strand, London

WC2A 2LL. The Telephone number is  $020\ 3938957$ . The offices are open between 10am and 4pm Monday to Friday.

## Costs

14. Costs reserved

Pursuant to CPR 40.7(1) this Order has effect from the date it is made, that being **20 December 2024.** 

#### **GUIDANCE NOTES**

#### Effect of this Order – the Defendants

1. A Defendant who is an individual and who is ordered not to do something must not do it him or herself or in any other way nor must he/she do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

### **Interpretation of this Order**

- 2. In this Order, references to 'the Defendant' means any or all of them (unless expressly stated otherwise).
- 3. A requirement to serve on a 'Defendant' means on each of them. However, the Order is effective against any Defendant on whom it is served in accordance with this Order.
- 4. An Order requiring 'the Defendant' not to do anything applies to all Defendants.
- 5. This Order contains the following schedules and annexes
  - i. Schedule 1 Named Defendants;
  - ii. Schedule 2 witness statements;
  - iii. Schedule 3 undertakings;
  - iv. Annexe 1 plans of the Shipley Site;
  - v. Annexe 2 plan of the Lincoln Site;
  - vi. Annexe 3 plan of the Wirral Site;
  - vii. Annexe 4 plan of the Chelmsford Site;
  - viii. Annexe 5 plans of the Presteigne Site;
    - ix. Annexe 6 plan of the Newbury Site.

### <u>SCHEDULE 1 – NAMED DEFENDANTS</u>

- (1) JULIAN ALLEN GAO
- (2) RUBY HAMILL
- (3) DANIEL JONES
- (4) NAJAM SHAH
- (5) RICKY SOUTHALL
- (6) AMAREEN AFZAL
- (7) SERENA FENTON

## SCHEDULE 2 – WITNESS STATEMENTS

The Court read the following witness statements on behalf of the Claimants:

- 1. The first witness statement of Nicholas James Wargent dated 13 December 2024;
- 2. The first witness statement of Manan Singh dated 13 December 2024;
- 3. The second witness statement of Nicholas James Wargent dated 19 December 2024.

## **SCHEDULE 3 – UNDERTAKINGS**

1. If the Court later finds that this Order has caused loss to the Defendants, and decides that the Defendants should be compensated for that loss, the Claimant gives an undertaking in damages limited to £50,000.

# ANNEXE 1 – SHIPLEY SITE



Promap

U Crown Copyright and database rights 2024. OS AC0000813445

Florted Scale - 1:4000, Paper Size - A4

Title Number: WYK387275



Promap
© Crown Copyright and database rights 2024. OS AC00000123445
(consider accommon Protect Scale + 1:1250. Paper Size – A4

Title Number: WYK367275

# ANNEXE 2 – LINCOLN SITE



Promap

O Crown Copyright and detabase rights 2024. OS AC0000813445
Piotted Scale - 1:1250. Paper Size - A4

Title Number: LL317736

# ANNEXE 3 – WIRRAL SITE



Promap

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Plotted Scale - 1:1250. Paper Size - A4

Title Number: MS575234

# ANNEXE 4 – CHELMSFORD SITE



Promop

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Plotted Scale - 1:4000. Paper Size - A4

Title Number: EX688035

## ANNEXE 5 – PRESTEIGNE SITE



Promop

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Plotted Scale - 1:1000, Paper Size – A4

Title Number: CYM839162



Promop

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Plotted Scale - 1:750. Paper Size - A4

Title Number: WA552132

## ANNEXE 6 – NEWBURY SITE



Promap

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Piotted Scale - 1:750. Paper Size - A4

Title Number: BK365055

N244

# **Application notice**

For help in completing this form please read the notes for guidance form N244 Notes.

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

Name of court  HIGH COURT OF JUSTICE, KING'S BENCH DIVISION	Claim no. KB-2024-004175
Fee account no. (if applicable)	Help with Fees - Ref. no. (if applicable)
PBA0087115	H W F
Warrant no. (if applicable)	
Claimant's name (including TELEDYNE UK LIMITED (TEL14/40)	ref.)
Defendant's name (including See Schedule 1	ng ref.)
Date	15 January 2025

1.	what is your nam	ie or, ir you are a legal repr	esentative, the han	ne of your firm:
	Keystone Law			
2.	Are you a	□Claimant	□Defendant	⊠Legal Representative
		□Other (please specify)		
	If you are a le	gal representative whom do	you represent?	Claimant
3.	What order are y	ou asking the court to make	e and why?	
	(ii) adding the pr	oposed Twelfth to Eighteenth I ope of the interim injunctive is	Defendants as Defenda	f granted by Bourne J on 20 December 2024, and to the Claim, pursuant to CPR 19.4, and s, (iii) permission to amend the Claim Form

N244 Application notice (06.22) 1 © Crown copyright 2022 24

4.	Have you attached a draft of the order you are applying for?	⊠Yes	□No
5.	How do you want to have this application dealt with?	□at a hearing	oxtimes without a hearing
6.	How long do you think the hearing will last? Is	□at a remote hea	aring Minutes
	this time estimate agreed by all parties?	□Yes	⊠No
7.	Give details of any fixed trial date or period	N/A	
8.	What level of Judge does your hearing need?	Judge	
9.	Who should be served with this application?	Defendants	
9a	Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.		

10. What information will	you be relying on, in support of your application?
	⊠the attached witness statement
	$\Box$ the statement of case
	☐ the evidence set out in the box below
If necessary, please	continue on a separate sheet.

Yes.	Please explain in what way you or the witness are vulnerable and what steps,
Г	support or adjustments you wish the court and the judge to consider.

# Statement of Truth

I understand that proceedings for contempt of court may be brought against a person 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 section 10 (and any continuation sheets) are true.
☑The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.
Signature
M Singh
□Applicant
□Litigation friend (where applicant is a child or a Protected Party)
Emphream stegatiepresentative (as defined s) of it 216(1))
Date
Day Month Year
15 01 2025
Full name
MANAN SINGH
Name of applicant's legal representative's firm
KEYSTONE LAW
If signing on behalf of firm or company give position or office held
PARTNER

Applicant's address to which documents should be sent.

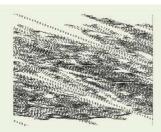
Building and street
48
Second line of address
CHANCERY LANE
Town or city
HOLBORN
County (optional)
Postcode
W  C  2  A  1  J  F
If applicable
Phone number
020 3319 3700
Fax phone number
DX number
193 Chancery Lane
Your Ref.
TEL14/40
Email
Manan.Singh@keystonelaw.co.uk info.teledyne@keystonelaw.co.uk

### **SCHEDULE 1 – DEFENDANTS**

(I) JULIAN ALLEN GAO of
(2) RUBY HAMILL of
(3) DANIEL JONES of
(4) NAJAM SHAH of
(5) RICKY SOUTHALL of
(6) AMAREEN AFZAL of
(7) SERENA FENTON of

- (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
- (13) <u>MAIS ROBINSON of</u>
- (14) AUTUMN TAYLOR-WARD of

- (15) <u>ANABELLA BARRINGER of</u>
- (16) <u>LARA DOWNES of</u>
- (17) <u>GABRIELLE MIDDLETON of</u>
- (18) <u>LUKE CARTER of</u>



# Claim Form (CPR Part 8)

In the High Court o	of Justice, King's Bench Division
Claim no.	
Fee Account no.	PBA0087115
Help with Fees - Ref no. (if appli- cable)	HWF-

#### Claimant

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

Defendant(s) See Schedule 1



✓ No Does your claim include any issues under the Human Rights Act 1998?

Details of claim (see also overleaf)

See attached 'Details of Claim'.

Defendant's name and address

See Schedule 1

T T	£
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				
<ul> <li>Claimant</li> <li>Litigation friend (where claimant is a child or a Protected Party)</li> <li>✓ Claimant's legal representative (as defined by CPR 2.3(1))</li> </ul>				
Date				
Day         Month         Year           13         12         2024				
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

- JULIAN ALLEN GAO of
   RUBY HAMILL of
   DANIEL JONES of
   NAJAM SHAH of
   RICKY SOUTHALL of
   AMAREEN AFZAL of
   SERENA FENTON of
- 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
- 13. MAIS ROBINSON of
- 14. <u>AUTUMN TAYLOR-WARD of</u>
- 15. ANABELLA BARRINGER of
- 16. LARA DOWNES of
- 17. GABRIELLE MIDDLETON of
- 18. <u>LUKE CARTER of</u>

# **SCHEDULE 2 – THE SITES**

- 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).

# <u>SCHEDULE 3 – THE ROADS</u>

1. Acorn Park, Shipley.

# **DETAILS OF CLAIM**

- 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.

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. KB-2024-004175

# In the matter of an injunction sought pursuant to CPR 25

Before the Honourable [ ] 24 January 2025

BETWEEN:

#### TELEDYNE UK LIMITED

**Claimant** 

#### -and-

# (1) JULIAN ALLEN GAO

- (2) (7) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THIS ORDER AND ALSO AT SCHEDULE 1 TO THE CLAIM FORM
- (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) (18) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THIS ORDER AND ALSO AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
	_
Draft INJUNCTION ORDER	_

## **PENAL NOTICE**

IF YOU, THE ABOVE NAMED DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

**UPON** the Claimant's claim brought by way of a Part 8 Claim Form dated 13 December 2024 (the 'Claim')

**AND UPON** the Claimant making an application for interim injunctive relief by way of an Application Notice dated 13 December 2024 (the 'Application'), which relief was granted on 20 December 2024 and which the Claimant now seeks to continue

**AND UPON** the Claimant making an application by way of an Application Notice dated 15 January 2025 to add further Named Defendants to the Claim and the interim injunctive relief

**AND UPON** the Court reading the witness statements listed in Schedule 2 to this Order

**AND UPON** the Court having particular regard to the importance of the Defendants' Article 10 and Article 11 Convention rights to freedom of expression and freedom of lawful assembly

**AND UPON** the Court being satisfied that the Order does not prohibit peaceful protest

**AND UPON** the Court considering its discretion to grant injunctive relief pursuant to s37(1) of the Senior Courts Act 1981 and considering it just and convenient to do so

AND UPON the Court accepting the undertakings given in Schedule 3 to this Order

**AND UPON** hearing Natalie Pratt of counsel for the Claimant, [attendance of and/or representation for the Defendants]

#### IT IS ORDERED THAT:

#### **Definitions**

- 1. For the purpose of this Order:
  - i. The 'Shipley Site' shall mean Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW, as marked in red on the plans at Annexe 1 to this Order;
  - ii. The **'Lincoln Site'** shall mean Teledyne UK Limited, 168 Sadler Road, Lincoln LN6 3RS, as marked in red on the plan at Annexe 2 to this Order;
  - iii. **'Wirral Site'** shall mean Teledyne UK Limited, Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA, as marked in red on the plan at Annexe 3 to this Order;
  - iv. The **'Chelmsford Site'** shall mean Teledyne UK Limited, 106 Waterhouse Lane, Chelmsford CM1 2QU, as marked in red on the plan at Annexe 4 to this Order;
  - v. The 'Presteigne Site' shall mean Teledyne UK Limited, Broadaxe Business Park, Presteigne LD8 2UH, as marked in red on the plans at Annexe 5 to this Order;
  - vi. The 'Newbury Site' shall mean Teledyne UK Limited, Reynolds Navigation House, Canal View Road, Newbury RG14 5UR, as marked on red on the plan at Annexe 6 to the Claim Form.

### **INJUNCTION**

2. Until and subject to any further order of the Court, the **First to Seventh Defendants** (inclusive) and the **Twelfth to Eighteenth Defendants** (inclusive) and each of them (whether by themselves or by instructing, encouraging, or allowing any other person) are <u>forbidden</u> from:

### And

Until and including **24 January 2030**, and subject to paragraph 8 below, the **Eighth to Eleventh Defendants** (inclusive) (those being Persons Unknown) and each of them (whether by themselves or by instructing, encouraging, or allowing any other person) are forbidden from:

- i. Entering or remaining on the following sites and/or entering or remaining in or on buildings on the following sites:
  - a) the Shipley Site, as marked in red on the plans at Annexe 1 to this Order;
  - b) the Lincoln Site, as marked in red on the plan at Annexe 2 to this Order;
  - c) the Wirral Site, as marked in red on the plan at Annexe 3 to this Order;
  - d) the Chelmsford Site, as marked in red on the plan at Annexe 4 to this Order;
  - e) the Presteigne Site, as marked in red on the plans at Annexe 5 to this Order; and
  - f) the Newbury Site, as marked in red on the plan at Annexe 6 to this Order.
- ii. Depositing any item or substance on the following sites, affixing themselves or any other item to any building, structure or fixture on the following sites, and/or defacing or damaging any building, structure or fixture on the following sites:
  - a) the Shipley Site, as marked in red on the plans at Annexe 1 to this Order;
  - b) the Lincoln Site, as marked in red on the plan at Annexe 2 to this Order;
  - c) the Wirral Site, as marked in red on the plan at Annexe 3 to this Order;
  - d) the Chelmsford Site, as marked in red on the plan at Annexe 4 to this Order;
  - e) the Presteigne Site, as marked in red on the plans at Annexe 5 to this Order; and
  - f) the Newbury Site, as marked in red on the plan at Annexe 6 to this Order.
- iii. Blocking, slowing down, obstructing or otherwise interfering with vehicular access to or from the highway at the Shipley Site (as marked in red on the plans at Annexe1 to this Order);
- iv. Approaching, slowing down or obstructing any vehicle moving along or accessing the road known as Acorn Park, Shipley (as marked in purple on the plans at Annexe 1 to this Order) for the purpose of:
  - a) disrupting vehicular access to or from the Shipley Site (as marked in red on the plans at Annexe 1 to this Order); and
  - b) protesting.

#### DRAFT ORDER

- v. Affixing themselves or any other item to, or leaving or depositing any item on, the road known as Acorn Park, Shipley (as marked in purple on the plans at Annexe 1 to this Order) for the purpose of:
  - a) disrupting vehicular access to or from the Shipley Site (as marked in red in the plans at Annexe 1 to this Order); and
  - b) protesting.
- vi. Affixing themselves or any other items to any vehicle on, entering or exiting the Shipley Site (as marked in red on the plans at Annexe 1 to this Order), where that affixation is done for the purpose of protesting.

#### Service and notification

- 3. Pursuant to CPR rules 6.15 and 6.27, the Claimant has permission to serve the First to Seventh Defendants and the Twelfth to Eighteenth Defendants with, and permission to notify the Eighth to Eleventh Defendants (Persons Unknown) of, the Claim Form, Amended Claim Form, Application for interim relief, Application for the addition of further Named Defendants, evidence in support of the Claim and both Applications, this Order and any further documents in the Claim by (with 3(i) 3(iv) to be treated conjunctively):
  - i. **Website:** placing a copy of the documents to be served on a website or webpage operated by the Claimant, a link to which shall be placed on the Claimant's main website; and
  - ii. **Email:** sending a copy of the documents to be served to Palestine Action, Bradford Friends of Palestine and the Palestine Solidarity Campaign (including the relevant local branches) at the following email addresses

info@palestineaction.org; media@palestinecampaign.org; info@palestinecampaign.org; pscchelmsford@gmail.com; liverpoolfopal@gmail.com; bfdfriendsofpalestine@yahoo.com; actions@palestineaction.org; branches@palestinecampaign.org; palestinesolidaritybradford@gmail.com; lincolnpalestine@gmail.com; pscshrop@gmail.com;

and providing a link by which the webpage or website mentioned in paragraph 3(i) above can be accessed.

- iii. **Post:** where an address of a Named Defendant is known to the Claimant, by posting a copy of the documents to be served together with a covering letter by way of first-class post;
- iv. **Signs:** placing signs on the perimeter of the Shipley Site, Lincoln Site, Wirral Site, Chelmsford Site, Presteigne Site and Newbury Site, which advise that a High Court injunction is in force that restricts some protest activities, and which provide a weblink and QR code by which the website or webpage mentioned in paragraph 3(i) above can be accessed;

#### DRAFT ORDER

- v. Where requested by a Defendant: the documents to be served may be served by email where the Defendant has requested that they be served by email, by sending the email to the address provided by the Defendant; or
- vi. **Lawyers:** by serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.
- 4. The deemed date of service of any documents referred to in paragraph 3 above shall be the day on which service of the document or documents is completed in accordance with paragraph 3 above.
- 5. The Defendants shall acknowledge service of the Claim Form 56 days after the deemed date of service and file any written evidence in defence by the same date.

# Liberty to apply

- 6. The Defendants or any other person affected by this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person, but they must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of that application, that evidence must be served on the Claimant's solicitors 48 hours in advance of the hearing.
- 7. Any person applying to vary or discharge this Order must provide their full name and address for service.

### **Review of this Order (Persons Unknown)**

- 8. The Order against the Eighth to Eleventh Defendants (Persons Unknown) shall be reviewed at a hearing no later than 23 January 2026 (and as near to that date as the Court can reasonably accommodate), with a time estimate of one day, unless the Claimant indicates to the Court that they do not seek to continue the Order, upon which the Order will expire as against the Eighth to Eleventh Defendants (Persons Unknown) only. The Claimant must file and serve in accordance with paragraph 3 above (save that paragraph 3(iii) need not be undertaken) any evidence upon which it intends to rely at the review hearing by 4pm on 9 January 2026. Any other person who would like to participate in the review hearing must also file and serve on the Claimant any evidence upon which they intend to rely at the review hearing by 4pm on 9 January 2026.
- 9. For the avoidance of doubt, if the Claimant seeks the continuation of the Order against the Eighth to Eleventh Defendants, but the review hearing provided for in paragraph 8 above has not yet taken place by 23 January 2026 but has been listed, the Order against the Eighth to Eleventh Defendants will continue until and including the date of the review hearing.

# **Directions (Named Defendants)**

10. The Claimant is permitted to amend the Claim Form in the manner of the red lined draft annexed to the Application dated 15 January 2025, and specifically to:

- i. add the Twelfth to Eighteenth Defendants as Defendants to the Claim those being Cheryl Leanaghan, Mais Robinson, Autumn Taylor-Ward, Anabella Barringer, Lara Downes, Gabrielle Middleton and Luke Carter respectively;
- ii. amend paragraph 7 of the Brief Details of Claim to include relevant information on the Twelfth to Eighteenth Defendants;
- iii. include the addresses of the First to Seventh and Twelfth to Eighteenth Defendants.
- 11. The Claimant shall file and serve (in accordance with paragraph 3 above) any further evidence upon which it will seek to rely at the disposal of the Claim by 4pm on 29 May 2025.
- 12. The Defendants shall file and serve any evidence upon which they will seek to rely at the disposal of the Claim by 4pm on 26 June 2025.
- 13. The Claimant may (if so advised) file and serve (in accordance with paragraph 3 above) any evidence in reply by 4pm on 10 July 2025.
- 14. A final hearing shall be listed for the first available date after 24 July 2025, with a time estimate of one day. A further ½ day should be allocated for judicial pre-reading. In the event that the time estimate requires revision (whether upwards or downwards), the Claimant shall inform the Court as soon as it is reasonably practicable to do so.
- 15. The Claimant shall file and serve (in accordance with paragraph 3 above) a hearing bundle 7 days before the date of the final hearing, save that the Claimant need only serve Named Defendants in accordance with paragraph 3(iii) above where that Defendant has acknowledged service of the Claim and/or filed evidence in defence of the Claim or indicated that they intend to participate in the final hearing of the Claim.
- 16. Skeleton arguments shall be filed and served (in accordance with paragraph 3 above) 3 days before the date of the final hearing, save that the Claimant need only serve Named Defendants in accordance with paragraph 3(iii) above where that Defendant has acknowledged service of the Claim and/or filed evidence in defence of the Claim or indicated that they intend to participate in the final hearing of the Claim.
- 17. Solicitors for the Claimant shall liaise with the KB Judges Listing Office as to the audio-visual technology required at the final hearing (if any).

# Communications with the Claimant and the Court

- 18. All communications with the Claimant about this Order should be sent by email to the Claimant's solicitors, Keystone Law, at info.teledyne@keystonelaw.co.uk.
- 19. All communications with the Court about this Order should be sent to <a href="mailto:KBJudgesListing@justice.gov.uk">KBJudgesListing@justice.gov.uk</a> or Room E03 Royal Courts of Justice, Strand, London WC2A 2LL. The Telephone number is 020 3938957. The offices are open between 10am and 4pm Monday to Friday.

### **Costs**

# DRAFT ORDER

20. Costs reserved.

#### **GUIDANCE NOTES**

#### Effect of this Order – the Defendants

1. A Defendant who is an individual and who is ordered not to do something must not do it him or herself or in any other way nor must he/she do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

## **Interpretation of this Order**

- 2. In this Order, references to 'the Defendant' means any or all of them (unless expressly stated otherwise).
- 3. A requirement to serve on a 'Defendant' means on each of them. However, the Order is effective against any Defendant on whom it is served in accordance with this Order.
- 4. An Order requiring 'the Defendant' not to do anything applies to all Defendants.
- 5. This Order contains the following schedules and annexes
  - i. Schedule 1 Named Defendants;
  - ii. Schedule 2 witness statements;
  - iii. Schedule 3 undertakings;
  - iv. Annexe 1 plans of the Shipley Site;
  - v. Annexe 2 plan of the Lincoln Site;
  - vi. Annexe 3 plan of the Wirral Site;
  - vii. Annexe 4 plan of the Chelmsford Site;
  - viii. Annexe 5 plans of the Presteigne Site;
    - ix. Annexe 6 plan of the Newbury Site.

# <u>SCHEDULE 1 – NAMED DEFENDANTS</u>

- (1) JULIAN ALLEN GAO
- (2) RUBY HAMILL
- (3) DANIEL JONES
- (4) NAJAM SHAH
- (5) RICKY SOUTHALL
- (6) AMAREEN AFZAL
- (7) SERENA FENTON
  - (12) CHERYL LEANAGHAN
  - (13) MAIS ROBINSON
  - (14) AUTUMN TAYLOR-WARD
  - (15) ANABELLA BARRINGER
  - (16) LARA DOWNES
  - (17) GABRIELLE MIDDLETON
  - (18) LUKE CARTER

# **SCHEDULE 2 – WITNESS STATEMENTS**

The Court read the following witness statements on behalf of the Claimants:

- 1. The first witness statement of Nicholas James Wargent dated 13 December 2024;
- 2. The first witness statement of Manan Singh dated 13 December 2024;
- 3. The second witness statement of Nicholas James Wargent dated 19 December 2024;
- 4. The third witness statement of Nicholas James Wargent dated 15 January 2025.

# <u>SCHEDULE 3 – UNDERTAKINGS</u>

1. If the Court later finds that this Order has caused loss to the Defendants, and decides that the Defendants should be compensated for that loss, the Claimant gives an undertaking in damages limited to £50,000.

# ANNEXE 1 – SHIPLEY SITE



Promap

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Plotted Scale - 1:4000, Paper Size – A4

Title Number: WYK387275



Promap

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Plotted Scale - 1:1250, Paper Size – A4

Title Number: WYK387275

# ANNEXE 2 – LINCOLN SITE



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Title Number: LL317736

# ANNEXE 3 – WIRRAL SITE



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Plotted Scale - 1:1250. Paper Size – A4

Title Number: MS575234

# ANNEXE 4 – CHELMSFORD SITE



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Title Number: EX688035

# ANNEXE 5 – PRESTEIGNE SITE



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Title Number: CYM839162



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Title Number: WA552132

# ANNEXE 6 – NEWBURY SITE



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Title Number: BK365055

Nicholas James Wargent Claimant Third Statement Exhibit NJW-3 15 January 2025

# 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

THIRD WITNESS STATEMENT OF			<u>Defe</u>
		LENTE OF	
		GENT	

- 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 pursuant to paragraph 9 of the Order of Bourne J dated 20 December 2024 (the 'Interim Injunction Order'), which requires any evidence in support of the continuation of the Interim Injunction Order to be filed by 17 January 2025. I make this witness statement in support of the continuation of the Interim

Injunction Order, and in support of the Application to add further Named Defendants to the Claim.

- 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-3**. All references to documents in this statement are to Exhibit **NJW-3**. References are in the format **NJW-3/page number.**
- 6. In this statement, I shall address the following:
  - (a) An update on matters since my second witness statement dated 19 December 2024;
  - (b) The Application to add further Named Defendants to the Claim and the Interim Injunction Order;
  - (c) Service of the proceedings, Interim Injunction Order and CPR 31 Orders;
  - (d) The need for the continuation of the Interim Injunction Order;
  - (e) Directions.

## **UPDATE**

# 23 September 2024

7. As a result of the initial disclosure received from West Yorkshire Police (which I shall explain further below), an additional incident has come to my attention that I did not cover in my first witness statement dated 13 December 2024. I did not explain that incident as it has not been reported through to our UK Security lead officer (for reasons

of which I am unsure), and I was unaware of it. I have now made enquiries in relation to the incident, and report as follows.

- 8. In summary, I understand from security staff at Teledyne UK that shortly before 17:00 on 23 September 2024, a female drove onto a premises that neighbours the Shipley Site (the Myers Building and Timber Supplies yard). The yard was due to close at 17:00. I am further informed that the Myers staff were concerned that something untoward was occurring, as the female asked to drive around their yard (which has apparently never happened – vehicles do not drive around the yard), and they followed the female. She was observed to stop alongside the fence that borders the Shipley Site and use a camera phone to film the site. The police disclosure shows that a person (who I assume is female) was later arrested on 25 September 2024. I am informed by Teledyne UK security staff who have been in contact with West Yorkshire Police that four burner phones were recovered, and a no-comment interview was given. The phone used in the incident on 23 September at the Shipley Site was not located. The recovered phones, and the female's laptop, contained evidence that she had undertaken reconnaissance at other similar sites. It is believed that she was undertaking reconnaissance for Palestine Action. I have now viewed CCTV footage of the incident, but unfortunately it shows nothing other than an obscured view of the car, and a Myers employee following it.
- 9. I have updated the spreadsheet that records the incidents of protest at Teledyne UK's sites to now include that protest (and two others), and exhibit the same at **NJW-3/1 4.**

### The 19 December 2024 protest at the Shipley Site

- 10. My second witness statement dated 19 December 2024 described an incident that occurred on the Shipley Site on that day, which took place just as the first hearing at which Teledyne UK sought interim injunctive relief occurred (which hearing, as described in that witness statement, was not effective).
- 11. West Yorkshire Police have informed Teledyne UK that the individual arrested is known as 'Luke Carter'. He is included within the Application to add further Named Defendants to the Claim and Interim Injunction Order, and West Yorkshire Police have

provided Teledyne UK with an address for Mr Carter within their initial CPR 31 disclosure. Further, West Yorkshire Police have also informed Teledyne UK that Mr Carter has been released on bail, subject to the condition that he is not to approach or enter any Teledyne UK site, and that the alleged locking-on offence will need to be reviewed by the Attorney General.

12. Security staff at the Shipley Site have also provided to me four additional photographs of the incident, which were captured by the security cameras at the site. I exhibit these at NJW-3/5 – 8. Three of those images show the car parked across the gates. The fourth image is a long-range shot that shows a male in a grey hooded-jumper stood outside the 'Toolstation' retail unit on Acorn Park. I understand from security staff at the Shipley Site that this is believed to be Mr Carter, and that he was observed visiting both the nearby Screwfix and Toolstation retailers in the hour preceding his actions at the Shipley Site, but that he appeared to leave both retailers empty handed.

## Further acts of protest at Teledyne UK sites

- 13. As I explained at length in my first witness statement dated 13 December 2024, Teledyne UK sought interim injunctive relief in part on the basis that it apprehended further and imminent acts of protest over the Christmas holiday period.
- 14. I also explained in my first witness statement that a protest, which was expected to be peaceful, had been arranged at the Chelmsford Site for 22 December 2024 (that being the protest that was re-arranged from 8 December, which did not take place because of bad weather). A protest did take place on 22 December 2024, but was instead held on the A1060 'Parkway', and not on Waterhouse Lane (on which the Chelmsford Site is located). The location of the protest was closer to the centre of Chelmsford, and is a main route into the city centre. I do not know why the protest occurred on Parkway and not Waterhouse Lane. The protest did not in any way affect the Chelmsford Site and, to my knowledge, was peaceful; I have viewed a video on the Instagram page hosted by the Chelmsford branch the of the Palestine Solidarity Campaign a, posted on 22 December 2024. That video shows protestors standing on the pavement of the main Aroad, holding placards. I exhibit some still images of the video at NJW-3/9 11. Even if this protest had occurred on Waterhouse Lane outside the Chelmsford Site, it would

not have been captured by the terms of the Interim Injunction Order. As I have repeatedly stated; both Teledyne UK and myself personally respect the important right to protest peacefully, and that right should be protected. Only acts of unlawful protest should be prohibited.

- 15. On 6 January 2025, the Chelmsford branch of the Palestine Solidarity Campaign also advertised on Instagram a march through Chelmsford that will take place on 8 February 2025, and which will conclude with a series of speeches and a one-minute silence. The advertised route does not pass by the Chelmsford Site. I exhibit a copy of the post at NJW-3/12. It again appears that this protest will be peaceful, and Teledyne UK (at this time) takes no issue with the planned protest at all; I mention it only as a point of full and frank disclosure, and for context.
- 16. Fortunately, there have been no further acts of unlawful protest at any of Teledyne UK's sites since 19 December 2024. As I shall explain below, acts of unlawful protest (taking the form of aggravated trespass) did occur on Christmas Day at a site operated by Elbit Systems Ltd. Whilst it is impossible to prove a negative, I invite the Court to infer, as I do, that the Interim Injunction Order played at least some part in protecting Teledyne UK over the Christmas period.

### **Christmas Day protest: Elbit Systems Ltd**

- 17. As I explained in my first witness statement dated 13 December 2024, Elbit Systems Limited ('Elbit') is an Israel-based company engaged in defence and security work, and which develops and supplies airborne, land and naval systems). The Palestine Action group often gravitates around the slogan of "shut Elbit down", although it is clear (including from the so-called Underground Manual exhibited to my first witness statement) that the focus and targets of Palestine Action is wider than just Elbit.
- 18. I understand from Palestine Action's website that on 25 December 2024, at around 12:30pm, protestors used two cherry-pickers to access the walls of the UAV Engines Ltd factory at Shenstone (UAV Engines Ltd is a subsidiary of Elbit, and Palestine Action understand that the factory at Shenstone is involved in the manufacturing of drones that are used in the Gaza conflict). The protestors used demolition tools on the

factory walls and the drivers of the cherry-picker vehicles secured themselves inside the vehicles and used locking-on devices to remain in position. I exhibit a copy of the relevant 'news' article from the Palestine Action website, dated 25 December 2024, at NJW-3/13 – 14: <a href="https://palestineaction.org/christmas-elbit/">https://palestineaction.org/christmas-elbit/</a>.

- 19. That news item was followed up by a second article dated 27 December 2024, which I exhibit at NJW-3/15 16: <a href="https://palestineaction.org/bryn-remanded/">https://palestineaction.org/bryn-remanded/</a>. That article describes how four protestors arrested for the action at Shenstone were released on bail on 26 December 2024, whilst a fifth (named as 'Bryn') was remanded into custody (seemingly as he had targeted the same site in an earlier action on 31 July 2024).
- 20. Palestine Action covered the Christmas Day action extensively on its social media channels (both in photographs and videos). I have in particular viewed the Instagram page used by the group. I exhibit at NJW-3/17 21 a copy of one of the posts as an example. That post is dated 25 December 2024 and contains several photographs of protestors wearing the familiar red Palestine Action overalls whilst in the buckets of cherry-pickers and using drills and hammers to damage and destroy the factory walls. I also exhibit at NJW-3/22 25 a copy of another post dated 26 December 2024, which contains photographs of a protestor wearing the red Palestine Action overalls in a cherry-picker bucket and using a hammer and chisel to demolish a wall, as well as pictures of the parked cherry-picker vehicle.
- 21. To my knowledge, neither Elbit (nor its subsidiaries) have sought or obtained injunctive relief that would prohibit such acts, as Teledyne UK have.

### **Other Palestine Action protests**

22. It is clear from Palestine Action's Instagram page that it continues to remain active, and that its supporters engage in unlawful acts of protest generally. For example, the Instagram page contains a post dated 6 January 2025, which documents an incident in which the premises of Elbit's accountants were targeted with spray paint and the smashing of windows (with the post alleging that this was not the first time that the company had been targeted). I exhibit a copy of the post and its photographs at NJW-3/26 – 28. By way of further example, the Instagram page also contains a post dated 29

December 2024 in which the premises of 'Leonardo' (another defence and security company) has been spray painted, apparently by activists associated with Palestine Action. I exhibit a copy of the post at NJW-3/29-31.

#### **CPR 31 Orders**

- 23. As the Court will be aware, Teledyne UK made two applications for disclosure pursuant to CPR 31 and the Senior Courts Act 1981, s34 to obtain the names and addresses of those who were arrested at the Shipley and Wirral Sites (and any relevant evidence in support), so that those persons could be named as Defendants to the proceedings. These Applications were prepared with the co-operation of the relevant police forces, and the Draft Orders were jointly produced. The Applications were included in the bundle used at the hearing on 20 December 2024, at which the Interim Injunction Order was granted.
- 24. Bourne J made the Order in relation to the Shipley Site (to which the Chief Constable of West Yorkshire Police was the Respondent) at the hearing. As the Application in relation to the Wirral Site (to which the Chief Constable of Merseyside Police is the Respondent) had not yet been processed on the Court file (as it was filed after the other Application), this was dealt with by Bourne J on the papers shortly after the hearing. Sealed copies of all three Orders (the Interim Injunction Order and the two disclosure Orders) were received on 20 December 2024. I understand from Teledyne UK's legal advisers that these Orders will be included within the hearing bundle to be used on 24 January 2025.
- 25. Later on 20 December 2024, Teledyne UK's legal advisers received from the Court a further sealed copy of an Order made in relation to the Wirral Site. The Order was made by Johnson J, and will also be included with the hearing bundle for the return date. I assume that the Court did not realise that Bourne J had already made the Order earlier in the day. It appears to me that the Orders are identical in terms, save that the Order of Johnson J included an additional paragraph (paragraph 6), giving liberty to apply. As I shall explain later in this statement, both the Bourne J and the Johnson J Order have been served.

- 26. When serving the disclosure Orders, Teledyne UK's legal advisers advised the relevant police forces of the return date listing, and the need for evidence in support to be filed by 17 January 2025. The police forces were asked to provide the names and addresses of the arrestees as a matter of priority, with the further evidence to follow (which, under the terms of the disclosure Orders, must be provided by 28 February 2025).
- 27. As I shall explain below, on 10 January 2025, Merseyside Police provided the names and addresses of the six people arrested at the Wirral Site on 5 July 2024 and 2 October 2024. Teledyne UK now applies to add these six persons as Named Defendants to both the Claim and the Interim Injunction Order.
- 28. On 13 January 2025, West Yorkshire Police confirmed the names of the First to Seventh Defendants, and Luke Carter (the proposed Eighteenth Defendant), and provided addresses for each.

#### APPLICATION TO ADD FURTHER NAMED DEFENDANTS

- 29. Following the initial disclosure from Merseyside Police, Teledyne UK applies to add the following persons as Named Defendants to the Claim, and include them within the scope of the Interim Injunction Order at the return date hearing:
  - (a) Defendant 12 Cheryl Leanaghan;
  - (b) Defendant 13 **Mais Robinson**:
  - (c) Defendant 14 **Autumn Taylor-Ward**;
  - (d) Defendant 15 **Annabella Barringer**;
  - (e) Defendant 16 Lara Downes;
  - (f) Defendant 17 **Gabrielle Middleton**.
- 30. Addresses and dates of birth have been provided by Merseyside Police for each of these persons, which I will not include within this statement. Based on the information with which Teledyne UK has been provided, it appears that each of these persons is over the age of 18. Each of these persons was arrested at the Wirral Site on either 5 July 2024 or 2 October 2024 in relation to the protest incidents that occurred on those dates (as described in my first witness statement). The initial disclosure from Merseyside Police

does not make it clear which Defendant was arrested on which day (but it is known that three persons were arrested on each of the two days); further details will follow in the full police disclosure.

31. Further, by reason of his actions at the Shipley Site on 19 December 2024, Teledyne UK applies to add **Luke Carter** to both the Claim and the scope of the Interim Injunction Order as Defendant 18.

#### **SERVICE**

- 32. Paragraph 3 of the Interim Injunction Order permits the alternative service of the documents in this Claim, including the Interim Injunction Order itself.
- 33. As to paragraph 3(i), the relevant webpage can be found here: <a href="https://www.teledyne-injunction.co.uk">https://www.teledyne-injunction.co.uk</a>. The webpage went live on 20 December 2024. I note that the link is the first Google search returned if "Teledyne Injunction" is used as a search term. A link to the webpage is included on the homepage of the main Teledyne UK website with the relevant linked text reading "Notice of Injunction".
- 34. As to paragraph 3(ii), I am informed by Teledyne UK's legal advisers that:
  - (a) Prior to the hearing on 20 December 2024, the Claim Form, Application Notice and all evidence in support of the Claim and Application were sent to the email addresses set out in paragraph 3(ii);
  - (b) On 20 December 2024, copies of the Interim Injunction Order, and the three disclosure orders were sent to the email addresses set out in paragraph 3(ii). That email also included a link to the webpage set up in accordance with paragraph 3(i); and
  - (c) On 13 January 2025, further copies of the Interim Injunction Order, Claim Form, Application Notice, and all evidence in support of the Claim and Application were sent to the email addresses set out in paragraph 3(ii) by way of a reminder (and to ensure that the Claim Form, Application Notice and all

evidence in support of the Claim and Application had in fact been properly served following the making of the alternative service order).

- 35. The signs required by paragraph 3(iv) of the Interim Injunction Order were erected at all six sites. The signs were erected at the Wirral, Shipley, Presteigne and Lincoln Sites on 20 December 2024 (in relation to the latter, these were temporary laminated copies, which have since been replaced by the permanent signage). Large signs were erected at the entrances to the Chelmsford Site on 20 December 2024, with further perimeter signage being added on 23 December 2024. The signs were erected at the Newbury Site on 23 December 2024. I exhibit at NJW-3/32 38 a plan of each of the six Teledyne UK sites that are the subject matter of this injunction, on which the perimeter of the sites and the location of the erected signs are marked. Further, by way of example of a sign in situ, I exhibit at NJW-3/39 a photograph of one of the signs attached to the front gates of the Chelmsford Site.
- 36. As to paragraph 3(iii), Teledyne UK only came into possession of the addresses of the First to Seventh Defendants on 13 January 2025, after the initial CPR 31 disclosure by West Yorkshire Police. I am informed by Teledyne UK's legal advisers that these Defendants will be served with all of the existing documents in the Claim, as well as with the documents for the return date hearing, by first-class post this week.
- 37. Further, the Application to add the further Named Defendants, as well as all documents in this Claim (including the Interim Injunction Order) will be sent by first-class post to those persons who Teledyne UK is applying to add as Named Defendants.
- 38. I am informed by Teledyne UK's legal advisers that the relevant certificates of service will be included within the hearing bundle for the return date.

## THE NEED TO CONTINUE THE INTERIM RELIEF

39. In support of the need for the continuation of the Interim Injunction Order, Teledyne UK continues to rely on the evidence set out in my first and second witness statements, as well as the first witness statement of Manan Singh dated 13 December 2024, all of

which explain why injunctive relief is required at this time and prior to any final determination of the Claim.

- 40. As I have set out above, the group known as Palestine Action remains active, and its followers continue to engage in unlawful direct action protest. As such, Teledyne UK continues to apprehend that, absent injunctive relief, it will suffer further acts of unlawful protest at its sites, and resulting harm. The incident on 19 December 2024 at the Shipley Site shows that Teledyne UK's apprehension is clearly well-founded.
- 41. It is notable that Elbit, which does not have the benefit of injunctive relief, suffered the aggravated trespass incident on Christmas Day; I invite the Court to infer that the Interim Injunction Order, at least in part, acted as a deterrent to unlawful activity at Teledyne UK's sites over the Christmas period. Indeed, since the grant of the Interim Injunction Order, no further unlawful acts of protest have been experienced at Teledyne UK's sites, that is despite the upward trajectory of incidents occurring towards the end of 2024, especially at the Shipley Site; I again invite the Court to draw the inference that the Interim Injunction Order has a deterring effect on the commission of unlawful acts of protest by activists.
- 42. Further, it is notable that, whilst the only protest of which Teledyne UK currently has intelligence is expected to be peaceful (that being the march in Chelmsford), the protest at the Shipley Site on 19 December 2024 began as a peaceful protest, before one lone-protestor (Mr Carter) undertook unlawful acts.
- 43. It is clear that Palestine Action continues to encourage its followers to engage in unlawful acts of protest (remembering that Teledyne UK is listed as a target on both the group's website and in its so-called Underground Manual), and that it intends for unlawful direct action protest to be continued into 2025. For example:
  - (a) I exhibit at **NJW-3/40** a copy of the homepage of the Palestine Action website, accessed on 13 January 2025. That webpage shows that the group is still recruiting new activists, as the application form to 'Join Palestine Action' appears on the homepage (as well as on the 'Join the Resistance' page). Three direct action training days are advertised on the homepage. Additional training

days and online 'crash courses' on direct action are advertised on the 'Training Days' page of the website (<a href="https://palestineaction.org/training/">https://palestineaction.org/training/</a>), exhibited at NJW-3/41;

(b) On 31 December 2024, Palestine Action posted to its Instagram page a promotional video, with the accompanying text: "2024 was our most intense year of direct action against Israel's biggest weapons producer yet. Palestine Action blockaded, occupied and destroyed Elbit's factories, whilst also targeting their whole supply chain. Join us in 2025 to chase Israel's war machine out of Britain for good!". I exhibit a copy of the post at NJW-3/42.

44. Teledyne UK therefore continues to apprehend, absent injunctive relief, further and imminent acts of unlawful direct action and resulting harm at its six sites advertised as targets by Palestine Action.

## Persons Unknown: the Order sought

- 45. As explained in Mr Singh's first witness statement and counsel's skeleton argument for the hearing on 20 December 2024, Teledyne UK seeks at this return date hearing a five-year order against Persons Unknown, subject to an annual review. Accordingly, any final hearing in this Claim will relate only to the Named Defendants. I understand that counsel will address the Court at the return date hearing as to why this is the proper order to make in the circumstances of this case.
- 46. In the alternative, Teledyne UK limited seeks a continuation of the Interim Injunction Order as against Persons Unknown until the final hearing of the Claim against the Named Defendants, at which time the five-year order with an annual review will be sought. However, I should say that, in the interests of furthering the overriding objective, Teledyne UK is hoping to resolve these proceedings by way of the Named

Defendants giving undertakings to the Court, in which case no such final hearing in relation to the Named Defendants would be required.

## DIRECTIONS

47. I understand that the appropriate directions in these proceedings is a matter for submissions at the return date hearing. Therefore, I only here respectfully ask the Court to consider that Teledyne UK is not yet in receipt of the full police disclosure, such that it is not yet in a position to put that evidence before the Court in advance of a final hearing.

48. Further, as the addresses of the First to Seventh and Eighteenth Defendants, and the identities and addresses of the Twelfth to Seventeenth Defendants, has only become know this week, further time is needed to allow important steps in these proceedings to occur. In particular, the Named Defendants shall now be served by first-class post, and may require time to consider those documents and whether they wish to defend the proceedings (that is especially the case for the Twelfth to Eighteenth Defendants, who have not yet been served with any documents in the Claim by way of the alternative service order). Further, it would be usual in a case such as this to attempt to settle the proceedings with the Named Defendants by way of them offering undertakings to the Court; Teledyne UK intends to explore this avenue with the Named Defendants, once they have been served and have had an opportunity to consider their position.

49. Accordingly, I respectfully ask that Teledyne UK is given a window of time following the receipt of the police disclosure to both explore the possibility of undertakings with the Named Defendants, and then assemble any trial evidence should any Named Defendant not be willing to give an undertaking.

## 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.

Nicholas James Wargent

Dated this 15th day of January 2025

## 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

	<b>Defendants</b>
EXHIBIT NJW-3	

This is Exhibit NJW-3 referred to in the Third Witness Statement of Nicholas James Wargent.

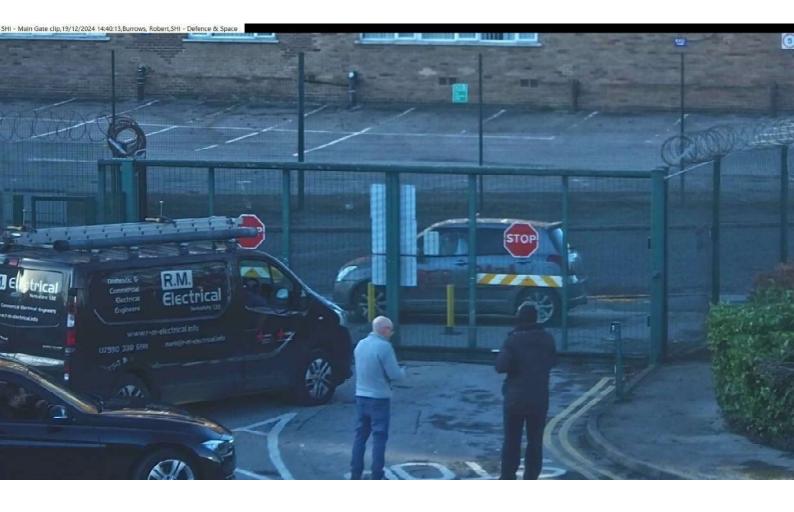
Date Location Duration 09-Dec-22 Labtech Presteigne 5-6 hours					מווסוופרומר		
5-6 hours	5	dno	Approx numbers	e	Tactics seen	Remarks	Subsequent Action
		Palestine Action	4	Yes. Large police response.	Accessed reception. Sledgehammers used to break glass and destroy IT equipment. Ladders used to scale roof. Damage to roof and production area.	Police at heights team and Fire Service removed and arrested protesters from roof.	4 protestors held in prison on remand pending trial. Trial held 9- 12 May 2023. [redacted] changed plea to guilty. Sentenced to 23 months imprisonment. [redacted] found guilty. Sentenced to 27 months imprisonment.
Minutes		Palestine Action	-	No.	Red paint splashed across front wall.	Photographer present.	Police did not respond - led to subsequent calls with an Essex Detective Chief Inspector. Photo of TDY employee on national press website: taken down on request.
1-2hrs	8	Bradford Friends of Palestine	10	Yes immediate 4 Officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
1-2hrs	8	Bradford Friends of Palestine	30	Yes immediate +6 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
1-2hrs	8	Bradford Friends of Palestine	120	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
Minutes		Unknown	2	Yes immediate approx 10 officers		Arson attack. No injuries. Minor damage to goods inward area.	Suspect arrested September 2024. Thought to be a local, not part of a group. The CPS decided not to charge evidence not strong enough.
1-2hrs	B	Bradford Friends of Palestine	120	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
1-2 hrs	8	Bradford Friends of Palestine	45	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
1-2hrs	8	Bradford Friends of Palestine	40	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
1-2hrs	8	Bradford Friends of Palestine	15	Yes immediate approx 10 officers	ces but allowing employee aphs of site and hostile	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
1-2hrs	<u> </u>	Bradford Friends of Palestine	09	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
1-2 hrs	а.	Palestine Action Liverpool	10	Yes - 1 vehicle 2 Officers	Blocking entrances but allowing employee access trying to hand out leaflets	Not believed to be linked to Palestine Action Group, peaceful banners and posters and handing out leaflets	
1-2hrs	8	Bradford Friends of Palestine	20	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
1-2hrs	<u>a.</u>	Palestine Action Liverpool	20	Yes immediate 1 vehicle 6 Officers	Blocking entrances trying to hand out leaflets. Possible that as all police/security resource arrives they disperse, thus costing Police and site extra cost.	Peaceful, blocking entrance gates, displaying banners handing out leaflets	

	Subsequent Action							Daniel Jones & Najam Shah	released from custody after 1 week. Ruby Hamill released from custody 2 May. Julian (aka Laila) Gao remained in custody until June. Trial 5-13 Sept 2024. Hung jury. Retrial set for 9 February 2026.									
	Remarks	Peaceful. Handing over a letter demanding to speak to management. Subsequent piece in press. Two individuals with known links to PAG and previous protests/damage etc	Peaceful, blocking entrance gates, displaying banners handing out leaflets	As previous. Banners leaflets standing at entrance points	Peaceful displaying banners (pro Palestine/anti Teledyne) 1 protester taking a lot of footage of the site buildings and perimeter Assessed to be hostile recon. Speaker units and microphone in use lunknown what was said) 2 protesters praying at gate during protests (not seen before). Unite union flags in attendance.	As previous. Banners leaflets standing at entrance points. No employees required access/exit	Banners, leaflets etc	Eventually arrested and removed. Significant		Nothing further	Banners, leaflets and speakers	Banners, leaflets, chanting	Banners, leaflets, chanting	No entry onto site, damage repaired following day	Police informed, images captured	Banners, chanting, hands covered in red paint	Red paint, sledgehammers. Not assessed to be PA	Reported to Police, they are investigating. Teledyne security investigation found that the individual was an employee but had failed to notify the control room of their visit out of hours. Employee educated and Police informed
eledyne UK - attacks and demonstrations 2022 - 2024	$\overline{}$	Blocking vehicle gate and handing in a letter	Blocking entrances, handing out leaflets	Blocking entrances but allowing employee entry	Stood in front of vehicle gates but allowed access	Blocking entrances but allowing employee entry	Stood in front of vehicle gates, handed letter to site	f, smashing roof tiles, brickwork,		Handed letter to site	Blocking entrances but allowing ingress egress	n front of entrances but allowed	Stood in front of gates allowing access	te	1 individual seen early hours inspecting repaired fence and gate	n road, standing in	smashing windows and t. Did not enter building	1 person taking photos of damaged windows Reported to Police, they are investigating.  Teledyne security investigation found that individual was an employee but had failed notify the control room of their visit out of hours. Employee educated and Police info
tacks and de	Police attendance	No.	Yes immediate approx 8 officers	1 police officer	5 Police, 2 vehicles in attendance prior to protest	1 police vehicle 2 officers	No police	All emergency	services in numbers	No police	6 Officers	No police	No Police	No police	No Police	8 officers	No response requested	Reported to Police
leledyne UK - al	Approx numbers	25	20	20	09	09	18	4 on roof + 20 outside		1	20-25	approx 8	10	3	1	30	4	1
	Group	Radnor Palestine Links	Palestine Action Liverpool	Palestine Action Liverpool	Bradford Friends of Palestine	Palestine Action Liverpool	Radnor Palestine Links	Palestine Action Liverpool		Local councillor and ex mayor	Bradford friends of Palestine	Palestine Action Liverpool	Palestine Action Liverpool	Unknown	Unknown	Bradford Friends of Palestine	Unknown	Unknown
	Duration	1-2 hrs	1-2hrs	1.5 hrs		45mins	2hrs	Approx 16hrs		10 mins	2hrs	1hr	1hr	30mins	10mins	2hrs	15mins	20 mins
		06-Mar-24 Labtech Presteigne	15-Mar-24 CML Bromborough	18-Mar-24 CML Bromborough	os Shipley	23-Mar-24 CML Bromborough	27-Mar-24 Labtech Presteigne	S Shipley		04-Apr-24 Labtech Presteigne	3S Shipley	10-Apr-24 CML Bromborough	17-Apr-24 CML Bromborough	21-Apr-24 E2V Tech Lincoln	23-Apr-24 E2V Tech Lincoln	3S Shipley	ımbernauld	imbernauld
	Date	06-Mar-24 La	15-Mar-24 CN	18-Mar-24 CN	20-Mar-24 TDS Shipley	23-Mar-24 CN	27-Mar-24 La	02-Apr-24 TDS Shipley	<u>.</u>	04-Apr-24 La	09-Apr-24 TDS Shipley	10-Apr-24 CN	17-Apr-24 CN	21-Apr-24 E2	23-Apr-24 E2	24-Apr-24 TDS Shipley	11-May-24 Cumbernauld	12-May-24 Cumbernauld

				Feledyne UK - a	ttacks and de	eledyne UK - attacks and demonstrations 2022 - 2024		
Date	Location	Duration	Group	Approx numbers		Tactics seen	Remarks	Subsequent Action
13-May-24 C	13-May-24   Cumbernauld	5-10 mins	Unknown	2	Reported to Police and response initiated	2 individuals walking along two aspects of the building	Police responded. No feedback from them due to investigation.	
15-May-24 TDS Shipley	TDS Shipley	7 hrs	Palestine Action group	4 (3 female, 1 Male)	Large emergency services response	4 individuals gained access to reception roof and smashed roof and windows.  Access to site was via a ladder against the fence. CCTV alarms activated and response called.	Police at heights team and fire service removed and arrested protesters from roof. Supporting demonstrators were held by Police at entrance to the industrial estate to prevent support to roof top protesters	Ricky Southall, Amareen Afzal, Serena Fenton released on police bail [redacted] in custody (has also attacked Barclays bank)
07-Jun-24 C	07-Jun-24 CML Bromborough	10mins	Unknown	1 male	- N	1 individual cut through fence and walked through site	Police informed, images captured	
21-Jun-24 C	21-Jun-24 CML Bromborough	1.5hrs	Palestine Action Liverpool	15	Large police presence	Stood in front of gates allowing access	Banners, leaflets, chanting	
21-Jun-24 C	21-Jun-24 CML Bromborough	10 mins	Unknown	1 male		Appears to have cut through fence and walked off site	Police informed, images captured	
05-Jul-24 C	05-Jul-24 CML Bromborough	4 hrs	Palestine Action Liverpool	3 females	Large Police presence	3 individuals attempted to scale ladder to roof. After failing this, they rammed the vehicle gates with a van and proceeded to spray paint over the building whilst live streaming.	Police arrested 3 protestors. All 3 released on bail. We await court dates	
07-Aug-14 TDS Shipley	rDS Shipley	2 hrs	Bradford Friends of Palestine	Approx 20	Large Police presence	Standing in front of gates, chanting and singing	Banners, speakers etc	
18-Sep-24 TDS Shipley	rDS Shipley	2 hrs	Bradford Friends of Palestine	Approx 30	Large Police presence	Standing in front of gates, chanting and singing	Banners, speakers etc. One individual carried a mask of [redacted]	Mask-wearer arrested, charged with a public order offence and bailed. Plea hearing 18 October 2024.
23-Sep-24 TDS Shipley	TDS Shipley	Aprrox 10 minutes	Individual - Palestine Action links	1 female	Not at the time	Adjoining property Myers building yard report a person driving into their yard and park alongside the shared fence to the TDY site. Myers CCTV review shows the driven arrive at main gate at 16:50 and drive into the yard looking around, they reverse and leave. The car returns at 16:53 and asks Myers staff if they can reverse around. Instead of reversing the car drives forwards and stops facing the TDY site. Individual suses a camera phone to film site. They then film Myers yard and then drives slowly to the far end of the yard. 16:55 The driver stops alongside the Teledyne shared fence and films the TDY site from 10ft away, then drives away at 16:56.	Red Fiesta VB63KCC, one female occurpant. Reported on 101 as hostile reconnaissance against section 4 National Security Act. Crime ref 13240522712 / WYP-20240924-0741.	We understand from West Yorks police that the individual was arrested with four burner phones, incriminating hostile recon evidence of other locations on her phones and laptop but the phone seen on 23° was not located. Individual is a regular at protests at the Shipley site with links to Palestine Action. The Police believe she passed the Teledyne recon phone onto Palestine Action before arrest. She gave no comment interview, then released on bail. Update from 28° Dec-CID and CPS are still deciding on next steps.
02-0ct-24 (	02-Oct-24 CML Bromborough	Shrs	Palestine Action Liverpool	2 males 2 females (1 male, driving the van, left immediately on electric scooter).	Large Police response	Climbed onto roof via ladder sealed in van, smashed roof and damaged production floor and clean room	Police arrested 3 individuals. We await court dates.	3 protestors released on police bail.
	rDS Shipley	5 hrs approx	Bradford Friends of Palestine	Approx 35	Immediate Police response	Standing in front of gates, chanting and singing	Originally planned for 12pm arrived at 0630hrs, banners, speakers etc	
20-Nov-24 T	TDS Shipley	2hrs	Bradford Friends of Palestine	Approx 12	Police on scene	Standing in front of gates, chanting, singing Police on scene preventing photography and dancing	Police on scene preventing photography	

	Subsequent Action			The vehicle was searched by the police who seized 2 x zombie-style knives, a brand new sledgehammer, a box of flares, small hammer, red paint and overnight bag of belongings. W York police subsequently informed us that the individual (Luke Carter) has been bailed. He had no previous arrests and no national intelligence recorded. Bail conditions not to approach / enter any Teledyne site across the UK.	
	Remarks	Police on scene throughout, prevented photography	No protest took place, due to adverse weather	Police attended site early in the morning in anticipation of an early morning blockade.  None materialised.  The protestors assembled at 1205 on both in attendance. They finished at 1340 and in attendance. They finished at 1340 and in attendance. They finished at 1340 and dispersed. The police also departed.  At 1437 an individual drove his car onto main gate, unfurled a Palestine flag and shoured pro-Palestine slogans and insults had no previous arrests and no shoured pro-Palestine slogans and insults the unit olock himself to the steering wheel.  The who seized 2 x zombie-style main early messives, a brand new shoured pro-Palestine slogans and insults had no previous arrests and no shoured pro-Palestine slogans and insults had no previous arrests and no shoured pro-Palestine slogans and insults had no previous arrests and no shoured pro-Palestine slogans and insults had no previous arrests and no shoured many a	
Teledyne UK - attacks and demonstrations 2022 - 2024	Tactics seen	Initially in front of gates, Police eventually moved them across the road to allow employee access	Social media posted for a protest outside 1130-1330hrs 8 Dec 24. A further post was made postponing the event until 22 Dec 24	Police attended Poster published on Bradford Friends of both protest and Palestine's Instagram account calling for a subsequent lock-on protest from 12 noon.  Initial peaceful protest at top of Acorn Initial peaceful protest at top of Acorn Road. Protestors with posters and flags standing on the kerb of the pavement.  Subsequent "lock-on" attempt by an individual who drove car in front of main gate.	No protest at Teledyne site. Protest instead held on Parkway, some distance from the site.
tacks and de	Police attendance	Police on scene prior	Nil	Police attended both protest and subsequent lock-on attempt	Not known
<sup>r</sup> eledyne UK - at	Approx numbers	Approx 20	n/a	Арргох 17	25+
	Group	Bradford Friends of Palestine	Chelmsford Palestine Solidarity Campaign	Bradford Friends of Palestine	Chelmsford Palestine Solidarity Campaign
	Duration	3 hrs	N/A	3 hrs approx	
	Location	DS Shipley	08-Dec-24 e2v Chelmsford	DS Shipley	22-Dec-24 e2v Chelmsford
	Date	28-Nov-24 TDS Shipley	08-Dec-24 e	19-Dec-24 TDS Shipley	22-Dec-24 e











Likes



7





pscchelmsford and 5 others

■ pscchelmsford · Original audio

On Sunday, 22nd December, we displayed ...





Likes



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On Sunday, 22nd December, we displayed ...





Likes



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On Sunday, 22nd December, we displayed ...



## ESSEX MARCH FOR PALESTINE Saturday 8th February - 12pm Chelmsford

On Saturday, 8th February 2025, at 12 p.m., join This march is a solemn and urgent demand for justice, an end to the genocide, and liberation us in Chelmsford to stand against the horrifying atrocities in Palestine. for the Palestinian people.

oppression and demand accountability for the Organised by a coalition of activist groups, we We will not rest until justice and peace prevail. unfathomable suffering inflicted on millions. are united in our resolve to confront

From there, we will proceed down Moulsham We will begin our march at Oaklands Park, exiting via the Moulsham Street entrance. Street, pass through the City Centre, and conclude at Shire Hall.

impactful speeches, followed by a solemn The march will conclude with a series of one-minute silence. Bring your banners. Bring your megaphones. Bring your placards and boards. Bring your Bring your unwavering spirit. Bring your Bring your art & lungs. family and friends. humanity.

Fogether, let us send a powerful message: WE WILL NOT BE SILENT IN THE FACE OF INJUSTICE.

Assembly Point: Oaklands Park, Chelmsford Date: Saturday, 8th February 2025 March Details: Time: 12 PM



# pscchelmsford ESSEX MARCH FOR PALESTINE

On Saturday, 8th February 2025, at 12 p.m., join us in Chelmsford to stand against the horrifying atrocities in Palestine. This march is a solemn and urgent demand for justice, an end to the genocide, and liberation for the Palestinian people.

the unfathomable suffering inflicted on millions. We will not rest Organised by a coalition of activist groups, we are united in our resolve to confront oppression and demand accountability for until justice and peace prevail.

Moulsham Street, pass through the City Centre, and conclude at Moulsham Street entrance, From there, we will proceed down We will begin our march at Oaklands Park, exiting via the Shire Hall.

The march will conclude with a series of impactful speeches, followed by a solemn one-minute silence.

and boards. Bring your family and friends. Bring your art & lungs. Bring your banners. Bring your megaphones. Bring your placards Bring your unwavering spirit. Bring your humanity.

Together, let us send a powerful message: WE WILL NOT BE SILENT IN THE FACE OF INJUSTICE.

MARCH DETAILS

Date: Saturday, 8th February 2025

• Time: 12 PM

Assembly Point: Oaklands Park, Chelmsford

Confirmed Collaborators: - PSC Chelmsford

- Association of Student Activism for Palestine COURT 12 CO 11 CO 11.





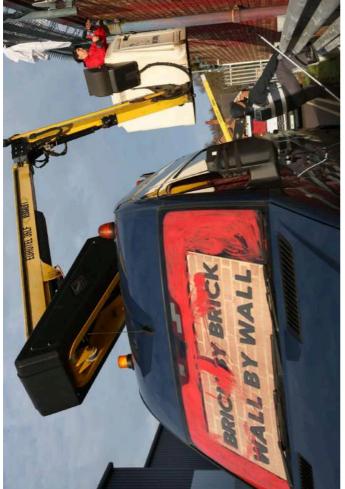


7 days ago



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Lane production site, and today, from within two buckets attached to two cherry pickers, a dedicated team of activists are using demolition tools to target the factory walls. The drivers have From 12.30PM on Christmas day, Palestine Action begun breaking through the walls of Elbit's UAV Engines' (UEL) Shenstone drone factory. Palestine Action have repeatedly targeted the Lynn secured themselves inside the two vehicles, using lock-ons to remain in position, allowing more time to put the Israeli weapons maker out of commission. Israel's largest weapons firm, Elbit Systems, use the Staffordshire site to design and manufacture Wankel-type rotary engines, which have been used to power Israel's Hermes killer drone fleet, bringing misery and death to the children of Gaza, to whom the 'Season of Goodwill' does not extend. In addition to producing engines for Elbit's 450 drone, the UEL AR731 rotary engines produced at Shenstone, are also used in the Israeli Aerospace Industries (IMI) Harop Kamikase drone, which is currently being upgraded to kill autonomously. Whilst UAV Engines routinely obfuscate their involvement in supplying arms to Israel, in line with their non-disclosure agreement with the Israeli military, export licenses show the company send drone parts to Israel with the 'end-user' listed as the 'State of Israel'. Today's action takes place, not only in the context of the Gaza Genocide, and with the birthplace of Christmas under occupation, but with a climate of state terror in Britain, being used to try and intimidate protestors. These tactics include dawn raids, detention under supposed anti-terror laws, and days of questioning. On Christmas Eve, Palestine Action already had 22 political prisoners behind bars, almost all of whom are still unconvicted, and none of whom are charged with terrorist offences.

## A Palestine Action spokesperson said:

"Despite state tactics to deter Palestine Action, we remain more determined than ever to bring an end to the British presence of Israel's largest weapons firm, Elbit Systems. By breaking the walls of an Israeli weapons factory today, we are standing with the Palestinian people who remain occupied and under Israeli bombardment on Christmas day. Brick, by brick, wall by wall, Israel's weapons trade will fall."

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NOTES TO EDITORS

If you would like any further information on Palestine action, please contact media@palestineaction.org

Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking direct action against Elbit Systems' UK locations at grassroots level, calling for them all to be shut down and for the British government to end its complicity in Israeli apartheid.

 $\leftarrow \text{Judge Keeps Unconvicted Palestine Action Prisoner, Francesca Nadin, Locked-Up Over Christmas}$ 

Palestine Action Activist Remanded in Custody After Christmas Day Action →

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## Images available are free to use, with relevant credit

Following Palestine Action's Christmas Day action, against Elbit's UAV Engines Shenstone drone factory, an activist has been remanded in custody.

The activist, Bryn, was arrested on Christmas Day, at the Staffordshire plant, where Elbit, Israel's largest weapons maker, manufacture engines for the killer drones used in the Gaza Genocide. The UEL rotary engines are used in Elbit's 450 Drone, as well as the Israeli Military Industries (IMI) Harop Kamikase Drone, which is being upgraded to kill autonomously. Whilst UAV Engines routinely obfuscate their involvement in supplying arms to Israel, in line with their non-disclosure agreement with the Israeli military, export licenses show the company send drone parts to Israel with the 'end-user' listed as the 'State of Israel'

The Christmas Day action saw two specially-modified vehicles arrive at the Shenstone site, equipped with cherry-pickers, from which activists smashed the factory structure, while the drivers of the vehicles locked-on, secured inside. While Bryn was remanded in custody, the four others, who took part in the action, were released the following day, 26 Th December.

A dedicated activist, Bryn recorded the following statement on his arrest form:

The spotlight should always be on Palestine, and the Palestinian struggle for equal human rights under international law, and against Israeli apartheid, ethnic cleansing, occupation

"The failure of our government to stop arms exports to Israel compel many ordinary people, like me, who are human rights supporters, to take action against those exports, and against the killing they enable.

Bryn was arrested for another action on July 31 2024, when Palestine Action blocked both entrances of the same UAV Engines factory, and plastered it with blood-red paint. While on bail for the action, he had not been charged, until now, which was a way of getting him remanded in prison.

A Palestine Action spokesperson said:

but 2, of the other prisoners, he is being held, unconvicted of any offence, imprisoned as part of the British state's attempt to deter Palestine Action. However, their actions against arms "As he joins Palestine Action's other 21 political prisoners, who will be starting 2025 in a jail cell, Bryn tells us that he is unbowed and unbroken, and accepts the position he is in. Like all, manufacturers will only serve to inspire others to take direct action to disrupt Israel's war machine."

ENDS

NOTES TO EDITORS

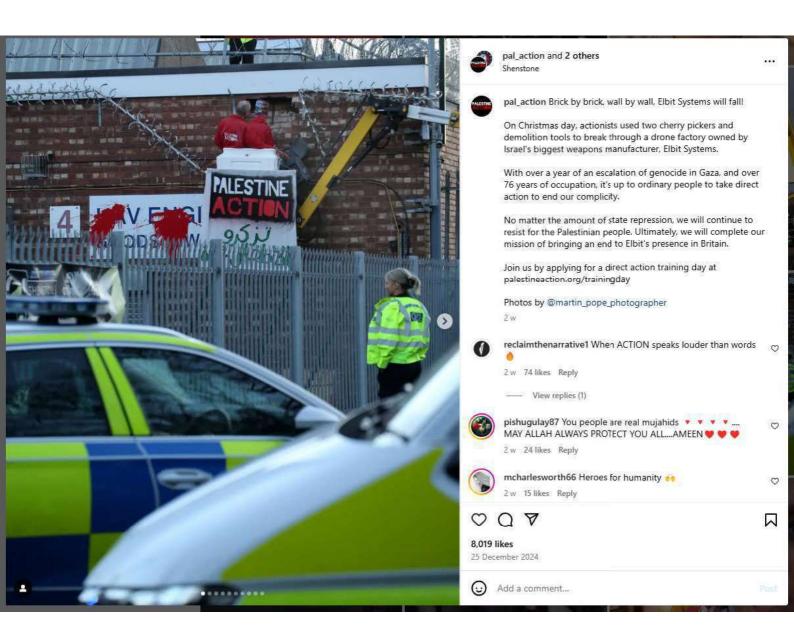
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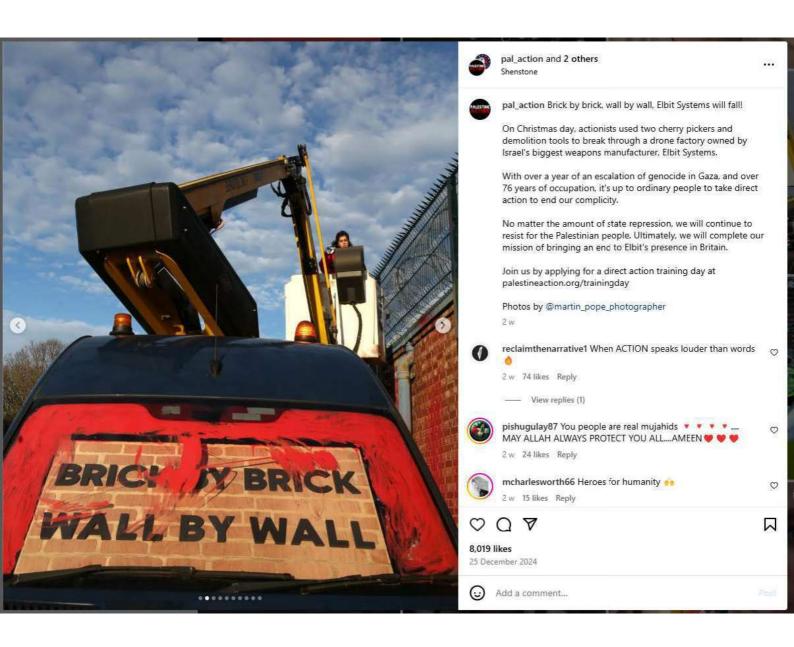
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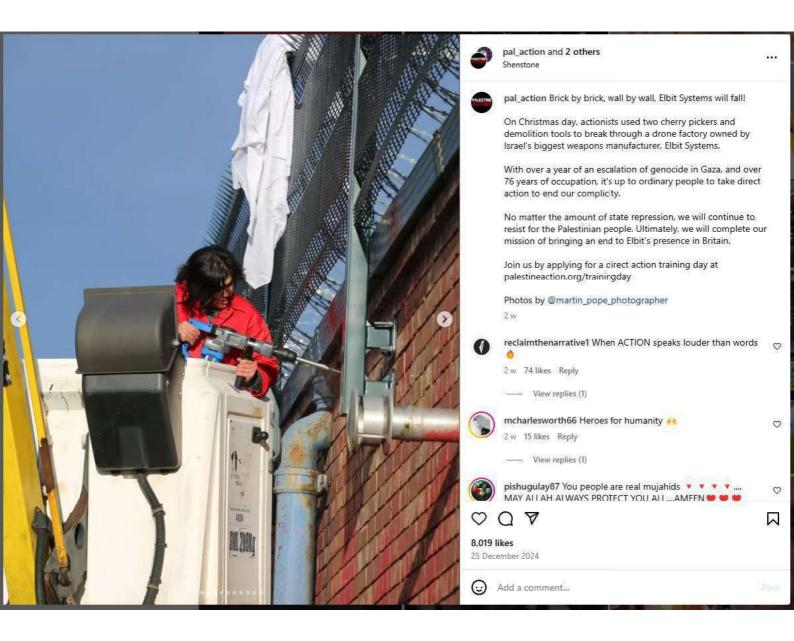
← On Christmas Day, Palestine Action Break the Walls of Elbit's UAV Engines Shenstone Drone Factory

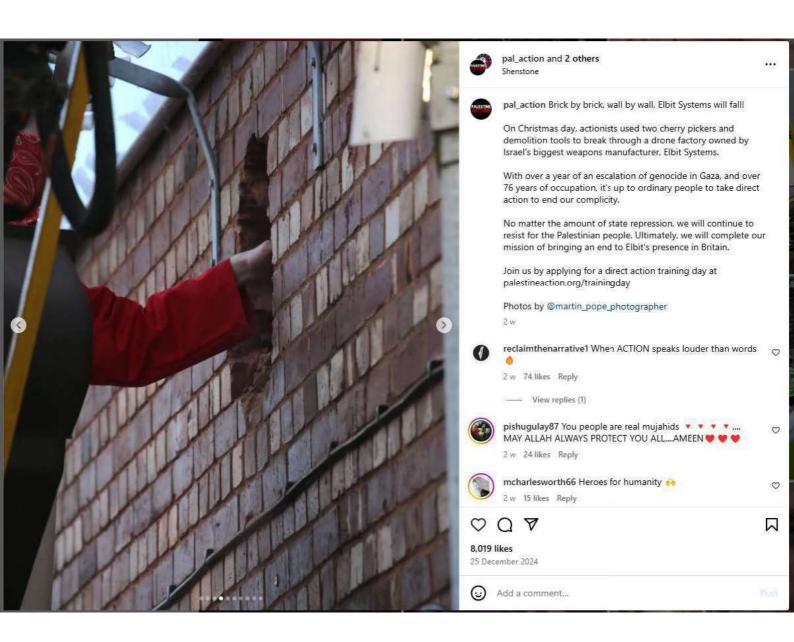
Glasgow factory smashed in overnight action for 'links to Gaza genocide' →

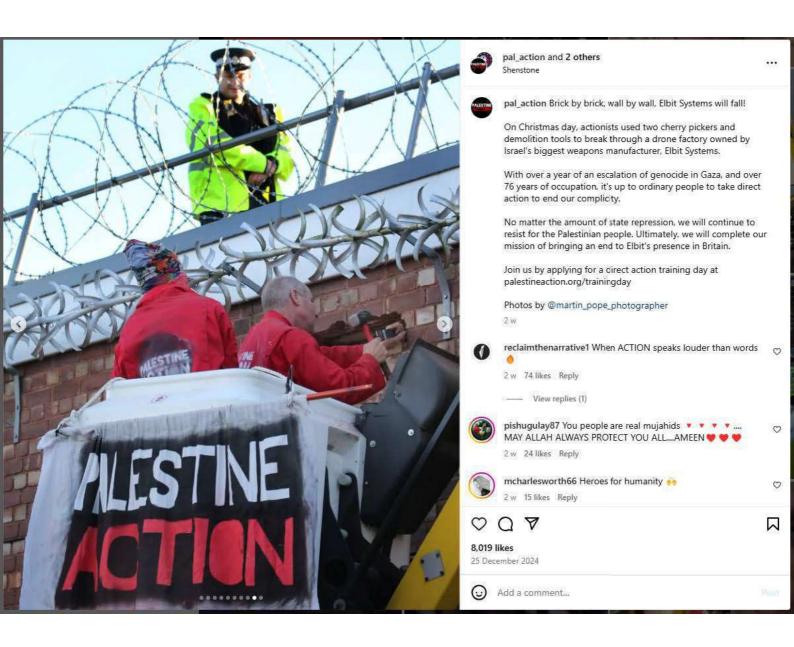


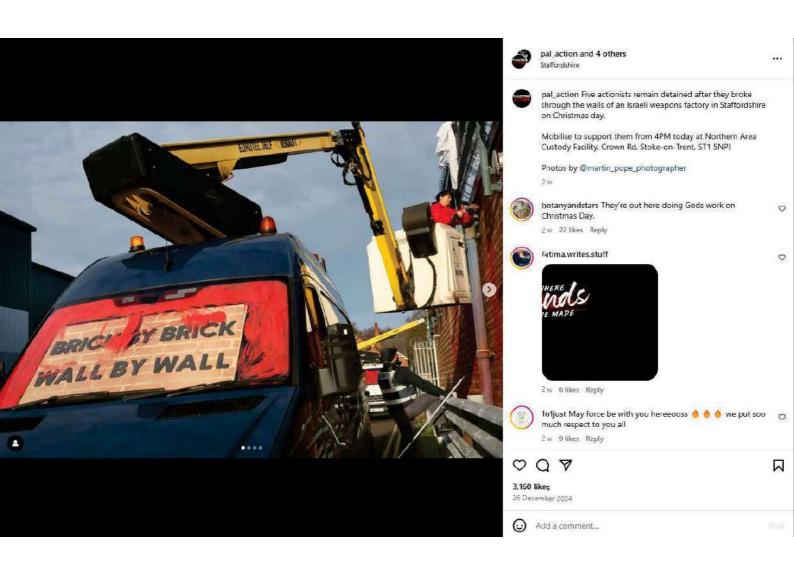


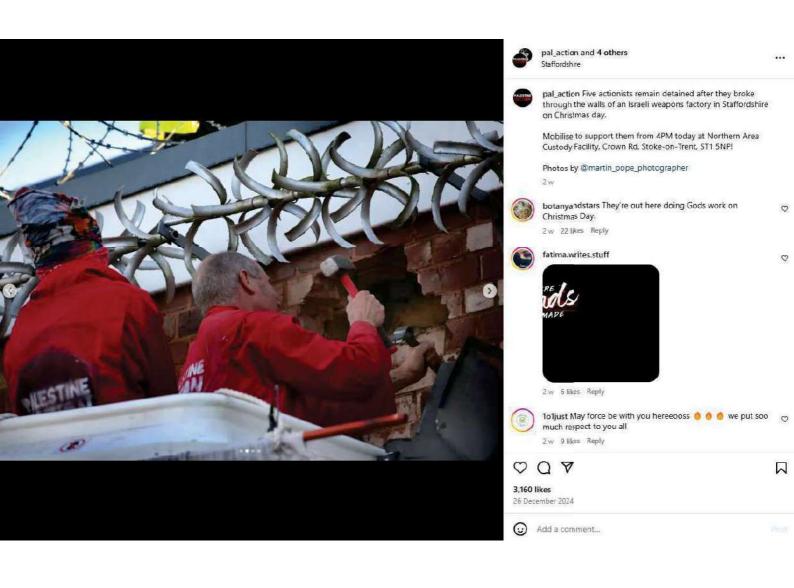


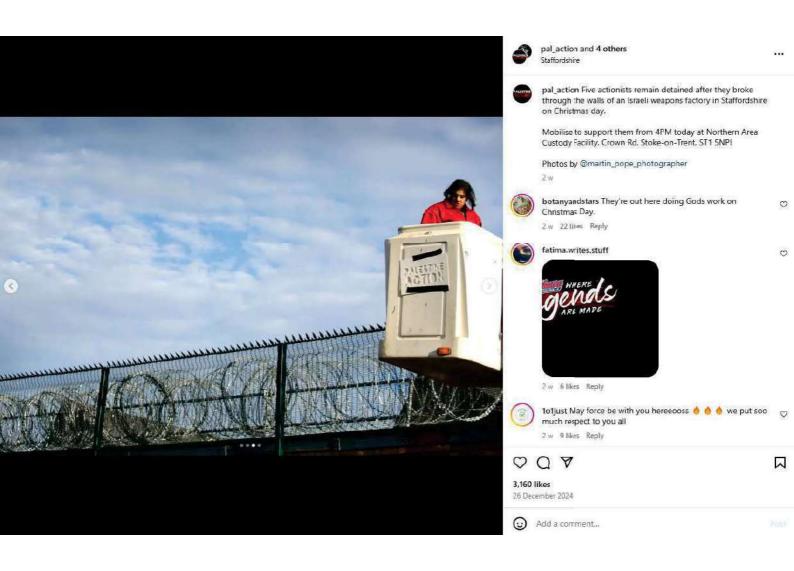


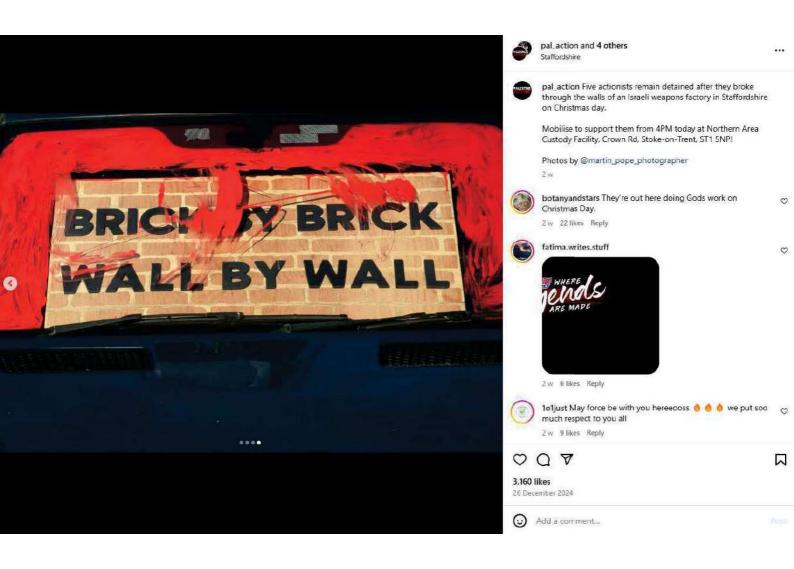


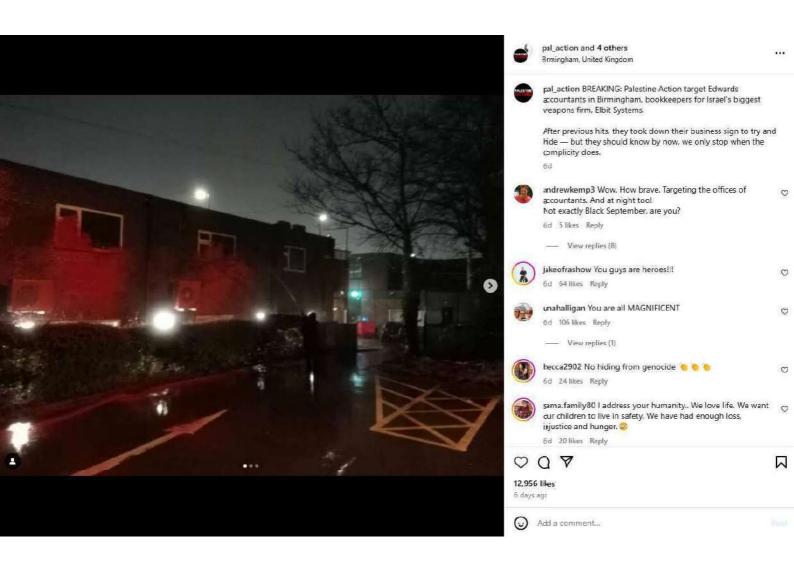


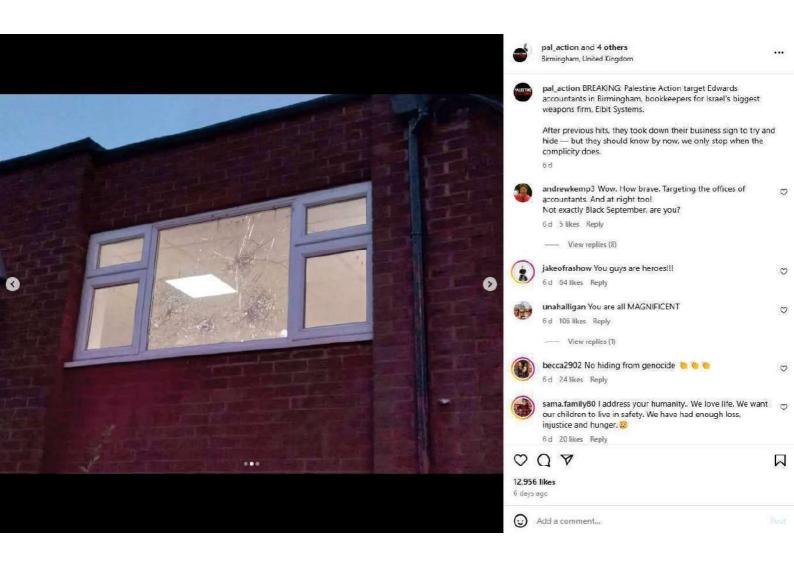


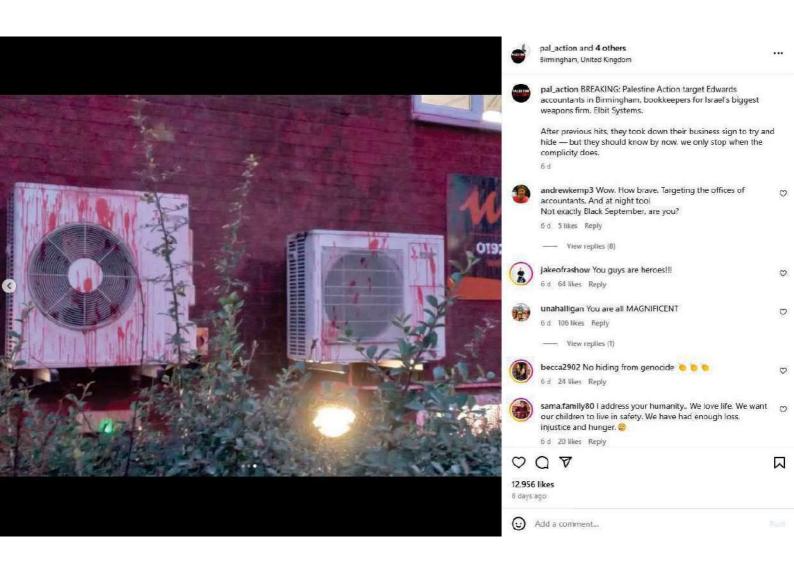


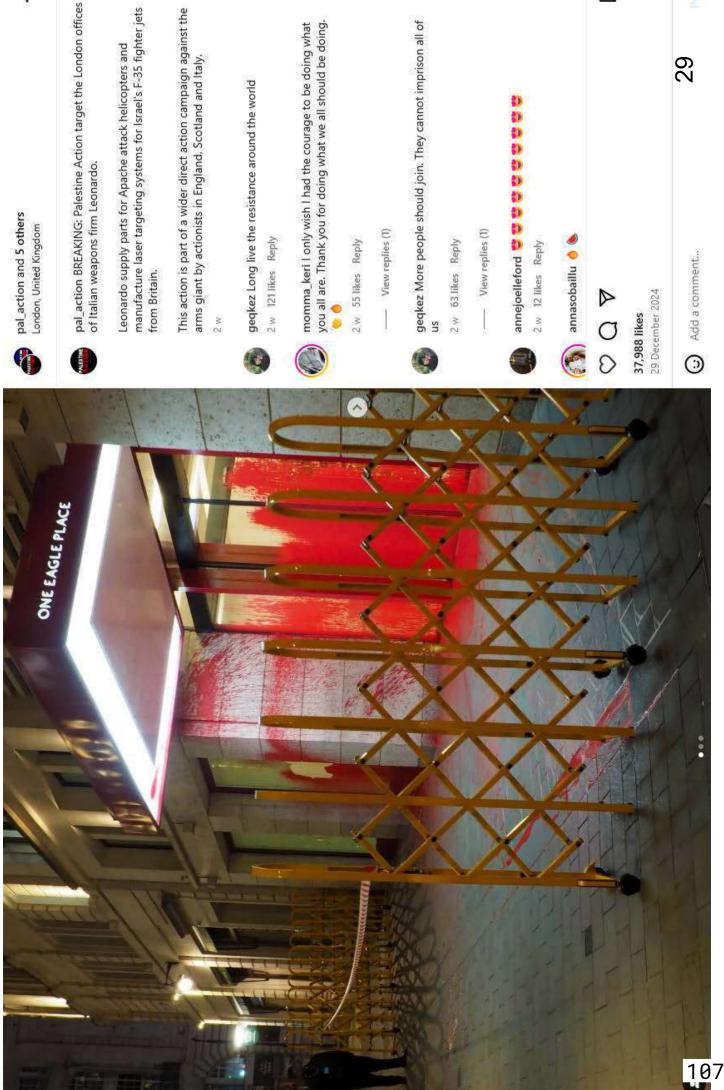












pal\_action and 5 others

:

manufacture laser targeting systems for Israel's F-35 fighter jets Leonardo supply parts for Apache attack helicopters and

This action is part of a wider direct action campaign against the arms giant by actionists in England, Scotland and Italy.

geqkez Long live the resistance around the world

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momma\_keri I only wish I had the courage to be doing what you all are. Thank you for doing what we all should be doing.

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View replies (1)

geqkez More people should join. They cannot imprison all of us

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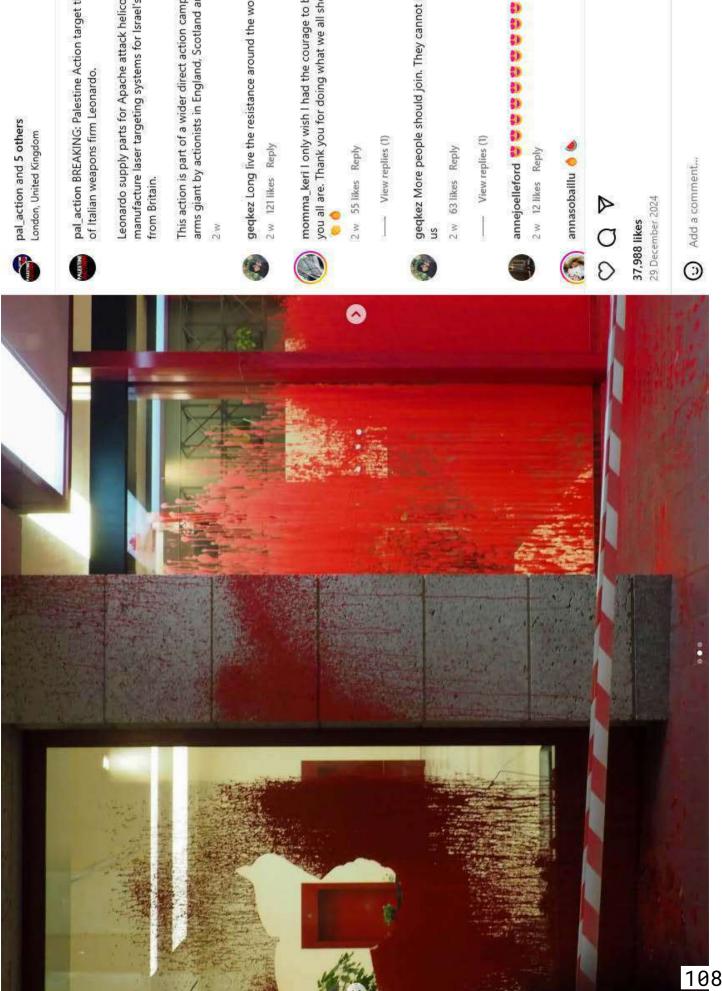
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pal\_action BREAKING: Palestine Action target the London offices of Italian weapons firm Leonardo.

manufacture laser targeting systems for Israel's F-35 fighter jets Leonardo supply parts for Apache attack helicopters and

This action is part of a wider direct action campaign against the arms giant by actionists in England, Scotland and Italy.

geqkez Long live the resistance around the world

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momma\_keri I only wish I had the courage to be doing what you all are. Thank you for doing what we all should be doing.

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geqkez More people should join. They cannot imprison all of

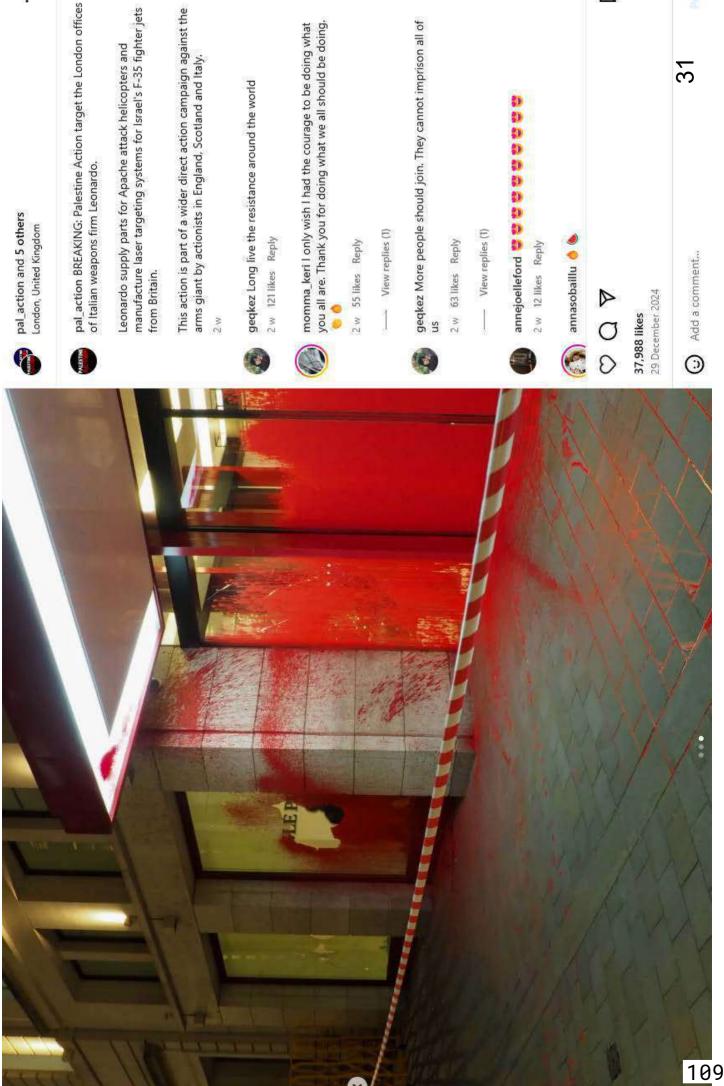
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manufacture laser targeting systems for Israel's F-35 fighter jets Leonardo supply parts for Apache attack helicopters and

This action is part of a wider direct action campaign against the arms giant by actionists in England, Scotland and Italy.

geqkez Long live the resistance around the world

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momma\_keri I only wish I had the courage to be doing what

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you all are. Thank you for doing what we all should be doing.

geqkez More people should join. They cannot imprison all of

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annejoelleford 🛡 🗢 🗢 🗢 🗢 😊 😊

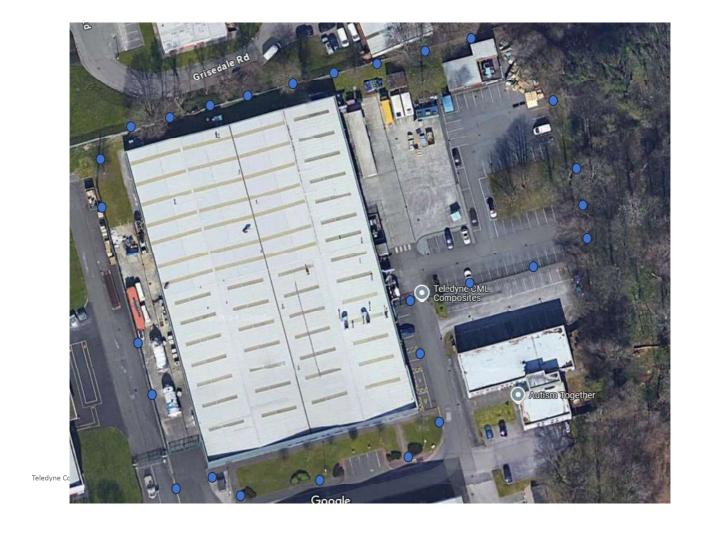
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# Injunction signage - Wirral







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Title Number: EX688035

# Injunction signage - Lincoln



Promap

LANDMARK INFORMATION

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Title Number: LL317736





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Title Number: BK365055



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Title Number: WYK387275



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LANDMARK INFORMATION

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Title Number: CYM839162





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Title Number: WA552132





#### JOIN A DIRECT ACTION TRAINING DAY

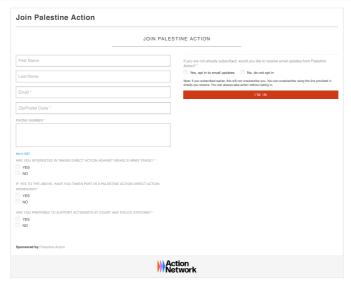






DIRECT ACTION TRAINING DAY [LONDON]

Load More





# SUPPORT UPCOMING TRIALS



Load More

# DIRECT ACTION TRAINING DAY

#### AS THE GENOCIDE OF PALESTINIANS RAGES ON, IT'S IMPORTANT TO RECOGNISE HOW CLOSE TO HOME THE ISRAELI WAR INDUSTRY IS AND HOW WE CAN IMPACT IT.

Britain is home to several Israeli weapons firms, including Israel's largest weapons firm, Elbit Systems. Elbit manufacture tanks, bullets, drones and munitions for the Israeli military and market their weaponry as "battle-tested" – tested on

#### THE ISRAELI WAR MACHINE IS OPERATING IN BRITAIN, AND THROUGH DIRECT ACTION WE CAN STOP IT IN ITS TRACKS.

The British government has been complicit in the colonisation of Palestine for over 100 years – protests and lobbying efforts has failed to change that. This refusal for the powers that be to end their participation in Israeli war crimes, and the presence of Israeli weapons factories on our doorstep, demands a more effective and direct approach – direct action.

#### "PROTEST IS LIKE BEGGING THE POWERS THAT BE TO DIG A WELL, DIRECT ACTION IS DIGGING THE WELL YOURSELF AND DARING THEM TO STOP YOU'

stine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down Israel's war machine.





## **CRASH COURSE ON DIRECT ACTION** [ONLINE WORKSHOP]

- **□ Date** January 15, 2025 Time 7:00 pm 9:00 pm

% Website BOOK HERE

how you can be part of this campaign and help us #ShutElbitDown. The workshop will cover ou theory on direct action, British complicity and the



## **DIRECT ACTION TRAINING DAY** [LONDON]

- **Date** January 19, 2025
- Time All Day Event
  Website BOOK HERE

country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down Israel...



### **CRASH COURSE ON DIRECT ACTION** [ONLINE WORKSHOP]

- Date January 19, 2025
  Time 7:00 pm 9:00 pm
- % Website BOOK HERE

Join this crash course on direct action to find out how you can be part of this campaign and help us #ShutElbitDown. The workshop will cover our theory on direct action, British complicity and the legal process associated with taking action!



# CRASH COURSE ON DIRECT ACTION [ONLINE WORKSHOP]

- Date January 22, 2025
  Time 7:00 pm 9:00 pm
  Website BOOK HERE

Join this crash course on direct action to find out how you can be part of this campaign and help us #ShutElbitDown. The workshop will cover our theory on direct action, British complicity and the legal process associated with taking actio



## DIRECT ACTION TRAINING DAY [LIVERPOOL]

- ☐ Date January 26, 2025 ⑤ Time 11:00 am 5:00 pm ℅ Website BOOK HERE

Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing



## CRASH COURSE ON DIRECT ACTION [ONLINE WORKSHOP]

- ☐ Date January 26, 2025 ⑤ Time 7:00 pm 9:00 pm ⑥ Website BOOK HERE

Join this crash course on direct action to find out how you can be part of this campaign and help us #ShutElbitDown. The workshop will cover our theory on direct action, British complicity and the

legal process associated with taking action!



# **CRASH COURSE ON DIRECT ACTION** [ONLINE WORKSHOP]

- Date January 29, 2025
  Time 7:00 pm 9:00 pm
  Website BOOK HERE

Join this crash course on direct action to find out how you can be part of this campaign and help us #ShutElbitDown. The workshop will cover our theory on direct action, British complicity and the legal process associated with taking actio



# **DIRECT ACTION TRAINING DAY** [BRISTOL]

- Date February 1, 2025
  Time 11:00 am 5:00 pm
  Website BOOK HERE

Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down Israel...

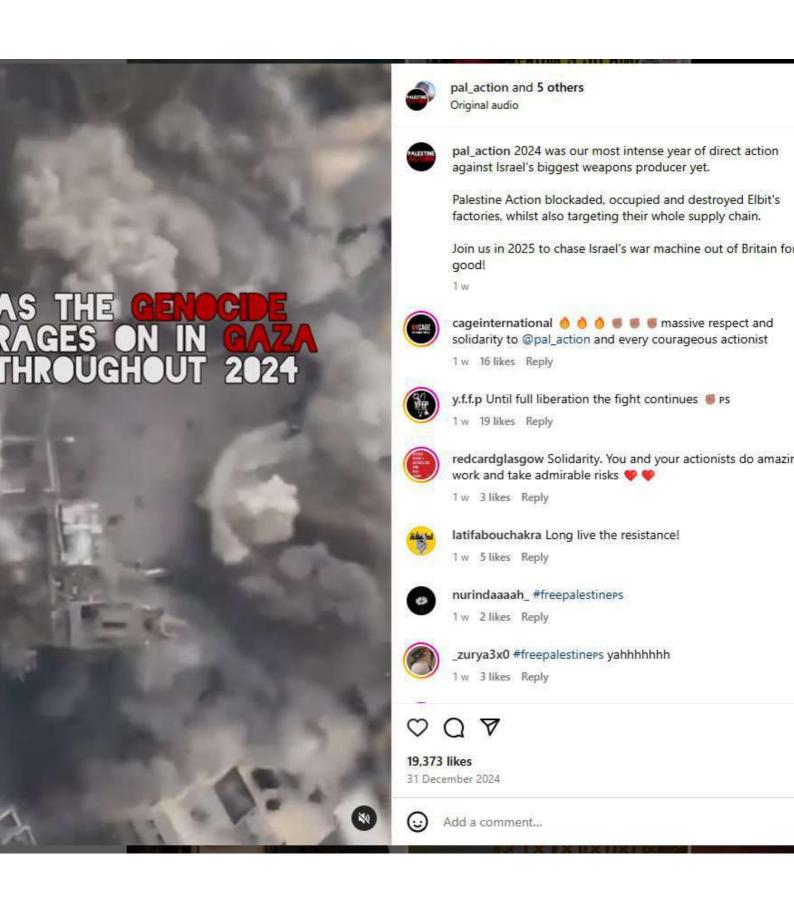


# **DIRECT ACTION TRAINING DAY** [BIRMINGHAM]

- Date February 2, 2025
  Time 11:00 am 5:00 pm
  Website BOOK HERE

Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down Israel...

If you're interested, please fill in the application form. The location of the training day will not be disclosed in advance. We advise you to download signal messenger at signal org/download where we will contact you directly. Only those who pass our vetting procedure will be informed of the location and allowed to participate.





# Claim Form (CPR Part 8)

In the High Court of	of Justice, King's Bench Division	
Claim no.		
Fee Account no.	PBA0087115	
Help with Fees - Ref no. (if appli- cable)	HWF-	

# Claimant

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

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 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)	Ctaim no.	

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 2024			
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
- 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

# SCHEDULE 2 – THE SITES

- 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).

# <u>SCHEDULE 3 – THE ROADS</u>

1. Acorn Park, Shipley.

# **DETAILS OF CLAIM**

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

## N244

# **Application notice**

For help in completing this form please read the notes for guidance form N244 Notes.

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when you fill in a form:

https://www.gov.uk/

government/organisations/hm-courts-and-

tribunals-service/about/personal-

information- charter

Name of court	Claim no.
HIGH COURT OF JUSTICE, KING'S BENCH DIVISION	
Fee account no.	Help with Fees - Ref. no.
(if applicable)	(if applicable)
PBA0087115	H W F
Warrant no.	
(if applicable)	
Claimant's name (including	
TELEDYNE UK LIMITED	COURT OF JUST
(TEL14/40)	
Defendant's name (includir See Schedule 1	is the state of th
see schedule 1	* 12 Don 2004 *
Date	13 Dec 2024 13 December 2024
Date	
	BENCH DIVIS

1.	What is your name or, if you are a legal representative, the name of your firm?				
	Keystone Law				
2.	Are you a	□Claimant	□Defendant	⊠Legal Representative	
		$\Box$ Other (please specify)			
	If you are a legal representative whom do you represent?		Claimant		
3.	What order are yo	ou asking the court to mak	e and why?		

The Claimant seeks interim injunctive relief pursuant to the Senior Courts Act 1981, s37(1) and CPR 25.1(1)(a) to restrain acts of trespass, interference with its common law right to access the highway from its land and public nuisance (obstruction of the highway).

The Claimant also seeks, pursuant to CPR 6.15 and CPR 6.27, an order permitting service by an alternative method of the Claim Form, Application for interim relief, all documents in support of the Claim and Application and any injunction order made.

The Claimant intends to make this Application on short notice to the Defendants.

4.	Have you attached a draft of the order you are applying for?	⊠Yes	□No
5.	How do you want to have this application dealt with?	⊠at a hearing	$\square$ without a hearing
		$\Box$ at a remote hea	aring
6.	How long do you think the hearing will last? Is	2 Hours	0 Minutes
	this time estimate agreed by all parties?	□Yes	⊠No
7.	Give details of any fixed trial date or period	N/A	
8.	What level of Judge does your hearing need?	Judge	
9.	Who should be served with this application?	Defendants	
9a	Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.		

10. What information will you be relying on, in support of your application?			
⊠the attached witness statement			
$\Box$ the statement of case			
$\Box$ the evidence set out in the box below			
If necessary, please continue on a separate sheet.			

□ `	Yes.	Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

# Statement of Truth

brought against a person 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 section 10 (and any continuation sheets) are true.			
☑The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.			
Signature			
M Singh			
□Applicant			
□ Litigation friend (where applicant is a child or a Protected Party)			
△Applicant's legal representative (as defined by CPR 2.3(1))			
Date			
Day Month Year  13 2024			
Full name			
MANAN SINGH			
Name of applicant's legal representative's firm			
KEYSTONE LAW			
If signing on behalf of firm or company give position or office held			
PARTNER			

Applicant's address to which documents should be sent.

Building and street
48
Second line of address
CHANCERY LANE
Town or city
HOLBORN
County (optional)
Postcode
W  C  2  A  1  J  F
If applicable
Phone number
020 3319 3700
Fax phone number
DX number
193 Chancery Lane
Your Ref.
TEL14/40
Email
Manan.Singh@keystonelaw.co.uk info.teledyne@keystonelaw.co.uk

# **SCHEDULE 1 - DEFENDANTS**

- (1) JULIAN ALLEN GAO
  - (2) RUBY HAMILL
  - (3) DANIEL JONES
  - (4) NAJAM SHAH
- (5) RICKY SOUTHALL
- (6) AMAREEN AFZAL
- (7) SERENA FENTON
- (8) <u>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:</u>
  - 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

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

CLAIM NO.

# In the matter of an injunction sought pursuant to CPR 25

Before the Honourable [ [date]

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:
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  - 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

	<b>Defendants</b>
Draft INJUNCTION ORDER	

# **PENAL NOTICE**

IF YOU, THE ABOVE NAMED DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

**UPON** the Claimant's claim brought by way of a Part 8 Claim Form dated 13 December 2024 (the 'Claim')

**AND UPON** the Claimant making an application for interim injunctive relief by way of an Application Notice dated 13 December 2024 (the 'Application')

**AND UPON** the Court reading the Application and the witness statements listed in Schedule 2 to this Order

**AND UPON** the Court being satisfied pursuant to s12(2)(b) of the Human Rights Act 1998 that the Claimants had compelling reasons why the Named Defendants should not be notified of the Application prior to the Court hearing the Application (but with short notice of this hearing having in any event been given to the Defendants by way of email to the email address listed at paragraph 3(ii) of this Order)

**AND UPON** the Court having particular regard to the importance of the Defendants' Article 10 and Article 11 Convention rights to freedom of expression and freedom of lawful assembly

AND UPON the Court being satisfied that the Order does not prohibit peaceful protest

**AND UPON** the Court considering its discretion to grant injunctive relief pursuant to s37(1) of the Senior Courts Act 1981 and considering it just and convenient to do so

AND UPON the Court accepting the undertakings given in Schedule 3 to this Order

AND UPON hearing Natalie Pratt of counsel for the Claimant, without attendance by the Defendants

# IT IS ORDERED THAT:

## **Definitions**

- 1. For the purpose of this Order:
  - i. The 'Shipley Site' shall mean Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW, as marked in red on the plans at Annexe 1 to this Order;
  - ii. The **'Lincoln Site'** shall mean Teledyne UK Limited, 168 Sadler Road, Lincoln LN6 3RS, as marked in red on the plan at Annexe 2 to this Order;
  - iii. **'Wirral Site'** shall mean Teledyne UK Limited, Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA, as marked in red on the plan at Annexe 3 to this Order;
  - iv. The **'Chelmsford Site'** shall mean Teledyne UK Limited, 106 Waterhouse Lane, Chelmsford CM1 2QU, as marked in red on the plan at Annexe 4 to this Order;
  - v. The 'Presteigne Site' shall mean Teledyne UK Limited, Broadaxe Business Park, Presteigne LD8 2UH, as marked in red on the plans at Annexe 5 to this Order;
  - vi. The 'Newbury Site' shall mean Teledyne UK Limited, Reynolds Navigation House, Canal View Road, Newbury RG14 5UR, as marked on red on the plan at Annexe 6 to the Claim Form.

# **INJUNCTION**

2. Until and subject to any further order of the Court, the Defendants and each of them (whether by themselves or by instructing, encouraging, or allowing any other person) are forbidden from:

- i. Entering or remaining on the following sites and/or entering or remaining in or on buildings on the following sites:
  - a) the Shipley Site, as marked in red on the plans at Annexe 1 to this Order;
  - b) the Lincoln Site, as marked in red on the plan at Annexe 2 to this Order;
  - c) the Wirral Site, as marked in red on the plan at Annexe 3 to this Order;
  - d) the Chelmsford Site, as marked in red on the plan at Annexe 4 to this Order;
  - e) the Presteigne Site, as marked in red on the plans at Annexe 5 to this Order; and
  - f) the Newbury Site, as marked in red on the plan at Annexe 6 to this Order.
- ii. Depositing any item or substance on the following sites and/or defacing or damaging any building or structure on the following sites:
  - a) the Shipley Site, as marked in red on the plans at Annexe 1 to this Order;
  - b) the Lincoln Site, as marked in red on the plan at Annexe 2 to this Order;
  - c) the Wirral Site, as marked in red on the plan at Annexe 3 to this Order;
  - d) the Chelmsford Site, as marked in red on the plan at Annexe 4 to this Order;
  - e) the Presteigne Site, as marked in red on the plans at Annexe 5 to this Order; and
  - f) the Newbury Site, as marked in red on the plan at Annexe 6 to this Order.
- iii. Blocking, slowing down, obstructing or otherwise interfering with vehicular access to or from the highway at the Shipley Site (as marked in red on the plans at Annexe1 to this Order);
- iv. Approaching, slowing down or obstructing any vehicle moving along or accessing the road known as Acorn Park, Shipley (as marked in purple on the plans at Annexe 1 to this Order) for the purpose of:
  - a) disrupting vehicular access to or from the Shipley Site (as marked in red on the plans at Annexe 1 to this Order); and
  - b) protesting.

- v. Affixing themselves or any other item to, or leaving or depositing any item on, the road known as Acorn Park, Shipley (as marked in purple on the plans at Annexe 1 to this Order) for the purpose of:
  - a) disrupting vehicular access to or from the Shipley Site (as marked in red in the plans at Annexe 1 to this Order); and
  - b) protesting.
- vi. Affixing themselves or any other items to any vehicle on, entering or exiting the Shipley Site (as marked in red on the plans at Annexe 1 to this Order), where that affixation is done for the purpose of protesting.

# Service and notification

- 3. Pursuant to CPR rules 6.15 and 6.27, the Claimant has permission to serve the First to Seventh Defendants with, and permission to notify the Eighth to Eleventh Defendants (Persons Unknown) of, the Claim Form, Application for interim relief, evidence in support of the Claim and Application, this Order and any further documents in the Claim by (with 3(i) 3(iv) to be treated conjunctively):
  - i. **Website:** placing a copy of the documents to be served on a website or webpage operated by the Claimant, a link to which shall be placed on the Claimant's main website; and
  - ii. **Email:** sending a copy of the documents to be served to Palestine Action, Bradford Friends of Palestine and the Palestine Solidarity Campaign (including the relevant local branches) at the following email addresses

info@palestineaction.org; media@palestinecampaign.org; info@palestinecampaign.org; pscchelmsford@gmail.com; liverpoolfopal@gmail.com; bfdfriendsofpalestine@yahoo.com; actions@palestineaction.org; branches@palestinecampaign.org; palestinesolidaritybradford@gmail.com; lincolnpalestine@gmail.com; pscshrop@gmail.com;

and providing a link by which the webpage or website mentioned in paragraph 3(i) above can be accessed.

- iii. **Post:** where an address of a Named Defendant is known to the Claimant, by posting a copy of the documents to be served together with a covering letter by way of first-class post;
- iv. **Signs:** placing signs on the perimeter of the Shipley Site, Lincoln Site, Wirral Site, Chelmsford Site, Presteigne Site and Newbury Site, which advise that a High Court injunction is in force that restricts some protest activities, and which provide a weblink and QR code by which the website or webpage mentioned in paragraph 3(i) above can be accessed;

- v. **Where requested by a Defendant:** the documents to be served may be served by email where the Defendant has requested that they be served by email, by sending the email to the address provided by the Defendant; or
- vi. **Lawyers:** by serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.
- 4. The deemed date of service of any documents referred to in paragraph 3 above shall be the day on which service of the document or documents is completed in accordance with paragraph 3 above.
- 5. The Defendants shall acknowledge service of the Claim Form 56 days after the deemed date of service and file any written evidence in defence by the same date.

# Liberty to apply

- 6. The Defendants or any other person affected by this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person, but they must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of that application, that evidence must be served on the Claimant's solicitors 48 hours in advance of the hearing.
- 7. Any person applying to vary or discharge this Order must provide their full name and address for service.

# **Return date hearing**

- 8. The continuation of this Order shall be considered at a hearing before a Judge of the King's Bench Division on 24 January 2025, with a time estimate of 1 day, to include 1.5 hours judicial pre-reading.
- 9. Any evidence in support of or opposition to the continuation of this Order shall be filed by 4pm on 17 January 2025.
- 10. The Claimant shall file, and serve in accordance with paragraph 3 above, a hearing bundle for use at the return date hearing by 4pm on 20 January 2025.
- 11. The Claimant shall file, and serve in accordance with paragraph 3 above, its skeleton argument by 4pm on 21 January 2025. Any other person who wishes to be heard at the return date hearing should also file and serve on the Claimant a skeleton argument by 4pm on 21 January 2025.

#### Communications with the Claimant and the Court

- 12. All communications with the Claimant about this Order should be sent by email to the Claimant's solicitors, Keystone Law, at info.teledyne@keystonelaw.co.uk.
- 13. All communications with the Court about this Order should be sent to KBJudgesListing@justice.gov.uk or Room E03 Royal Courts of Justice, Strand, London

WC2A 2LL. The Telephone number is 020 3938957. The offices are open between 10am and 4pm Monday to Friday.

# Costs

14. Costs reserved

Pursuant to CPR 40.7(1) this Order has effect from the date it is made, that being [date]

#### **GUIDANCE NOTES**

#### Effect of this Order - the Defendants

1. A Defendant who is an individual and who is ordered not to do something must not do it him or herself or in any other way nor must he/she do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

# **Interpretation of this Order**

- 2. In this Order, references to 'the Defendant' means any or all of them (unless expressly stated otherwise).
- 3. A requirement to serve on a 'Defendant' means on each of them. However, the Order is effective against any Defendant on whom it is served in accordance with this Order.
- 4. An Order requiring 'the Defendant' not to do anything applies to all Defendants.
- 5. This Order contains the following schedules and annexes
  - i. Schedule 1 Named Defendants;
  - ii. Schedule 2 witness statements;
  - iii. Schedule 3 undertakings;
  - iv. Annexe 1 plans of the Shipley Site;
  - v. Annexe 2 plan of the Lincoln Site;
  - vi. Annexe 3 plan of the Wirral Site;
  - vii. Annexe 4 plan of the Chelmsford Site;
  - viii. Annexe 5 plans of the Presteigne Site;
    - ix. Annexe 6 plan of the Newbury Site.

# <u>SCHEDULE 1 – NAMED DEFENDANTS</u>

- (1) JULIAN ALLEN GAO
- (2) RUBY HAMILL
- (3) DANIEL JONES
- (4) NAJAM SHAH
- (5) RICKY SOUTHALL
- (6) AMAREEN AFZAL
- (7) SERENA FENTON

# SCHEDULE 2 – WITNESS STATEMENTS

The Court read the following witness statements on behalf of the Claimants:

- 1. The first witness statement of Nicholas James Wargent dated 13 December 2024;
- 2. The first witness statement of Manan Singh dated 13 December 2024.

# **SCHEDULE 3 – UNDERTAKINGS**

1. If the Court later finds that this Order has caused loss to the Defendants, and decides that the Defendants should be compensated for that loss, the Claimant gives an undertaking in damages limited to £50,000.

# ANNEXE 1 – SHIPLEY SITE



Promap

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Plotted Scale - 1:4000, Paper Size – A4

Title Number: WYK387275



Promap
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Plotted Scale - 1:1250. Paper Size – A4

Title Number: WYK387275

# ANNEXE 2 – LINCOLN SITE



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Title Number: LL317736

# ANNEXE 3 – WIRRAL SITE



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Plotted Scale - 1:1250. Paper Size – A4

Title Number: MS575234

# ANNEXE 4 – CHELMSFORD SITE



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Title Number: EX688035

# ANNEXE 5 – PRESTEIGNE SITE



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Flotted Scale - 1:1000, Paper Size – A4

Title Number: CYM839162



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Plotted Scale - 1:750. Paper Size - A4

Title Number: WA552132

# ANNEXE 6 – NEWBURY SITE



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Flotted Scale - 1:750. Paper Size – A4

Title Number: BK365055

Nicholas James Wargent Claimant First Statement Exhibit NJW-1 13 December 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

CLAIM NO.

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).

Page 1 of 35

- (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

	<u>Defe</u>
FIRST WITNESS STATEMENT OF	

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 in support of Teledyne UK's Claim for injunctive relief against the above Named Defendants and various categories of Persons Unknown, and also Teledyne UK's Application for interim relief and an alternative service order.

- 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.
- 5. There is now produced and shown to me a paginated bundle of true copy documents marked **NJW-1**. All references to documents in this statement are to Exhibit **NJW-1**, and are in the format **NJW-1/page number**.
- 6. To assist in the navigation of this witness statement, I shall address:
  - i. Introduction and overview of the relief sought;
  - ii. Teledyne UK Limited;
  - iii. Teledyne UK Limited's sites;
  - iv. The relevant protest groups;
  - v. Protests that have already occurred at Teledyne UK's sites;
  - vi. The Defendants to this Claim and Application;
  - vii. Apprehension of future protests and harm; and
  - viii. Teledyne's response to mitigate the apprehended harm.

# **INTRODUCTION**

- 7. Broadly, and as I shall explain further below, Teledyne UK is, by reason of its business activities, a target for pro-Palestinian protests. Typically, but not exclusively, those protests are and have been carried out by persons who associate with one or more of the groups known as 'Palestine Action', 'Palestine Solidarity Campaign' and 'Bradford Friends of Palestine'.
- 8. By this Claim and Application, Teledyne UK is seeking injunctive relief to protect six of its sites against acts of unlawful protest. Those sites are:
  - i. The 'Shipley Site' (Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW);

- ii. The 'Lincoln Site' (Teledyne UK Limited, 168 Sadler Road, Lincoln LN6 3RS);
- iii. The 'Wirral Site' (Teledyne UK Limited, Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA);
- iv. The 'Chelmsford Site' (Teledyne UK Limited, 106 Waterhouse Lane, Chelmsford CM1 2QU);
- v. The 'Presteigne Site' (Teledyne UK Limited, Broadaxe Business Park, Presteigne LD8 2UH); and
- vi. The 'Newbury Site' (Teledyne UK Limited, Reynolds Navigation House, Canal View Road, Newbury RG14 5UR).
- 9. Teledyne UK also operates its business from other sites across the country; however, relief is sought in relation to only these six sites. As I shall explain below, the addresses of these six sites are published on the Palestine Action website and listed as 'targets' for direct action protest, such that Teledyne UK reasonably apprehends that acts of protest will occur at these sites.
- 10. Teledyne UK seeks injunctive relief in relation to all six sites to restrain acts of trespass (including the entering and remaining on Teledyne UK's land, and in buildings, and the defacing of buildings and land with spray paint or similar). As I shall explain in this witness statement, Teledyne UK has experienced several acts of trespass at its sites, with aggravating features, the frequency of which has increased throughout 2024.
- 11. Further, in relation to the Shipley Site, Teledyne UK also seeks injunctive relief to restrain interference with its common law right to access the highway from its land, as well as injunctive relief to prevent public nuisance (that being obstruction of the highway). Obstruction of access to the Shipley Site is becoming an increasingly common feature of the direct action that Teledyne UK is experiencing at its sites, and the disruption of access to and from target sites is a well-known and often-used tactic of those engaged in direct action protest (and is a known tactic of the group known as Palestine Action, as I shall explain below). Three such incidents have been experienced

in recent months at the Shipley Site, on 30 October and 20 and 28 November 2024, in which the gate to the site was blocked by protestors who appear to be associated with the group known as Bradford Friends of Palestine. I will explain more about these incidents below.

- 12. The Shipley Site has been identified as requiring this additional protection (and not just protection against trespass) because (i) Teledyne has already experienced access to the Shipley Site being disrupted and (ii) the location and topography of the site is such that it can be easily blockaded, and any blockade could also have an adverse impact on Teledyne UK's neighbours (as I shall explain further below, the site is served by a single dead-end access road, which is shared with other businesses, and which is accessed via a main A-road).
- 13. Teledyne UK (and I personally) respect the democratic rights of citizens of this country (and indeed elsewhere) to lawfully protest and hold peaceful demonstrations in support of causes they believe in, and the injunction sought by Teledyne UK does not in any way seek to impede or circumvent that fundamental and important human right. Teledyne UK seeks only to restrain protest activity that goes beyond that which is peaceful and lawful. Specifically, Teledyne UK seeks to prevent further trespasses at its sites (which in the past has been aggravated and caused significant property damage), and the serious risks posed to the health, safety and well-being of employees and personnel present on site at the time of such aggravated attacks; Teledyne UK owes duties, as a matter of law, to provide a safe working environment for its employees, contractors and others visiting its sites.
- 14. This Claim and Application is being made now as (i) there has been a significant increase in the frequency of unlawful protest activity at Teledyne UK's sites throughout 2024, (ii) Teledyne UK apprehends acts of protest over the Christmas period as people (including protestors) typically enjoy time off work and have more time at their disposal indeed, as I shall explain below, an incident occurred at the Shipley Site on Boxing Day in 2023 (with incidents also occurring at the Shipley Site during the Easter vacation and October half-term of this year), and (iii) it is a sad fact that the situation in the Middle East continues to deteriorate, such that those who choose to engage in direct

action protest in relation to that cause may feel inclined or compelled to take action at this time (as they have with increased frequency throughout 2024).

15. Teledyne UK obtained intelligence that a protest was being planned at the Chelmsford Site for 8 December 2024, but that the protest was then cancelled because of the bad weather caused by storm Darragh. The intelligence that Teledyne UK received suggested that the planned protest was intended to be peaceful; protestors were planning to stand on the pavement of Waterhouse Lane, on which the Chelmsford Site is located, and hold placards. The intelligence now suggests that this protest has been rescheduled for 22 December 2024. I stress that this not the kind of protest that Teledyne UK seeks to prohibit, nor should it. This kind of protest would not be caught by the terms of the injunction order sought. The public have every right to engage in this sort of protest, and Teledyne UK respects that rights and expects the law to uphold that right.

#### TELEDYNE UK LIMITED

- 16. 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.
- 17. Teledyne UK is a global leader in specialised components and subsystems for innovative solutions in medical, science, aerospace, defence and industrial applications. Specifically, Teledyne UK is known for its innovation in semi-conductors, high power RF, imaging and precision timing and engineered systems. Across its UK sites, Teledyne UK mainly manufactures products for commercial use in a vast range of industrial markets, including aerospace and defence, factory automation, air and water quality environmental monitoring, electronics design and development, oceanographic research, energy, medical imaging and pharmaceutical research. Teledyne UK also provides electronic components and subsystems and communications products, including defence electronics, data acquisition and communications equipment for air transport and business aircraft, and components and subsystems for wireless and satellite communications.

- 18. Teledyne UK typically manufactures components and subsystems that are incorporated by its customers into their own products, which go on to be used in a variety of applications and end-uses. The core technologies on which the products manufactured by Teledyne UK are based can be used in very different end applications. For example, Teledyne UK manufactures RF magnetrons that generate radio frequency (RF) power: RF magnetrons can be used to power radiotherapy machines for the treatment of cancer, as well as commercial and military radar systems. On the same site, a Teledyne UK business unit can manufacture products that have both commercial and military enduses.
- 19. The majority of Teledyne UK revenue is derived from products with commercial end uses, some of which are used in critical national infrastructure, from healthcare to space observation. Teledyne UK also manufactures products that are dual-use or have military applications. Many of those products are manufactured for use by the UK Ministry of Defence, other NATO member states and other allied nations. Exports are also made to commercial businesses outside the UK, including those in Israel and the Ukraine. Dual-use and military products exported by Teledyne UK are exported under UK Government-approved export licences, and Teledyne UK complies with the UK Government's export compliance regime.
- 20. Furthermore, three of Teledyne UK's sites that are the subject matter of this Claim and Application have 'FSC status' (formerly known as 'List X' status), those being Shipley, Chelmsford and Lincoln. FSC stands for 'facility security clearance', and is a requirement of being a UK Government defence supplier. FSC status is required as Teledyne UK holds contracts with the UK Ministry of Defence which requires it to safeguard assets classified SECRET or above on its premises. FSC status is required to ensure that Teledyne UK meets and maintains the required protective controls to safeguard the classified assets.
- 21. Teledyne UK's sites therefore form a critical part of the UK defence supply chain, and form an important part of the UK's ability to protect its security and advance national interests, and the security of the UK's allies. Disruption to production at Teledyne UK's sites threatens national security: for example, delays to the manufacture and repair of radar warning systems and components for the UK Ministry of Defence not only

increases costs for the UK taxpayer, but places serving personnel at increased risk of shortages and equipment failure.

- 22. Therefore, Teledyne UK's sites are extremely sensitive; it is unacceptable to have unauthorised persons trespassing on the sites, entering the buildings and damaging the buildings and property (as protestors have done). At many of Teledyne UK sites, particularly at those where research, development and production occur, there are additional sensitivities. For example, some areas must be kept sterile, and hazardous materials and chemicals are stored on site. Many sites contain highly specialised (and expensive) equipment, which require special skills and knowledge to safely operate. It is unacceptable and dangerous to have trespassers who are not aware of those sensitivities and the risks that that they pose roaming the sites; it not only places the trespassers at risk, but those who have to retrieve them from the buildings and clear up after them.
- 23. The Teledyne Technologies Group employs approximately 1,750 staff across the UK.

#### TELEDYNE UK LIMITED'S SITES

24. Below are the necessary and relevant details for the six Teledyne UK sites in relation to which injunctive relief is sought. Teledyne UK holds either the freehold or leasehold titles to each of the sites.

# The Shipley Site

- 25. The Shipley Site has FSC status.
- 26. Teledyne UK holds the freehold title to the Shipley Site, which is registered at HM Land Registry under Title Number WYK387275. I exhibit at NJW-1/1 7 the official copy of the register of title and accompanying plan; the Shipley Site is edged in red. I also exhibit at NJW-1/8 9 two satellite images of the Shipley Site, on which the site is edged in red.

- 27. As can be seen from the plan filed at HM Land Registry, the Shipley Site is only accessible via a single access point to the North West of the site, off the road named Acorn Park. That access is gated, and the gate is operated by way of an electronic fob. The entire perimeter of the Shipley Site is fenced; the site cannot be accessed without passing through the gate (or over the fence line).
- 28. Acorn Park is an adopted highway maintainable at public expense, and connects to the A6038 (Otley Road)). As can be seen from the plan filed at HM Land Registry, Acorn Park is not a through-road (it is effectively a dead-end road).
- 29. Acorn Park also serves as the sole access to a number of adjoining properties and businesses (including the "Warehouse" marked in yellow on the plan document which is currently a printing business, and other tool and trade merchants), some of which frequently receive deliveries by HGVs.

#### The Wirral Site

- 30. Teledyne UK holds the leasehold title to the Wirral Site, which is registered at HM Land Registry under Title Number MS575234. I exhibit at NJW-1/10 17 the official copy of the register of title and accompanying plan; the Wirral Site is edged in red. I also exhibit at NJW-1/18 19 two satellite images of the Wirral Site, on which the site is edged in red.
- 31. There is sometimes reference made to 'Teledyne CML Group Limited' in the address to the Wirral Site, including by Palestine Action. 'Teledyne CML' is a business unit and trading name of Teledyne UK, the business and assets of Teledyne CML Group Limited having been transferred to Teledyne UK. The Teledyne CML Group Limited company is however retained and not dissolved for various business-related reasons.
- 32. As can be seen from the plan filed at HM Land Registry, the Wirral Site is only accessible via a single access point, off the road named Tebay Road. That access is gated. The vehicle gate is operated by way of a padlock, and pedestrian access by way

of passcode barrier entry. The entire perimeter of the Wirral Site is fenced; the site cannot be accessed without passing through the gate (or over the fence line).

33. Tebay Road also serves as the sole access to a number of adjoining properties and businesses (including Tebay Retail Park, B&M Home Store, Magnet Kitchens and Magnet Trade), some of which frequently receive deliveries by HGVs.

#### **The Chelmsford Site**

- 34. The Chelmsford Site has FSC status.
- 35. Teledyne UK holds the freehold to the Chelmsford Site, which is registered at HM Land Registry under Title Number EX688035. I exhibit at NJW-1/20 26 the official copy of the register of title and accompanying plan; the Chelmsford Site is edged in red. I also exhibit at NJW-1/27 a satellite image of the Chelmsford Site, on which the site is edged in red.
- 36. The official copy of the register lists 'Teledyne E2V (UK) Limited' as the registered proprietor of the site. That is the former name of Teledyne UK, and evidence of the change of the company name is recorded at Companies House and exhibited at NJW-1/28 29. In any event, it is clear that the company number recorded on the official copy of the register of title matches that of Teledyne UK.
- 37. The majority of the Chelmsford Site is fenced, with two vehicle access gates and three pedestrian access gates. The reception at the front of the building is open to the pavement: access further into the site is controlled by swipe card access.

# **The Presteigne Site**

- 38. Teledyne UK holds the leasehold title to the Presteigne Site. The Presteigne Site comprises two legal titles.
- 39. The first, which is 'Unit 1', is a registered leasehold title, registered at HM Land Registry under Title Number CYM839162. NJW-1/30 34 the official copy of the

register of title and accompanying plan; the Unit 1 of the Presteigne Site is edged in red. I also exhibit at **NJW-1/35** a satellite image of Unit 1 of the Presteigne Site, on which the site is edged in red.

- 40. The second, which is 'Unit 5 and Unit 6', is not registered at HM Land Registry, it being a lease for five years (and therefore not registrable). I can however confirm that the current lease is dated 9 October 2024, and is for a term of five years. I exhibit at NJW-1/36 89 a redacted copy of the lease (given the sensitive nature of Teledyne UK's business, I hope the court will understand the desire to redact the lease, save to evidence the demise for the purposes of the trespass claim).
- 41. A satellite image, on which Units 5 and 6 are outlined in red, is exhibited at **NJW-1/90**.
- 42. There is sometimes reference made to 'Teledyne Labtech Limited' in the address to the Presteigne Site, including by Palestine Action. 'Teledyne Labtech' is a business unit and trading name of Teledyne UK, the business and assets of Teledyne Labtech Limited having been transferred to Teledyne UK. The Teledyne Labtech Limited company is however retained and has not been dissolved for various business-related reasons.
- 43. The perimeters of both Unit 1 and Units 5 and 6 are fenced, with electronic keypad access for both vehicle and pedestrian gates.

#### The Lincoln Site

- 44. The Lincoln Site has FSC status.
- 45. Teledyne UK holds the freehold title to the Lincoln Site which is registered at HM Land Registry under Title Number LL317736. I exhibit at NJW-1/91 99 the official copy of the register of title and accompanying plan; the Lincoln Site is edged in red. I also exhibit at NJW-1/100 a satellite image of the Lincoln Site, on which the site is edged in red.
- 46. The official copy of the register lists 'Teledyne E2V (UK) Limited' as the registered proprietor of the site. That is the former name of Teledyne UK, and evidence of the

change of the company name is recorded at Companies House and exhibited at NJW-1/28 - 29. In any event, it is clear that the company number recorded on the official copy of the register of title matches that of Teledyne UK.

47. The entire perimeter of the Lincoln site is fenced.

# The Newbury Site

48. Teledyne UK holds the leasehold title to the Newbury Site which is registered at HM Land Registry under Title Number BK365055. I exhibit at NJW-1/101 – 105 the official copy of the register of title and accompanying plan; the Newbury Site is edged in red. I also exhibit at NJW-1/106 a satellite image of the Newbury Site, in which the site is edged in red.

# THE RELEVANT PROTEST GROUPS

49. The protestors that attend Teledyne UK's sites appear to be associated with, or gravitate around, organised groups. To that end, Teledyne UK is aware of three groups in particular: Palestine Action, Bradford Friends of Palestine (in relation to the Shipley Site) and the Palestine Solidarity Campaign (which has various local branches).

#### **Palestine Action**

- 50. Of these three groups, Palestine Action is notably more 'extreme', and promotes acts of unlawful direct action protest; many of the historic acts of aggravated trespass at Teledyne UK's sites have been carried out by and attributed to followers of the Palestine Action group. I shall explain more about these incidents later in this witness statement.
- 51. Further, Palestine Action also promotes, publicises and claims responsibility for various other aggravated attacks at sites owned by companies that it associates with the conflict in the Middle East, such as Elbit Systems, Barclays Bank, Allianz and Thales (to name just a few). Examples of the various attacks that Palestine Action takes credit for can be found in the 'News' section of its website: <a href="https://palestineaction.org/news/">https://palestineaction.org/news/</a>.

As can be seen from that section of the website, those actions often include spray painting of buildings and the smashing of windows, the occupation of buildings, and the blockading of sites. Examples include (but are certainly not limited to):

- The blockading of CDW UK's offices in Manchester on 1 July 2024 by using a vehicle and locking-on device, whilst one protestor occupied the ledge at the building's entrance: <a href="https://palestineaction.org/cdw-manchester/">https://palestineaction.org/cdw-manchester/</a> (exhibited at NJW-1/107 109);
- ii. The smashing of windows and spray painting of 12 Barclays Bank sites overnight on 12 September 2024: <a href="https://palestineaction.org/barclays-nationwide/">https://palestineaction.org/barclays-nationwide/</a> (exhibited at NJW-1/110 112); and
- iii. The blockading of two sites in Bristol at which Elbit Systems conducts its business on 12 November 2024. The activists used vans and locking-on devices to block the gates to the sites: <a href="https://palestineaction.org/bristol-sites-shut/">https://palestineaction.org/bristol-sites-shut/</a> (exhibited at NJW-1/113 114).
- Palestine Action's cause gravitates around the slogan of "shut Elbit down" (Elbit being a reference to Elbit Systems Ltd which is an Israel-based company engaged in defence and security work, and which develops and supplies airborne, land and naval systems). However, it is clear that those who associate with Palestine Action have a far wider range of targets for their direct action protests. Specifically, and as I shall explain further below, Palestine Action lists the six Teledyne UK sites (with their addresses) that are the subject matter of this Claim and Application as 'targets' for direct action: <a href="https://elbitsites.uk/company/2/">https://elbitsites.uk/company/2/</a> (exhibited at NJW-1/115).
- 53. Palestine Action is a highly active organisation. In particular:
  - i. The homepage of the Palestine Action website (<a href="https://palestineaction.org">https://palestineaction.org</a>) (NJW-1/116 122) contains links to pages where potential activists can 'join the resistance' and "sign up to get involved in the campaign to shut down Israel's weapons trade", 'fund the movement' and 'attend an online workshop' which run every Wednesday and Friday at 7pm, and Sunday at 3pm;

- ii. I exhibit at NJW-1/123 124 a copy of the form by which potential activists can sign up to 'join the resistance': <a href="https://palestineaction.org/join-the-resistance/">https://palestineaction.org/join-the-resistance/</a>;
- iii. Palestine Action organises workshops for its activists across the country, including direct action training and arrestee support (which clearly pre-supposes that its activists will be arrested for their actions and require the support of volunteers). The relevant webpage is at <a href="https://palestineaction.org/workshops/">https://palestineaction.org/workshops/</a>. I note that the page is updated frequently, with new workshops released regularly (and at fairly short notice). For example, I exhibit PDFs of the webpage as access on 27 November 2024 (NJW-1/125) and 1 December 2024 (NJW-1/126).

# Palestine Action: the Underground Manual

- 54. Palestine Action has produced, and published on its website, a PDF document entitled 'THE UNDERGROUND MANUAL'. That manual appears to be intended to advise, encourage and instruct activists as to how they can conduct acts of direct action protest.
- 55. I exhibit a copy of that manual at **NJW-1/127 140**. There are seven chapters to the manual, which are:
  - i. 'Create a cell'. Activists are encouraged to band together in small cells to organise and carry out acts of direct action protest;
  - ii. 'Pick a target'. Activists are encouraged to pick a target for their direct action (using a secure browsers, if conducting internet research). In this chapter, 'Teledyne' is expressly listed as a target that should be considered and, if the 'check out the targets' link is followed, a map is accessed on which Palestine Action have plotted what they consider to be targets for direct action. As I have set out above, here, the six Teledyne UK sites that are the subject matter of this Claim and Application are listed, along with their addresses;
  - iii. 'Prepare for action'. This chapter instructs activists how to conduct reconnaissance of the sites that they have selected as a target for their direct action;

- iv. 'Plan your action'. This is the largest chapter and includes suggestions as to the type of action that might be undertaken, how to get to and from a target undetected, how to evade arrest and how to divide roles amongst cell members. The types of action suggested are all unlawful, and are not acts of peaceful protest: using re-purposed fire extinguishers to spray paint, 'regular' spray painting, smashing windows and exterior equipment, blocking pipes and breaking in. There is also extensive guidance as to how to avoid identification and capture, including by using burner phones, face coverings, dark loose-fitting clothing, plain trainers and covering the whole body;
- v. 'Take action';
- vi. 'Post-action'. Activists are advised to destroy all evidence;
- vii. 'Technology and security'. Activists are encouraged to use burner phones, VPNs, Protonmail, Signal and devices such as faraday cages to reduce their digital footprint and avoid detection and identification.
- 56. It is clear from the Underground Manual that the acts promoted and encouraged by Palestine Action to its followers are all unlawful and are not acts of peaceful protest. Anyone following the guidance in this manual would not be protesting within the boundaries of the law.
- 57. Further, much of the content of the manual is also focussed on instructing and advising activists as to how they may keep their identities unknown. If activists were to successfully follow each of the suggested steps and also avoid arrest, it would be almost impossible to identify and trace activists (and name them for the purposes of legal proceedings).
- 58. Palestine Action, by way of the Underground Manual, and the publishing of the addresses of the six Teledyne UK sites, are also clearly encouraging and facilitating acts of unlawful direct action protest at those sites.

#### **Bradford Friends of Palestine**

- 59. The group known as Bradford Friends of Palestine does not, to my knowledge, operate a website (but does operate various social media accounts, and has an email address).
- 60. This protest group operates in and around the Bradford area which, geographically, includes the Shipley Site. Activists associated with this group were responsible for the protest incidents on 30 October and 20 and 28 November 2024 at the Shipley Site, during which the access to the Site was obstructed (and blocked) for several hours. Whilst the actions of the protestors on these occasions were very disruptive (and unlawful), it is fair to say that Teledyne UK's experience of this group, to date, is that they deploy less aggravated tactics when compared to those activists who take action under the banner of Palestine Action. This group has also in the past conducted peaceful protests at the Shipley Site. For example, historically, if protestors attended the Shipley Site and stood outside the gate, they would move to one side and allow access to and from the site when a vehicle approached.
- 61. From my review of the Bradford Friends of Palestine Instagram account, it appears that the group primarily adopts tactics of marches, sit-ins at public places (such as shopping centres) and assembling at locations with placards and banners (including, as I have mentioned, outside the gate at the Shipley Site, recently blocking access to the site).

# **Palestine Solidarity Campaign**

- 62. The Palestine Solidarity Campaign (**'PSC'**) is a long-established community that also adopts a pro-Palestinian message. The group operates a website, which can be found here: <a href="https://palestinecampaign.org">https://palestinecampaign.org</a>. This group is a legal entity, and is registered as a company limited by guarantee with company number 5213508. I exhibit at **NJW-1/141** the record of the company at Companies House.
- 63. From my reading of the website, and my understanding of PSC, it is well organised and undertakes a wide range of work in pursuit of its cause; these activities include protests, the production of information leaflets, various campaigns and lobbying activities.

- 64. PSC Campaign has several regional branches, including in regions where a number of Teledyne UK sites are located (such as Bradford, Chelmsford, Lincoln & District, Liverpool and Shropshire).
- 65. I must stress that by naming and discussing the PSC in this witness statement I am <u>not</u> suggesting that it has done anything unlawful. I am merely describing the context against which this Claim and Application is made. As I have set out above, both I and Teledyne UK respect and fully support the right to peaceful protest. Indeed, the protest planned for outside the Chelmsford Site on 8 December 2024, and which was expected to be peaceful, was organised by the Chelmsford branch of the PSC.
- 66. I also refer to the PSC because it is suggested that to assist with giving notice of the Claim, Application and any injunction to Persons Unknown, the same should be emailed to the PSC and any relevant regional branches. That suggestion is made to ensure that all those persons who may be inclined to attend Teledyne UK's site with a view to engaging in protest are aware of any injunction and its terms. I understand from those advising Teledyne UK that the need for and terms of the proposed alternative service order will be dealt with in the witness statement of Mr Manan Singh of Keystone Law.

# PROTESTS AT TELEDYNE UK LIMITED'S SITES

- 67. Teledyne UK has experienced acts of unlawful direct action protest, and suffered harm as a result. As I shall explain below, some of these protest incidents have been aggravated, and have caused significant loss to Teledyne UK.
- 68. Some acts of protest experienced by Teledyne UK have been lawful. As I explained earlier, Teledyne UK does not seek to prohibit acts of lawful and peaceful protest, and fully supports the rights of citizens to protest in such a way. For example, Teledyne UK does not take issue with protestors standing outside its sites with placards and banners, and making as much noise as they want to ensure that their message is heard. What Teledyne UK takes issue with is when protestors trespass on its sites, or prevent access to its sites.

- 69. I exhibit at NJW-1/142 144 a spreadsheet. That spreadsheet has been passed to me, and is maintained by, a colleague at Teledyne UK. The spreadsheet records the incidents of protest that have occurred at Teledyne UK's sites since December 2022. Teledyne UK takes the view that many of these protests have been 'lawful'; many fall into the category of protestors attending a site with banners and placards, and making noise to ensure that their message is heard, with the protestors moving to one side to allow staff and visitors to gain access to the sites.
- 70. However, not all of the protest incidents recorded in the spreadsheet are lawful; where Teledyne UK has experienced unlawful acts of protest, I have given further details of the incident below.
- 71. I have redacted the spreadsheet to remove references to the names of employees of Teledyne UK, or any protestors who are not being named as a Defendant to these proceedings.

# 9 December 2022: the Presteigne Site

- 72. On 9 December 2022, at approximately 6am, at least four persons broke into the reception area of the Presteigne Site; they were wearing balaclavas to conceal their identities. They were armed with crowbars and sledgehammers. As is evident from Palestine Action's social media posts exhibited at NJW-1/145 146, these persons were associated with Palestine Action.
- 73. These persons proceeded to gain access to the roof of the Presteigne Site using a ladder that they had brought with them, and they caused extensive damage to the roof and to the premises generally. They entered the premises and smashed glass doors and windows, damaged IT equipment and sprayed the inside and outside of the premises with red paint (using re-purposed fire extinguishers, which Palestine Action encourages activists to use in its Underground Manual). The protestors destroyed the controllers of hot manufacturing equipment, so they could not be safely switched off, and then sprayed paint into the hot equipment and associated motors. They also released flares

and pyrotechnic devices in the chemical processing area, in close proximity to a number of vats of potentially dangerous, even lethal, chemicals.

- 74. I exhibit at NJW-1/147 158 photographs of the damage caused by the trespassing protestors. Those photographs show the extensive damage to the skylights and windows of the building, the extensive use of red paint, and the large amount of shattered glass left throughout the building. In addition, the photographs show the protestors sitting on the roof.
- 75. The attack lasted for approximately 5-6 hours, and the Dyfed-Powys police and fire service attended the Presteigne Site to remove and arrest four persons. All four persons remained in custody on remand until their trial in May 2023, charged with conspiracy to commit criminal damage. Three of those on trial changed their pleas to guilty immediately before trial, and one person was found guilty at trial. All of them received custodial sentences.
- 76. Teledyne UK suffered extensive loss as a result of this incident. The cost of repairing and clearing up the damage caused by the protestors was in the approximate sum of £1.2m. In addition, the business was unable to complete and ship approximately US\$1,000,000 of sales in December 2022.
- 77. The site was able to partially re-open on 12 December 2022, with a limited team to commence clean up and make safe the working areas. All employees were not able to return to the business until 19 December 2022. The clean-up operation and repairs to the roof and windows lasted several months, and caused ongoing disruption to the business. As well as the cost of increased security, the disruption cost the business approximately another £266,000.

# 28 September 2023: the Chelmsford Site

78. On 28 September 2023, the Chelmsford Site was hosting an open day for graduates (Teledyne UK is one of the biggest private employers, if not the biggest, in the Chelmsford area). An individual associated with Palestine Action splashed red paint

across the front of the building (as shown in the photographs exhibited at NJW-1/159 - 161).

- 79. The incident also featured in a 'news' item on the Palestine Action website, exhibited at NJW-1/162 164.
- 80. While the physical damage and financial harm from this protest incident was not particularly significant when compared to other incidents experienced by Teledyne UK, this incident was clearly intended to cause reputational harm to the business and to deter future employees from considering a career with us.
- 81. Whilst Essex Police did not attend this particular incident, there was a subsequent phone call between me and a Detective Chief Inspector at Essex Police to discuss the incident and future response of Essex Police to incidents at the Chelmsford Site.
- 82. No arrests have been made in relation to this incident, and no suspects identified.

# 26 December 2023: the Shipley Site

- 83. On 26 December 2023 (Boxing Day), at approximately 4.30am, one individual gained access to the Shipley Site by climbing over the fence. They then approached the building and attempted to set fire to a goods entrance.
- 84. I exhibit at **NJW-1/166** a still CCTV image which shows the trespasser inside the Shipley Site, running away from the fire that they have started.
- 85. I exhibit at NJW-1/167 169 photographs of the damage that was caused by the fire. Luckily, as can be seen from the photographs, limited damage was done to a very small area of the site. Nevertheless, the fire damage caused to the entrance to the main building incurred costs of approximately £35,000 to repair.

86. West Yorkshire Police responded to the incident; approximately 10 police officers attended the Shipley Site. An individual was later arrested, but the CPS elected not to bring any charges on the evidence available.

# 2 April 2024: the Shipley Site

- 87. On 2 April 2024, at approximately 5.30am, a group of around 20 protestors attended the Shipley Site. Four of these protestors managed to climb on to the roof of the premises and proceeded to cause extensive damage to the roof tiles and brickwork, as well as the glass doors and windows. The protestors were wearing the red overalls often worn by Palestine Action protestors when they carry out acts of direct action protest.
- 88. I exhibit at NJW-1/170 182 a selection of photographs that show the damage caused by the protestors, including by the broken roof falling through into the building below. Those photographs also capture the protestors on the roof, and using a sledge hammer to smash the roof tiles. The final photograph shows the items that were seized by the police when they attended the site; these include a sledge hammer, ladder and fire extinguisher.
- 89. The incident lasted for approximately 16 hours, and the emergency services attended the Shipley Site in significant numbers. West Yorkshire Police arrested the four protestors who accessed the roof of the premises: Julian Allen Gao, Ruby Hamill, Daniel Jones and Najam Shah. As I shall explain below, all have been named as Defendants to this Claim and Application. These individuals went on trial in September 2024, and all pleaded not guilty to damaging property, and possession of articles with intent to destroy or damage property. The trial resulted in a hung jury and a retrial is set for February 2026.
- 90. Teledyne UK suffered significant loss as a result of this incident. The cost to repair the damaged caused by the protestors and clean up after them was estimated to cost in excess of £571,000. Production was interrupted for five days, causing a loss of revenue in excess of £300,000.

91. The site was shut during the incident and for the rest of 2 April 2024. Whilst the business was able to return to full production within a week, around half of the main building remained shut for approximately two weeks whilst major repairs were carried out, and further repair and refurbishment work carried on for a number of weeks after that.

# 15 May 2024: the Shipley Site

- 92. On 15 May 2024, at approximately 4.30am, four individuals gained access to the roof at the Shipley Site and once again caused damage to the roof; specifically, as can be seen in the photographs exhibited at NJW-1/183 187, the protestors smashed the top floor windows of the building and applied spray paint (the photographs also show the protestors on the roof of the building). The protestors also set off fireworks inside the building.
- 93. I also exhibit at NJW-1/188 189 social media posts from Palestine Action which shows that the protestors (who are dressed in the familiar red overalls) are associated with Palestine Action.
- 94. The incident lasted for approximately seven hours and the emergency services attended the Shipley Site in significant numbers. West Yorkshire Police arrested the four protestors who gained access to the roof. Three of those persons have been released on bail: Ricky Southall, Amareen Afzal and Serena Fenton (all of whom have been named as Defendants to this Claim and Application). The fourth person remains on remand in custody. All four are charged with burglary with intent to commit damage, criminal damage to property and having an article with intent to destroy damage/property.
- 95. The protestors caused damage directly to the roof, surrounding windows and interior damage, incurring Teledyne UK the cost of approximately £68,000 to repair. Production was interrupted for one day causing a loss of revenue in excess of £60,000.
- 96. The site was shut during the incident and for the rest of 15 April 2024, but re-opened the following day.

# 5 July 2024: the Wirral Site

- 97. On 5 July 2024, at approximately 4.45am, three individuals gained access to the Wirral Site by ramming the vehicular access gates with a van, and then proceeded to spray red paint over the building. One of my colleagues at the Wirral Site was informed by police at the time that the protestors were live streaming their actions online. They also attempted to gain access to the roof of the premises with a ladder, but failed to do so.
- 98. I exhibit at **NJW-1/190 194** photographs which show the spray painted building, and the van abandoned inside the site (as well as two photographs of a protestor sitting on top of the van they appear to be live streaming from their phone). I note that the protestor is wearing the red overalls associated with Palestine Action.
- 99. I also exhibit at NJW-1/195 197 social media posts from Palestine Action, which confirm that the protestors were associated with this group.
- 100. The incident lasted for approximately four hours, and Merseyside Police attended and arrested the three protestors. At this time, I do not know what these persons have been charged with, or what their names are (as I explain below, that information is being sought from Merseyside Police). I do however know that they are currently on bail and awaiting a court date for trial.
- 101. The protestors caused damage to the gate and paint damage to the site, incurring Teledyne UK costs of approximately £1,000 to repair. Production was interrupted briefly, causing a loss of revenue of approximately £6,400.

# 2 October 2024: the Wirral Site

102. On 2 October 2024, at approximately 5.55am, three individuals gained access to the Wirral Site and climbed onto the roof of the premises. They caused damage to the roof,

as well as to the production floor in the building underneath, including by the use of red paint.

- 103. I exhibit at **NJW-1/198 201** photographs of the roof and production floor, which show the damaged caused by the protestors.
- 104. I also exhibit at NJW-1/202 204 social media posts from Palestine Action, which shows that the protestors were associated with that group. These posts show how the actions of the protestors were targeted and intended to cause maximum disruption. In particular, the text accompanying the pictures of the damage caused explains that protestors had accessed the 'clean room' at the site, the contamination of which could stop production for up to 12 months, and disrupt production for 18 months. Palestine Action had come by that information as it was contained in a witness statement that had been given by a senior employee of Teledyne UK during criminal proceedings; the protestors had clearly used that information to do maximum damage during the course of their protest.
- 105. The incident lasted for approximately five hours and Merseyside Police attended and arrested the three protestors. At this time, I do not know what these persons have been charged with, or what their names are (as I explain below, that information is being sought from Merseyside Police). I do however know that they are currently on bail and awaiting a court date for trial.
- 106. The protestors caused damage to the roof and to the machinery in the rooms below the roof, incurring Teledyne UK costs to date of approximately £148,000 to repair, with a further £335,000 expected to be spent on a permanent roof repair. Production was interrupted, causing a loss of revenue of approximately £14,000.

# 30 October 2024: the Shipley Site

107. On 30 October 2024, the entrance gate to the Shipley Site was obstructed by approximately 20 protestors. The protestors stood outside the gate and blocked access

to the site (remembering that the Shipley Site has only this single point of access), whilst holding banners and placards.

- 108. The blockade lasted for around five hours, between 6.30am and 11.30am, during which time employees were unable to get through the gates and onto the site. The working day and business at the Shipley Site were therefore significantly disrupted on this day, with half a working day lost by reason of the protest. During blockade actions such as this one on 30 October, approximately 100 staff members are unable to access the site and carry on work, daily factory deliveries and collections are missed, staff members feel intimidated just by reason of arriving at their place of work, and 10-20 police officers are diverted from other duties to respond to a blockade. Depending on shipping schedules, up to £90,000 of revenue can be put at risk.
- 109. The protest appears to have been carried out by those who associate with the group known as Bradford Friends of Palestine. I have reviewed the Instagram page for that group and can see that a short video was posted on 30 October 2024, which shows protestors standing outside the gate to the Shipley Site, obstructing access. The protestors are wearing face and/or head coverings of various descriptions, or look away from the camera as it pans around, such that it is not possible to identify those who were present. I exhibit at NJW-1/205 209 some still images of the video which show what I have here described.
- 110. During the protest, a female dressed in all dark clothing and wearing a face covering attached a poster to the fence at the Shipley Site. That poster had attached to it sharp lids of tin cans. I exhibit at **NJW-1/210** a still CCTV image of this person. Given her all dark clothing, face covering and the quality of the CCTV image, it is impossible to identify this person.
- 111. West Yorkshire Police attended the Shipley Site and eventually moved the protestors away from the gate to the site; the protestors had been in front of the gate for some five hours before they were moved away from the gate. To my knowledge, no arrests were made.

#### 20 November 2024: the Shipley Site

- 112. On 20 November 2024, the entrance gate to the Shipley Site was obstructed by approximately 12 protestors. The protestors stood outside the gate and were chanting, singing and dancing, and obstructed access to the site.
- 113. The protest lasted for approximately 2 hours, between 12 noon and 2pm. During this time, access to the site was disrupted, although the impact was less severe than the protest on 30 October as a result of the shorter duration. That said, employees did still experience delays entering the site, which caused some inconvenience and loss of productivity during the working day.
- 114. The protest appears to have been carried out by those associated with Bradford Friends of Palestine. I exhibit at NJW-1/211 217 a post made to the group's Instagram account, which documents the incident.
- 115. The West Yorkshire Police attended the site to manage the situation. To my knowledge, no arrests were made, but the Police did prohibit the filming and taking of photographs by the protestors given the status of the Shipley Site as a 'prohibited place' under the National Security Act 2023.

#### 28 November 2024: the Shipley Site

- 116. On 28 November 2024, the entrance gate to the Shipley Site was again blockaded. On this occasion, a group of approximately 20 protestors attended the site and obstructed the gate and therefore access to the site. This blockade lasted for approximately three hours, between 6am and 9am. Consequently, and fortunately, this meant that the working day was not as disrupted as it had been by the earlier blockade on 30 October, as employees were able to access the site shortly after the time that they ordinarily would on a working day.
- 117. I understand from a colleague that the protestors who engaged in this protest were associated with Bradford Friends of Palestine, although I am also told that a group called 'Yorkshire Palestine Collective' have expressed solidarity with the incident in

various social media posts on 29 November 2024. Prior to this protest incident, neither I nor the other members of management at Teledyne UK were aware of this group. I have searched online for this group and exhibit at NJW-1/218 – 238 the social media posts by the Yorkshire Palestine Collective, which records the incident. As with earlier incidents of this nature, most of the protestors are wearing face and/or head coverings.

- 118. The blockade lasted for some three hours. After being warned about their actions by officers from the West Yorkshire Police (who attended the site to manage the situation), the protestors were eventually shepherded away from the gate, without any significant resistance.
- 119. To my knowledge, no arrests were made, but the Police did prohibit the filming and taking of photographs by the protestors given the status of the Shipley Site as a 'prohibited place' under the National Security Act 2023.

#### THE DEFENDANTS TO THIS CLAIM AND APPLICATION

120. Teledyne UK has (at this time) named seven Defendants, and defined four categories of Persons Unknown (the latter of which are tied to and reflect the relevant causes of action).

#### **Named Defendants**

- 121. Each of the Named Defendants has attended one of Teledyne UK's sites throughout 2024 and engaged in an act of unlawful direct action protest, for which they were arrested. As a result of those recent acts of protest, Teledyne UK reasonably apprehends that these persons may re-attend Teledyne UK's sites and engage in further acts of direct action protest; these people are clearly currently active direct action protestors, with an interest in protesting against Teledyne UK's business. A summary of the Named Defendants is as follows:
  - i. **Julian Allen Gao** arrested at the Shipley Site on 2 April 2024 for having accessed the roof of the premises on site. Mr Gao was charged with damaging property, and possession of articles with intent to destroy or damage property, and was tried for

- these offences in September 2024, which resulted in a hung jury. A re-trial has been set for February 2026;
- ii. **Ruby Hamill** arrested at the Shipley Site on 2 April 2024 for having accessed the roof of the premises on site. Ms Hamill was charged with damaging property, and possession of articles with intent to destroy or damage property, and was tried for these offences in September 2024, which resulted in a hung jury. A re-trial has been set for February 2026;
- iii. **Daniel Jones** arrested at the Shipley Site on 2 April 2024 for having accessed the roof of the premises on site. Mr Jones was charged with damaging property, and possession of articles with intent to destroy or damage property, and was tried for these offences in September 2024, which resulted in a hung jury. A re-trial has been set for February 2026;
- iv. **Najam Shah** arrested at the Shipley Site on 2 April 2024 for having accessed the roof of the premises on site. Mr Shah was charged with damaging property, and possession of articles with intent to destroy or damage property, and was tried for these offences in September 2024, which resulted in a hung jury. A re-trial has been set for February 2026;
- v. **Ricky Southall** arrested at the Shipley Site on 15 May 2024 for having accessed the roof of the premises on site. I believe that Mr Southall is currently on bail;
- vi. **Amareen Afzal** arrested at the Shipley Site on 15 May 2024 for having accessed the roof of the premises on site. I believe that Ms Afzal is currently on bail;
- vii. **Serena Fenton** arrested at the Shipley Site on 15 May 2024 for having accessed the roof of the premises on site. I believe that Ms Fenton is currently on bail.
- 122. As mentioned above, there were in fact four protestors who were arrested at the Shipley Site on 15 May 2024 for having accessed to the roof of the premises. However, the fourth protestor has not been named as a defendant to these proceedings; that is because they remain on remand in custody, such that Teledyne UK does not reasonably

apprehend that they will re-attend its sites at this time, because they are not at liberty to do so.

- 123. Teledyne UK has elected not to name as defendants those persons who were arrested in relation to protest incidents at its sites throughout 2022 and 2023. That is because none of those persons have re-attended Teledyne UK's sites since those incidents, nor does Teledyne UK have any current knowledge of the status or whereabouts of these persons (including whether they continue to be involved in acts of direct action protest in support of the Palestine Action cause, or other similar cause). As such, Teledyne UK does not reasonably apprehend that those persons will re-attend its sites at this time.
- 124. No arrests were made in relation to the protests outside the Shipley Site during which access to the site was blocked on 30 October and 20 and 28 November 2024. As such, Teledyne UK has not been able to obtain any of the names of those protestors, such that they could become named defendants to this Claim and Application. Further, as I have explained above, clear images of the protestors engaging in alleged unlawful acts were not obtained (with most wearing face and/or head coverings of some description to conceal their identities), such that identification of these persons and joining them to the proceedings by way of photograph is not practicable (it would be impossible to tell if any future protestor attending a Teledyne UK site was one of those who had previously attended and concealed their identity).

#### **Applications under CPR 31.17**

125. As is clear from my earlier explanations of the unlawful protest incidents that have occurred at Teledyne UK's sites, six protestors were arrested at the Wirral Site on 5 July and 2 October 2024. Teledyne UK is not aware of the names of those protestors, yet understands that they are persons who might properly be added to this Claim as named defendants. With that in mind, both I and the solicitors for Teledyne UK have approached the Merseyside Police to obtain the names and addresses (and other contact details) of the persons arrested, to enable their identification and service in these proceedings. Unfortunately, Merseyside Police are unable to share that information without a court order. Accordingly, at the time of finalising this statement, the solicitors for Teledyne UK are in the process of preparing an application pursuant to CPR 31.17

to secure the disclosure of the names and addresses of the arrestees. It is hoped that an order can be secured in advance of the return date hearing of these injunction proceedings, and that Teledyne UK will have had sufficient time to act on the information obtained (if so advised).

- 126. Further, solicitors for Teledyne UK are, at the time of finalising this statement, also preparing a CPR 31.17 application in relation to information held by the West Yorkshire Police. Specifically, whilst Teledyne UK has the names of those persons who were arrested at the Shipley Site in 2024, it does not have any address or contact details for those persons to assist with service. Teledyne UK are seeking that disclosure (as well as confirmation that the names of the First to Seventh Defendants are correct).
- 127. Counsel will update the court as to the status of these disclosure Applications at the hearing of the Application for interim injunctive relief.

#### Persons Unknown

- 128. Teledyne UK also seeks relief against various defined categories of Persons Unknown. Those categories are defined so that they are tied to the causes of action relied upon and the conduct that Teledyne UK seeks to prohibit. Specifically, those categories are:
  - i. 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).
- ii. 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;
- iii. 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);
- iv. 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.
- 129. A Persons Unknown injunction is required because, as is evident from the above in relation to the protests at the Shipley Site on 30 October and 20 and 28 November 2024, it has not been possible to name all those persons who have attended, and may attend, Teledyne UK's sites and protest in a way that is unlawful.
- 130. Further, it is impossible for Teledyne UK to name all those persons who may in the future attend Teledyne UK's sites and engage in unlawful acts of protest. This is especially the case in circumstances where Palestine Action (that being one of the key groups with which Teledyne UK is concerned, and certainly the most extreme of the groups with which Teledyne UK is concerned) continues to recruit new activists to its cause and host direct action training days. There appears to be an ever increasing and changing cast of activists, who it is impossible to identify. Further, as I have explained above, Palestine Action advise and instruct its activists as to how to conceal their identities and escape arrest; if that advice is followed with success, Teledyne UK would not ever be in a position to be able to identify and name as defendants all those persons

who attend, or may attend, Teledyne UK's site and engage in acts of unlawful direct action protest.

#### APPREHENSION OF FUTURE PROTEST AND HARM

- 131. Absent the injunctive relief sought, Teledyne UK reasonably apprehends that it will experience further acts of protest in the same nature as those which have already been experienced. As I have set out above, many of those protests (but not all) have been unlawful and aggravated, with resulting harm.
- 132. Specifically, Teledyne UK reasonably apprehends imminent future acts of unlawful protest by reason of:
  - i. The past acts of unlawful protest that have been suffered, and the increasing frequency of those acts of protest throughout 2024;
  - ii. The continuing activity and recruitment of activists by groups such as Palestine Action, and the programme of direct action training run by that group;
  - iii. The instruction and encouragement of unlawful acts of direct action protest through mechanisms such as the aforementioned Underground Manual (Palestine Action). Specifically, every suggested act of protest in that manual is unlawful and includes acts of trespass and criminal damage;
  - iv. The continuing deterioration of the situation and conflict in the Middle East, which is the cause with which the activists who target Teledyne UK are concerned;
  - v. The imminent Christmas holiday period. Typically, people are not at work over this period and have more disposable time. When taken with the above factors, it seems likely that Teledyne UK will experience further acts of protest over this period, as protestors will have the time available to engage in such acts. Indeed, an incident occurred at the Shipley Site on Boxing Day 2023. Further, the incident at the Shipley Site on 2 April 2024 occurred during the Easter vacation period (2 April

being the Tuesday after Easter Monday), and the incident on 30 October 2024 occurred during the October school half-term holiday.

- 133. Further, Teledyne UK reasonably apprehends that harm will be suffered as a result of the apprehended acts of protest. The apprehended harm is in the same nature as the harms that have previously been suffered by reason of past acts of unlawful protest and include (but are not limited to):
  - i. Property damage (caused by acts of trespass and aggravated trespass). As set out above, Teledyne UK has incurred significant repair and clean up costs following acts of trespass by protestors. Those losses are not sustainable. To date, and as set out above, the cumulative loss in this regard is in excess of £2.25m, with that figure expected to increase as the Wirral Site continues to undergo repairs;
  - ii. Disruption to business and operational losses. Teledyne UK cannot operate its business at its sites when unauthorised persons are trespassing on site. In many instances, it would not be safe to do so, and in other instances it would not be prudent to do so given the sensitivity of the business operations. Therefore, trespassers impact significantly on Teledyne UK's ability to go about its day-to-day business. Further, when damage has been caused by trespassing protestors, further disruption to the business is caused by the clean up operation, and sometimes also by reason of areas of the site being out of action until repairs can be undertaken. Further still, in instances where access to the site is blocked and staff cannot access the site, clearly the day-to-day business of that site is also disrupted;
  - iii. Further, and as described above, Teledyne UK's sites form a critical part of the UK defence supply chain. Disruption to production at these sites can weaken the UK's ability to protect its security and can place serving personnel at risk.

#### MITIGATION OF THE APPREHENDED HARM

134. Teledyne UK has comprehensive and sophisticated security arrangements in place across its sites to help guard against acts of unlawful protest (especially acts of trespass), and mitigate the loss and harm that is suffered when such acts do occur. Some

of those arrangements are long standing, whilst others have been put in place and/or enhanced in more recent times in response to the harmful acts of protest that have been suffered. These arrangements include:

- i. Manned guarding of sites;
- ii. Guard dogs;
- iii. Paths for patrolling and access;
- iv. Razor wire;
- v. Fencing lines;
- vi. Anti-climb devices;
- vii. Internal door strengthening;
- viii. Internal door locks;
  - ix. Steel external doors;
  - x. CCTV cameras;
- xi. Intruder detection systems;
- xii. Internal structural hardening (walls and ceilings);
- xiii. Secure rooms upgraded to the latest Ministry of Defence standards.
- 135. In the interests of full and frank disclosure I should say that not every site has all of the above measures in place. The measures that are in place at any given site depends on the nature of the site and its topography, the work undertaken at the site and the resources at and physical capability of the buildings at the site. However, as I am sure the court will appreciate, it is not prudent for me to explain in a public document exactly which measures are in place at which site.
- 136. The cost to Teledyne UK for putting in place the variety of additional security measures, including the additional guarding, is estimated to be in the region of \$2.7m for the 2024 financial year
- 137. A number of Teledyne UK sites have "Prohibited Site" signage in accordance with the National Security Act 2023. That Act provides the police with powers to deter, capture, and prosecute harmful activity in and around prohibited places. These powers include ordering a person to cease their activity or move away from the place. Prohibited places include "any land or building in the United Kingdom ... which is used for the purposes

... of the activities of the armed forces of the Crown...or.. the invention, development,

production, operation, storage or disposal of weapons or other equipment or

capabilities of those forces and research relating to it" (see section 7). Teledyne UK's

sites that are involved in the production of components used by the UK's armed forces

are prohibited places.

138. UK defence suppliers, such as Teledyne UK, are not required to register their premises

as a prohibited place, but they are advised to place signage outside to inform the public.

Teledyne UK has done this at those of its sites that fall within the definition of a

prohibited place.

139. Finally, when Teledyne UK received the intelligence of the protest planned at the

Chelmsford Site for 8 December 2024, additional temporary fencing was placed at the

front the site (which adjoins the pavement) to clearly mark where the boundary to the

site is. It was hoped that the fencing would prevent and deter acts of trespass in

connection with the protest. That fencing has now been removed, but will be re-

installed in advance of the re-scheduled protest.

CONCLUSION

140. I respectfully asked that the court grants the relief set out in the draft Order. It is clear

that the criminal law alone is not an adequate deterrent to acts of unlawful protest, and

Teledyne UK cannot sustain the losses that it has been incurring by reason of acts of

unlawful protest at its sites.

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.

Nicholas James Wargent

Dated this 13 day of December 2024

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## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

CLAIM NO.

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

	<b>Defendants</b>
EXHIBIT NJW-1	

This is Exhibit NJW-1 referred to in the First Witness Statement of Nicholas James Wargent.

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



# Official copy of register of title

#### Title number WYK387275 Edition date 17.05.2021

- This official copy shows the entries on the register of title on 10 SEP 2024 at 13:18:41.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 10 Sep 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Nottingham Office.

## A: Property Register

This register describes the land and estate comprised in the title.

WEST YORKSHIRE : BRADFORD

- (01.06.1977) The Freehold land shown edged with red on the plan of the above Title filed at the Registry and being Land lying to the south east of Otley Road, Charlestown, Shipley.
- The land has the benefit of the following rights reserved by but is subject to the following rights granted by a Conveyance of the land tinted brown on the filed plan dated 26 March 1975 made between (1) Finchdale Investments Limited and (2) Don Brennan & Sons Limited:-

TOGETHER ALSO WITH a right (in common as aforesaid) to use the pipes drains sewers wires and cables now laid or within the aforesaid period to be laid under through or over the adjoining land of the Vendor subject to the payment of a proportionate part of the cost of maintenance and repair thereof and a right of entry upon such adjoining land in connection with the exercise of such rights the Purchaser causing the minimum damage in the exercise of such rights and making good any damage caused thereby EXCEPTING AND RESERVING NEVERTHELESS unto the Vendor and its successors in title the owners and occupiers for the time being of the remaining part of the Vendor's Airedale Park Estate aforesaid or any part or parts thereof the like right to connect into and to use the pipes drains sewers wires and cables now laid or within the said period to be laid under through or over the property hereby conveyed subject to contribution as aforesaid and EXCEPTING AND RESERVING as aforesaid all necessary rights of entry upon the property hereby conveyed in connection with the exercise of the rights hereinbefore reserved causing the minimum damage in the exercise of such rights and making good any damage caused thereby.

3 The land has the benefit of the following rights reserved by a Transfer of the land tinted blue on the filed plan dated 4 February 1980 made between (1) Centregate Properties Limited and (2) The Royal London Mutual Insurance Society Limited: -

EXCEPT AND RESERVING unto the Transferors and their successors in title owners and occupiers for the time being of the remaining part of the Transferors' Airedale Park Estate aforesaid or any part or parts thereof:-

(i) the like right to connect into and use the pipes drains sewers

## A: Property Register continued

wires and cables now laid or within the aforesaid area to be laid under through or over the property hereby transferred subject to contribution as aforesaid

- (ii) all necessary rights of entry upon the property hereby transferred in connection with the exercise of the rights hereinbefore reserved causing the minimum damage in the exercise thereof and making good any damage caused thereby.
- By a Deed dated 1 February 1982 made between (1) Healthilife Limited (Healthilife) (2) Centregate Properties Limited (Centregate) (3) GTE Sylvania Limited (Sylvania) (4) Barclays Bank Limited (5) Guinness Mahon & Co. Limited (Guinness) and (6) The Royal London Mutual Insurance Society Limited (RLM) the benefit of the rights reserved by the Conveyance dated 26 March 1975 referred to above was extinguished as to the following extent:

"Centregate as Beneficial Owner, Guinness as Mortgagees and RLM as Beneficial Owner (to the extent that it is entitled to the same) hereby release to Sylvania the right to use services referred to in the Fourth Schedule hereto so far as the same relates to or affects the Pink Land to the intent that in relation to the Pink Land the right to use the services shall henceforth cease and be extinguished".

NOTE 1: The rights contained in the Fourth Schedule repeat the exceptions and reservations set out from the Conveyance dated 26 March 1975 referred to above

NOTE 2: The pink land referred to is hatched in red on the filed plan.

The land has the benefit of the following rights granted by a Transfer of the land in this title dated 25 February 1987 made between (1) GMI Construction Group Limited (2) Centregate Properties Limited (Transferor) and (3) Filtronic Components Limited (Transferee):-

"TOGETHER WITH the rights set out in Part 2 of the Schedule hereto

THE SCHEDULE BEFORE REFERRED TO

#### PART 2

Rights granted to the Transferee

The right in common with others entitled to the like right to connect into and use the pipes drains sewers wires and cables now laid or within a period of twenty one years from the date hereof to be laid through or over the adjoining land of the Transferor subject to the payment of a fair and reasonable proportion of the cost of maintenance and repair thereof and a right of entry upon such adjoining land in connection with the exercise of such rights the Transferee causing the minimum damage in the exercise thereof and making good damage caused thereby to such adjoining land"

6 (07.08.2008) A new title plan based on the latest revision of the Ordnance Survey Map has been prepared.

## B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

#### Title absolute

- 1 (17.05.2021) PROPRIETOR: TELEDYNE UK LIMITED (Co. Regn. No. 00432014) of 106 Waterhouse Lane, Chelmsford CM1 2QU.
- 2 (17.05.2021) The price stated to have been paid on 10 May 2021 was £798,459.
- 3 (17.05.2021) A Transfer dated 10 May 2021 made between (1) Teledyne Limited and (2) Teledyne UK Limited contains purchaser's personal

## B: Proprietorship Register continued

covenants.

NOTE: Copy filed.

## C: Charges Register

This register contains any charges and other matters that affect the land.

A Conveyance of the land tinted pink on the filed plan and other land dated 26 April 1973 made between (1) Woolcombers Limited (Vendor) and (2) Finchdale Investments Limited (Purchaser) contains the following covenants:

"THE Purchaser hereby covenants with the Vendor so as to bind so far as may be the property hereby conveyed into whosesoever hands the same may come and so that this covenant shall be for the benefit of the Vendors property specified in the First Schedule hereto that the Purchaser and its successors in title will not use or permit the use of the property hereby conveyed or any part thereof for the purpose of woolcombing and will not install any combs or ancillary machinery for the combing of wool in or upon any part of the said property.

#### THE FIRST SCHEDULE

Greenside Combing Company Greenside Lane Fairweather Green Bradford."

The land is subject to the following rights granted by a Transfer of the land tinted yellow on the filed plan dated 19 February 1980 made between (1) Centregate Properties Limited and (2) GTE Sylvania (GB) Limited:-

"TOGETHER WITH

(ii) a right in common as aforesaid to use the pipes drains sewers wires and cables now laid or within a period of twenty one years from the date hereof to be laid under through or over the adjoining land of the Transferor subject to the payment of a proportionate part of the cost of maintenance and repair thereof and a right of entry upon such adjoining land in connection with the exercise of such rights the Transferee causing the minimum damage in the exercise thereof and making good any damage caused thereby."

3 (02.10.2009) The parts of the land thereby affected are subject to the rights granted by a Lease of an electricity substation dated 28 September 2009 referred to in the schedule of leases hereto.

The said deed also contains restrictive covenants by the grantor.

NOTE: Copy lease filed under WYK910237.

4 (02.10.2009) The parts of the land affected thereby are subject to the leases set out in the schedule of leases hereto.

The leases grant and reserve easements as therein mentioned.

#### Schedule of notices of leases

	Registration date and plan ref.	Property description	Date of lease and term	Lessee's title
1	02.10.2009 edged and numbered 1 in blue	electricity substation, Acorn Park	28.09.2009 60 years from 28 September 2009	WYK910237

## Schedule of notices of leases continued

Registration Property description Date of lease Lessee's date and plan ref.

 ${\tt NOTE}\colon {\tt See}$  entry in the Charges Register relating to the rights granted by this lease.

## End of register

## Land Registry



10 September 2024

Your ref TEL14.23

Our ref WYK387275/OC/113

HM Land Registry Durham Office PO Box 75 Gloucester GL14 9BD

DX 321601 Gloucester 33 Tel 0300 006 0010 Fax NA Email durham.office@ landregistry.gov.uk www.gov.uk/land-registry

## Official copy/copies

HM Land Registry payment ref 10/09 Z0NE3PNF Fee debited £3.00

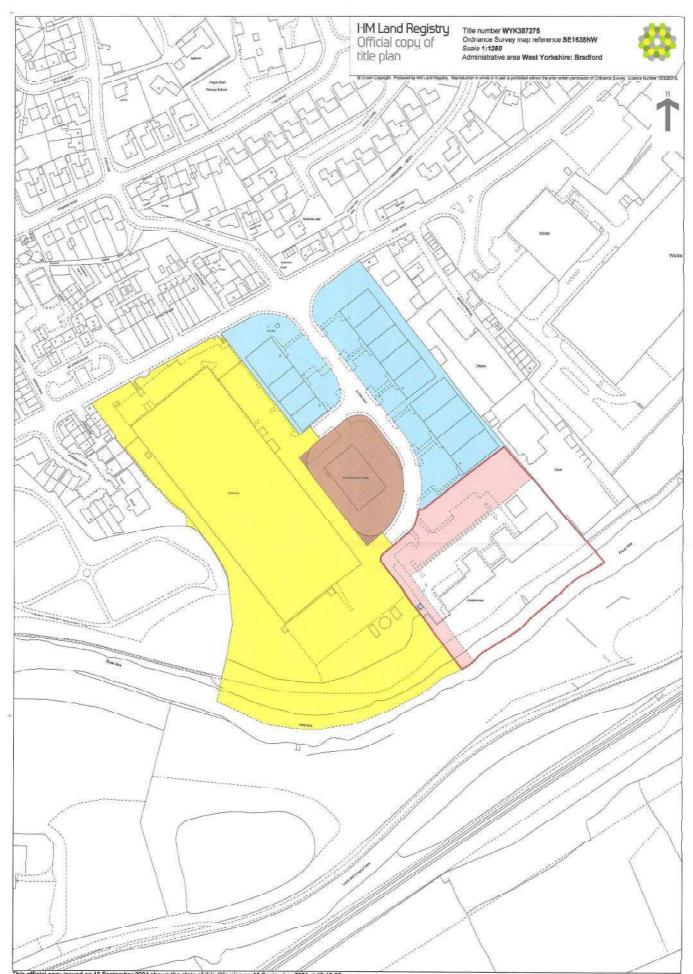
The official copy/copies of the title plan or certificate in form CI you applied for is/are enclosed.

You did not apply for an official copy of the register.

Please contact the HM Land Registry Office named if you have any questions about the enclosed official copy/copies.

TEL14.23

KEYSTONE LAW LTD DX 193 Chancery Lane



This official copy issued on 10 September 2024 shows the state of this title plan on 10 September 2024 at 13:19:32.

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This title plan shows the general position, on the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. This title is dealt with by HM Land Registry, Durham Office.



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Title Number: WYK387275



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Title Number: WYK387275

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# Official copy of register of title

#### Title number MS575234

Edition date 26.07.2021

- This official copy shows the entries on the register of title on 08 OCT 2024 at 11:48:39.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 08 Oct 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Birkenhead Office.

## A: Property Register

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

MERSEYSIDE : WIRRAL

1 (07.07.2010) The Leasehold land shown edged with red on the plan of the above title filed at the Registry and being Unit A, Tebay Retail Park, Tebay Road, Bromborough, Wirral.

NOTE: The land tinted green on the title plan is not included in the title.

- 2 (07.07.2010) The title includes any legal easements referred to in clause LR11.1 of the registered lease but is subject to any rights that are granted or reserved by the lease and affect the registered land.
- 3 (07.07.2010) The land has the benefit of the rights granted by but is subject to the rights reserved by the Conveyance dated 12 January 1990 referred to in the Charges Register.
- 4 (07.07.2010) The land has the benefit of the rights granted by but is subject to the rights reserved by the Transfer dated 4 December 2009 referred to in the Charges Register.
- 5 (07.07.2010) The Transfer dated 4 December 2009 referred to in the Charges Register contains a provision excluding the operation of section 62 of the Law of Property Act 1925 and other matters as therein mentioned.
- 6 (07.07.2010) Short particulars of the lease(s) (or under-lease(s)) under which the land is held:

Date : 24 June 2010

Term : 15 years from 4 June 2010 Parties : (1) Redsun Developments Limited

(2) C.M.L Group Limited

- 7 (07.07.2010) The Lease prohibits or restricts alienation.
- 8 (07.07.2010) The landlord's title is registered.

## B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

#### Title absolute

- 1 (11.05.2021) PROPRIETOR: TELEDYNE UK LIMITED (Co. Regn. No. 00432014) of 106 Waterhouse Lane, Chelmsford CM1 2QU.
- 2 (07.07.2010) RESTRICTION: No transfer of the registered estate by the proprietor of the registered estate or by the proprietor of any registered charge is to be registered without a certificate signed by a conveyancer that the provisions of of clauses 20.2 and 20.3 of the registered lease have been complied with.
- 3 (11.05.2021) RESTRICTION: No disposition of the registered estate (other than a charge) by the proprietor of the registered estate or by the proprietor of any registered charge, not being a charge registered before the entry of this restriction, is to be registered without a certificate signed by a conveyancer that the provisions of clause 2.2 of a Deed of Covenant dated 10 May 2021 made between (1) Teledyne UK Limited and (2) Ministry of Housing Communities and Local Government have been complied with.
- 4 (11.05.2021) A Transfer of the land in this title dated 29 December 2013 made between (1) Teledyne C.M.L. Group Limited and (2) Teledyne Limited contains purchasers personal covenant(s).

NOTE: Copy filed.

The Transfer to the present proprietor(s) contains a covenant to observe and perform the aforesaid covenant(s) and of indemnity in respect thereof.

## C: Charges Register

#### This register contains any charges and other matters that affect the land.

- 1 (07.07.2010) The land in this title is with other land unknown subject to a perpetual yearly rentcharge of £4.10s.0d. created by a Deed of unknown date and parties mentioned in the Conveyance dated 29 May 1908 referred to below. The Conveyance states that the rentcharge is payable to the poor of the Townships of Bromborough and Brimstage but no other particulars were supplied on first registration.
  - By the Conveyance dated 12 January 1990 referred to below the land in this title was informally exonerated from this rentcharge.
- 2 (07.07.2010) A Conveyance of the freehold estate in the land in this title and other land dated 29 May 1908 made between (1) Lever Brothers Limited (2) Bromborough Port Estate Limited contains the following covenants:

COVENANT by the Purchasers with the Vendors:-

That no works or buildings should at any time be erected or used for the manufacture or sale of soap upon any part of the lands and hereditaments thereby assured except such part as might be sold under the provisions of an Agreement not the subject of this Abstract and that the business of a soap-maker or perfumer not to be carried on upon any part of said land and hereditaments.

- 3 (07.07.2010) A Conveyance of the freehold estate in the land in this title and other land dated 18 December 1956 made between (1) Unilever Limited (2) The Board of Trade contains covenants details of which are set out in the schedule of restrictive covenants hereto.
- 4 (07.07.2010) The land is subject to the following rights granted by a Conveyance of Factory BT341/21 on the Old Hall Estate dated 30 July 1987 made between (1) The English Industrial Estates Corporation (2) Magnet Joinery & Timber Limited:-

## C: Charges Register continued

"TOGETHER WITH the rights set out in the First Schedule hereto

THE FIRST SCHEDULE above referred to

#### (Rights Granted)

- (i) Full and free right and liberty for the Purchaser in common with the Vendor and all other persons having the like right but subject to all easements which may have been or may hereafter be granted by the Vendor (the Vendor agreeing that any easements which may hereafter be granted shall not result in the obstruction of or interference with the right and liberty of passing and repassing hereinafter mentioned) upon over or under the private road of the Vendor on the Estate known as Tebay Road at all times and for all purposes connected with the use and enjoyment of the Property with or without motors or other vehicles laden or unladen to pass and repass over and along the said private road known as Tebay Road
- (ii) Liberty to enter on the remainder of the Estate adjacent to the Property for the purposes of compliance with any of the covenants conditions and stipulations hereinafter contained and on the part of the Purchaser to be observed or performed making good all damage occasioned by such entry and taking all precautions to avoid obstruction to or interference of the Estate
- (iv) The free and uninterrupted right (in common with the Vendor and all other persons having the like right) of running of water soil gas and electricity and any other services or supply from and to the Property and all buildings erected thereon through along or under (including (but without disturbing any buildings or erections now standing on the remainder of the Estate) the right to connect into) all sewers watercourses channels water and gas pipes electric and other wires flues drains and other services and conducting media now or at any time within eighty years of the date of the Conveyance to the Purchaser made in on or under all parts of the remainder of the Estate as afford service or benefit for the Property together with all easements rights and privileges necessary and property (but without disturbing any buildings or erections now standing on the remainder of the Estate) for laying making inspecting cleansing repairing and reinstating the same (the person exercising such rights making good at his own expense all damage caused in the exercise of such rights) provided that the Vendor may at any time without incurring any liability to the Purchaser stop up alter remove or make connections to the said sewers watercoarses channels water and gas pipes electric and other wires flues drains and other services and conducting media subject to an obligation on the part of the Vendor to supply the Purchaser with suitable alternative services
- (v) The right of support for the Property from all parts of the remainder of the Estate
- (vi) The right after reasonable notice and at reasonable times (except in the case of emergency) to enter upon the remainder of the Estate for the purpose of executing any works on or in connection with the Property or any part thereof which cannot otherwise be conveniently executed (the person exercising such rights causing as little inconvenience as possible and making good at his own expense all damage caused in the exercise of such rights)
- (vii) The right with or without workmen at all reasonable times and after reasonable notice (except in the case of an emergency) to enter upon the remainder of the Estate for the purpose of maintaining repairing renewing altering or amending any fences walls buildings or works on all parts of the Property (the person exercising such right causing as little inconvenience as possible and making good at his own expense all damage caused in the exercise of such right)
- 5 (07.07.2010) A Conveyance of the freehold estate in the land in this title dated 12 January 1990 made between (1) The English Industrial Estates Corporation (2) The Morgan Crucible Company plc contains restrictive covenants.

## C: Charges Register continued

NOTE: Copy filed under MS299602.

6 (07.07.2010) By a Deed dated 8 February 2007 made between (1) Thermal Ceramics UK Limited and (2) Henry Boot Developments Limited the rights granted by the Conveyance dated 30 July 1987 referred to above were varied as therein mentioned.

NOTE: Copy Filed under MS259869.

7 (07.07.2010) By a Deed dated 9 March 2009 made between (1) UML Limited and (2) Thermal Ceramics UK Limited the covenants contained in the Conveyances dated 29 May 1908 and 18 December 1956 referred to above were expressed to be released.

NOTE:-Copy filed under MS299602.

8 (07.07.2010) The land is subject to the easements granted by a lease dated 1 May 2009 of an electricity substation for a term of 99 years .

The said deed also contains restrictive covenants by the grantor.

NOTE: Copy lease filed under MS563827.

9 (07.07.2010) A Transfer of the freehold estate in the land in this title dated 4 December 2009 made between (1) Thermal Ceramics Uk Limited and (2) Redsun Developments Limited contains restrictive covenants.

NOTE: Copy filed under MS570108.

#### Schedule of restrictive covenants

1 (07.07.2010) The following are details of the covenants contained in the Conveyance dated 18 December 1956 referred to in the Charges Register:-

"The Board for itself and its successors in title hereby COVENANTS with the Company to the intent that this covenant shall run with and bind the said property and every part thereof into whosesoever hands the same may come and to the intent that the benefit thereof may be annexed to and run with each and every part of the adjoining or neighbouring properties of the Company as follows:-

(i) Not to erect upon the said property any building without first obtaining the approval in writing of the Company its architect or surveyor (which approval shall not be unreasonably withheld or delayed) to plans showing the site of and the sections and elevations of the building to be erected thereon and only to erect any such building in conformity with such plans and the erection of any building without such previous approval or not in conformity with approved plans shall be deemed to constitute a continuing breach of this covenant until such time as plans shall be submitted and approved as aforesaid or until such building shall be made to conform with approved plans ( as the case may be) and any building erected without such previous approval or which is not in confirmity with such approved plans shall forthwith be pulled down

or altered (as the case may be) upon the demand in writing of the  $\operatorname{Company}$ 

(ii) Not to alter the elevations of any building erected upon the said property without first obtaining the consent in writing of the Company its architect or surveyor (which consent shall not be unreasonably withheld or delayed) to such alterations and the alterations to any elevations to any building erectedther

eon without such consent shall be deemed to constitute a continuing breach of this covenant until such time as such consent shall be obtained and any alterations made without such consent shall upon the demand in writing of the Company br restored forthwith

#### Title number MS575234

#### Schedule of restrictive covenants continued

- (iii) Not to use the said property or any building erected or to be erected thereon or permit or suffer the same or any part thereof to be used
- (a) for the manufacture of or for the sale of or for dealing in any manner what

soever in soap or detergents of any description candles glycerine perfume toilet preparations or margarine edible fats cattle cake or cattle foods

- (b) for an hotel or tavern or for the sale of beer wines or spirits PROVIDED that nothing in this clause contained shall apply to any building used as a works canteen or a sports or social club (wherein may be sold or consumed beer wines or spirits) maintained for the benefit of the employees of the owners or occupiers of the said property
- (c) for the carrying on of any offensive noxious noisome or dangerous trade business manufacture or occupation or any trade business manufacture or occupation which shall or may be or become offensive objectionable injurious or dangerous to the Company or the owners or occupiers of any adjacent or neighbouring property or which shall or may involve the use of any process which gives off any offensive objectionable injurious or dangerous gas odour smoke or fumes
- (iv) Not to do or suffer to be done on the said property or any building erected or to be erected thereon anything which shall or may be or become a nuisance or annoyance to the Company or to the owners or occupiers of any adjacent or neighbouring property
- (v) Not to erect or exhibit or permit or suffer to be erected or exhibited upon the property or any part thereof or upon any building erected thereon any advertisement or advertisement hoarding whatsoever PROVIDED that nothing in this clause contained shall prevent the owner or occupier for the time being of the said property or any part thereof from exhibiting signs or advertisements relating exclusively to the trade or business carried on by such owner or occupier in or upon the said property or any part thereof or any building erected thereon or signs or notices relating to the sale or letting of the said property or any part thereof or any building to be erected thereon
- (vi) Not to sink or permit or suffer to be sunk any well or wells on any part of the said property or bore or excavate in search of water or do or suffer to be done on the said property anything which may prejudice or cause damage to the water supply of the Company or of Lever Brothers Port Sunlight Limited or any company or companies associated with them.

## End of register

#### These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

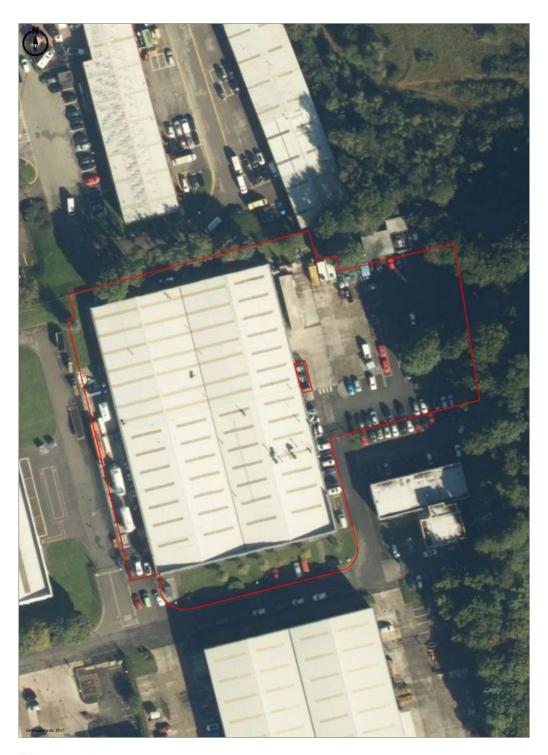
This official copy is issued on 08 October 2024 shows the state of this title plan on 08 October 2024 at 11:48:39. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the

This title is dealt with by the HM Land Registry, Birkenhead Office .

# HM Land Registry Official copy of title plan

Title number MS575234
Ordnance Survey map reference SJ3581NE
Scale 1:1250
Administrative area Merseyside: Wirral

©Crown Copyright. Produced by HM Land Registry.
Reproduction in whole or in part is prohibited without the prior written permission of Ordnance Survey.Licence Number AC0000851063.
The land tinted green is not included in this title. TEBAY ROAD



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Title Number: MS575234



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Title Number: MS575234

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



# Official copy of register of title

#### Title number EX688035

Edition date 12.08.2019

- This official copy shows the entries on the register of title on 08 OCT 2024 at 11:25:20.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 08 Oct 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Peterborough Office.

## A: Property Register

This register describes the land and estate comprised in the title.

ESSEX : CHELMSFORD

- 1 (05.08.2002) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being 106 Waterhouse Lane, Chelmsford (CM1 2QU).
- 2 (05.08.2002) The land has the benefit of the following rights reserved by but is subject to the following rights granted by a Conveyance of the land tinted mauve on the filed plan dated 31 December 1967 made between (1) English Electric Valve Company Limited (Vendor) and (2) The Marconi Company Limited (Purchaser) :-

"TOGETHER ALSO with full and free right of way for the Purchaser and its successors in title owners or owner for the time being of the property hereby conveyed and their his or her servants visitors and licensees in common with all other persons now or hereafter entitled to the like right at all times hereafter by day or night with or without horses cattle or other animals carts waggons carriages traction engines motor cars motor lorries and other vehicles of any description for all purposes connected with the use and enjoyment of the property hereby conveyed or of any portion thereof for whatever purpose the same may from time to time lawfully be used and enjoyed over and along the roadway coloured green on the plan annexed hereto to pass and repass at all reasonable times but not to park or permit to be parked or to cause any other obstruction SUBJECT NEVERTHELESS and RESERVED unto the Vendor and its successors in title similar and like rights over the land coloured yellow"

NOTE: Copy plan filed.

3 (05.08.2002) The land has the benefit of the following rights reserved by a Conveyance of 110 Waterhouse Lane dated 14 March 1978 made between (1) English Electric Valve Company Limited (Vendor) and (2) Constance Rowena Strange (Purchaser):-

"Excepting and Reserving unto the Vendor and their successors in title the owner or owners and occupier or occupiers for the time being of the Vendors adjoining or neighbouring properties or any part or parts thereof:.....all other easements and quasi easements and rights which are or but for the common ownership would have been so used and enjoyed over the property hereby conveyed for the

## A: Property Register continued

Benefit of the said adjoining properties and each and every part"

4 (05.08.2002) The land has the benefit of the following rights reserved by a Transfer of other land dated 7 June 1999 made between (1) Marconi Electronic Systems Limited (Vendor) and (2) Fairview New Homes (Chelmsford) Limited (Purchaser):-

"excepting and reserving out of the Property the Exceptions and Reservations for the benefit of each and every part of the Retained Land

SCHEDULE 2 (The Exceptions and Reservations)

In this Schedule the definition of the Vendor shall be read as also including EEV Limited and its and their successors in title and assigns the owners and occupiers for the time being of the Retained land or any part thereof

- 1 The full and unrestricted right at any time hereafter and from time to time for the Vendor to erect and permit to be erected any buildings or other erections and to alter any buildings or other erections now standing or hereafter to be erected on any part of the Retained Land in such manner as to obstruct or interfere with the passage and access of light and air to any building which is or may be erected upon any part of the Property and so that all privileges of light or air now or hereafter to be enjoyed from any part of the Retained Land by or in respect of the Property shall be deemed to be so enjoyed by the licence or consent of the Vendor and not as of right
- 2.1 The full and unrestricted right for all purposes connected with the Retained land and each and every part thereof for the Vendor to the free and uninterrupted passage of Services through the existing Service Media which serve the Retained Land at the date of this Transfer or such other substituted Service Media as may within the Perpetuity Period be laid in under or over the property with the right at reasonable times and on reasonable written notice (except in emergency) for the Vendor to enter on the Property for the purposes of inspecting repairing renewing maintaining or cleansing the same the persons exercising such right causing as little damage as possible and making good any damage caused
- 2.2 The full and unrestricted right for all purposes connected with the Retained Land and each and every part thereof for the Vendor to connect up to any of the Service Media to be installed for the benefit of the Retained Land and every part thereof (such connections to be made only in the positions shown marked on Plan C) in under or over the Property within the Perpetuity Period or such other substituted Service Media as may within the Perpetuity Period be laid in under or over the property and thereafter the free and uninterrupted passage of Services through such Service Media with the right at reasonable times and on reasonable notice (except in emergency) for the Vendor to enter on the Property for the purposes of inspecting repairing renewing maintaining or cleansing the same the persons exercising such right causing as little damage as possible and making good any damage caused
- 3 The rights of support and shelter now enjoyed by any of the buildings or other structures upon the Retained Land
- $4\ \text{All}$  rights to light and air enjoyed by the Retained Land over the Property notwithstanding that by reason of unity of ownership no such right previously existed
- 5 The full and unrestricted right at all times and for all purposes for the Vendor to drain water from the Retained Land or any part thereof into the drainage ditch the approximate position of which is shown by a red line on Plan B for the purposes of identification only together with the right to dig out and enlarge such ditch in such manner as the Vendor may require from time to time
- 6 The full and unrestricted right at all times and for the purposes of pedestrian and cycle access and for the purposes of repair and maintenance for the Vendor and those authorised by the Vendor to pass and repass between the Retained Land and the public cycle track over

## A: Property Register continued

and along the bridges and accessways situated on the property in the locations shown for the purposes of identification only coloured pink on Plan B subject to the Vendor repairing and maintaining such bridges and accessway at the Vendor's own cost

NOTE 1: The following are the definitions referred to above:

"the First Property" Part of the Vendor's Land comprising land and buildings at Writtle Road Chelmsford shown edged red on Plan A for identification purposes only

"the Perpetuity Period" the period of 80 years from the date of this transfer

"the Property" the First Property and the Second Property

"the Retained Land" the land adjoining or neighbouring the Property retained by the Vendor and shown edged blue on Plan B for identification purposes only and the adjoining or neighbouring land of EEV Limited shown edged green on Plan B for identification purposes only

"the Second Property" the land and buildings shown coloured pink on Plan A annexed hereto for identification purposes only

"the Service Media" any drain sewer main wire cable watercourse conduit flue channel and other conducting media works pump or apparatus for the supply transmission or discharge of the Service

"the Services" gas electricity telecommunications water surface water or sewerage or any other services being supplied by or transmitted through or discharged from any of the Service Media.

NOTE 2: Copy plans filed under EX619559.

5 (05.08.2002) The land has the benefit of but is subject to the rights granted by a Deed dated 4 January 2002 made between (1) Marconi Applied Technologies Limited and (2) Ashtenne Land Limited. The said Deed also expresses to release the rights contained in the Conveyance dated 31 December 1967 referred to above.

NOTE: Original filed.

## **B**: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

#### Title absolute

- 1 (05.08.2002) PROPRIETOR: TELEDYNE E2V (UK) LIMITED (Co. Regn. No. 432014) of 106 Waterhouse Lane, Chelmsford CM1 2QU.
- 2 (12.08.2019) The proprietor's address for service has been changed.

## C: Charges Register

This register contains any charges and other matters that affect the land.

1 (05.08.2002) A Conveyance of the land tinted yellow on the filed plan and other land dated 3 May 1935 made between (1) William Grose Webber and others (Vendors) and (2) William Smith Henderson (Purchaser) contains the following covenants:-

COVENANT by the Purchaser with the Vendors to the intent that the abstracting covenant should be binding so far as might be on the owners or owner for the time being of the hereditaments thereby assured but upon the Purchasers only so long as they were the owners of the same hereditaments that the Purchasers and the successors in title would at

### C: Charges Register continued

all times thereafter observe and perform the several restrictions and stipulations set forth in the First Schedule thereto.

THE FIRST SCHEDULE therein above referred to

.....

- 2. The Purchaser shall not erect on the said piece or parcel of land a single house with domestic offices and outbuildings of less value than £450. Private dwellinghouses only with domestic offices and outbuildings shall be erected on the said piece or parcel of land.
- 3. The Purchaser shall not stand place or erect or allow to be stood placed or erected any hut tent caravan house on wheels or other chattel nor erect make place or use or allow to remain any show booth or roundabout on the said piece or parcel of land.
- 4. No gravel sand brick earth clay or soil shall be raised from the said piece or parcel of land or any part thereof except such as it shall be necessary to excavate for foundations of buildings or for the purpose of drainage cellarage or water supply.
- 5. The said piece or parcel of land shall not nor shall any part thereof be used as a road.
- 6. All dwellinghouses to be erected on the said piece or parcel of land shall front or face the said strip of land coloured yellow on the said plan and no dwellinghouse shall be built which shall front upon the flank of the said piece or parcel of land.
- 7. The Vendors reserve the right to waive alter modify or vary at any time as they may think fit the foregoing restrictions and stipulations in respect of the land retained by them.

NOTE: The land coloured yellow referred to above is Waterhouse Lane.

- 2 (05.08.2002) A Conveyance of the land tinted blue on the filed plan and other land dated 31 July 1935 made between (1) William Grose Webber and others (Vendor) and (2) Henry Potter (William Sharp) Limited (Purchaser) contains covenants identical with those contained in the Conveyance dated 3 May 1935 referred to above.
- 3 (05.08.2002) A Conveyance of the land tinted pink on the filed plan and other land dated 13 January 1936 made between (1) William Grose Webber and others (Vendor) and (2) Henry Potter (William Sharp) Limited (Purchaser) contains covenants identical with those contained in the Conveyance dated 3 May 1935 referred to above.
- 4 (05.08.2002) By a Deed dated 25 October 1957 made between (1) The English Electric Valve Company Limited and (2) The Mayor Aldermen and Burgesses of the Borough of Chelmsford the land cross hatched blue on the filed plan was dedicated for use as highway land.

NOTE: Copy filed.

5 (05.08.2002) By an Agreement dated 20 November 2001 made between (1) Fairview New Homes (Chelmsford) Limited (2) Marconi Mobile Limited (3) Marconi Applied Technologies Limited (4) Chelmsford Borough Council and (5) Essex County Council the land tinted brown on the filed plan was dedicated as highway land.

NOTE: Copy filed.

6 (30.08.2005) The land is subject for a term of 80 years from 23 June 2005 to the rights in respect of a surface water drain granted by a Deed dated 23 June 2005 made between (1) E2V Technologies (UK) Limited and (2) Ashtenne Land Limited for a term of 80 years from 23 June 2005.

NOTE:-Copy filed.

### Land Registry



8 October 2024

Your ref TEL14.23

Our ref EX688035 /OC/133

HM Land Registry Durham Office PO Box 75 Gloucester GL14 9BD

DX 321601 Gloucester 33 Tel 0300 006 0010 Fax NA Email durham.office@ landregistry.gov.uk www.gov.uk/land-registry

### Official copy/copies

HM Land Registry payment ref 08/10 Z0PB4SRC Fee debited £3.00

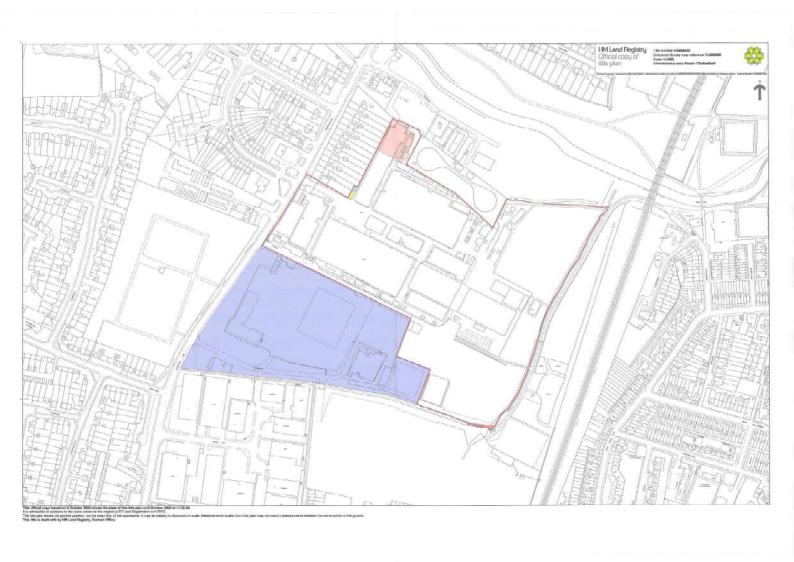
The official copy/copies of the title plan or certificate in form CI you applied for is/are enclosed.

You did not apply for an official copy of the register.

Please contact the HM Land Registry Office named if you have any questions about the enclosed official copy/copies.

TEL14.23

KEYSTONE LAW LTD DX 193 Chancery Lane





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Title Number: EX688035

In accordance with Section 78 of the Companies Act 2006.

## **NM01**

#### Notice of change of name by resolution

LD1

30/12/2019 COMPANIES HOUSE #190

E 50 PAID

A fee is payable with this form. Please see 'How to pay' on the last page.

riease see now to pay on the last pag

What this form is for You may use this form to give notice of an unconditional change of name by the company members. What this form is NOT for You cannot use this form to give notice of a conditional change of For further information, please refer to our guidance at www.companieshouse.gov.uk

Company details Filling in this form 0 0 4 3 2 Company number Please complete in typescript or in bold black capitals. Existing company TELEDYNE E2V (UK) LIMITED name in full All fields are mandatory unless specified or indicated by \* Proposed name Sensitive words and To check if a company name is available use our WebCHeck service and select duplicate names the 'Company Name Availability Search' option: If the proposed name contains sensitive or restricted words or www.companieshouse.gov.uk/info expressions you must provide form NM06 'Request to seek comments The above company resolved to change the company name to: of government department or other specified body on change of name' Proposed name • TELEDYNE UK LIMITED and the appropriate supporting information before the name can be changed. Please note that the Registrar cannot change the company name until a copy of Duplicate names are not permitted. the resolution has been received. A list of registered names can be found on our website. There are various rules that may affect your choice of name. More information on this is available in our guidance booklet GP1 at: www.companieshouse.gov.uk Signature I am signing this form on behalf of the company. Societas Europaea If the form is being filed on behalf Signature lule War of a Societas Europaea (SE) please delete 'director' and insert details X of which organ of the SE the person signing has membership. Person authorised This form may be signed by: Under either section 270 or 274 of Director . Secretary, Person authorised . Liquidator, Administrator, the Companies Act 2006. Administrative receiver, Receiver, Receiver manager, Charity commission receiver and manager, CIC manager.

> CHFP000 05/12 Version 5.0

NM01 Notice of change of name by resolution

Presenter information	Important information
You do not have to give any contact information, but if you do it will help Companies House if there is a query on the form. The contact information you give will be visible to searchers of the public record.	Please note that all information on this form will appear on the public record.
	E How to pay
Contact name Susanne Pederson	A fee of £10 is payable to Companies House
Company name McGuireWoods London LLP	in respect of a notice of change of name by resolution.
Address 11 Pilgrim Street	Make cheques or postal orders payable to 'Companies House'.
	■ Where to send
Post town London	You may return this form to any Companies House address, however for expediency we advise you to return it to the appropriate address below:
Postcode  E C 4 V 6 R N  Country United Kingdom  DX  Telephone 02076321690  Checklist  We may return forms completed incorrectly or with information missing.  Please make sure you have remembered the following:  The company name and number match the information held on the public Register.  You have given the proposed name in section 2.	For companies registered in England and Wales: The Registrar of Companies, Companies House, Crown Way, Cardiff, Wales, CF14 3UZ. DX 33050 Cardiff.  For companies registered in Scotland: The Registrar of Companies, Companies House, Fourth floor, Edinburgh Quay 2, 139 Fountainbridge, Edinburgh, Scotland, EH3 9FF. DX ED235 Edinburgh 1 or LP - 4 Edinburgh 2 (Legal Post).  For companies registered in Northern Ireland: The Registrar of Companies, Companies House, Second Floor, The Linenhall, 32-38 Linenhall Street, Belfast, Northern Ireland, BT2 8BG. DX 481 N.R. Belfast 1.
<ul> <li>You have checked that the proposed company name is available as well as the various rules that may affect your choice of name. More information can be found in guidance on our website.</li> <li>You have attached a copy of the resolution unless previously filed.</li> <li>You have signed the form.</li> <li>You have enclosed the correct fee.</li> </ul>	Further information  For further information, please see the guidance notes on the website at www.companieshouse.gov.uk or email enquiries@companieshouse.gov.uk  This form is available in an alternative format. Please visit the forms page on the website at www.companieshouse.gov.uk

CHFP000 05/12 Version 5.0

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

Mae'r copi swyddogol electronig o'r gofrestr yn dilyn y neges hon.

Sylwch mai hwn yw'r unig gopi swyddogol a ddarparwn. Ni fyddwn yn darparu copi swyddogol papur.



## Official copy of register of title Copi swyddogol o gofrestr teitl

# Title number / Rhif teitl CYM839162

Edition date / Dyddiad yr argraffiad 03.02.2022

- This official copy shows the entries on the register of title on 08 OCT 2024 at 12:42:38.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 08 Oct 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Wales Office.
- Mae'r copi swyddogol hwn yn dangos y cofnodion yn y gofrestr teitl ar 08 HYDREF 2024 am 12:42:38.
- Rhaid dyfynnu'r dyddiad hwn fel y "dyddiad y chwilir ohono" mewn unrhyw gais am chwiliad swyddogol sy'n seiliedig ar y copi hwn.
- Y dyddiad ar ddechrau cofnod yw'r dyddiad y gwnaethpwyd y cofnod yn y gofrestr.
- Cyhoeddwyd ar 08 Hydref 2024.
- Dan adran 67 Deddf Cofrestru Tir 2002, mae'r copi hwn yn dderbyniol fel tystiolaeth i'r un graddau â'r gwreiddiol.
- Gweinyddir y teitl hwn gan Gofrestrfa Tir EF Swyddfa Cymru.

### A: Property Register / Cofrestr eiddo

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

Mae'r gofrestr hon yn disgrifio'r tir a'r ystad a gynhwysir yn y teitl. Ac eithrio yr hyn a nodir isod, mae'r teitl yn cynnwys unrhyw hawddfreintiau cyfreithiol a roddir gan y brydles gofrestredig ond mae'r ddarostyngedig i unrhyw hawliau a gedwir ganddi, i'r graddau y mae'r hawddfreintiau a'r hawliau hynny'n bodoli ac o fudd i'r tir cofrestredig neu'n effeithio arno.

#### POWYS

- 1 (03.02.2022) The Leasehold land demised by the lease referred to below which lies within the area shown edged with red on the plan of the above Title filed at the Registry and being Unit 1, Broadaxe Business Park, Presteigne (LD8 2UH).
- 2 (03.02.2022) The mines and minerals together with ancillary powers of working are excepted with provision for compensation in the event of damage caused thereby.
- 3 (03.02.2022) Short particulars of the lease(s) (or under-lease(s)) under which the land is held:

#### A: Property Register continued / Parhad o'r gofrestr eiddo

Date : 21 January 2022

Term : 10 years from 21 January 2022

Parties : (1) Intelek Pension Trustees Limited

(2) Teledyne UK Limited

NOTE 1: The original lease dated 21 July 1994 referred to in the above lease was formerly registered under WA731815

NOTE 2: A copy of the original lease is filed under WA731815.

- 4 (03.02.2022) The Lease prohibits or restricts alienation.
- 5 (03.02.2022) The title includes any legal easements referred to in clause LR11.1 of the registered lease but is subject to any rights that are granted or reserved by the lease and affect the registered land.

NOTE: A copy of the superior lease dsted 23 March 1998 referred to in the above lease is filed under WA869023.

- 6 (03.02.2022) The registrar has not seen any consent to the grant of this sub-lease that the superior lease, out of which it was granted, may have required.
- 7 (03.02.2022) The landlord's title is registered.

### B: Proprietorship Register / Cofrestr Perchnogaeth

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Mae'r gofrestr hon yn nodi'r math o deitl ac yn enwi'r perchennog. Mae'n cynnwys unrhyw gofnodion sy'n effeithio ar yr hawl i waredu.

#### Title absolute/Teitl llwyr

```
1 (03.02.2022) PROPRIETOR: TELEDYNE UK LIMITED (Co. Regn. No. 00432014) of 106 Waterhouse Lane, Chelmsford CM1 2QU.
```

#### C: Charges Register / Cofrestr Arwystlon

This register contains any charges and other matters that affect the land.

Mae'r gofrestr hon yn cynnwys unrhyw arwystlon a materion eraill sy'n effeithio ar y tir.

1 (03.02.2022) The land is subject to the provisions of a Wayleave Consent dated 17 November 1949 in favour of The Midlands Electricity Board.

NOTE: Copy filed under WA573844.

#### End of register / Diwedd y gofrestr

#### These are the notes referred to on the following official copy

Dyma'r nodiadau y cyfeirir atynt ar y copi swyddogol canlynol.

The electronic official copy of the title plan follows this message.

Mae'r copi swyddogol electronig o'r cynllun teitl yn dilyn y neges hon.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

Sylwch mai hwn yw'r unig gopi swyddogol a ddarparwn. Ni fyddwn yn darparu copi swyddogol papur.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

Anfonwyd y copi swyddogol hwn yn electronig a phan gaiff ei argraffu ni fydd wrth raddfa. Gallwch gael copi swyddogol papur trwy archebu un o Gofrestrfa Tir EF.

This official copy is issued on 08 October 2024 shows the state of this title plan on 08 October 2024 at 12:42:38. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this points on the ground.

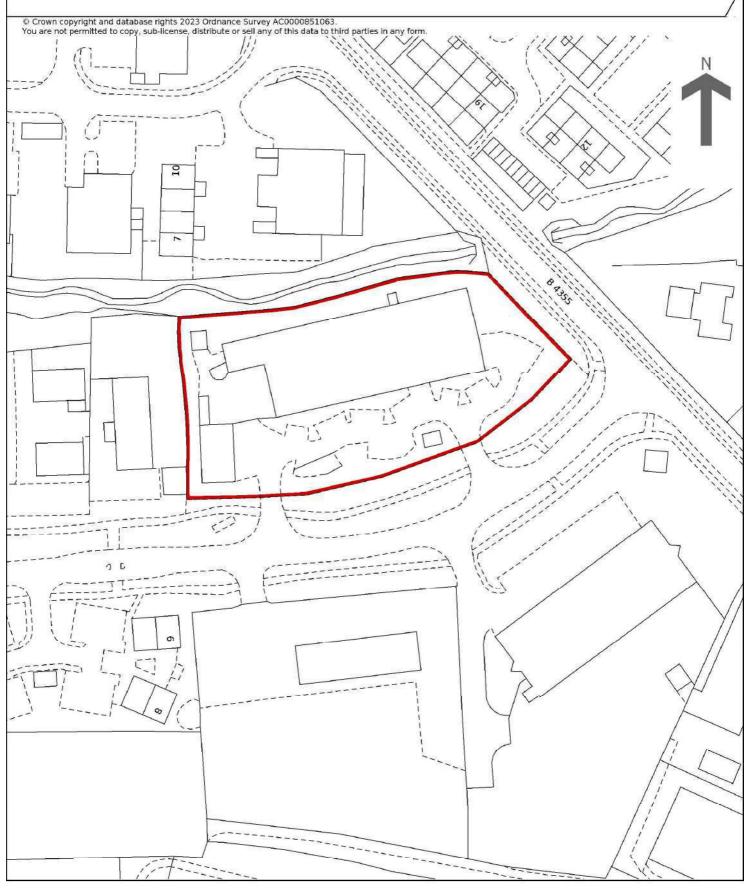
Mae'r copi swyddogol hwn a gyhoeddir ar 08 Hydref 2024 yn dangos sefyllfa'r cynllun teitl hwn ar 08 Hydref 2024 am 12:42:38. Mae'n dderbyniol fel tystiolaeth i'r un graddau â'r gwreiddiol (adran 67 Deddf Cofrestru Tir 2002). Mae'r cynllun teitl hwn yn dangos safle cyffredinol, nid union linell, y terfynau. Gall fod gwyriadau yn y raddfa. Mae'n bosibl na fydd plan may not match measurements between the same mesuriadau wedi eu graddio o'r cynllun hwn yn cyfateb â mesuriadau rhwng yr un pwyntiau ar y llawr. Gweinyddir y teitl hwn gan Gofrestrfa Tir EF Swyddfa Cymru.

This title is dealt with by the HM Land Registry, Wales Office.

## HM Land Registry Official copy of title plan

Title number CYM839162
Ordnance Survey map reference SO3163NE
Scale 1:1250 enlarged from 1:2500
Administrative area Powys







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Title Number: CYM839162

DATED 9th October

2024

#### RENEWAL LEASE BY REFERENCE TO AN EXISTING LEASE

relating to

Units 5 and 6 Presteigne Industrial Estate,
Presteigne, Powys

between

and

(2) TELEDYNE UK LIMITED

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ANI	NEX A	Copy of the Existing Lease1	0	

This lease is dated

9th October

2024

#### **PARTIES**

(1)

(2) TELEDYNE UK LIMITED incorporated and registered in England and Wales with company number 00432014 whose registered office is at 106 Waterhouse Lane, Chelmsford, Essex, CM1 2QU ('the Tenant')

#### BACKGROUND

- (A) The Landlord is the freehold owner of the Property.
- (B) The residue of the term of the Existing Lease is vested in the Tenant.
- (C) The Landlord has agreed to grant a new lease of the Property to the Tenant on the terms set out in this lease.

#### **Agreed Terms**

#### 1. Interpretation

The following definitions and rules of interpretation apply in this lease.

1.1 Definitions:

Contractual Term: a term of 5 years from and including y = 0 Ctober y2024 to and including y = 0 Ctober y2029.

Existing Lease: the lease of the Property dated 28 September 2018 and made between (1) the Landlord and (2) Teledyne Limited (trading as Teledyne Labtech) (a copy of which is annexed to this lease at ANNEX A).

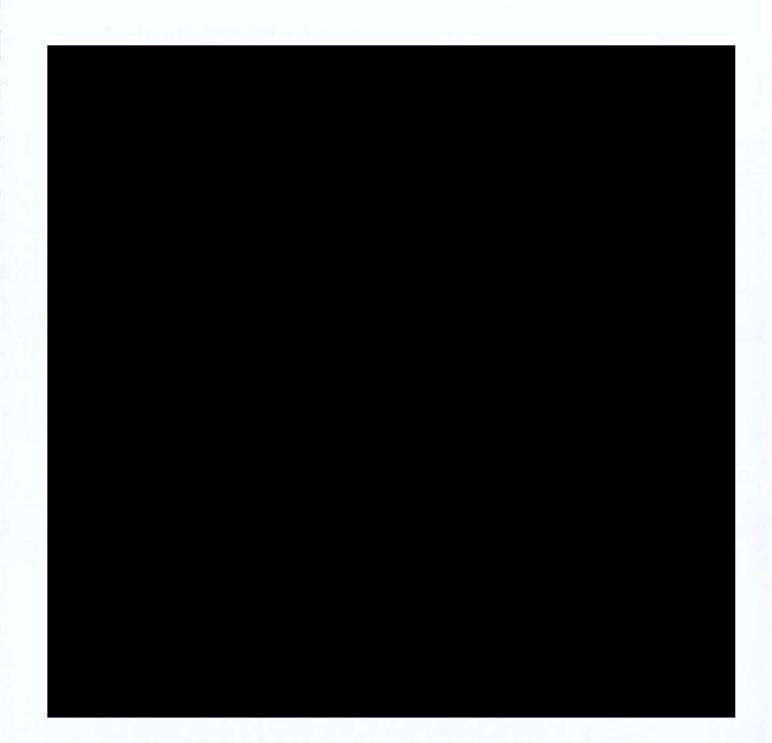
**Property**: the property known as Units 5 and 6 Presteigne Industrial Estate, Presteigne, Powys the freehold title of which is registered at HM Land Registry under title number WA552132 and shown edged red on the Plan and as described in the definition of "The Premises" in the Existing Lease.

- Z. Grant
- 2.1 The Landlord lets the Property to the Tenant:
  - (a) for the Contractual Term;
  - (b) with full title guarantee;
  - on the terms of this lease which include the Incorporated Terms as if they were set out in full in this lease; and
  - (d) with the Tenant paying as rent to the Landlord the sums reserved as rent in the Incorporated Terms at the times and in the manner set out in the Incorporated Terms.
- 3. Tenant's Covenants

The Tenant covenants with the Landlord to comply with the Tenant's Covenants.

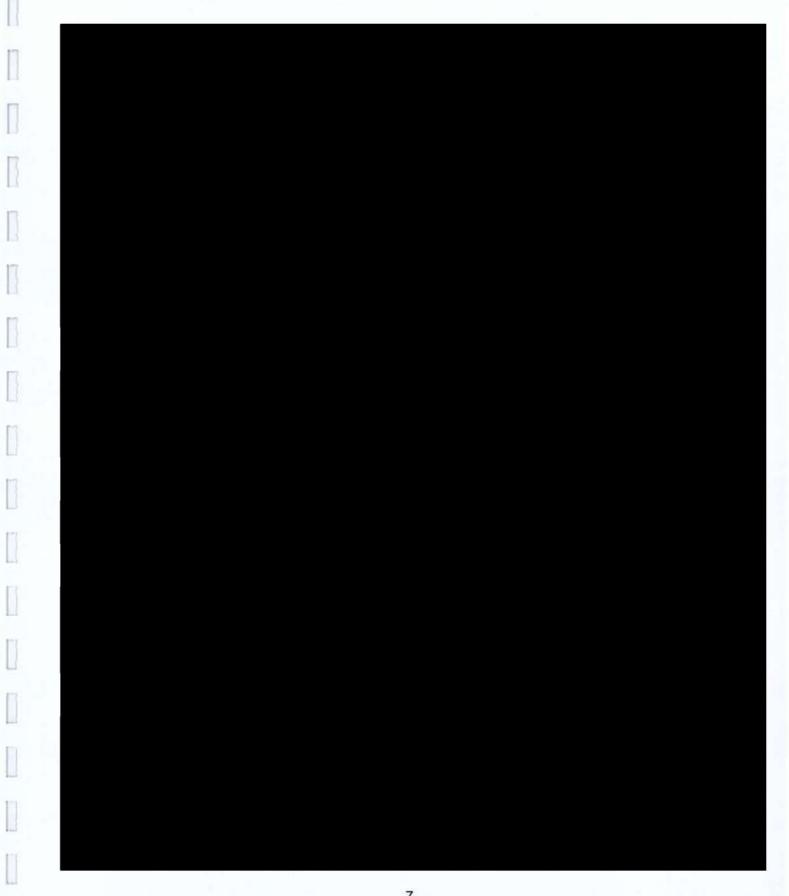
4. Landlord's Covenants

The Landlord covenants with the Tenant to comply with the Landlord's Covenants.



-		
	2.	Substitution of the Contractual Term  For the purposes of this lease only, the provisions of the Existing Lease shall be varied as follows:
	2.1	The Existing Lease Contractual Term shall be deleted and replaced by the Contractual Term.
	2.2	All of the provisions in the Existing Lease relating to the Existing Lease Contractual Term shall be read and construed as referring to the Contractual Term instead.
		5









ANNEX A Copy of the Existing Lease

DATED 28th September 2018

(2) TELEDYNE LIMITED (trading as Teledyne Labtech)

### **LEASE**

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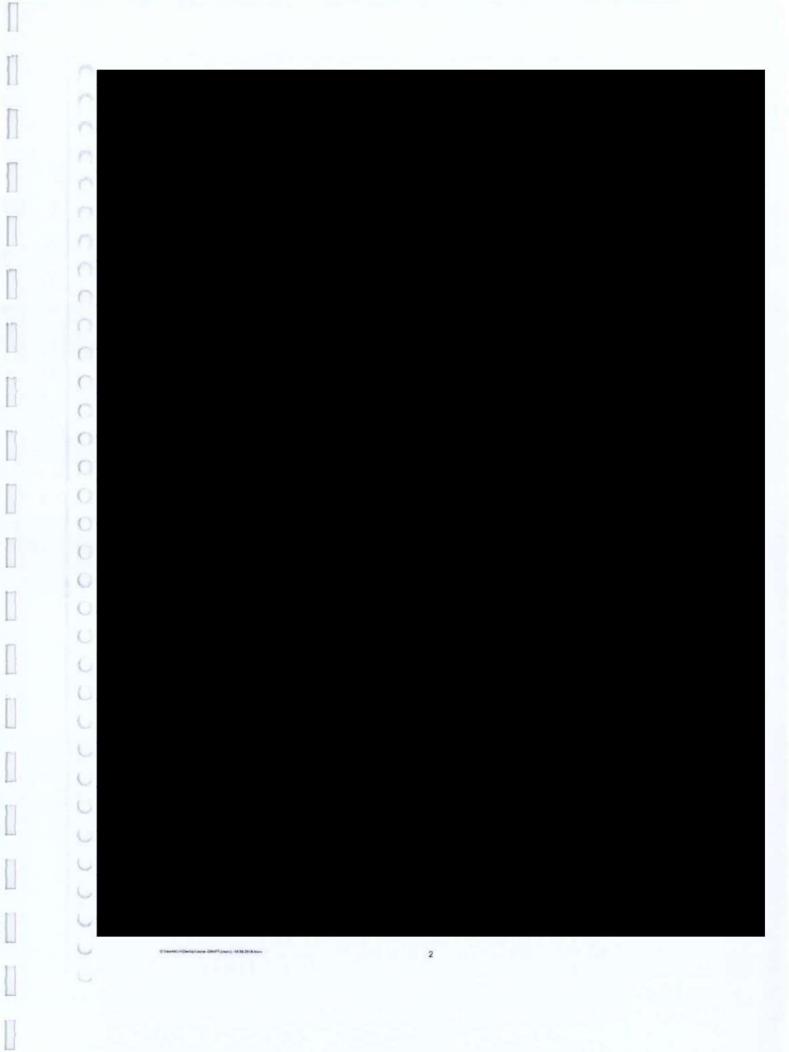
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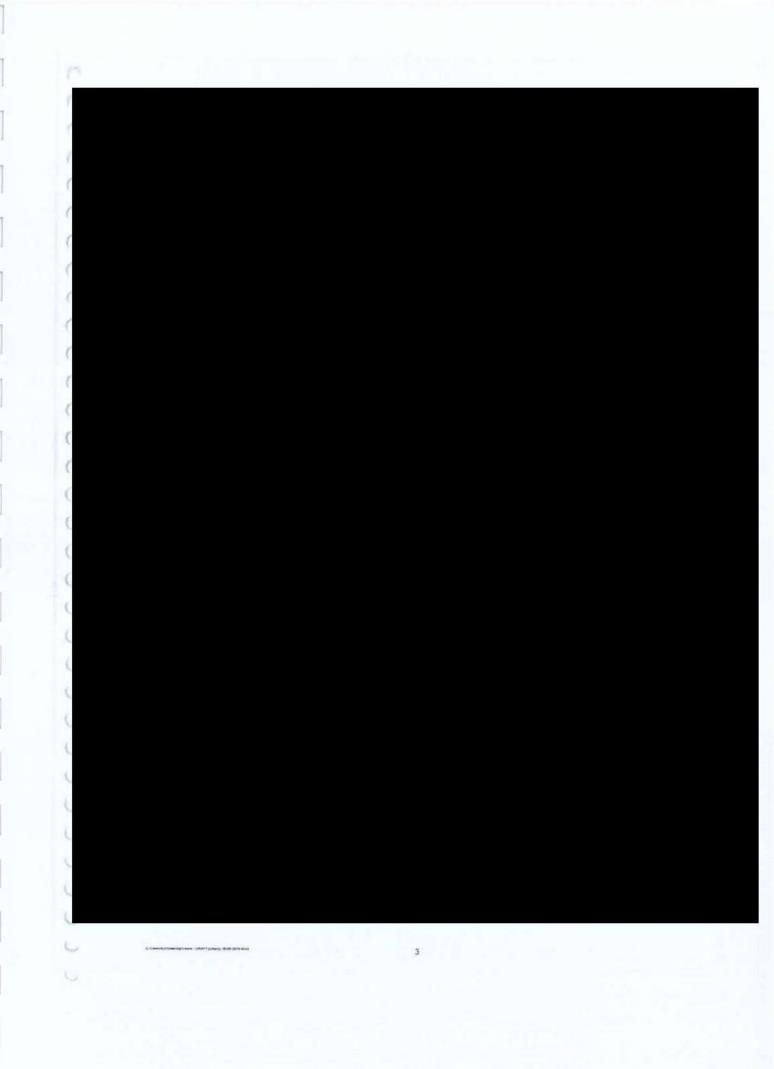
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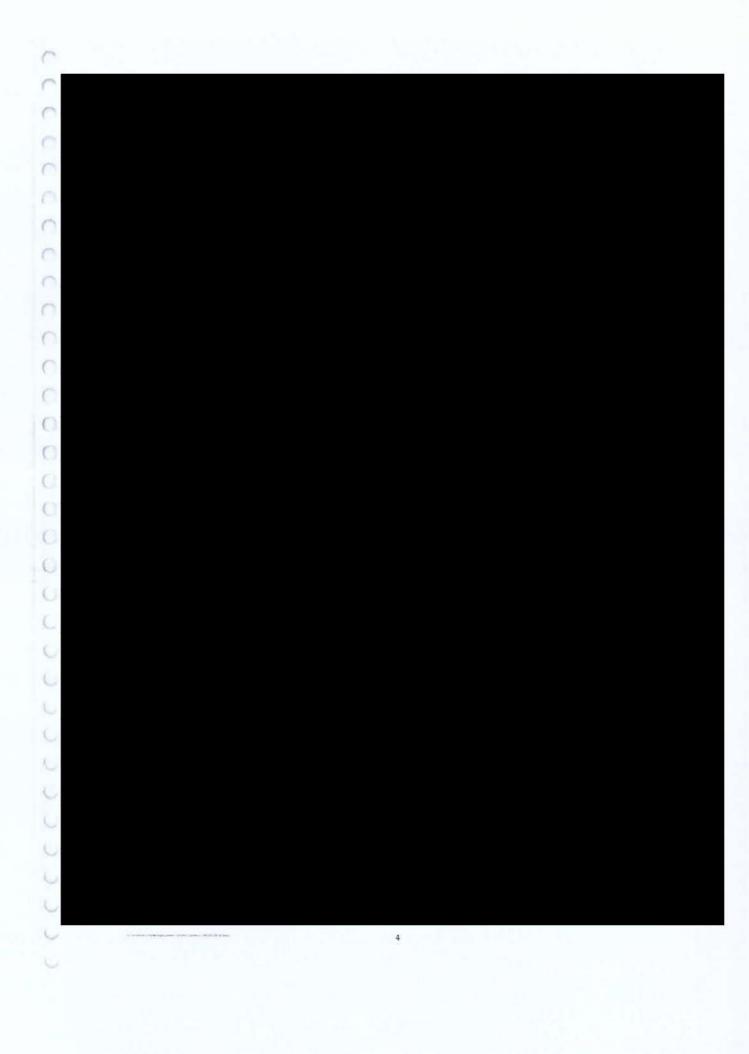
of

Units 5 and 6 Presteigne Industrial Estate, Presteigne, Powys THIS LEASE is made the 28 day of September, 2018 BETWEEN:

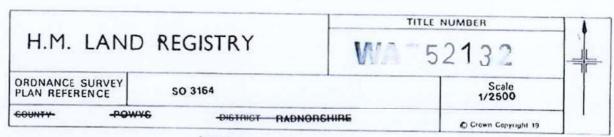
(2) TELEDYNE LIMITED (trading as Teledyne Labtech) (Company number: 03863642) whose registered office is at Aviation House, The Lodge, Harmondsworth Lane, West Drayton, Middlesex UB7 0LQ ('the Tenant')







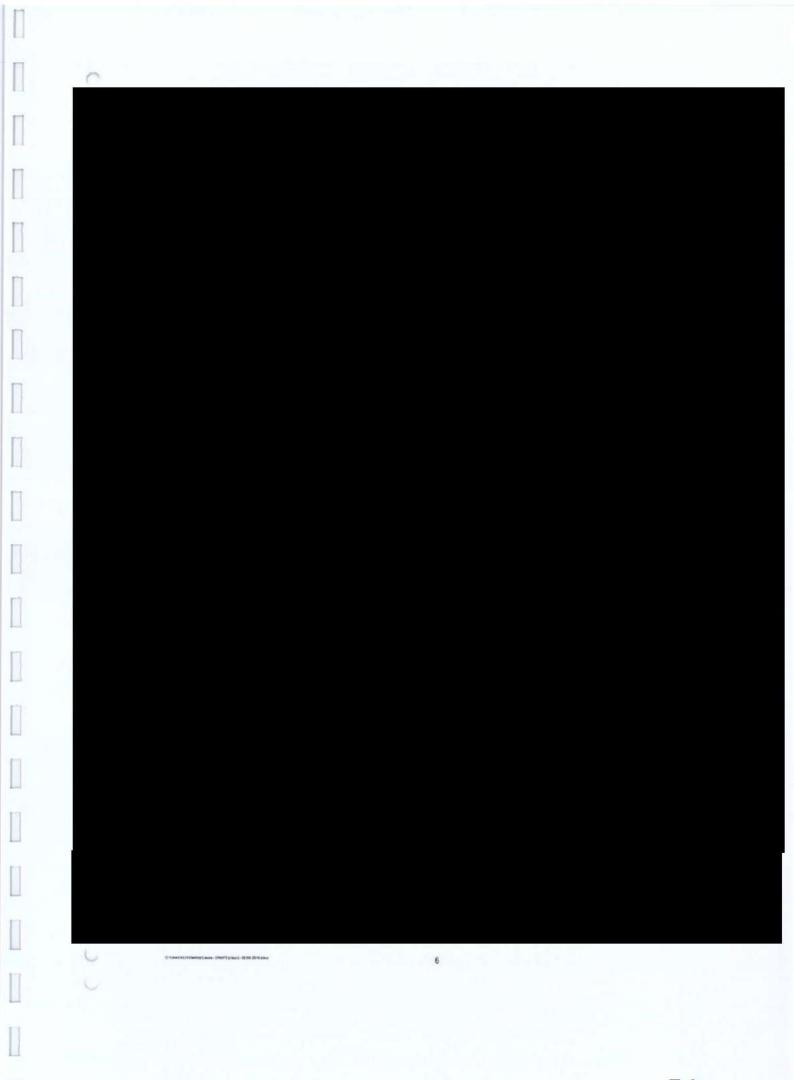




ADMINISTRATIVE AREA
POWYS

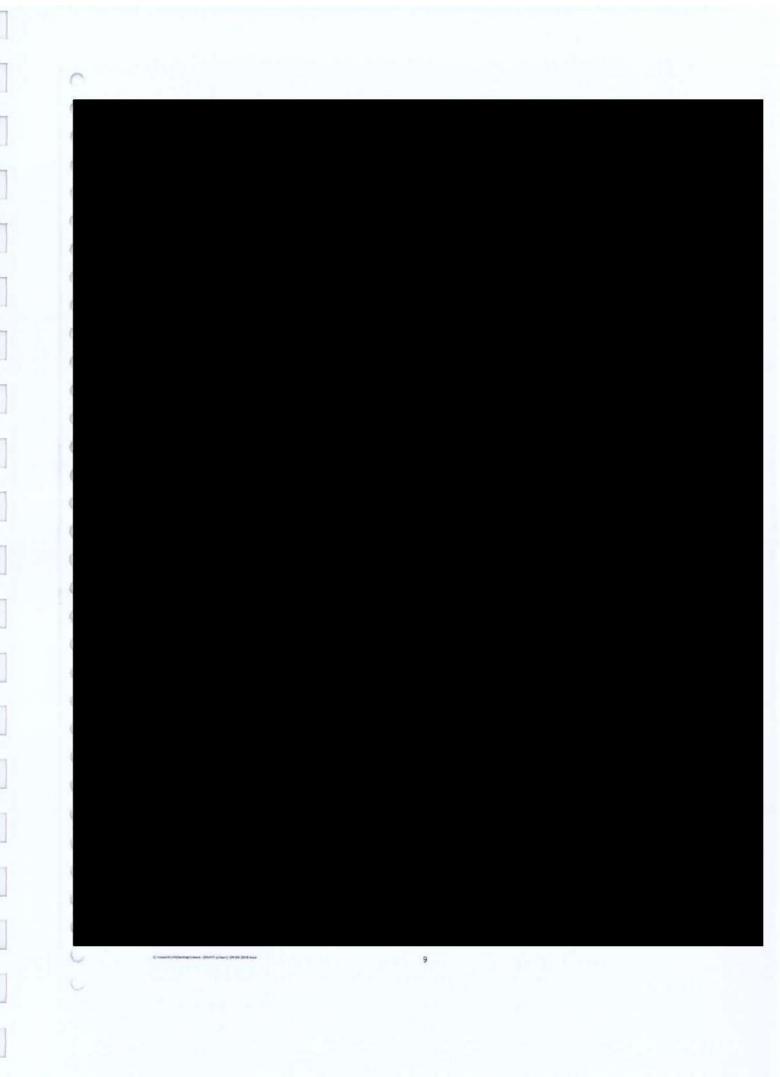


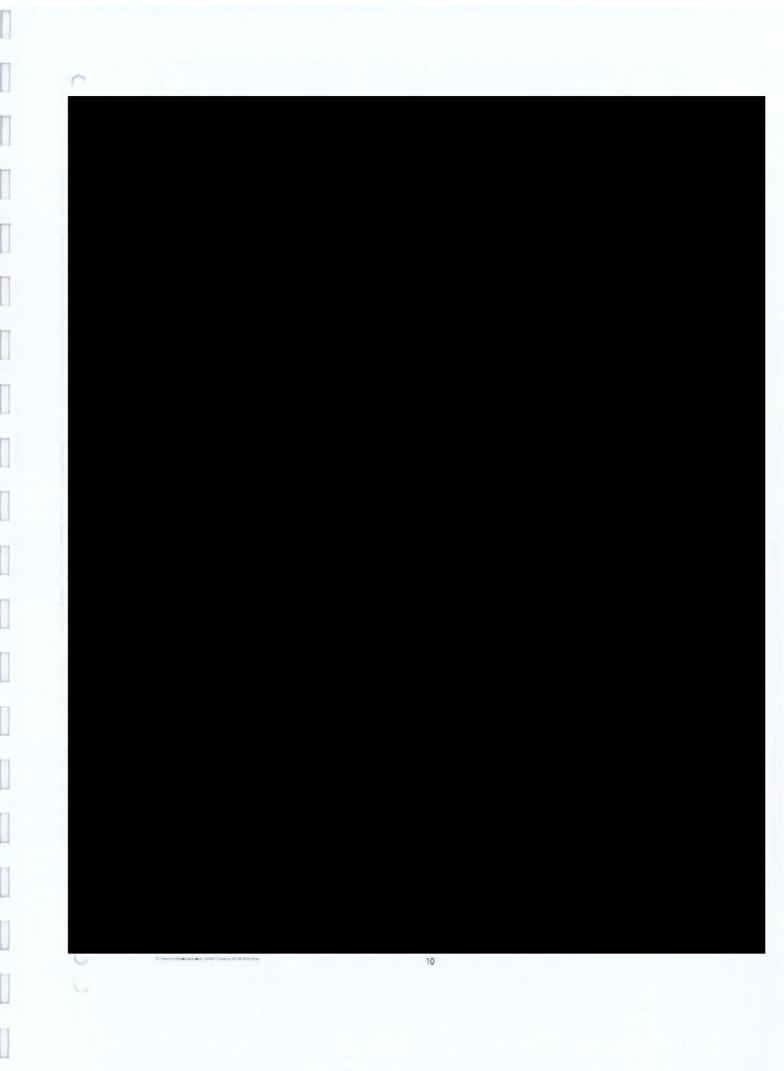
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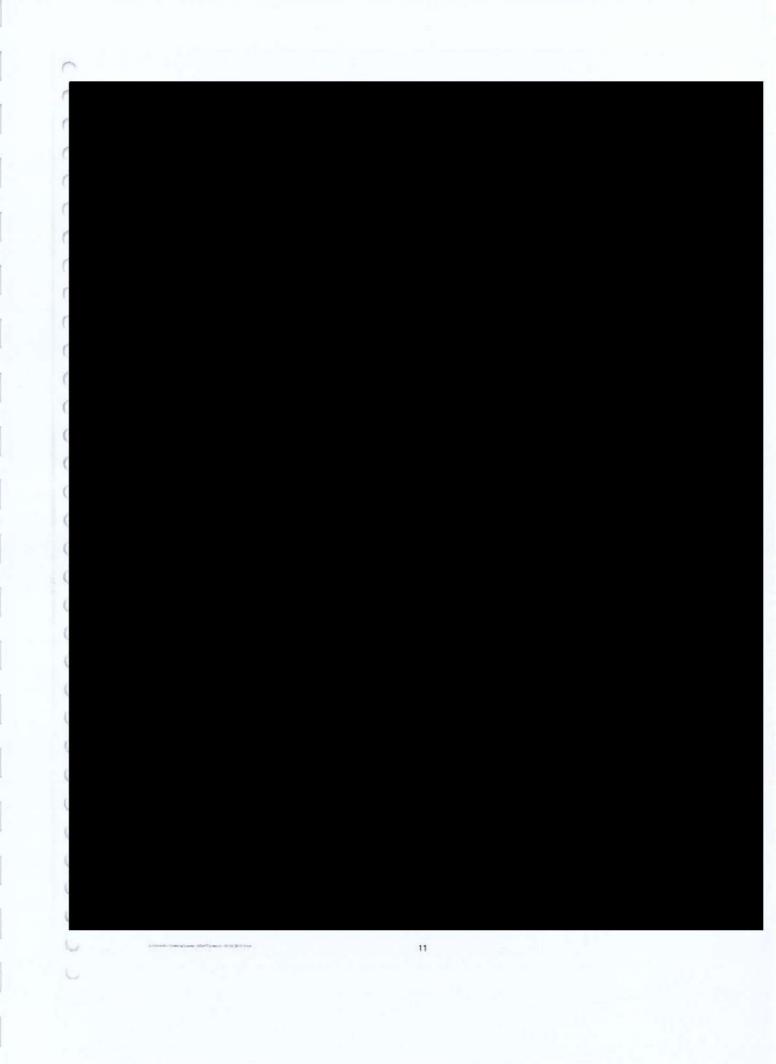




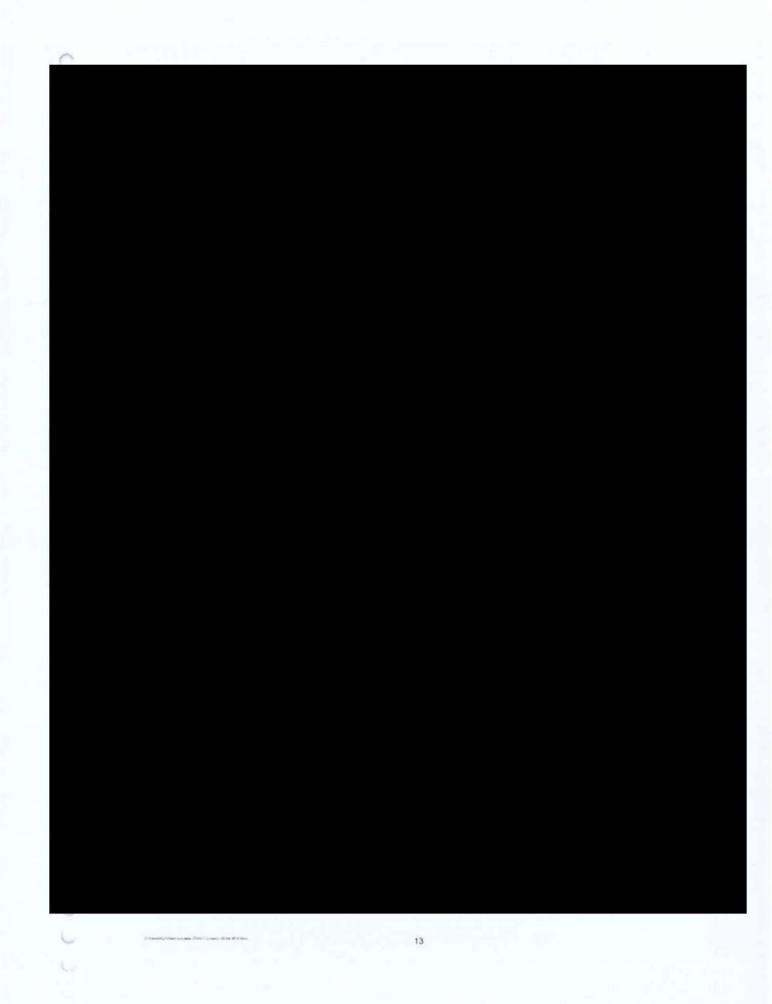


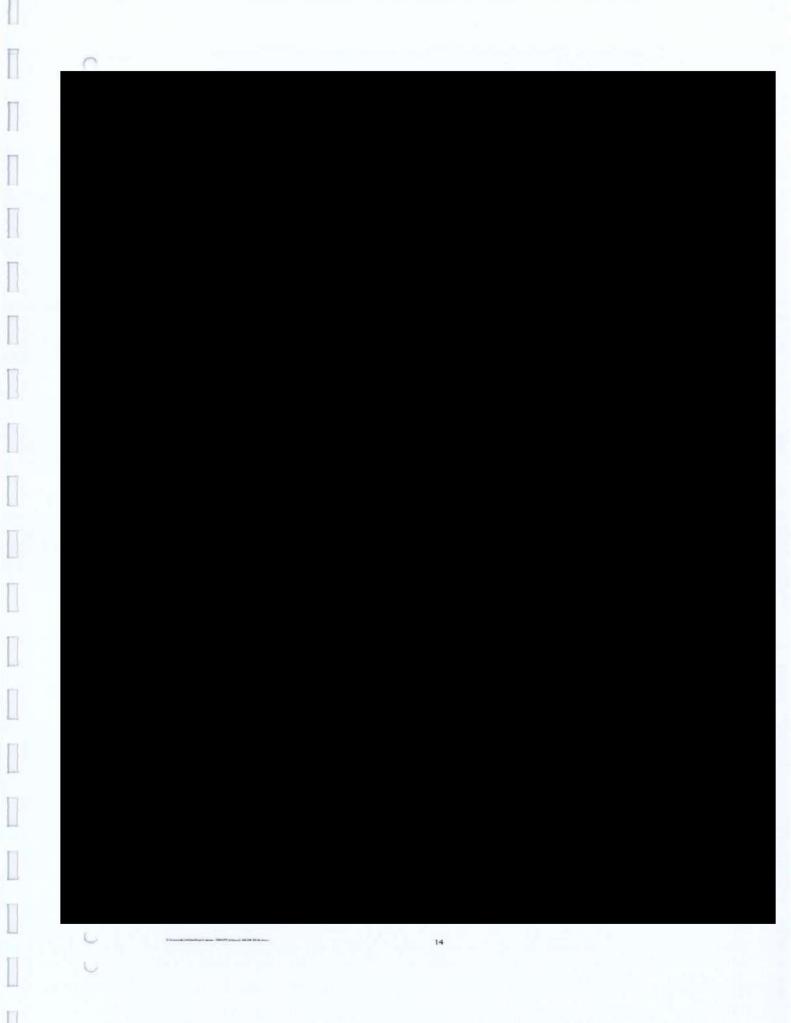


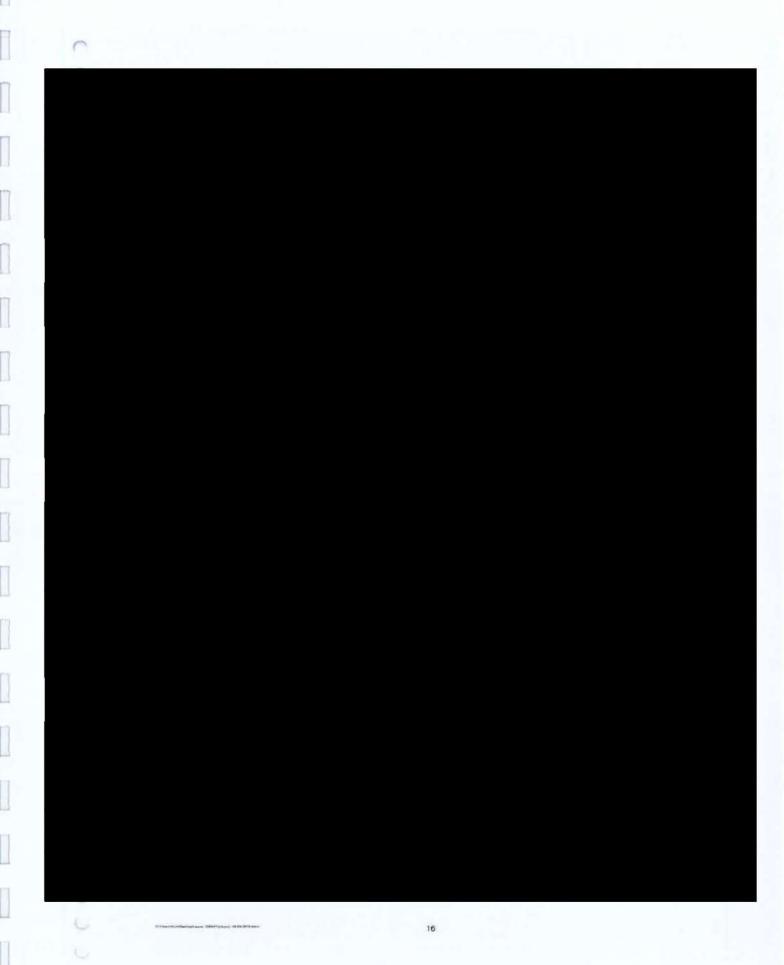




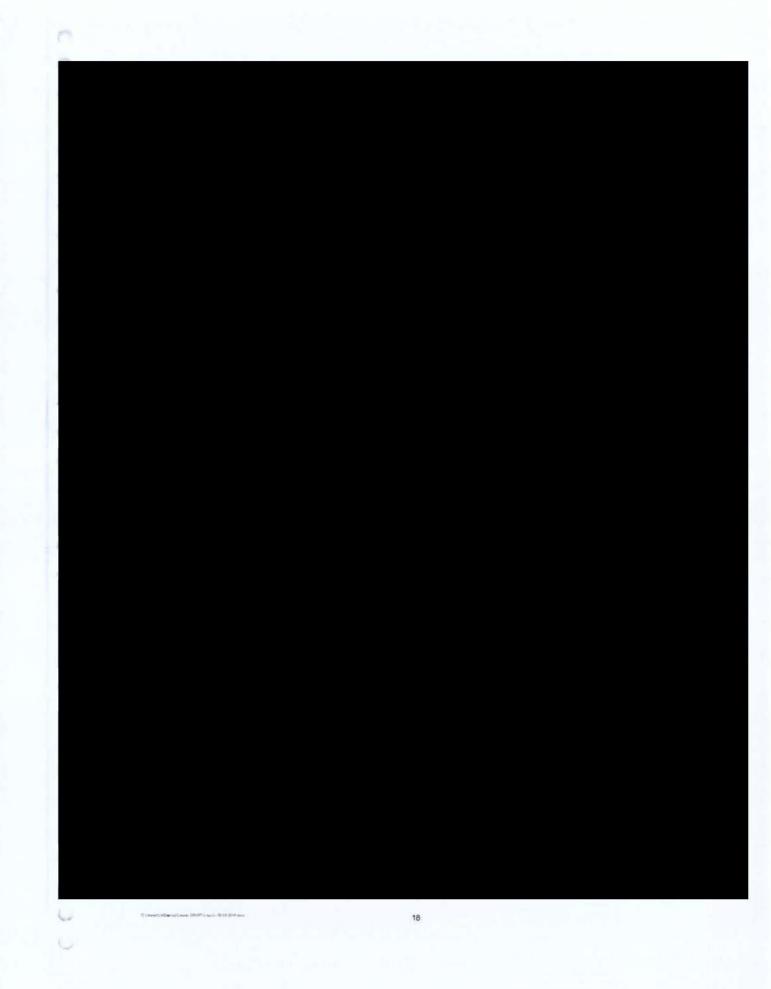




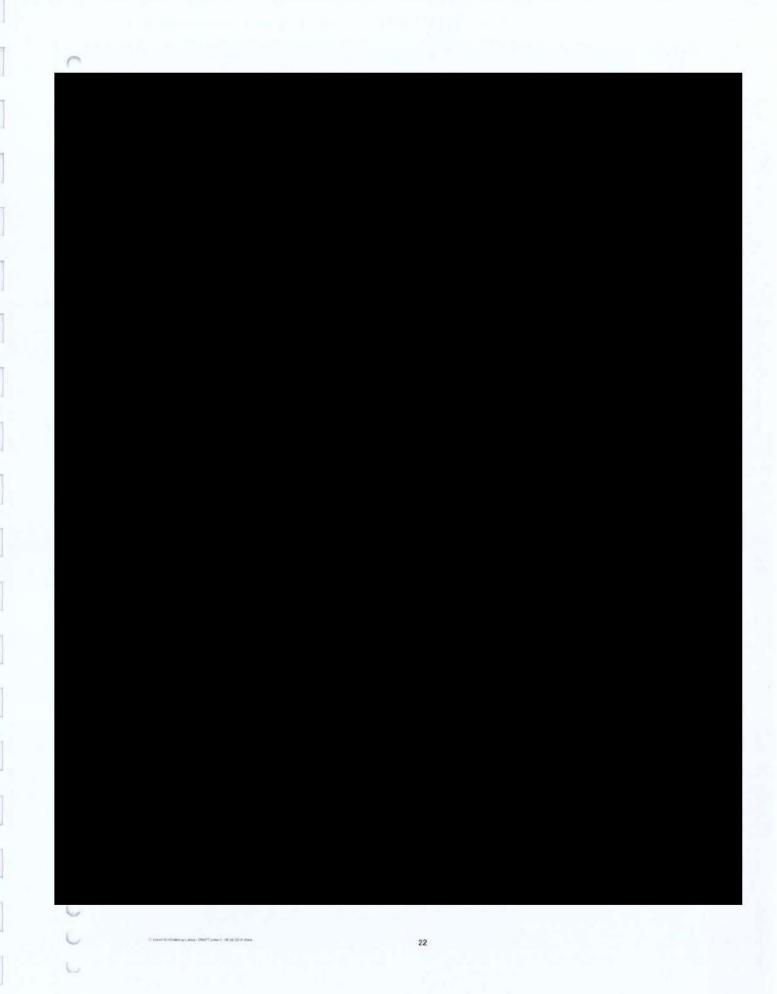


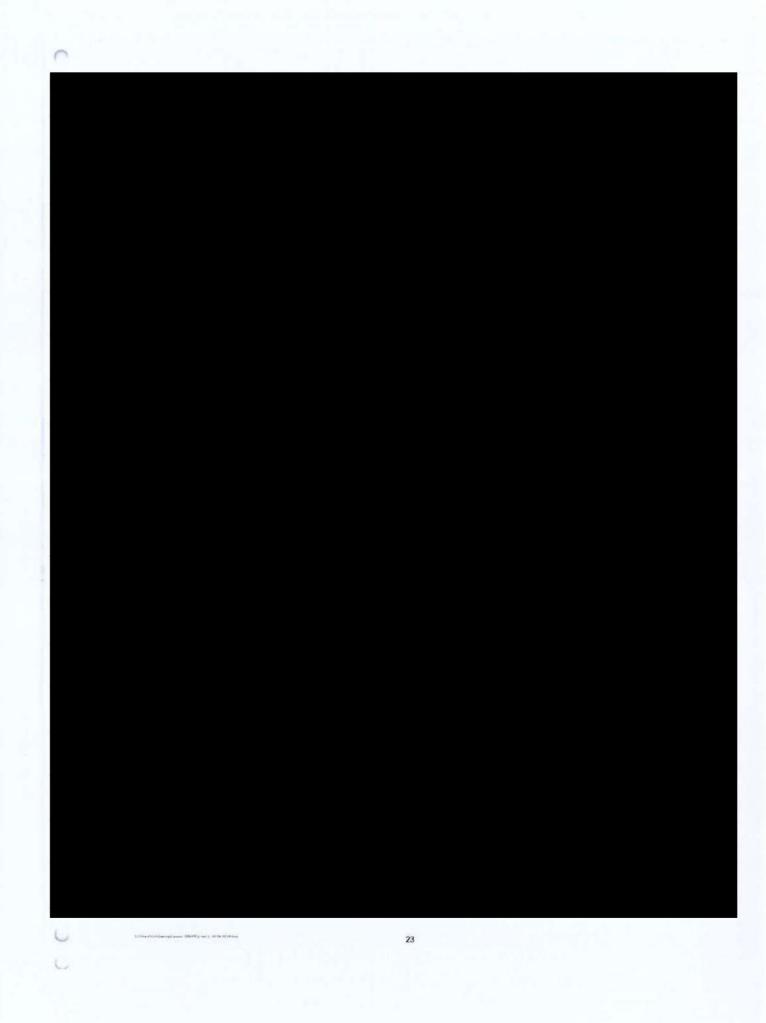


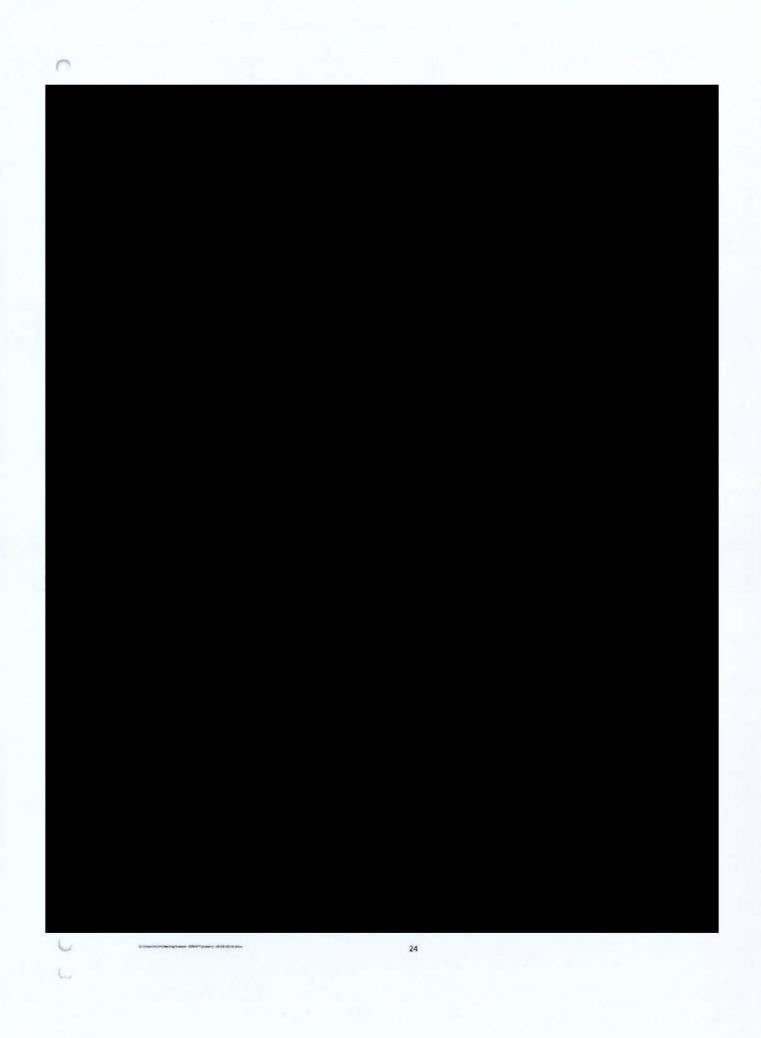


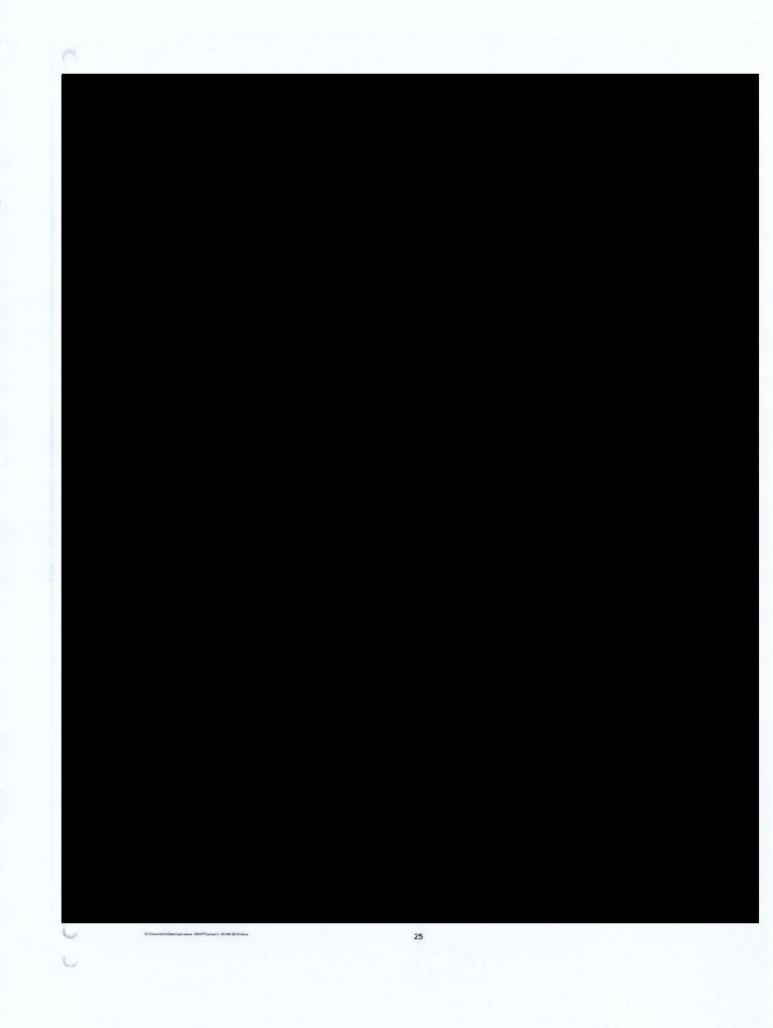


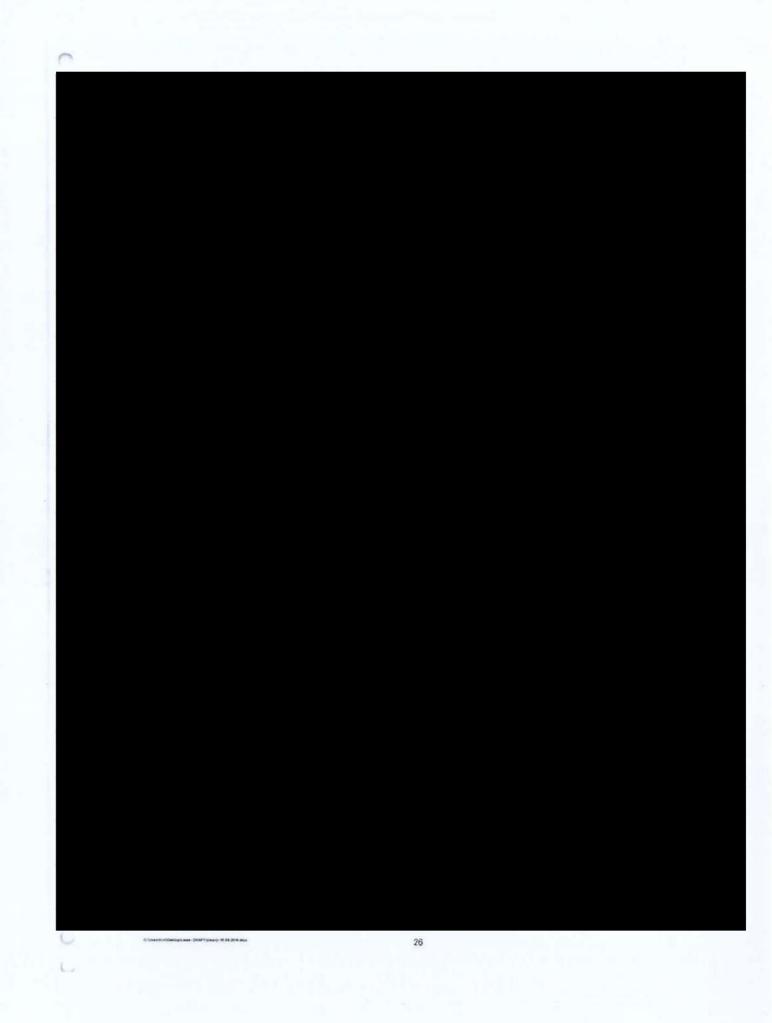


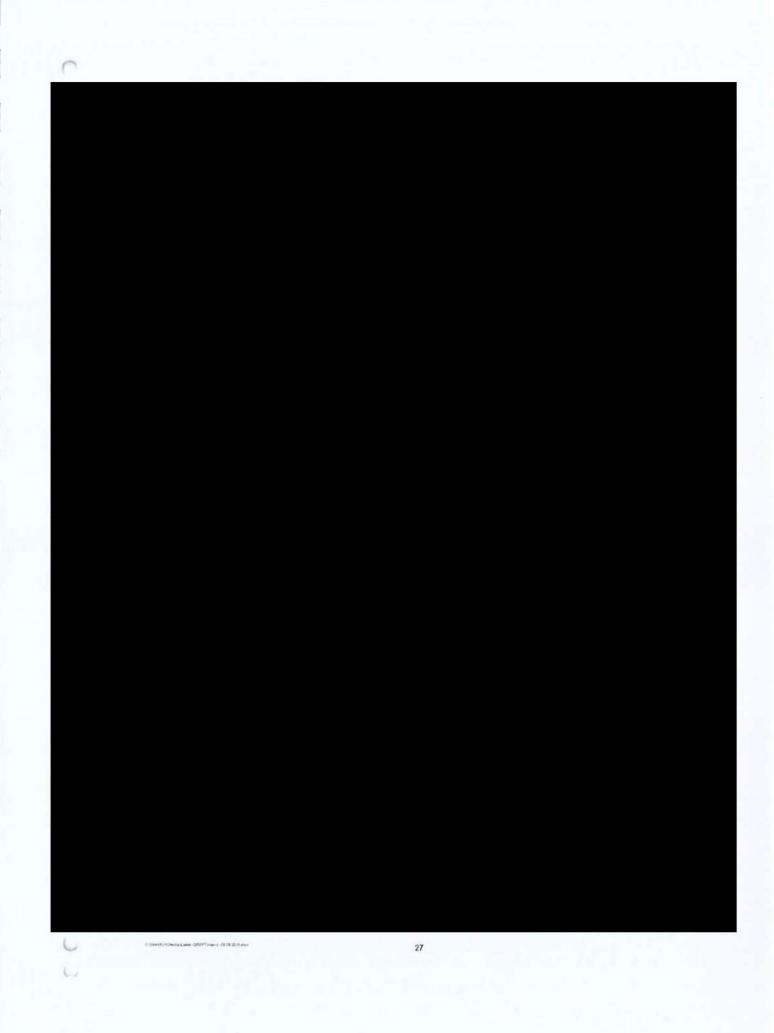


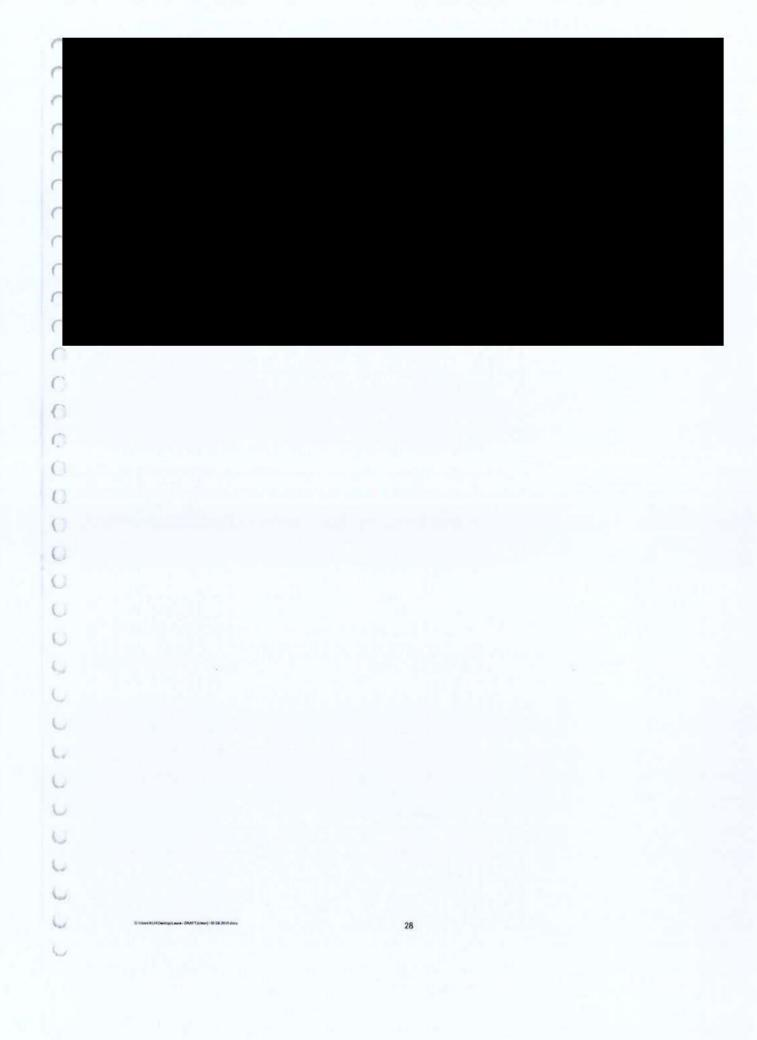








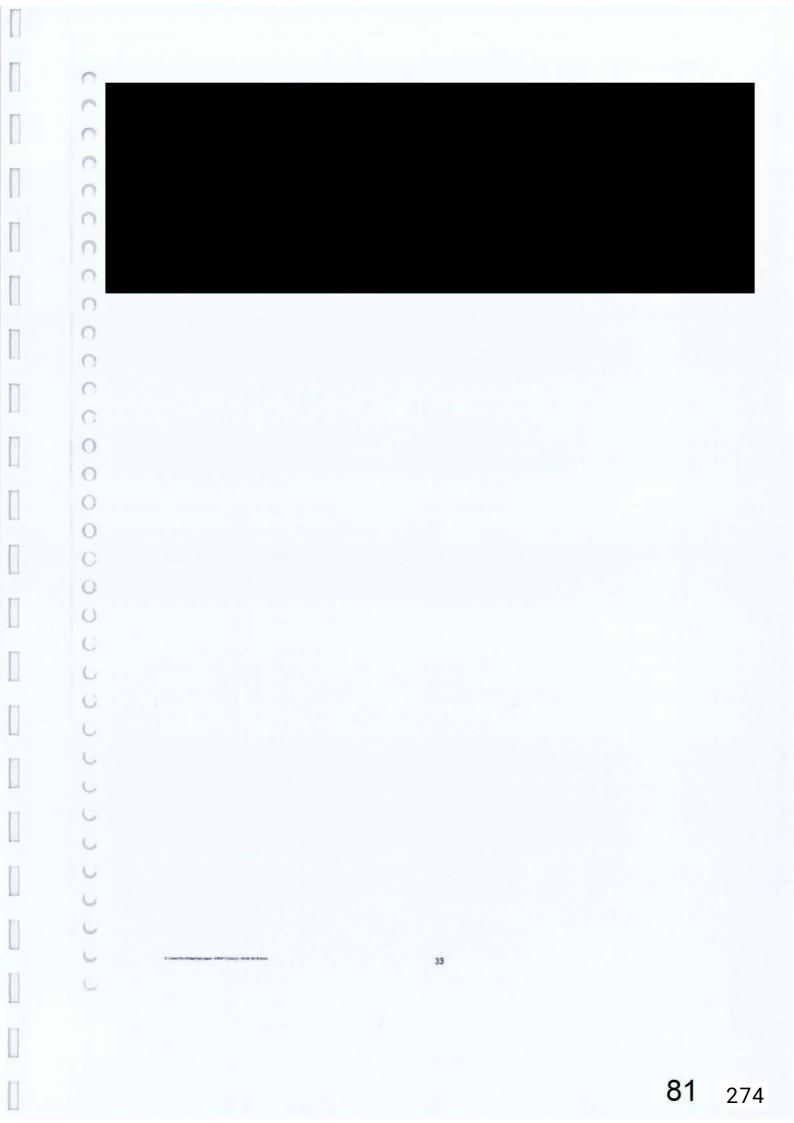


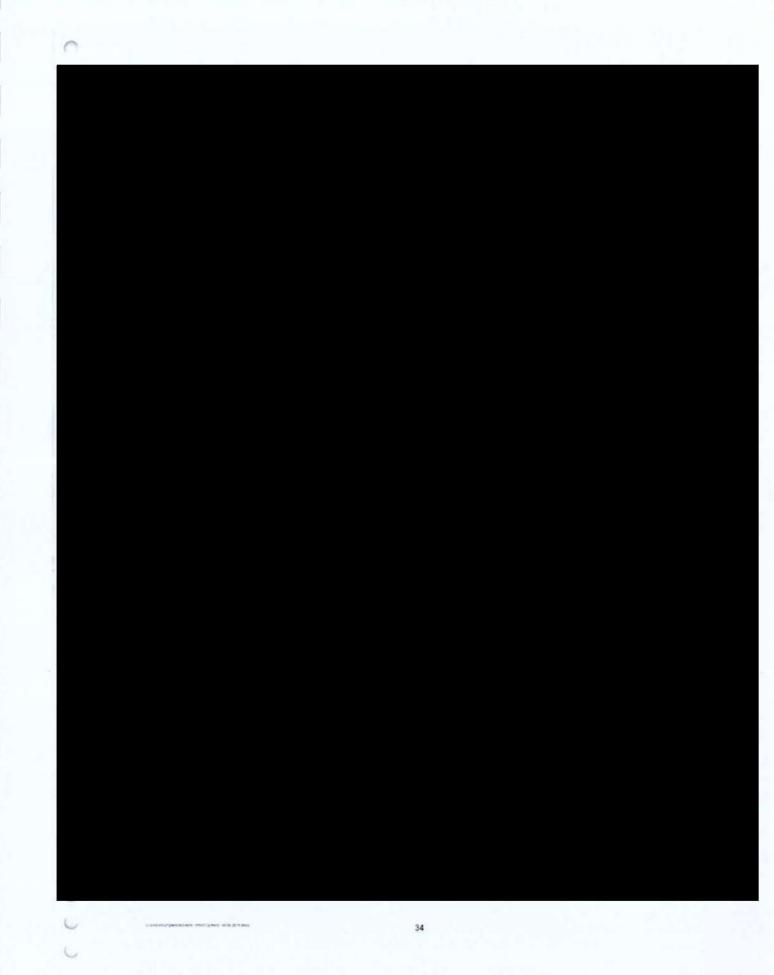


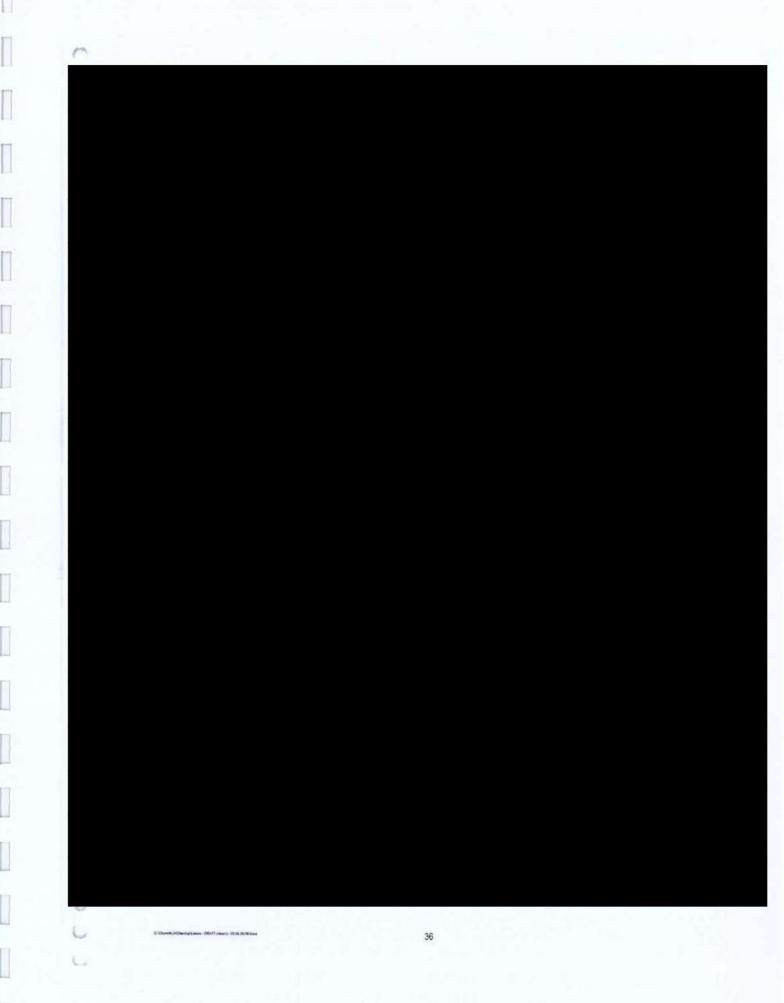


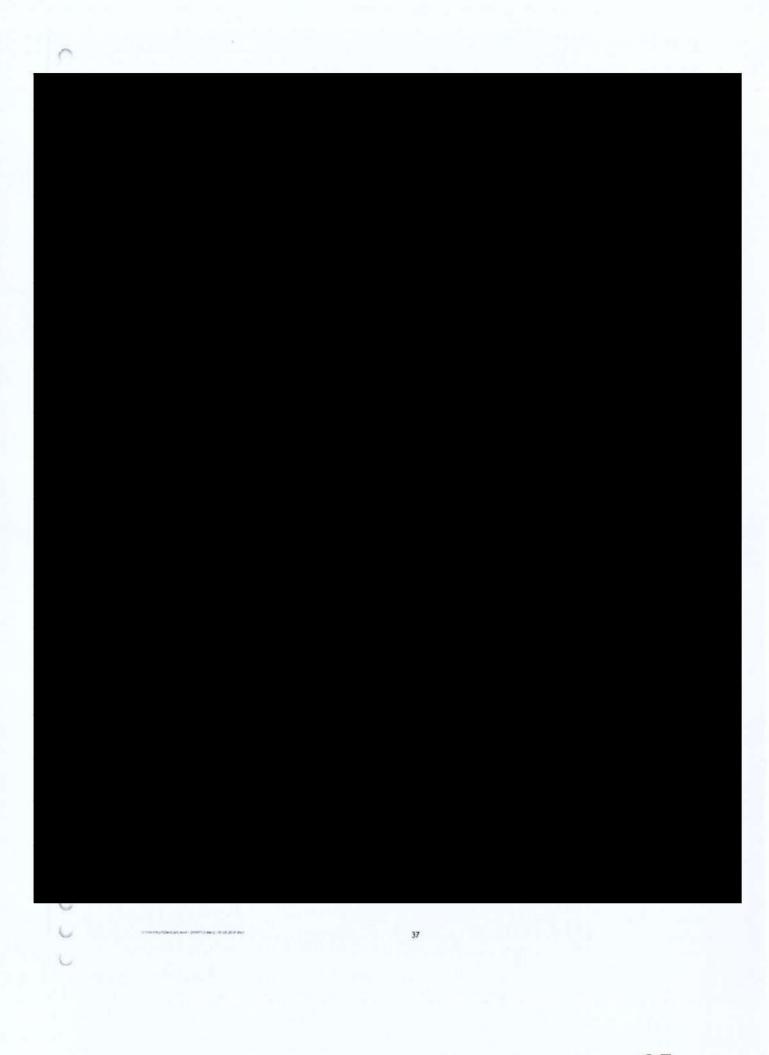


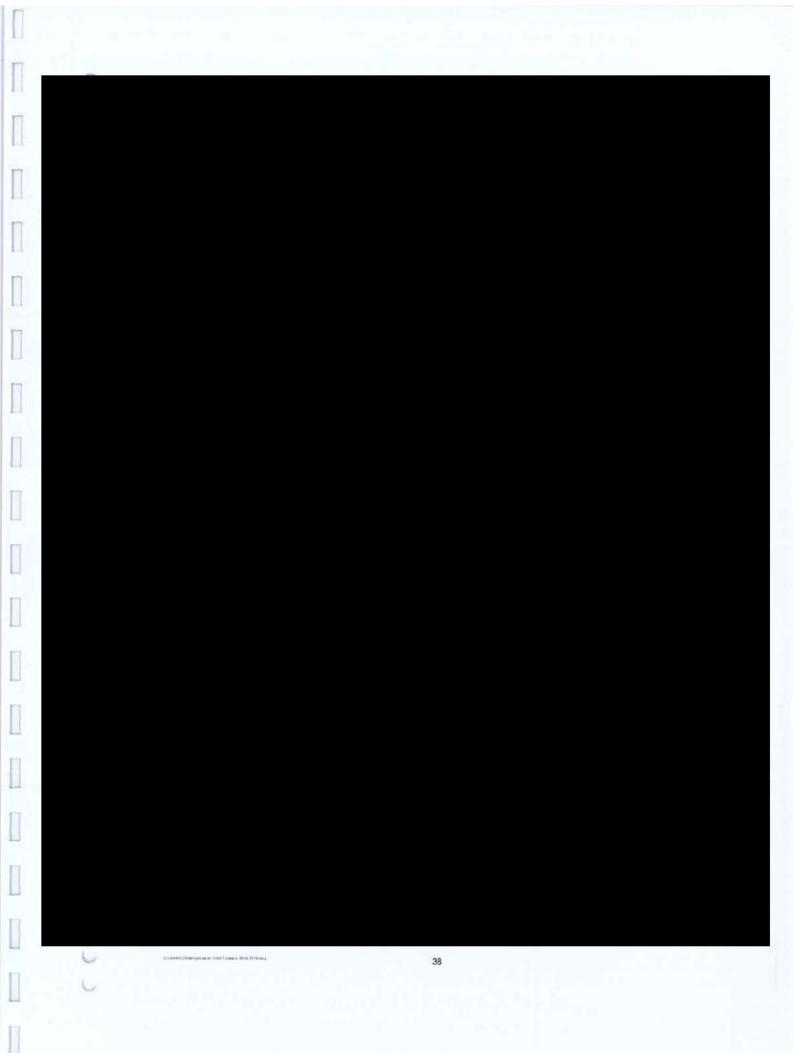




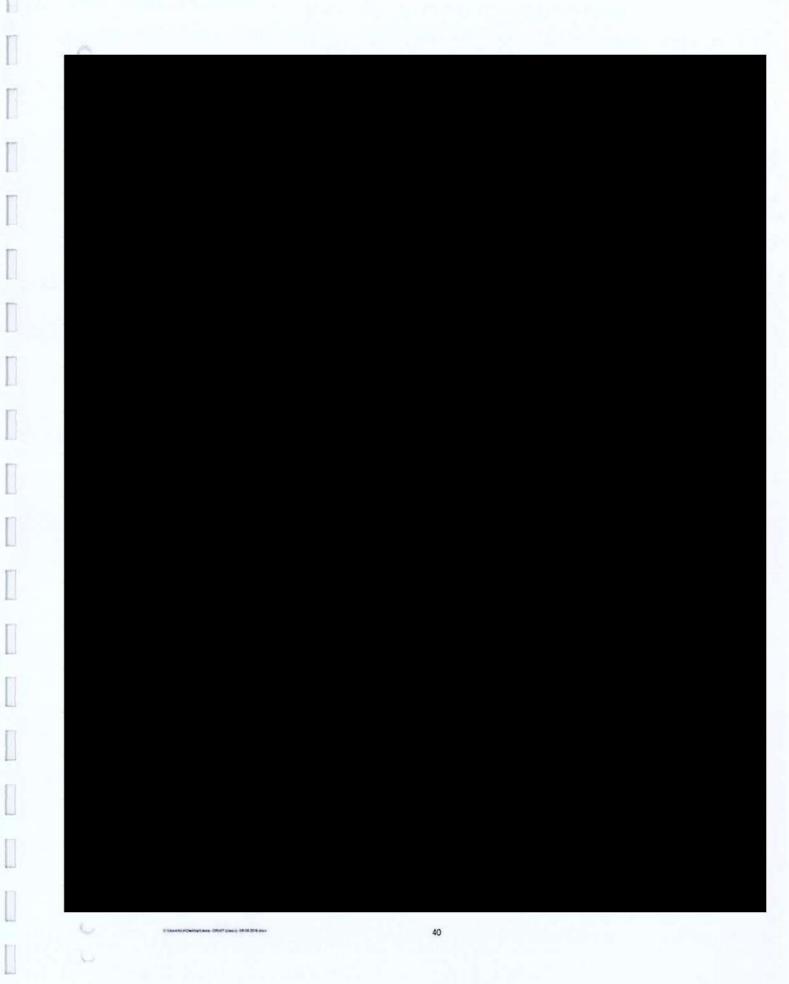
















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Title Number: WA552132

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



# Official copy of register of title

#### Title number LL317736

Edition date 25.07.2019

- This official copy shows the entries on the register of title on 08 OCT 2024 at 11:32:58.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 08 Oct 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Kingston Upon Hull Office.

# A: Property Register

This register describes the land and estate comprised in the title.

LINCOLNSHIRE : LINCOLN

- 1 (07.05.1976) The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Land on the north side of Sadler Road, Lincoln.
- There are excluded from this registration the mines and minerals excepted by the Conveyance dated 6 April 1939 referred to in the Charges Register in the following terms:-

Excepting and reserving unto the Vendor in fee simple

- (a) All coal and mines of coal under any of the premises hereby assured together with all property and rights annexed to such coal and mines of coal as by the operation of the Coal Act 1938 will on the first July one thousand nine hundred and forty two become vested in the Coal Commission and
- (b) Such right to withdraw support from the land hereby assured as by the operation of Section 4(3) of the Coal Act 1938 will on the first July One thousand nine hundred and forty two become vested in the Coal Commission but subject to the right of the Purchaser to reserve such compensation for surface damage as is payable by the Coal Commission under the provisions of the said Act and so nevertheless that the Vendor shall not be entitled to exercise such right to withdraw support from the surface prior to the first July one thousand nine hundred and forty two and
- (c) Any sum or sums of money or other consideration which may become due or payable in respect of compensation or otherwise under the Coal Act 1938 or any existing or future Act or Acts of Parliament in respect of the compulsory acquisition of such coal and mines of coal.
- The land tinted pink on the title plan has the benefit of the following rights granted by a Conveyance of the land lying to the east of the land in this title dated 14 January 1975 made between (1) Lorona Trading Co. Limited (Vendor) and (2) Lamport And Holt Line Limited:-
  - THERE is excepted and reserved in fee simple to the Vendor and its successors in title the owners and occupiers for the time being of the land shown edged green on the Plan annexed hereto marked A (hereinafter

## A: Property Register continued

called "the Estate") the rights mentioned in the Second Schedule hereto

#### SECOND SCHEDULE

- (1) The right within Eighty years from the date of this Conveyance to enter on the Property for the purpose of laying within that period pipes sewers drains ducts conduits cables and wires ("the services") within 50 feet from Doddington Road between the eastern and western boundaries of the land to serve the Estate and the right of the free passage and running of water soil steam gas and electricity to and from the Estate and any buildings for the time being thereon through and along such Services when constructed and to make connections thereto with power for the Vendor and its successors in title owner or owners of such adjoining properties or any part or parts thereof to enter on the Property for the purpose of cleansing repairing and renewing the said sewers and drains or any of them doing as little damage as possible to the Property in the exercise of the rights mentioned in this paragraph and making good the surface of the Property without unnecessary delay at its own cost.
- (2) The full and uninterrupted access and enjoyment of light and air in perpetuity and the right of the Vendor and other the owners and occupiers for the time being of the Estate to deal as it or they may think fit with such property and to erect or allow to be erected thereon any buildings whatsoever whether or not such buildings shall affect or diminish the light or air which may now or at any time or times during the period of 80 years from the date of this Conveyance be enjoyed by the Vendor and the owners or occupiers for the time being of the Estate.

NOTE: The land in this title is included within the land edged green referred to above.

- The land has the benefit of the rights granted by but is subject to the rights reserved by the Transfer dated 8 March 1979 referred to in the Charges Register.
- 5 The land has the benefit of the rights granted by but is subject to the rights reserved by the Transfer dated 9 August 1984 referred to in the Charges Register.
- 6 (07.11.2006) The land tinted pink on the title plan has the benefit of the rights granted by but is subject to the rights reserved by a Transfer of land adjoining the western boundary of the land in this title and other land dated 24 August 2006 made between (1) Lincoln Corn Exchange and Markets (1991) Limited and (2) British Overseas Bank Limited and WFTC Nominees Limited.

NOTE: Copy filed under LL274915.

7 (04.06.2010) The land has the benefit of the rights granted by but is subject to the rights reserved by a Transfer of the land in this title dated 5 May 2010 made between (1) Lincoln Corn Exchange And Markets (1991) Limited and (2) E2V Technologies (UK) Limited.

NOTE: Copy filed.

- 8 The restrictions covenants and other matters contained in the Property and Charges Register of title LL10172 referred to in Clause 6 of the Transfer dated 8 March 1979 are set out in the Register of this title so far as they affect the same.
- 9 The matters referred to in the Property and Charges Register of LL10172 mentioned in clause 4 of the Transfer dated 9 August 1984 referred to above are set out in the Register of this title so far as they affect.
- 10 (08.02.2011) The land edged and numbered in green on the title plan has been removed from this title and registered under the title number or numbers shown in green on the said plan.

# B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

#### Title absolute

- 1 (04.06.2010) PROPRIETOR: TELEDYNE E2V (UK) LIMITED (Co. Regn. No. 00432014) of 106 Waterhouse Lane, Chelmsford, Essex CM1 2QU.
- 2 (04.06.2010) The price stated to have been paid on 5 May 2010 was £955,000 plus £167,125 VAT.

## C: Charges Register

This register contains any charges and other matters that affect the land.

- 1 The land tinted pink is subject to rights of drainage and rights in respect of water steam soil gas and electricity supply services.
- By a Conveyance of the land in this title and other land dated 6 April 1939 made between (1) The Right Honourable Arthur William de Brito Savile Earl of Liverpool and (2) Thomas Place such part of the land as was affected thereby was conveyed subject to a yearly rentcharge of £50 for the maintenance of the Mathematical School of Christ's Hospital. The said Conveyance also contains an assignment of the benefit of the covenant by the Governors of Christ's Hospital to pay the said rentcharge and to keep the purchaser indemnified contained in a Conveyance dated 25 June 1908 made between (1) The Governors of Christ's Hospital and (2) The Earl of Liverpool.

NOTE: No further particulars of this rentcharge were supplied on first registration.

A Conveyance of the land in this title and other land dated 19 January 1945 made between (1) Thomas Place and T Place Trust Limited (Vendors) and (2) George Henry Hobbins (Purchaser) contains the following covenants:-

"THE Purchaser hereby covenants with the Vendors that he the Purchaser and his successors in title will not for a period of fifty years from the date hereof sell any of the sand or gravel in or under the said Close of land hereby conveyed coloured pink and blue on the said plan and also that he or they will not erect any houses or buildings of any description on the portion of the said close of land hereby conveyed fronting to the Doddington Road and coloured pink on the said plan to a depth of Two hundred and ten feet therefrom. And also that he or they will not sell any of the land comprised in the Fifty years frontage to the said Doddington Road and coloured blue on the said plan (which is excluded from the buildings restriction affecting the frontage of the said land to the Doddington Road coloured pink on the said plan) at a less price than that at which the Vendors sell their adjoining land."

NOTE: The land in this title forms part of the land coloured pink referred to and is not affected by the land coloured blue referred to. The blue broken line does not affect the land in this title

By a Deed dated 14 January 1975 made between (1) Thomas William Granville Place and T Place Trust Limited (Present Covenantees) and (2) Lorona Trading Co Limited (Company) the said covenants were expressed to be released in the following terms:-

"THE Present Covenantees hereby release the Company and its successors in title and the premises and every part thereof from the Covenants so far as the same are subsisting and capable of being enforced."

The land tinted pink on the title plan is subject to the following rights reserved by a Conveyance of the land in this title and other land dated 4 July 1973 made between (1) George Henry Hobbins (Vendor) and (2) Lindum Securities Limited:-

"EXCEPT AND RESERVED unto the Vendor and the owners and occupiers from time to time of the retained premises (a) the free and uninterrupted

# C: Charges Register continued

right of running pure and foul water to and from the retained premises and through the pipes and sewers now or at any time within the period of 80 years from the date hereof laid under the land AND the right to connect onto the same (b) the right to drain surface water from the retained premises into such part of the Prial Drain as is included in the land.

PROVIDED that the Vendor shall not be liable for any payment towards the maintenance of such part of the Prial Drain."

The land tinted blue on the title plan is subject to the following rights reserved by a Conveyance of the land in this title and other land dated 4 July 1973 made between (1) George Henry Hobbins (Vendor) and (2) Lindum Securities Limited:-

"EXCEPT AND RESERVED unto the Vendor and the owners and occupiers from time to time of the retained premises (a) the free and uninterrupted right of running pure and foul water to and from the retained premises and through the pipes and sewers now or at any time within the period of 80 years from the date hereof laid under the land AND the right to connect onto the same."

A Transfer of the land tinted pink on the title plan and other land dated 8 March 1979 made between (1) Lorona Trading Co. Limited and (2) A E I Semi Conductors Limited contains restrictive covenants.

NOTE 1: A Copy of the Agreement dated 5 September 1974 referred to in the above Transfer is filed under LL16432.

NOTE 2: Copy of the Transfer is filed under LL16432.

7 The Transfer dated 8 March 1979 referred to above contains the following covenant by the Transferor:-

"THE Transferor hereby further covenants on behalf of itself and its successors in title of the retained land and the occupiers thereof for the benefit of the Transferee and its successors in title of the land hereby transferred and each and every part thereof not to use or permit the retained land to be used for any noxious noisy dangerous dust making or offensive trade or business."

8 A Transfer of the land tinted blue on the title plan and other land dated 9 August 1984 made between (1) Lorona Trading Co. Limited and (2) Marconi Electronic Devices Limited contains restrictive covenants.

NOTE: Copy filed under LL29849.

9 (12.11.1993) The parts of the land affected thereby are subject to the following rights granted by a Deed dated 28 October 1993 made between (1) AEI Semi Conductors Limited (Grantor) and (2) East Midlands Electricity Plc (Grantee):-

"The Grantor as Beneficial Owner hereby grants unto the Grantee FULL RIGHT AND LIBERTY (i) to enter upon break open and excavate under the Grantors Premises in the position indicated on the plan annexed hereto (hereinafter called "the underground cable land") and to lay place use inspect repair maintain renew replace remove or render unusable electric lines within the meaning of Section 64 of the Electricity Act 1989 therein and thereunder (ii) to enter upon land of the Grantor adjoining the route of the electric lines as may be necessary for any of the purposes aforesaid and (iii) to enjoy the benefit of support for the electric lines from the subjacent and adjacent land of the Grantor TO HOLD the same unto the Grantee in fee simple as appurtenant to its statutory electricity undertaking"

The said Deed also contains the following covenants by the Grantor:-

"THE GRANTOR hereby covenants with the Grantee with the intent and so as to bind the underground cable land into whosesoever hands the same may come and for the benefit and protection of the said electric lines and the Grantees statutory electricity undertaking as follows:-

(a) Not to erect or place any part of any dwellinghouse building structure or other erection or plant or materials on over or within one

#### C: Charges Register continued

metre on either side of the route of the said electric lines save as existing at the date hereof

- (b) Not to alter by any activity whatsoever the level of the underground cable land which shall remain at the level as exists at the date hereof
- (c) Not to do or cause or permit to be done on the underground cable land anything calculated or likely to cause damage or injury to the said electric lines and to take all reasonable precautions to prevent such damage or injury
- 4. IF the Grantor at any time hereafter wishes to redevelop the Grantor's premises and cannot reasonably do so by reason of the presence of the said electric lines then if the Grantor shall give to the Grantee six month's prior notice in writing and shall without further consideration grant to the Grantees easements in the form herein contained along a substituted route through the Grantor's premises acceptable to the Grantee and subject to provisions as herein contained (other than this provision) then the Grantee shall as soon as reasonably possible and at the joint and equal expense of the Grantor and the Grantee relocate the said electric lines upon the substituted route"

NOTE: The underground cable land referred to is shown by a brown broken line on the filed  $\operatorname{plan}$ "

10 (08.11.1993) The land tinted blue on the title plan is subject to the rights granted by a Deed of Grant dated 28 October 1993 made between (1) Marconi Electronic Devices Limited and (2) East Midlands Electricity PLC.

The said Deed also contains restrictive covenants by the grantor.

NOTE: Copy filed under LL29849.

(11.06.2003) The land is subject to the easements granted by a lease of Land on the South West side of Doddington Road, Lincoln dated 25 March 2003 for a term of 25 years from 25 March 2003 determinable as therein mentioned and made between (1) Lincoln Corn Exchange & Markets (1991) Limited and (2) Dynex Semiconductor Limited.

¬Copy filed under LL228856.

12 (25.09.2006) The land is subject to the easements granted by a lease of 991 Doddington Road, Lincoln dated 23 June 2006 for a term of 15 years from 16 June 2006 and made between (1) Lincoln Corn Exchange & Markets (1991) Limited and (2) Simons Group Limited.

¬Copy filed under LL273923.

13 (11.12.2006) The land is subject to the easements granted by a lease of Land on the north side of Sadler Road, Lincoln dated 9 August 2006 for a term of 10 years from 9 August 2006 and made between (1) Lincoln Corn Exchange & Markets (1991) Limited and (2) Simons Group Limited.

¬Copy filed under LL276909.

(01.05.2007) The land is subject to the easements granted by a lease of Warehouse and Offices on the north side of Sadler Road, Lincoln dated 23 April 2007 for a term of 10 years from 26 March 2007 and made between (1) Lincoln Corn Exchange & Markets (1991) Limited and (2) Simons Group Limited.

 $\neg \text{Copy filed under LL282330.}$ 

15 (16.04.2009) The land is subject to the easements granted by a lease of Land on the north side of Sadler Road, Lincoln dated 13 March 2009 for a term of 15 years from and including 27 March 2009 and made between (1) Lincoln Corn Exchange & Markets (1991) Limited and (2) Booker Limited.

¬Copy filed under LL306619.

#### Title number LL317736

#### C: Charges Register continued

16 (08.02.2011) A Transfer of the land edged and numbered LL323520 in green on the title plan dated 1 February 2011 made between (1) E2V Technologies (UK) Limited and (2) Central Networks East Plc contains transferor's restrictive covenants.

NOTE:-Copy filed under LL323520.

17 (08.02.2011) The land is subject to the rights granted by the Transfer dated 1 February 2011 referred to above.

#### End of register

#### These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.

This official copy was delivered electronically and when printed will not be to scale. You can obtain a paper official copy by ordering one from HM Land Registry.

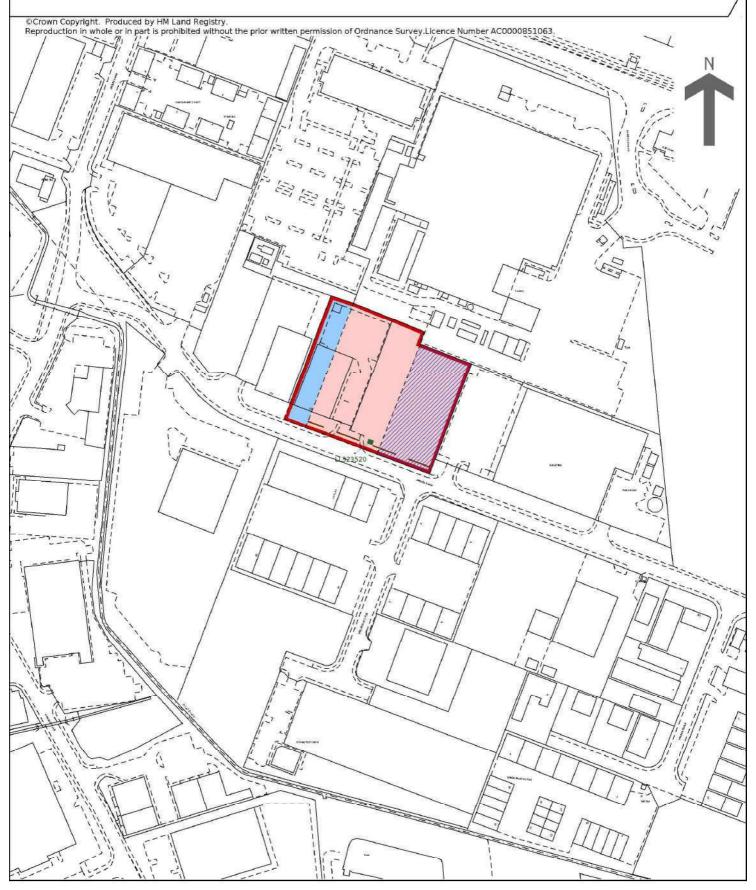
This official copy is issued on 08 October 2024 shows the state of this title plan on 08 October 2024 at 11:32:58. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground

This title is dealt with by the HM Land Registry, Kingston Upon Hull Office .

## HM Land Registry Official copy of title plan

Title number **LL317736**Ordnance Survey map reference **SK9268SE**Scale **1:2500**Administrative area **Lincolnshire**: **Lincoln** 







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Title Number: LL317736

The electronic official copy of the register follows this message.

Please note that this is the only official copy we will issue. We will not issue a paper official copy.



# Official copy of register of title

#### Title number BK365055

Edition date 11.05.2021

- This official copy shows the entries on the register of title on 03 DEC 2024 at 19:00:14.
- This date must be quoted as the "search from date" in any official search application based on this copy.
- The date at the beginning of an entry is the date on which the entry was made in the register.
- Issued on 03 Dec 2024.
- Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
- This title is dealt with by HM Land Registry, Gloucester Office.

#### A: Property Register

This register describes the land and estate comprised in the title. Except as mentioned below, the title includes any legal easements granted by the registered lease but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

WEST BERKSHIRE

- 1 (02.11.2000) The Leasehold land shown edged with red on the plan of the above Title filed at the Registry and being Navigation House, Canal View Road, Newbury (RG14 5UR).
- 2 (25.09.2000) Short particulars of the lease(s) (or under-lease(s)) under which the land is held:

Date : 2 November 2000

Term : 25 years from 25 August 2000

Rent : £190,000 subject to review and service rent Parties : (1) Norwich Union Life & Pensions Limited

(2) Reynolds Industries Limited

NOTE: The Lease contains provisions relating to determination as therein mentioned

therein mentioned

- 3 (25.09.2000) There are excepted from the effect of registration all estates, rights, interests, powers and remedies arising upon, or by reason of, any dealing made in breach of the prohibition or restriction against dealings therewith inter vivos contained in the Lease.
- 4 (25.09.2000) The landlord's title is registered.
- 5 Unless otherwise mentioned the title includes any legal easements granted by the registered lease(s) but is subject to any rights that it reserves, so far as those easements and rights exist and benefit or affect the registered land.

#### B: Proprietorship Register

This register specifies the class of title and identifies the owner. It contains any entries that affect the right of disposal.

Title absolute

#### Title number BK365055

#### B: Proprietorship Register continued

- 1 (11.05.2021) PROPRIETOR: TELEDYNE UK LIMITED (Co. Regn. No. 00432014) of 106 Waterhouse Lane, Chelmsford CM1 2QU.
- 2 (11.05.2021) The Transfer to the proprietor contains a covenant to observe and perform the covenants referred to in the Charges Register and of indemnity in respect thereof.

#### C: Charges Register

This register contains any charges and other matters that affect the land.

1 (25.09.2000) The land is subject to the following rights reserved by a Conveyance of the freehold estate in the land in this title and other land dated 10 May 1977 made between (1) Frederick Charles Grahame Hill and others (Vendors) and (2) Redpath Durman Long Limited (Purchasers):-

"Except and Reserving unto the Vendors the right to the free passage and running of water through the watercourses now existing or hereafter within a period of 80 years from the date hereof to be formed or constructed on the said land."

#### End of register

#### These are the notes referred to on the following official copy

The electronic official copy of the title plan follows this message.

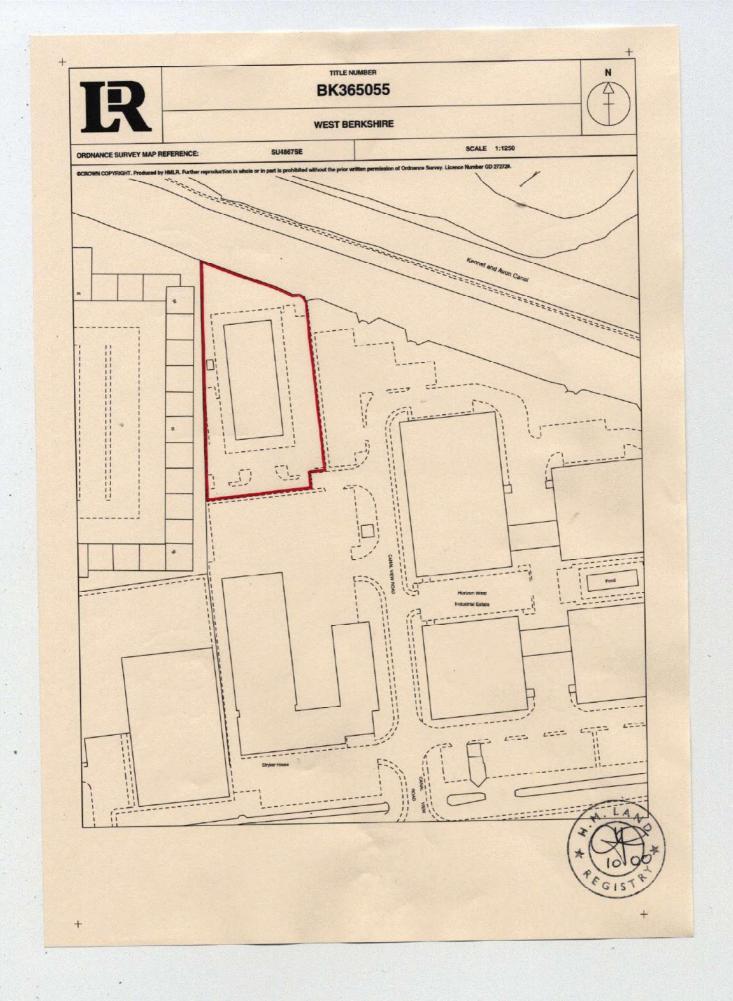
Please note that this is the only official copy we will issue. We will not issue a paper official copy.

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This official copy is issued on 03 December 2024 shows the state of this title plan on 03 December 2024 at 19:00:14. It is admissible in evidence to the same extent as the original (s.67 Land Registration Act 2002). This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the

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Title Number: BK365055





## Four arrested after they occupy Manchester tech company connected to Israel's weapons trade

Jul 1, 2024



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#### Images and videos which are free to use uploaded here

Four activists were arrested this afternoon after they targeted another link in Britain's chain of complicity with Israel's genocide in Gaza, as the Manchester offices of 'CDW UK' were severely disrupted by an activist blockade.

Elbit Systems, Israel's largest weapons company, are facilitated in their British presence by support from CDW's software and technology services, and so, as part of a nationwide campaign against complicity in Israeli atrocities, activists used a vehicle and lock-on device to blockade the back entrance whilst one occupied the ledge at the building's entry. Locals gathered in support of the action and drivers passing by repeatedly beeped their horns to express solidarity. The building was also sprayed with blood-red paint – to serve as a reminder to CDW of the Palestinian bloodshed from which their firm profits.

CDW provide supply chain management, IT solutions, cyber security and eProcurement services to the British operations of the Elbit brand, part of the global Israeli arms firm. CDW are contracted for IT services for 'Elbit Systems UK Ltd', headquartered in Bristol, from which Elbit oversees drone and arms production nation-wide. This is not the first time the company has been targeted, with activists spraying a site in Peterborough with red paint and shattering their windows.

This action follows on the heels of others taken to target Elbit's partners & suppliers. Last week activists occupied the GRiD Defence Systems site in High Wycombe, barricading themselves inside and proceeding to destroy hardware and unfurled banners. This came after activists destroyed dozens of boxes of GRiD processors found inside Elbit's Kent factory during an action, the total damage-caused estimated by police to be worth over £1million. GRiD manufactures a range of military computers, processors, and similar electronic equipment, either for direct battlefield use or to be integrated into other systems.

Since October 7th, over 38,000 Palestinians have been killed, more than 86,000 injured and the majority of the people in Gaza are now displaced. Elbit Systems supply the majority of Israel's military drone fleet, land based equipment, bullets, munitions and missiles. Their weaponry is often marketed as "battle-tested", after deployment against the people of Gaza. The genocide of Gaza would not be possible without Elbit's weaponry – and those firms, including CDW and GRiD, are made complicit by their facilitation of Elbit's deadly business.

CDW is not the first to be targeted. After similar actions, five other companies have ended their association with Elbit's deadly trade in the past two months. These include Elbit's weapons transporters Kuehne+Nagel, recruiters iO associates, property managers Fisher German, website designers Naked Creativity and legal firm MLL Legal.

**108** 301

Palestine Action will continue to target all those who allow Elbit to continue their business of genocide, until they declare they've cut all ties.

#### **ENDS**

#### **NOTES TO EDITORS**

If you would like any further information on Palestine action, please contact media@palestineaction.org

Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking action against the sites of Elbit Systems and other companies complicit in Israeli apartheid, calling for all such sites to be shut down.

 $\leftarrow$  Palestine Action activist granted bail after nearly 3 months in prison Teledyne's Wirral Factory Breached & Damaged, F-35 Supplier Shut Down  $\rightarrow$ 



Dismantle the war machine | #ShutElbitDown

add\_action('wp\_footer', function() { ?>





#### Palestine Action target over 10 Barclays sites across the country

Sep 12, 2024



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## PRESS RELEASE, 12/09/24 FOR IMMEDIATE RELEASE

#### Palestine Action target over 10 Barclays sites across the country

Images and videos available for free here (More photos will be uploaded throughout the day)

Overnight, Palestine Action have targeted more than ten Barclays sites including branches, call centres and offices. The bank has been marked with symbols of their complicity in the genocide of Palestinians.

Bank premises from Edinburgh to Kent have had their windows smashed, and covered in blood-red paint, in actions which Palestine Action have vowed will continue until Barclays cease their investments in Elbit Systems – Israel's largest weapons firm, and Palestine Action's primary target. These actions follow those of June 2024, when nearly 20 branches of the arms-investing bank were smashed [1].

Confirmed targeted sites include:

- Barclays Wealth & Investment Management, 3 Hardman St, Manchester
- Barclays Bank, Royal Tunbridge Wells, TN1 2TB
- Barclays Bank, Islington, London, N1 8EH
- Barclays Bank, Whitechapel, El 1BJ
- Barclays Bank, Mayfair, W1J 8NL
- Barclays Bank, Hammersmith, W6 9HY
- Barclays Bank, Oxford, OX1 3HB
- Barclays Bank, Edinburgh, EH2 2AN
- Barclays Bank, London, E6 2HW
- Barclays Wealth & Investment Management, Edinburgh, EH3 7LU
- Barclays Centre, Liverpool, L7 9PQ

Il months into the genocide in Gaza, in which Elbit plays a central role, Barclays still holds Elbit shares. In fact, it has more than tripled its Elbit shareholdings [2]. Elbit provides 85% of Israel's military drone fleet and land-based equipment, as well as bombs, missiles and other weaponry [3], which it markets as "battle-tested" [4] after they are developed during bombardments in occupied Palestine.

Additionally, Barclays holds over £2billion of investments, and underwrite loans worth £6billion, in other firms involved in arming Israel [5].

When Barclays last saw nationwide resistance, its CEO, CS Venkatakrishnan, claimed that the bank is "deeply sympathetic about the overall suffering in the region", but pleaded that Barclays' property ought to be protected [6]. Palestine Action state in response:

111 304

"Barclays' investments are contributing to the wholesale destruction of Gaza, the erasure of Palestinian life and property.

These banks choose to invest in manufacturers of genocide. They have evaluated that the continued returns on investment generated by Elbit Systems and Israel's war machine are worth more than the moral or political cost of dealing in war crimes.

Palestine Action will continue to take action to re-calibrate that cost-benefit analysis: reducing the profitability of any operation doing business with Israel's arms trade."

#### **ENDS**

#### **NOTES TO EDITORS**

If you would like any further information on Palestine action, please contact media@palestineaction.org

Palestine Action is a direct-action network of groups and individuals formed with the mandate of taking action against the sites of Elbit Systems and other companies complicit in Israeli apartheid, calling for all such sites to be shut down.

- [1] Freedom Press, 11th June 2024, Shut the System and Palestine Action smash 20 Barclays branches
- [2] Campaign Against Arms Trade, May 2024, Barclays: Arming Israel's Apartheid and Genocide
- [3] Investigate AFSC (American Friends Service Committee): Elbit Systems <a href="https://investigate.afsc.org/company/elbit-systems">https://investigate.afsc.org/company/elbit-systems</a>
- [4] WhoProfits Research Centre: Elbit Systems https://www.whoprofits.org/companies/company/3794
- [5] Campaign Against Arms Trade, May 2024, Barclays: Arming Israel's Apartheid and Genocide
- [6] CS Venkatakrishnan, 14th June 2024, 'Attacks on Barclays put our staff at risk and are not justified by Middle East events', The Guardian
  - ← Palestine Action Blockade and Spray Lobbyists for Israeli Weapons Firm Israel's biggest arms firm and government ministers influence prosecution and policing of Palestine Action →









#### Palestine Action blockade two Israeli weapons sites in Bristol

Nov 12, 2024 | 0 comments



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#### Images and videos are available for free, with the relevant credit

Today the direct action network Palestine action redoubled their efforts to shut down Elbit Systems, Israel's largest weapons company, by blockading the entrances of two sites in Bristol. The activists used lock on devices inside vans to block the gates at both sites, preventing any from entering and damaging Elbit's ability to develop death dealing weapons.

One of the sites, the facility at Filton, Bristol, is the most recent of Elbit facilities in England, the brand new £35m R&D hub of Israel's biggest weapons firm. Its June 2023 opening was attended by the UK-Israeli Ambassador Tzipi Hotevely, and Elbit's CEO Bezhalel Machlis – who has frequently boasted of the company's central role in Israel's military during the ongoing Gaza genocide.

According to Israeli media, Elbit provides up to 80% of the Israeli military's land based military equipment and 85% of its military drones. It supplies vast numbers of munitions and missiles – including the 'Iron Sting' recently developed and deployed for the first time in the 2023–2024 Genocide in Gaza, along with wide categories of surveillance technologies, targeting systems, and innumerate other armaments.

"Direct action against Elbit aims to disrupt this: targeting the source of colonial violence and genocide against the Palestinian people, undermining Elbit's profiteering from Israel's daily massacres." said a Palestine Action spokesperson.

The other site is Elbit's headquarters at Aztec West 600. This HQ is used by used by Elbit to oversee their logistical, financial, and operational affairs throughout the country, making it a key hub for Israel's arms trade in Britain. This is the latest in a seriesofactions undertaken at the site since the start of Palestine Action's campaign.

A Palestine Action spokesperson said: "Sustained direct action against Elbit disrupts the colonial violence and genocide against the Palestinian people. When our government fails to abide by their legal and moral responsibility to prevent genocide, it is the responsibility of ordinary people to take direct action to do so. We will continue to take direct action until Elbit is out of Britain."

#### **ENDS**

#### **NOTES TO EDITORS**

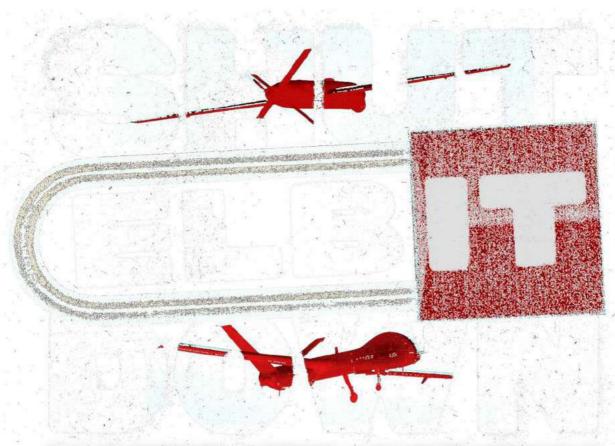
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# TAKE DIRECT ACTION AGAINST ISRAEL'S ARMS TRADE IN BRITAIN

#### **JOIN THE RESISTANCE**

Sign up to get involved in the campaign to shut down Israel's weapons trade



#### **FUND THE MOVEMENT**

Help us make 2024 the worst year for Elbit yet

https://palestineaction.org



### **ATTEND AN ONLINE WORKSHOP**

Join one of our online workshops every Wednesday 7PM, Friday 7PM and Sunday 3PM

JOIN AN EVENT

https://palestineaction.org 117 310

# JOIN A DIRECT ACTION TRAINING DAY



## Direct Action Training Day [Edinburgh]

Date December 8, 2024

Time All Day Event

Website BOOK HERE

Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down Israel...

https://palestineaction.org 118 311

#### Join Palestine Action

#### JOIN PALESTINE ACTION

First Name	If you are not already subscribed, would you like to receive email updates from Palestine Action? *
Last Name	<ul><li>Yes, opt in to email updates</li><li>No, do not opt in</li></ul>
Email *	Note: If you subscribed earlier, this will not unsubscribe you. You can unsubscribe using the link provided in emails you receive. You can always take action without opting in.
Zip/Postal Code *	I'M IN
PHONE NUMBER *	
Not in GB?	
ARE YOU INTERESTED IN TAKING DIRECT ACTION AGAINST ISRAEL'S ARMS TRADE? *	
☐ YES ☐ NO	
IF YES TO THE ABOVE, HAVE YOU TAKEN PART IN A PALESTINE ACTION DIRECT ACTION WORKSHOP?  YES NO	
ARE YOU PREPARED TO SUPPORT ACTIONISTS AT COURT AND POLICE STATIONS? *	

Sponsored by: Palestine Action

☐ YES ☐ NO

https://palestineaction.org 119 312



# TAKE ACTION TO DISMANTLE THE WAR MACHINE

# JOIN AN ONLINE WORKSHOP

TAKING PLACE EVERY WEDNESDAY 7PM, FRIDAY 7PM AND SUNDAY 3PM (BST)



# SPERMING TRIALS

https://palestineaction.org 120 313



## The #Al-Ahli2 Trial

Date Dec 2 - 13, 2024

Time 9:30 am - 4:30 pm

Venue Leicester Crown Court



## The #Deansgate1 Trial

Date Dec 2 - 3, 2024

Time 9:30 am - 4:30 pm

https://palestineaction.org 121 314

**Venue** Manchester Magistrates Court

More Info



## The #Ferranti2 Trial

Date Dec 4 - 6, 2024

Time 9:30 am - 4:30 pm

Venue Minshull Crown Court

More Info

Load More



Dismantle the war machine | #ShutElbitDown

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https://palestineaction.org 122 315

03/12/2024, 19:03





# JOIN THE RESISTANCE

### **Join Palestine Action**

#### JOIN PALESTINE ACTION

First Name	If you are not already subscribed, would you like to receive email updates from Palestine Action? *
Last Name	Yes, opt in to email updates
	O No, do not opt in
Email *	Note: If you subscribed earlier, this will not unsubscribe you. You can unsubscribe using
	the link provided in emails you receive. You can always take action without opting in.
Zip/Postal Code *	I'M IN
PHONE NUMBER *	1 101 114
Not in GB?  ARE YOU INTERESTED IN TAKING DIRECT ACTION AGAINST ISRAEL'S ARMS TRADE? *  YES NO	
IF YES TO THE ABOVE, HAVE YOU TAKEN PART IN A PALESTINE ACTION DIRECT ACTION WORKSHOP?  YES NO	
ARE YOU PREPARED TO SUPPORT ACTIONISTS AT COURT AND POLICE STATIONS? *  YES NO	

#### TALKS & TRAININGS



#### **CRASH COURSE ON DIRECT ACTION [ONLINE** WORKSHOP]

Time 7:00 pm - 9:00 pm Website BOOK HERE

Join this crash course on direct action to find out how you can be part of this campaign and help us #ShutElbitDown. The workshop will cover our theory on direct action, British complicity and the legal process associated with taking action!



#### ARRESTEE SUPPORT VOLUNTEER WORKSHOP [ONLINE WORKSHOP]

Date November 28, 2024 Time 7:30 pm - 8:30 pm Website BOOK HERE

post-arrest support volunteer teams who look after our fellow



#### DIRECT ACTION TRAINING DAY [GLASGOW]

Date December 1, 2024 Wahrita BOOK HERE

Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down israel...



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#### DIRECT ACTION TRAINING DAY [EDINBURGH]

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Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down Israel...



#### ARRESTEE SUPPORT VOLUNTEER WORKSHOP [ONLINE WORKSHOP]

Date December 10, 2024 Website BOOK HERE

Online workshop for all those interested in joining the welfare and post-arrest support volunteer teams who look after our fellow

#### ARRESTEE SUPPORT VOLUNTEER WORKSHOP [ONLINE WORKSHOP]

Time 7:30 pm - 8:30 pm Website BOOK HERE

Online workshop for all those interested in joining the welfare and post-arrest support volunteer teams who look after our fellow comrades

X @

#### **TALKS & TRAININGS**



#### DIRECT ACTION TRAINING DAY [GLASGOW]

Date December 1, 2024 Time 11:00 am - 5:00 pm Website BOOK HERE

Palestine Action is running training days across the country, to bring together like minded people for a day of talks, trainings and group discussions. All of which is geared towards harnessing the strength of the grassroots and directing it towards bringing down Israel,..



#### CRASH COURSE ON DIRECT ACTION [ONLINE WORKSHOP]

Date December 1, 2024 Time 7:00 pm - 9:00 pm Website BOOK HERE

Join this crash course on direct action to find out how you can be part of this campaign and help us #ShutElbitDown. The workshop will cover our theory on direct action, British complicity and the legal process associated with taking action



#### DIRECT ACTION TRAINING DAY [EDINBURGH]

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Date December 10, 2024 Time 7:30 pm - 8:30 pm Website BOOK HERE

Online workshop for all those interested in joining the welfare and post-arrest support volunteer teams who look after our fellow



#### ARRESTEE SUPPORT VOLUNTEER WORKSHOP [ONLINE WORKSHOP]

Date December 19, 2024 Time 7:30 pm - 8:30 pm Website BOOK HERE

Online workshop for all those interested in joining the welfare and post-arrest support volunteer teams who look after our fellow

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add action('wp footer', function() {?>

126 319



# STEP 1 CREATE A CELL

A CELL IS AN AUTONOMOUS GROUP TAKING ACTIONS WITHOUT DETECTION AS PART OF PALESTINE ACTION UNDERGROUND.

To build your cell, it is crucial that you only invite **TRUSTED** people to take part in it. You don't need loads of people either. Keeping the cell small, makes it more secure. **3-5 PEOPLE** is an ideal number. BUT, just one person taking action on their own is enough!

However, taking action with other trusted people, makes it safer and means you've always got back up with you.

Once you've got your cell together, come up with a name. This can be named after a Palestinian freedom fighter, a play on taking action against the war machine, or anything else that's appropriate.

Next, get a protonmail address. This will be key for sending in your actions, which we talk about later on in the guide. Once your cell has done its first action, and sent in the information to actions@palestineaction.org, we will then respond to you with further information, potential future targets and any other tips and tricks that we come across in the Palestine Action Underground.

\*Please refer to the technology page for more advice on protonmail and proton VPN\*



# STEP 2 PICK A TARGET BRITAIN

Now you've got your cell (or yourself), it's time to pick your target. Head to our website to find a list of secondary and primary targets who enable and profit from the Israeli weapons industry in Britain. Making your job to pick one a slightly easier process! Each is just as culpable as the other, and applying pressure to them is key to breaking the links which sustain Israel's arms trade.

It might be simpler to pick a target based on your locality, making it easier to plan, conduct the reccies and save some transport costs!

#### CHECK OUT THE TARGETS

If you are not based in Britain, then it might take a little bit of research to find your relevant target. As Israel's weapons industry isn't content with just the destruction of Palestine, they tend to try and expand their reach to every corner of the globe.

CHECK OUT THE NEXT PAGE TO FIND INTERNATIONAL TARGETS



# STEP 2

# **PICK A TARGET**

#### INTERNATIONAL

A starting point for research is to make sure your using a secure browser when looking into complicity companies. Here are some key search terms to use alongside the country/city you live in:

#### ELBIT SYSTEMS

#### RAFAEL

#### TELEDYNE

If that doesn't bring any fruitful results, then you can try searching the company names of all our targets included here and see if they have a presence in your country/area.

"elbit systems" "leicester"

Some countries may have a Ministry of Defence which has made a deal to buy weapons from Elbit Systems or another Israeli weapons firm, without having a factory in the country. Targeting the Ministry of Defence offices, or any other relevant buildings associated with government making decisions, is always a possibility.

It's also definitely worth looking into your country's weapons firms, or as they might call it "security and defence". Many countries have their own public and private weapons firms, who deal with the apartheid state of Israel. For example, Thales is a french weapons firm with many links to Elbit Systems.

#### CHECK OUT THE TARGETS



# STEP 3

## PREPARE FOR ACTION

If picking your target didn't get you excited enough about your new venture to dismantle Israel's war machine, preparing for action definitely will.

WHEN PREPARING FOR ACTION, KNOWING YOUR TARGET AND DOING AN EFFECTIVE RECONNAISANCE (RECCE) IS VITAL. RECCES PROVIDE KEY INFORMATION TO MAKE YOUR ACTION AS SMOOTH AND DAMAGING AS POSSIBLE.

Before we get into what infromation you need to gather, let's talk about not being obvious as f\*\*\* when you do a recce. Depending on where your target is, changes how you need to act. For example, if it's in the middle of town centre, then going for a walk with a friend or by yourself and pulling out a camera to look at the site doesn't look suspicious at all. However, if you're going out in the sticks walking around an industrial estate with a selfie stick - you'll probably stand out a bit. On going for sites in more rural areas, try asking to borrow someone's dog to take them on a walk (or walk your own dog if you've got one). You can also do a drive by, but make sure you're getting the key information you need from this.

Now, before you go heading into town centre or to walk your dog, it's always worth having a look first on google earth. After searching on google earth using a secure browser (Tor for example), and using the little yellow man to walk down the street, you'll have more of an idea of what you could potentially do on your action, and what else you need to find out from your recce. Having a brief idea of what your action could be, will help you do a recce which takes into account your actual plan. Do not just leave it to google though, as company's make changes all the time, which is not updated on google. Nothing beats going in person for the best possible preparation.

#### KEY INFORMATION TO FIND OUT

#### PLACES TO PARK

Before, after and during It's important to find out a car parking space which isn't monitored by CCTV or needs a parking ticket .Of course you might have got your hands on fake plates, but even still it's good to keep the vehicle undetected. Make sure it is also easy to access from where your action will be.

#### SECURITY

How many? Are they stationary or moving around?
If there is security present, think about how you could potentially avoid them.
If that's not possible, consider how you could still do your action.

#### INSIDE OR OUTSIDE?

Where are they looking out onto? Which street? Times of shift change- its often better not to catch them at shift changes as there will be more staff around. Do security remain inside the compound or seek to cover entry points outside the facility?

#### CCTV

Location? How many? What is it pointing at/filming? It may be impossible to avoid doing your action whilst avoiding CCTV, that's why it is crucial to make sure you are unidentifiable as mentioned before

#### > WHAT IS SURROUNDING THE TARGET SITE

Do they have neighbours/neighbouring buildings? Do the neighbouring buildings have security?

#### ESTIMATED TIME OF ARRIVAL FOR POLICE

How far away is the local police stations?

#### POLICE PATROLS

Do they patrol area? During specific times? Unmarked police cars in the area? Foot patrols?

#### FENCES?

How many? Where? What type of fences? How high a ladder would be needed to get over fences?

#### BARBED WIRE?

How much? Where?

ACCESS POINTS to building (fire escapes etc)

#### ALARMS

Do you know what sets off the alarm? Whatever sets off the alarm should be done last.

# STEP 4 PLAN YOUR ACTION

# TYPES OF ACTION

Now you've done your recce, it's time to nail down your plan! Creativity is vital to keep our resistance effective. When planning for your action, an important starting point is to finalise what you want to achieve. Here are just a few examples of what actions have already been taken. If your inexperienned it's best to start simple and build your way up. Dream up crazy ideas in your cell, remember that your action is to destrupt, damage or destroy your target. Here are some suggestions and different tatics to get you started...

## **EXTINGUISH YOUR TARGET**

Fire extinguishers can be repurposed and refilled with blood-red paint, so when it's sprayed it makes a big splash and can cover a massive area within seconds - perfect for a get away action.

# SPRAY PAINT

Spray painting can be quick as well, as long as you don't try and spray an essay onto the walls of your target! Some key slogans you can use are: Shut Elbit Down, Free Palestine, Evict Elbit, War criminals

#### **SMASHING WINDOWS AND EXTERIOR EQUIPMENT**

Smashing stuff can also be very quick to do. With an efficient sledgehammer in your hand, you can cause quite a bit of damage! Smashing windows often only takes one or two swings. But air conditioning units, cameras and other external equipment can sabotage the profits of your target even further.

### **BLOCK THEIR PIPES**

If you've managed to locate the company's external pipes (water and/or sewage), then blocking them will create a lot of disruption for your target! Concrete can be used to fill up the pipes, and when it dries, your target will be in for a messy surprise.

# BREAK IN

If you're feeling up for it, and know the site back to front, then breaking into your target and damaging the contents inside is obviously a very effective tactic.

#### THINK BIG

The tactics mentioned are examples of previous actions so by all means think big! Try not limit your action based on whats been done before. Remind yourself when brainstorming different ideas, what could I do to be creative?



# HOW TO GET TO THE SITE AND LEAVE UNDETECTED

Now once you've decided what tactics you're going to use for your action, you'll need to plan how to get to the site and leave undetected. Transportation is a key part of any plan, and can be the difference between getting away with it, and getting caught. Here are some examples of different transport methods, and how you can use them to your advantage:

# FOOT

Walking to a site, or even running if you're feeling up for it, is probably one of the most covert ways of taking action. Key to this is keeping your face covered the whole time, and planning a place to go to where there are no cameras, which you can leave with normal clothing on, to head to your next destination. Remember to make sure it's a busy area, so if you are later captured on CCTV, they won't be able to tell it's the same person who did the next action.

### BIKE

For covert actions, bikes are great. A similar principle applies though as using a car. Have the bike stored somewhere close to your target, but in a place without cameras. Then go on foot from that point to do the action, then head back to your bike.

# CAR

Cars tend be the easiest way to get around. But, they do have license plates which can be picked up by cameras and traced to the owner. If you do plan on using a car, make sure you've sussed out where all the CCTV and road cameras are for the route you want to take - and find a route which avoids them completely. Do not park the car next to the site, have it at a location which isn't able to be picked up by cameras.

# ROUTE

When you decide your mode of transport, you need to make sure you have your routes planned for a perfect getaway. Think about where the cameras are, and don't walk a few hundred metres down the road and take your mask off. If the police want to trace you, they'll follow the cameras to where you took your mask off and possibly get a picture of your face. Wearing a baseball cap does still help with avoiding your face being captured on camera as well, but it's no guarantee. The best thing to do is remain covered until you are at a safe spot without cameras, and that is relatively busy. From there you can plan your route home.

### **PUBLIC TRANSPORT**

If you're using public transport, do not, we repeat DO NOT, use your own debit/credit card. This information is stored and can be accessed by the police very easily. It is always best to use cash. However, these days, many transport modes don't allow cash. If you're in London using an oyster card which is topped up with cash is the best way to go. Also be aware than public transport has CCTV, so keeping your face covered is ideal. Getting on the bus or train with a balaclava on might draw more suspicion though. So think of other ways to cover your face - half face coverings are very common since covid and you can wear sunglasses at night.

**CRUCIAL ELEMENTS** 

# ROLES

If there is more than one of you in the action, which is ideal, you should split up roles between you. For example, if you want one person to just focus on getting pictures and a video, then they should focus on that and not on swinging hammers! The others could split up their roles from taking on hitting different parts of the site, or one can focus on paint and the other on smashing. Whatever your action is, make sure you've thought through who is doing what to make the action as efficient and quick as possible.

Make the action as quick as possible, whilst making your action effective! This is one of the key reasons its so crucial to plan your action well, so everyone knows what they're doing.

# EQUIPMENT

Now you've got your plan down to a T, it's time to get equipped. On this point, it's a good idea to remember that CASH IS KING. When buying equipment, whether it's spray paints or sledgehammers, don't leave a paper (or digital) trail. Use cash and wear a baseball cap in the store and/or a face covering, just for extra measure. Obviously, you're going need the tools to conduct your action. These may include spray paints, making a fire extinguisher (check out our guide) and sledgehammers. It's important to remember when using sledgehammers, to get some cut safety gloves (YOU DON'T WANT TO GET CUT AND YOU DON'T WANT TO LEAVE YOUR BLOOD ON THE SITE EITHER!).

Now, those items are crucial for the action. But here's how to remain undetected.

# **MAKE SURE:**

# A FACE COVERING IS KEY

Do not have your face on show at any point during the action. Balaclava is best for this. This might seem predantic, but cops are obsessed with trainers. Don't wear shoes that you've worn when arrested on an action or at a protest, or that are all over your social media. Best thing is to get the most plain boring black shoes and to only wear them when taking action.

# YOUR CLOTHING IS DARK

(BLACK IS BEST)

# (BLACK IDEALLY)

### YOUR CLOTHING IS BAGGY!

(THIS MAKES IT HARDER TO SUSS OUT YOUR BODY TYPE)

## YOUR WHOLE BODY IS COVERED

YOUR TRAINERS ARE VERY PLAIN

This is especially important if you have any identifying features such as tattoos or birthmarks on show. Therefore make sure you have gloves as mentioned above and everything is covered up.

\*WHEN TAKING ACTION, NEVER LEAVE ANYTHING BEHIND. ABSOLUTELY NOTHING APART FROM PAINT AND DESTRUCTION. THE POLICE MAY TRY TO FORENSICALLY ANALYSE ANY ITEMS WHICH ARE LEFT, SO DON'T LEAVE ANYTHING.\*

# DOCUMENTING YOUR ACTION

# RECORD

Now you've got your underground fashion sorted. Let's move on to how you're going to capture your action. The most crucial aspect of taking action is to tarnish your target and apply pressure. However, do not underestimate the power of capturing your action on camera so it can reach beyond the target. This means every other target can see what's happened, and more imporantly the people of Palestine know we're active in our solidarity.

# DO NOT

ever take your own personal phone on an action. But, if you're thinking about how to capture your action by video/ pictures, then it's worth getting a burner smart phone. You don't need to spend £100s on this. You can get some really cheap ones from second hand shops. Lycamobile sim cards tend to be best, as you can buy a top up from any shop (using cash), and then add credit to it without needing to register. Remember when using a lycamobile sim card, after you've added a top up, to add a plan to it immediately. You can search online how to do this. But this saves you a lot of money!

# ONCE YOU'VE GOT YOUR BURNER SMART PHONE

It's wise to have a dropbox account set up on the phone. You can set once up using a protonmail email address, which you can easily create for free on Proton

Make sure someone else who is in your cell but not on the action has access to this account, just incase. Also remember to check the dropbox account is working! Capturing your action on camera does not mean compromising yourself. If a video is taken, you can edit out any part which reveals identities. If you do not managed to do this successfully, Palestine Action will make sure to check videos for anything that can be used against you and remove it before posting it.

You can send in videos/images of your action to:

# **ACTIONS@PALESTINEACTION.ORG**

For extra security measure, you can also remove the "exif data" from your pictures before sending them in. This is basically all the data that is stored in pictures which can have some identifiable information. It's really easy to remove this. You can use the website https://www.yerexif.com/en/

If you forget to do this, Palestine Action will remove the exif data before posting.

\*See our technology page for more information\*

SAFE MEETING PLACE AFTER ACTION

# WHAT IF IT ALL GOES PEAR SHAPED?

Prepare a "safe" meeting place if you all have to split up and scarper! This should be far enough away from the site to be safe, but not too far away that it would take too long. You should agree a length of time you would wait there until those who've arrived at the meeting place leave.

# LEGAL

Now even though you're planning to get away, you must be prepared and take into account the risk of getting caught. You can do everything possible to minimise this, but this is a very real possibility. Make sure that your cell is aware of the potential legal consequences. This will obviously be dependent on the action you take and that's why it's important you do your own research on this.

We recommend using Kelly's solicitors if you do end up hed.

- Kelly Brighton
- Hodge Jone
- Allen London

They'll ask for your authority to liase with Palestine Action's support team. If you do allow this, it means we can arrange police station support and keep you in touch with our dedicated support team throughout your legal process.



# STEP 5 TAKE ACTION

Adrenaline and nerves will be pumping through you at the same time. This is normal. Make sure you run through your plans right before taking action another time, to make sure everyone is on the same page. Then go for it.

THE DAY HAS COME, YOUR ACTION IS PLANNED, YOU'RE ALL EQUIPPED AND READY TO GO.

**GOOD LUCK!** 



# STEP 6 POST-ACTION

You've just sabotaged a complicit company. At this point, you want to make sure to

# **DESTROY ALL EVIDENCE.**

If you've got empty spray cans or any other items left, get them out as soon as possible. Don't put them in your recycling bins, find a communal or other place to throw them away. If you don't want to get rid of your underground attire, make sure they're not in your place or your car. Take them to a friend's place. This might seem over the top but the best peace of mind and finale to an action is knowing there is no evidence left behind at the site, or in your home. If the police ever get as far as searching your home (which is very unlikely if you follow all the above steps), they'll search for any items which connect you to that action.

### REMEMBER TO:

- Get the pictures off the burner smart phone
- Remove the exif data from any pictures verexif
- Edit out any identifiable points in video footage (voices or faces)
- Send them into actions@palestineaction.org

Along with the footage, you can add your own communique, which Palestine Action will publish alongside your action.



# STEP 7 TECHNOLOGY

# CHECKLIST

# **KEY INFORMATION TO FIND OUT**

- WHERE POSSIBLE, DON'T USE PHONES OR COMPUTERS
- ARRANGING MEETINGS

Use Signal with disappearing messages on.
Put phones in a Faraday cage or microwave in another room.

- USE TOR FOR ONLINE RESEARCH
- STAY CLEAN

Delete everything you don't need like photos and research files.

- USE A BURNER SMART PHONE FOR MEDIA
- IISF A VPN

Although this is not necessary when you are using Tor, a VPN will obscure where you are connecting from so you are less identifiable by the websites you are using.

Good VPNs to use are:

- ProtonVPN (free)
- MullvadVPN (paid, can pay cash)

# HOW TO SET UP SIGNAL WITH A BURNER NUMBER:

- 1 INSTALL SIGNAL ON YOUR REGULAR PHONE
- 2 BUY OR USE ANOTHER PHONE (E.G. A CHEAP BRICK PHONE)
  WITH A SIM ALL BOUGHT IN CASH
- 3 WHEN REGISTERING FOR SIGNAL, SET UP AN ACCOUNT Using the number on the Burner Phone
- 4 TAKE THE ACTIVATION CODE FROM THE BURNER PHONE
  AND ENTER IT IN THE FIRST ONE
- 5 YOU CAN NOW TURN OFF AND NOT USE THE BURNER PHONE
- 6 USE SESSION FOR MESSAGING IF YOU WOULD NOT LIKE A PHONE NUMBER ASSOCIATED
- 7 USE PROTONMAIL AND CREATE A COMPLEX PASSWORD:



We could write a whole book on this subject. But hey, firstly it would be out of date by the time we wrote it with the rapid change of specially digital security, and second plenty of other clever folks have so we provide some trusted sources here for you to check and re check. One thing about your underground cell is you don't need to worry or engage in recruitment once it's formed and therefore it is somewhat easier to put in place higher level security procedures that you need. Digital security is vital but it should not be at the detriment of basic security! Bragging, gossiping and loose words generally are often how things become undone and that sort of behaviour should be avoided and called out if you some

across it in your cell. In addition to the advice contained in the guides below you should also adopt some simple and sensible precautions of your own. The most well known, as oftentimes forgotten is you should not have your phone with you in any meeting your cell has. Ideally you would arrange meetings via signal messenger (be sure to enable disappearing messages) and then not take your phone. Also all members of your cell should invest in a faraday cage for your phone (you can pick them up for £20-£30). These block all communications to your phone and in effect if used properly you "go dark" for the duration the phone is in the faraday cage (its called a cage but most look like oversized wallets!)

#### WHAT IS A VPN?

**SECURITY GUIDE** 

"A VPN, or virtual private network, is a technology that establishes a secure tunnel between two or more devices. An Internet VPN, such as Mullvad, offers a tunnel between you and the Internet, allowing you to browse the web securely and privately, even when using a public WiFi network at a cafe or hotel."

### CRYPTPAD

Use CryptPad to store any collaborative research documents, if you have too. On cryptpad, add passwords to your files and set expiry (destruction) dates for after your action if you don't need it beyond then.

# PROTONMAIL

Protonmail is an end to end encrypted email. This means that only you and the people who you email (e.g. action@palestineaction.org are the ones that can see your email content.

However, if the Swiss courts request data from protonmail (which can be done via Europol) protonmail may provide them with IP address information (basically, where you logged in from). If you use a VPN every time you log into the address, then this means protonmail never gets access to an IP address that is linked to you and you are much safer. Although services like riseup.net are run by people more politically aligned, that doesn't necessarily mean they are better. Organisations like RiseUp and smaller and less well resourced than protonmail.

Just use protonmail and be careful

"We know by the nature of technology and digital security this information will go out of date quickly. We welcome constructive suggestions about changes to this part of the guide just email info@palestineaction.org (or whatever)"

# Cookies on Companies House services

We use some essential cookies to make our services work.

We'd also like to use analytics cookies so we can understand how you use our services and to make improvements.

Accept analytics cookies Reject analytics cookies View cookies (Ihelp/cookies)

# ⊕ GOV.UK

Find and update company information

# PALESTINE SOLIDARITY CAMPAIGN LTD

Company number 05213508

Follow this company

File for this company (https://beta.companieshouse.gov.uk/company/05213508/authorise?retum\_to=/company/05213508)

Overview Filing history.

More

People

Registered office address 27 Old Gloucester Street, London, England, WC1N 3AX

Company type Private company limited by guarantee without share capital

Incorporated on 24 August 2004

Accounts

Next accounts made up to 31 August 2024 due by 31 May 2025

Last accounts made up to 31 August 2023

Confirmation statement

Next statement date 24 August 2025 due by 7 September 2025

Last statement dated 24 August 2024

Nature of business (SIC)

94990 - Activities of other membership organisations not elsewhere classified

			Teledyne UK	Teledyne UK - attacks and d	emonstration	demonstrations 2022 - 2024		
Date Location	ion	Duration	Group	Approx numbers	е	Tactics seen	Remarks	Subsequent Action
09-Dec-22 Labtech Prestigne		5-6 hours	Palestine Action	4	Yes. Large police response.	Accessed recption. Sledgehammers used to Police at heights team and Fire Service break glass and destroy IT equipemnt. Ladders used to scale roof. Damage to roof and production area.	Police at heights team and Fire Service removed and arrested protesters from roof.	4 protestors held in prison on remand pending trial. Trial held 9-12 May 2023. [redacted] changed plea to guilty. Sentenced to 23 months imprisonment. [redacted] found guilty. Sentenced to 27 months imprisonment.
28-Sep-23 Te2v Chelmsford		Minutes	Palestine Action	п	No.	Red paint splashed across front wall.	Photographer present.	Police did not respond - led to subsequent calls with an Essex Detective Chief Inspector. Photo of TDY employee on national press website: taken down on request.
23-Nov-23 TDS Shipley	1-7	1-2hrs	Bradford Friends of Palestine	10	Yes immediate 4 Officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
07-Dec-23 TDS Shipley	1-:	1-2hrs	Bradford Friends of Palestine	30	Yes immediate +6 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
19-Dec-23 TDS Shipley	<u>+</u>	1-2hrs	Bradford Friends of Palestine	120	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
26-Dec-23 TDS Shipley		Minutes	Unknown	2	Yes immediate approx 10 officers		Arson attack. No injuries. Minor damage to goods inward area.	Suspect arrested September 2024. Thought to be a local, not part of a group. The CPS decided not to charge: evidence not strong enough.
04-Jan-24 TDS Shipley	7-7	1-2hrs	Bradford Friends of Palestine	120	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
18-Jan-24 TDS Shipley	1-5	1-2 hrs	Bradford Friends of Palestine	45	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
25-Jan-24 TDS Shipley	1-7	1-2hrs	Bradford Friends of Palestine	40	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
08-Feb-24 TDS Shipley	1-7	1-2hrs	Bradford Friends of Palestine	15	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
14-Feb-24 TDS Shipley		1-2hrs	Bradford Friends of Palestine	09	Yes immediate approx 10 officers	Blocking entrances but allowing employee access. Photographs of site and hostile reconnaissance	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
16-Feb-24 CML Bromborough		1-2 hrs	Palestine Action Liverpool	10	Yes - 1 vehicle 2 Officers	Blocking entrances but allowing employee access trying to hand out leaflets	Not believed to be linked to Palestine Action Group, peaceful banners and posters and handing out leaflets	
29-Feb-24 TDS Shipley		1-2hrs	Bradford Friends of Palestine	20	Yes immediate approx 10 officers	yee	Peaceful displaying banners (pro Palestine/anti Teledyne) but verbally aggressive/handing out leaflets	
06-Mar-24 CML Bromborough		1-2hrs	Palestine Action Liverpool	20	Yes immediate 1 vehicle 6 Officers	Blocking entrances trying to hand out leaflets. Possible that as all police/security resource arrives they disperse, thus costing Police and site extra cost.	Peaceful, blocking entrance gates, displaying banners handing out leaflets	

			Teledyne Uk	Teledyne UK - attacks and demonstrations 2022 - 2024	emonstratio	ns 2022 - 2024		
Date	Location	Duration	Group	Approx numbers	Police attendance	Tactics seen	Remarks	Subsequent Action
06-Mar-24	06-Mar-24 Labtech Prestigne	1-2 hrs	Radnor Palestine Links	25	o Z	Blocking vehicle gate and handing in a letter	Peaceful. Handing over a letter demanding to speak to management. Subsequent piece in press. Two individuals with known links to PAG and previous protests/damage etc	
15-Mar-24	15-Mar-24 CML Bromborough	1-2hrs	Palestine Action Liverpool	20	Yes immediate approx 8 officers	Blocking entrances, handing out leaflets	Peaceful, blocking entrance gates, displaying banners handing out leaflets	
18-Mar-24	18-Mar-24 CML Bromborough	1.5 hrs	Palestine Action Liverpool	20	1 police officer	Blocking entrances but allowing employee entry	As previous. Banners leaflets standing at entrance points	
20-Mar-24	20-Mar-24 TDS Shipley		Bradford Friends of Palestine	09	5 Police, 2 vehicles in attendance prior to protest	Stood in front of vehicle gates but allowed access	Peaceful displaying banners (pro Palestine/Snti Teledyne) 1 protester taking a lot of footage of the site buildings and perimeter. Assessed to be hostile recon. Speaker units and microphone in use (unknown what was said) 2 protesters praying at gate during protests (not seen before). Unite union flags in attendance.	
23-Mar-24	CML Bromborough	45mins	Palestine Action Liverpool	09	1 police vehicle 2 officers	Blocking entrances but allowing employee entry	As previous. Banners leaflets standing at entrance points. No employees required access/exit	
27-Mar-24	27-Mar-24 Labtech Prestigne	2hrs	Radnor Palestine Links	18	No police	Stood in front of vehicle gates, handed letter Banners, leaflets etc to site	Banners, leaflets etc	
02-Apr- 24	02-Apr-24 TDS Shipley	Approx 16hrs	Palestine Action Liverpool	4 on roof + 20 outside	All emergency services in numbers	On roof, smashing roof tiles, brickwork, windows etc	sted and removed. age to building. Costs 700k	Daniel Jones & Najam Shah released from custody after 1 week. Ruby Hamill released from custody 2 May. Julian (laka Laila) Gao remained in custody until June. Trial 5-13 Sept 2024. Hung jury. Retrial set for 9 February 2026.
04-Apr-24	04-Apr-24 Labtech Prestigne	10 mins	Local councillor and ex mayor	1	No police	Handed letter to site	Nothing further	
09-Apr-24	09-Apr-24 TDS Shipley	2hrs	Bradford friends of Palestine	20-25	6 Officers	Blocking entrances but allowing ingress egress	Banners, leaflets and speakers	
10-Apr-24	10-Apr-24 CML Bromborough	1hr	Palestine Action Liverpool	approx 8	No police	Stood in front of entrances but allowed access	Banners, leaflets, chanting	
17-Apr-24	17-Apr-24 CML Bromborough	1hr 30mins	Palestine Action Liverpool	10	No Police	Stood in front of gates allowing acess	Banners, leaflets, chanting	
47-14K-17	בלא ופכון דוויניסון	SIIIII	Oliviowii	n j	DOILOR I	Daliiage causeu to periilleter rence/gate	following day	
23-Apr-24	23-Apr-24 E2V Tech Lincoln	10mins	Unknown	1	No Police	<ol> <li>individual seen early hours inspecting repaired fence and gate</li> </ol>	Police informed, images captured	
24-Apr-24	24-Apr-24 TDS Shipley	2hrs	Bradford Friends of Palestine	30	8 officers	Slow march on approach road, standing in front of gates	Banners, chanting, hands covered in red paint	
11-May-24	11-May-24 Cumbernauld	15mins	Unknown	4	No response requested	4 individuals smashing windows and spraying paint. Did not enter building	Red paint, sledgehammers. Not assessed to be PA	

		Teledyne UK	Teledyne UK - attacks and d	emonstratior	demonstrations 2022 - 2024		
Date Location	Duration	Group	Approx numbers	Police attendance	Tactics seen	Remarks	Subsequent Action
12-May-24 Cumbernauld	20 mins	Unknown	н	Reported to Police	Reported to Police 1 person taking photos of damaged windows Reported to Police, they are investigating.  Teledyne security investigation found that the individual was an employee but had the individual was an employee but had failed to notify the control room oftheir via out of hours. Employee educated and Police informed	Reported to Police, they are investigating. Teledyne security investigation found that the individual was an employee but had failed to notify the control room oftheir visit out of hours. Employee educated and Police informed	
13-May-24 Cumbernauld	5-10 mins	Unknown	2	Reported to Police and response initiated	2 individuals walking along two aspects of the building	Police responded. No feedback from them due to investigation.	
15-May-24 TDS Shipley	7 hrs	Palestine Action group	4 (3 female, 1 Male)	Large emergency services response	4 indiviuals gained access to reception roof and smashed roof and windows. Access to removed and arrested protesters from site was via a ladder against the fence.  CCTV alarms activated and response called. by Police at entrance to the industrial estate to prevent support to to roof to protesters	held	Ricky Southall, Amareen Afzal, Serena Fenton released on police bail [redacted] in custody (has also attacked Barlcays bank)
07-Jun-24 CML Bromborough	10mins	Unknown	1 male	Nil	1 individual cut through fence and walked through site	Police informed, images captured	
21-Jun-24 CML Brombourough	1.5hrs	Palestine Action Liverpool	15	Large police presence	Stood in front of gates allowing acess	Banners, leaflets, chanting	
21-Jun-24 CML Bromborough	10 mins	Unknown	1 male		Appears to have cut through fence and walked off site	Police informed, images captured	
05-Jul-24 CML Bromborough	4 hrs	Palestine Action Liverpool	3 females		to e d to	Police arrested 3 protestors. All 3 released on bail. We await court dates	
07-Aug-14 TDS Shipley	2 hrs	Bradford Friends of Palestine	Approx 20		Standing in front of gates, chanting and singing	Banners, speakers etc	
18-Sep-24 TDS Shipley	2 hrs	Bradford Friends of Palestine	Approx 30		Standing in front of gates, chanting and singing		Mask-wearer arrested, charged with a public order offence and bailed. Plea hearing 18 October 2024.
02-Oct-24 CML Bromborough	Shrs	Palestine Action Liverpool	2 males 2 females (1 male, driving the van, left immediately on electric scooter).	Large Police response	Climbed onto roof via ladder sealed in van, Police arrested 3 individuals. We await smashed roof and damaged production court dates.		3 protestors released on police bail.
30-Oct-24 TDS Shipley	5 hrs approx	Bradford Friends of Palestine	Approx 35	Immediate Police response	Standing in front of gates, chanting and singing	Originally planned for 12pm arrived at 0630hrs, banners, speakers etc	
20-Nov-24 TDS Shipley	2hrs	Bradford Friends of Palestine	Approx 12	Police on scene	Standing in front of gates, chanting, singing Police on scene peventing photography and dancing	Police on scene peventing photography	
28-Nov-24 TDS Shipley	3 hrs	Bradford Friends of Palestine	Approx 20	Police on scene prior		Police on scene throughout, prevented photography	
08-Dec-24 e2v Chelmsford	N/A	Chelmsford Palestine Solidarty Campaign	N/K	Ξ.	Social media posted for a protest outside 1130-1330hrs 8 Dec 24. A further post was 'made postponing the event until 22 Dec 24	No protest took place, due to adverse weather	

# **Presteigne**

09/12/2022



Q Palestine labtech

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# Including results for "Palestine latech"

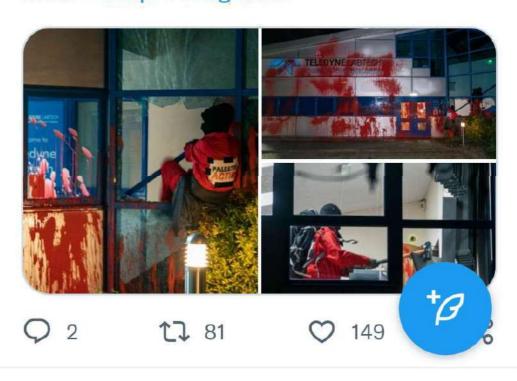
Search instead for "Palestine labtech"



Palestine Action @Pal\_action · 1h
BREAK IN: Palestine Action smash their
way inside Teledyne Labtech in Wales,

manufacturers of military radars for Israel's high-precision targeting of Palestinians. No company arming apartheid escapes our

radar #StopArmingIsrael



























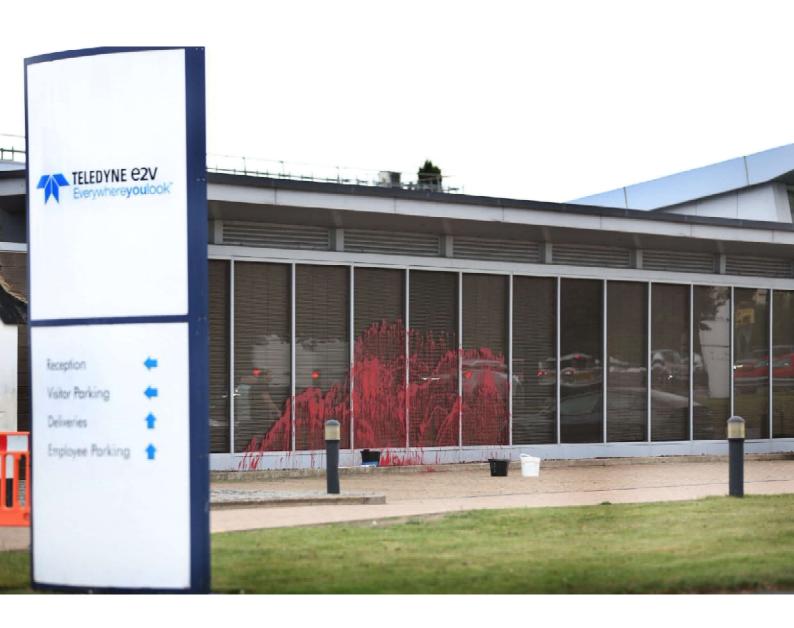








# Chelmsford 28/09/2023









# Palestine Action Spray Red Paint Over Bomb Factory Teledyne e2v on Student Open Day

Sep 29, 2023 | 0 comments



Images and videos from the action are free to use and reproduce: https://bit.ly/TeledyneOpenDay

Teledyne e2V in Chelmsford Essex, a part of the Teledyne Technologies Group — the largest supplier of weapons from Britain to the Israeli regime [1], opened its doors to students on 28th September 2023 as a recruitment drive to coincide with National Manufacturing Day [2]. Palestine Action joined the 'open day' event disguised, to make prospective students thinking of working there, fully aware of the company's murderous operations.

Spraying red paint from fire extinguishers over the entrance, students applying to join Teledyne's workforce, or considering the "opportunities" being advertised inside, would have been quickly made aware that a job in this industry leaves you with 'blood on your hands'.

The action was an embarrassment for the firm, who despite their efforts, had no students turn up to their open day and failed to hide their business of war using glossy presentations, attractive pension plans and life insurance schemes, in an attempt to attract new young employees without explaining the whole story. Their 'e2v' factory specialises in detonators used in a wide range of weapons including missiles, bombs and sea mines [3] [4].

Last December, four Welsh activists took direct action at the Teledyne Labtech factory in the small rural border town of Presteigne, rendering the factory inoperable and causing substantial damage — the action to close the factory, which was a success, incurred lengthy custodial sentences. The police alleged hundreds of thousands of pounds of damage was caused, despite that cost being incomparable to the Palestinian lives destroyed by Teledyne's weaponry [5]

Today's action serves to remind war mongers hiding behind state of the art premises, that wherever you are and no matter how hard you try to shield the truth from the public, Palestine Action won't allow your 'business of bloodshed' to operate without consequences. There are no benefits to working in the war industry — there are only lives torn apart.

#### **ENDS**

Images and videos from the action are free to use and reproduce: https://bit.ly/TeledyneOpenDay

Palestine Action is a network of groups and individuals established to take direct action against properties owned by Israel's biggest arms firm Elbit Systems. The mission is to shut Elbit down and end all British complicity in the illegal colonisation of Palestine.

Website: https://palestineaction.org/

Twitter: https://twitter.com/Pal\_action

Instagram: https://www.instagram.com/pal\_action/

Youtube: https://www.youtube.com/@pal\_action

# **NOTES TO EDITORS**

[1] https://caat.org.uk/data/exports-uk/licence-list?region=Israel&company=Teledyne+Technologies

[2] https://www.essexopportunities.co.uk/events/teledyne-chelmsford-recruitment-open-day/

- [3] https://www.teledyne-e2v.com/en/markets/defence/
- [4] https://ueaeprints.uea.ac.uk/id/eprint/83371/1/Accepted\_manuscript.pdf
- [5] https://www.palestineaction.org/teledyne-on-trial/

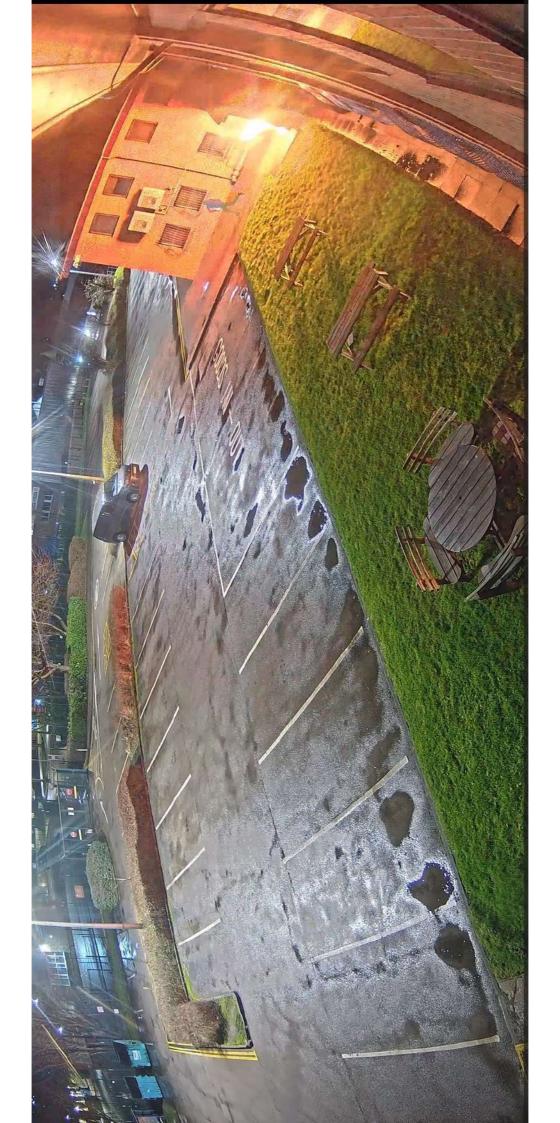
← Palestine Action Crash Europe's Largest Business Event on Drones





Dismantle the war machine | #ShutElbitDown

# **Shipley** 26/12/2023

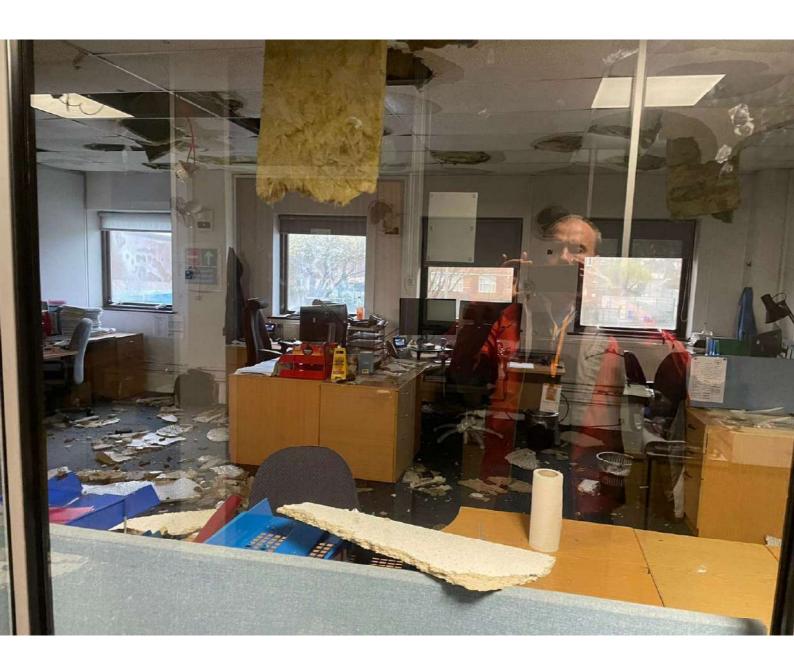


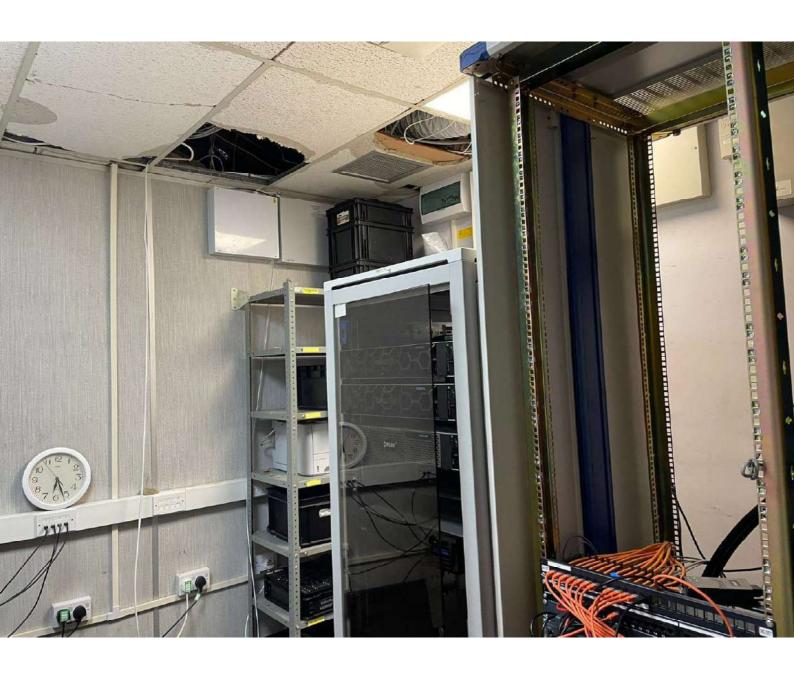






### **Shipley** 02/04/2024









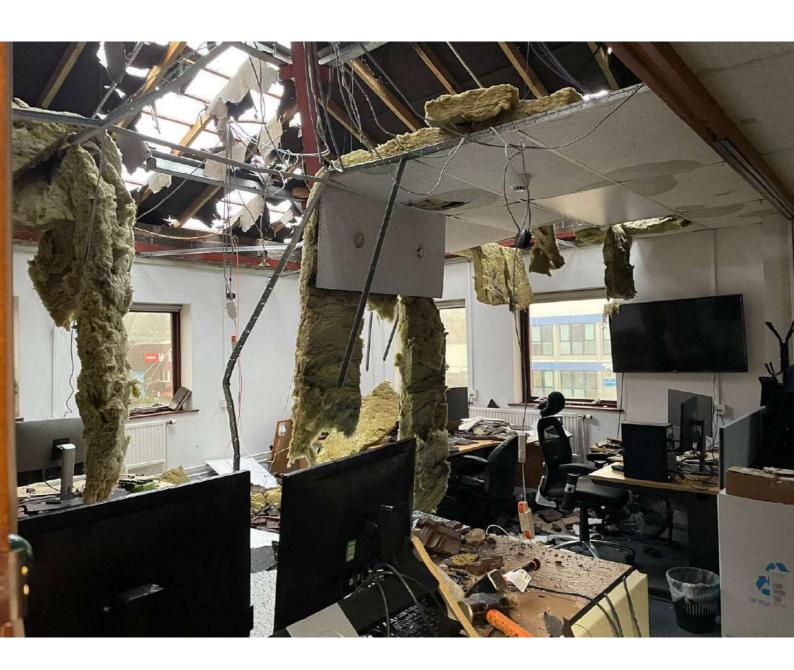
















# **Shipley 15/05/2023**





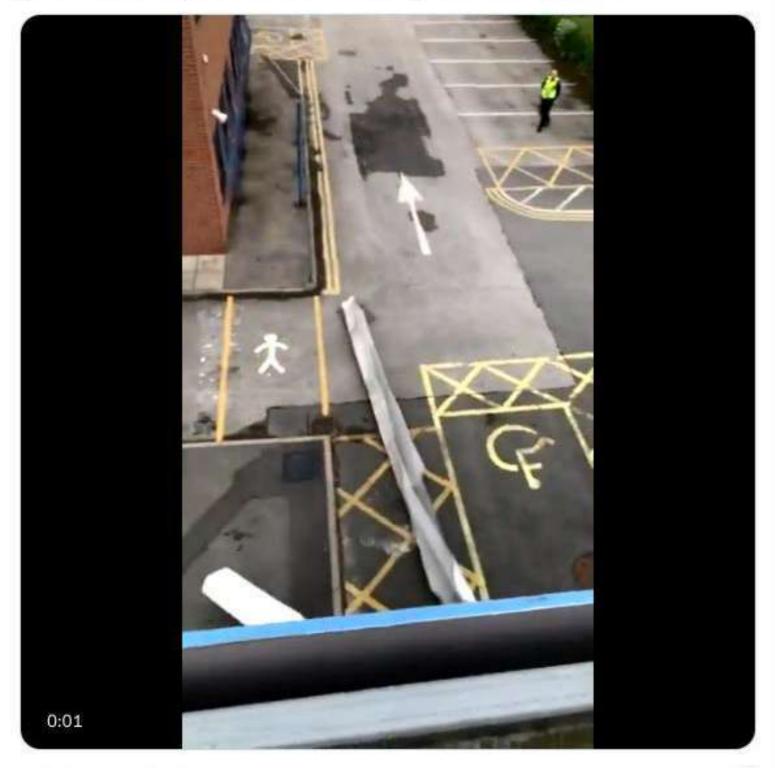






The roof of Teledyne's Shipley weapons factory is starting to come off.

The factory manufactures components for Israel's missiles and fighter jets — that's why actionists are shutting it down! #Nakba76









By dismantling Teledyne's weapons factory in Shipley, Amareen and her comrades halted the production of parts for Israel's missiles and fighter jets.

Help her raise the legal fees needed to prove who the real criminals are in the upcoming trial



From gofundme.com

2:23 PM - Jul 9, 2024 - 39.8K Views



## **Bromborough (Wirral)** 05/07/2024





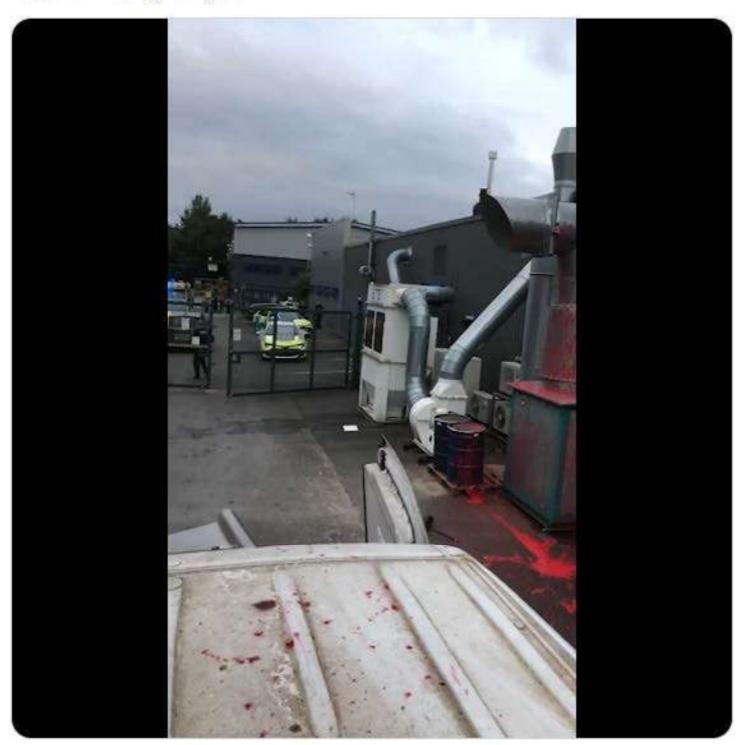








BREAKING: Palestine Action rammed a van through the gates of Teledyne's Wirral factory, forcing workers to stop producing parts for Israel's F-35 fighter jets



10:10 AM · Jul 5, 2024 · 184.2K Views



### Palestine Action @ @Pal\_action · Jul 5

Three actionists arrested after they disrupted Teledyne's Wirral factory, halting the manufacture of parts for Israel's F-35 fighter jets.

Mobilise in their support at Birkenhead police station, Mortimer St, CH41 5EU!





### Palestine Action 📀 @Pal\_action - Jul 6

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All released after they shut down the Wirral-based manufacturer of Israel's F-35 fighter jet parts



Q 206

**17** 2K

♥ 7.4K

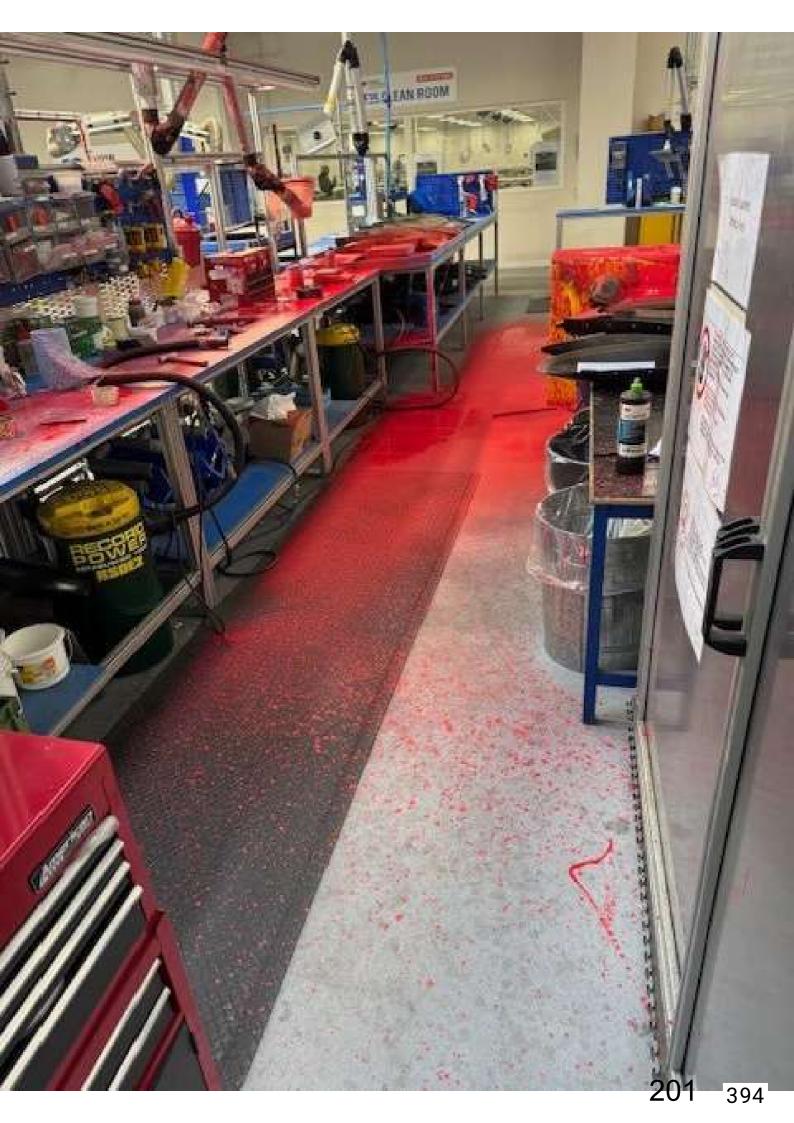
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## **Bromborough (Wirral)** 02/10/2024









#### Palestine Action @ @Pal action · Oct 2

Three actionists arrested after they brought the production of crucial parts for Israel's F-35 fighter jets to a standstill.

Mobilise at Wirral Custody Suite, Birkenhead, CH41 8BA to make clear that the public know who the real criminals are!

Q 42

17 685

O 1.7K

111 42K

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#### Palestine Action @ @Pal action - Oct 2

According to a senior Teledyne manager, contamination of their clean rooms could stop production for up to 12 months.

Actionists just got through to the clean room for Israel's F-35 fighter jet parts.



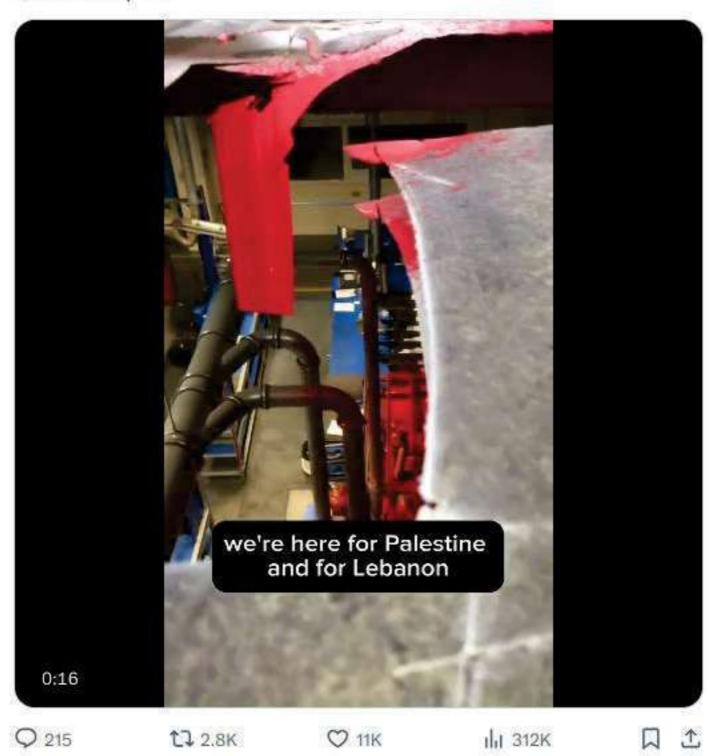


### Palestine Action @ @Pal\_action · Oct 2

Contamination of this clean room will cause severe disruption to the production of Israel's F-35 fighter jet components.

When our government fails to abide by their legal duty to end complicity in genocide, it's up to ordinary people to take action.

Watch this space.





#### Palestine Action @ @Pal action · Oct 3

BREAKING: According to British police, Teledyne's production of crucial parts for Israel's F-35 fighter jets could be disrupted for up to 18 months due to this action.

#### Palestine Action 🔮 @Pal\_action - Oct 2

According to a senior Teledyne manager, contamination of their clean rooms could stop production for up to 12 months.

Actionists just got through to the clean room for Israel's F-35 fighter jet parts.



Q 573

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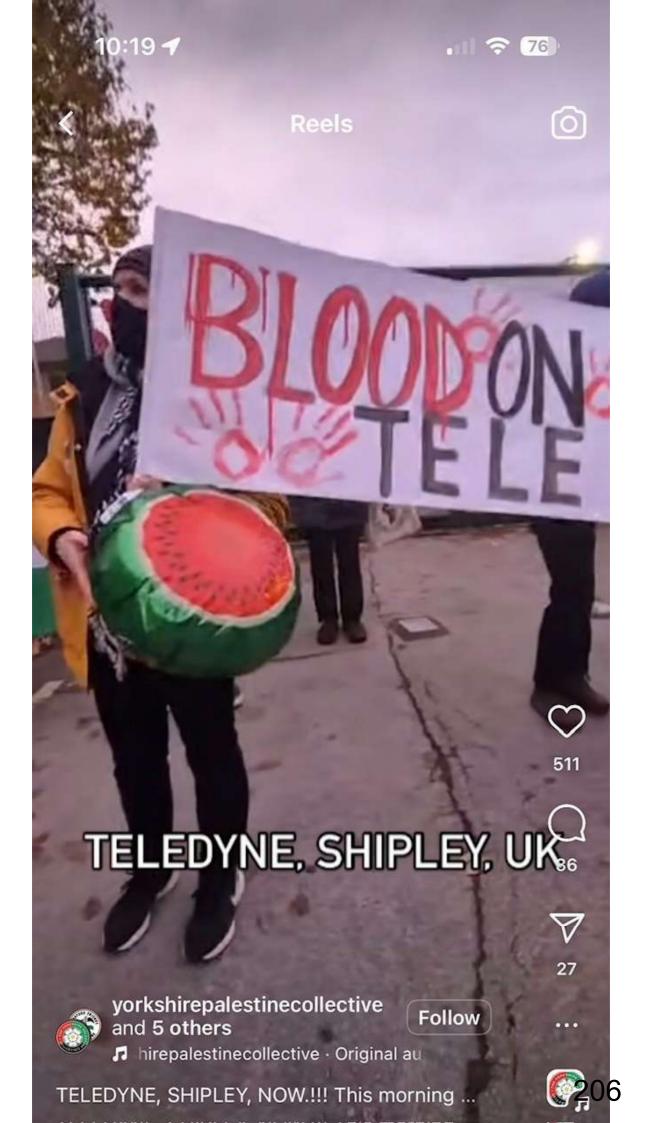
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#### **Shipley** 30/10/2024











# **Shipley 20/11/2024**



■ Lowkey · Long Live Palestine Part 1





191





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**bfdfriendsofpalestine** Activists braved the cold today to protest outside Teledyne, to send a clear message: not on our doorstep, not in the country, full arms... more



#### bfdfriendsofpalestine and yorkshirepalestin... Shipley, Bradford, United Kingdom











bfdfriendsofpalestine Activists braved the cold today to protest outside Teledyne, to send a clear message: not on our doorstep, not in the country, full arms... more



■ Lowkey · Long Live Palestine Part 1









C) 191 () 7 20



bfdfriendsofpalestine Activists braved the cold today to protest outside Teledyne, to send a clear message: not on our doorstep, not in the country, full arms... more



■ Lowkey · Long Live Palestine Part 1





191







bfdfriendsofpalestine Activists braved the cold today to protest outside Teledyne, to send a clear message: not on our doorstep, not in the country, full arms... more



■ Lowkey · Long Live Palestine Part 1





191







**bfdfriendsofpalestine** Activists braved the cold today to protest outside Teledyne, to send a clear message: not on our doorstep, not in the country, full arms... more



#### bfdfriendsofpalestine and yorkshirepalestin... Shipley, Bradford, United Kingdom





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**bfdfriendsofpalestine** Activists braved the cold today to protest outside Teledyne, to send a clear message: not on our doorstep, not in the country, full arms... more

# **Shipley 28/11/2024**



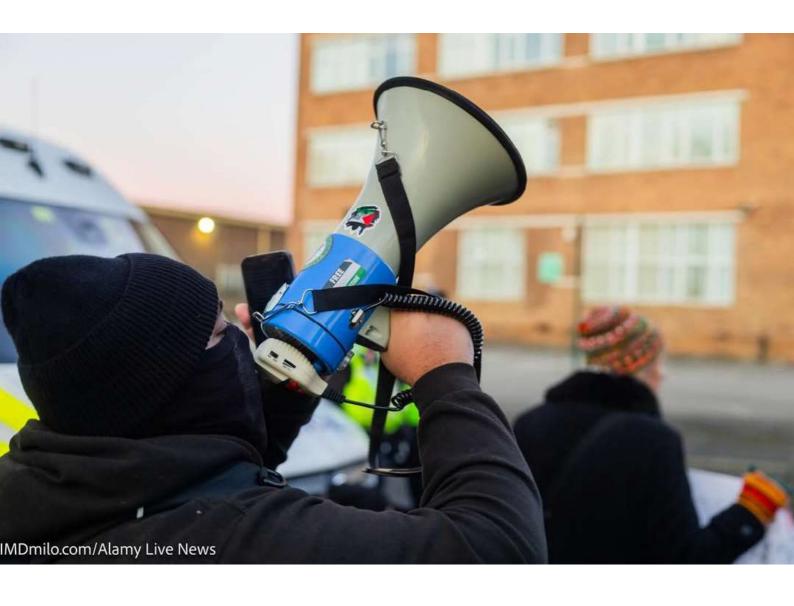






































Manan Singh Claimant First Statement Exhibit MS1

### IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

CLAIM NO.

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

	<b>Defendants</b>
FIRST 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. 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.
- 2. I make this witness statement in support of the Claimant's Claim for final injunctive relief and its Application for interim injunctive relief and an alternative service order. The Claim and Application is brought (at this time) against 7 Named Defendants and four defined categories of Persons Unknown who the Claimant reasonably apprehends will (i) trespass on the Claimant's land, (ii) interfere with the Claimant's (and their licensees' rights) to access the public highway from the Claimants' land, and (iii) cause a public nuisance by obstructing the highway.

- 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 MS1. All references to that exhibit are in the format MS1/page number.
- 5. I understand that the factual background to these proceedings shall be set out in the witness statement made by Mr Nicholas James Wargent, also in support of the Claim and Application. I will not repeat any of that content here. Rather, in this witness statement I shall address:
  - i. Why the Application for interim relief is made on short notice;
  - ii. The need for a 'Persons Unknown' injunction;
  - iii. The need for interim injunctive relief, by reference to the *American Cyanamid* and *Vastint* tests (in relation to the named Defendants);
  - iv. The need for injunctive relief against Persons Unknown, by reference to the *Wolverhampton* test;
  - v. The prohibitions sought;
  - vi. The need for alternative service orders;
  - vii. Full and frank disclosure.

## **Background**

- 6. The land that the Claimant is seeking to protect by way of injunctive relief is land on which it operates its business. Those sites are:
  - i. The 'Shipley Site' (Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW);
  - ii. The 'Lincoln Site' (Teledyne UK Limited, 168 Sadler Road, Lincoln LN6 3RS);

- iii. The 'Wirral Site' (Teledyne UK Limited, Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA);
- iv. The 'Chelmsford Site' (Teledyne UK Limited, 106 Waterhouse Lane, Chelmsford CM1 2QU);
- v. The 'Presteigne Site' (Teledyne UK Limited, Broadaxe Business Park, Presteigne LD8 2UH); and
- vi. The 'Newbury Site' (Teledyne UK Limited, Reynolds Navigation House, Canal View Road, Newbury RG14 5UR).
- 7. As explained in the witness statement of Mr Wargent, each of the above six sites is owned by the Claimant, Teledyne UK Limited. Whilst the Claimant owns and/or operates its business from other sites throughout the county, injunctive relief is sought only in relation to these six sites; of the Claimant's sites, only these six addresses have been published on the 'targets' section of the 'Palestine Action' website: <a href="https://elbitsites.uk/company/2/">https://elbitsites.uk/company/2/</a>. Further, as Mr Wargent explains in his witness statement, the 'Underground Manual' produced by Palestine Action encourages those who wish to take direct action to select a target for that action from the 'targets' section of the website (and contains a link to the same), and again expressly refers to the Claimant in the 'targets' section of the manual: <a href="https://elbitsites.uk/manual.pdf">https://elbitsites.uk/manual.pdf</a>.
- 8. The Claimant seeks injunctive relief to restrain trespass in relation to each of the six sites. The Claimant has taken a measured and proportionate approach to this Claim and Application and, at this time, seeks injunctive relief to restrain interference with the common law right to access the highway obstruction of the highway in relation to the Shipley site only.

#### **Short notice**

- 9. Following the Supreme Court's decision in *Wolverhampton City Council & Ors v London Gypsies and Travellers & Ors* [2024] 2 WLR 45, injunctive relief against newcomer persons unknown is always made on a 'without notice' basis (see paras 139, 142 ad 143).
- 10. As against the Named Defendants in this Claim, the interim relief will be sought on a short notice basis (although the Claimant of course accepts that it is still subject to the same duty of full and frank disclosure as it would be if the Application was made without any notice). Specifically, it is proposed that within the 24 hours before the hearing, notice of the Claim, Application and hearing will be given by email to the email addresses set out in paragraph 3(ii) of the draft Order (those being the known addresses of the relevant protest group).

## 11. It is proposed to give only short notice of the Application hearing because:

i. If full notice was given to the Named Defendants and relevant protest groups, the unlawful acts of protest and resulting harm apprehended by the Claimant could be accelerated and occur before injunctive relief is in place. Direct-action protest tactics are crude, and easily done with minimal planning, yet can have extremely disruptive and harmful effects. For example, a handful of protestors (or even just a single protestor) attending a site and locking on to an entrance gate can cause access to a site to be blocked, affecting (and event halting) operations at the site. Such actions can be undertaken with minimal planning, and it is clear (as will be explained in the evidence in support of this Claim and Application) that the Palestine Action cause has a large following that can be mobilised to undertake such actions (and possibly at short notice).

Further, as shall also be explained in the course of the evidence, historic acts of protests at the Claimant's sites have been incredibly destructive – if further similar acts were accelerated and undertaken upon notice of the Application being given, the Claimant could again suffer significant property damage and financial loss. The losses already incurred have been significant and are unsustainable. It is submitted that the Claimant should not be exposed to the risk of further losses being incurred prior to the securing on injunctive relief; relatedly

- ii. There has been an increased frequency in incidents of alleged unlawful protest at the Shipley Site in recent weeks, such that it is clear that there is a group of protestors who are actively interested in engaging in such acts. It is reasonable to believe that these people could mobilise at short notice and cause further disruption to access to the Shipley Site;
- iii. The Claimant apprehends further acts of protest over the Christmas period when, typically, people (including protestors) are not at work and have time at their disposal. To that end, the court will see from the witness statement of Mr Wargent that an arson attack did in fact occur on 26 December 2023 at the Shipley Site. Consequently, the Claimant has needed to move to secure this relief before the end of the court term. Further, it is notable that the incident at the Shipley Site on 2 April 2024 took place during the Easter school vacation (and the day after Easter Monday), and the incident at the Shipley Site on 30 October 2024 occurred during the October half-term school vacation.

## Persons Unknown

- 12. The Claimant seeks relief against various categories of Persons Unknown, as well as relief against Named Defendants (who have been identified by reason of their arrests at the Shipley Site throughout the course of 2024; as explained in the witness statement of Mr Wargent, efforts to identify those arrested at the Wirral Site are ongoing).
- 13. The Claimant understands that it must use reasonable endeavours to identify, name and serve individual defendants to the Claim. I understand from Counsel that, in other recent injunctions that have been granted by the Courts to restrict unlawful protest activity, the naming of defendants is often achieved in collaboration with the Police upon the arrest of protestors for related offences (such as public nuisance, aggravated trespass and public order offences).
- 14. The Claimant is also aware that where an alleged wrongdoer is identified, but remains anonymous, the Claimant will be expected to join this person as a defendant to the proceedings and identify them by way of photograph or description, and ascribe that person a cipher.

### The need for a Persons Unknown injunction

- 15. In the circumstances of this Claim, a Persons Unknown injunction is required as it is not possible to name and identify at this time all those who may attend the Claimant's sites and engage in unlawful acts of protest.
- 16. As Mr Wargent sets out in his witness statement, the primary group associated with the threatened protest (Palestine Action) is actively recruiting and seeking new members, is hosting several workshops and direct action training days, and is encouraging like-minded people to engage in such acts (and instructing them how to do so) by way of the aforementioned Underground Manual. The group clearly has a fluctuating membership. It is impossible to identify all those persons who are associated with cause and who will engage acts of unlawful protest (with identification typically occurring once a protestor is arrested), or those persons who are not yet associated with the cause but who will come to be so and engage in acts of unlawful protest.
- 17. The movement is clearly gaining momentum at this time (as evidenced by the increasing frequency of attacks on the Claimant's sites), and it is a sad reality that the situation in the Middle East continues to deteriorate, which may encourage those who are sympathetic to the Palestine Action cause to join in and engage in direct-action protest. Further, it is likely that there will be other people sympathetic to the cause, but who are not members of a specific group, that engage in direct-action and acts of protest. Where 'new-recruits' attend the Claimant's sites and engage in unlawful protest, the Claimant would be unprotected from such unlawful activity if there was not a Persons Unknown injunction in place.
- 18. As Mr Wargent also explains in his witness statement, the Palestine Action Underground Manual instructs those who engage in direct action how to keep their identity concealed (including by the use of facial coverings, loose clothing, burner phones, various ways of reducing or eliminating digital footprint, and also by suggesting various tactics to evade arrest); if these instructions are followed, it will be difficult for individuals to be identified.

<sup>&</sup>lt;sup>1</sup> Mr Wargent exhibits to his witness statement the 'workshops' page of the Palestine Action Website, accessed on 27 November 2024 and 1 December 2024, which details upcoming workshops on direct action: <a href="https://palestineaction.org/training/">https://palestineaction.org/training/</a>.

- 19. Even once the pool of named and identified defendants is settled for the purposes of a final hearing of the Claim, the nature of the protests and the above observations mean that continuing injunctive relief against the defined categories of Persons Unknown is also required. It is inevitable that there will be persons who are both unknown and unidentified (ie. 'newcomers') when final relief (if any) is granted against the Named Defendants, who will later commit the wrongs complained of in these proceedings. The grant of final relief against Named Defendants will do nothing to deter Persons Unknown.
- 20. Overall, and for the reasons that I have set out above, it is highly likely that there will be protestors that attend the Claimant's sites for the first time, and undertake unlawful protest and engage in the conduct complained of, including *after* the granting of any final injunctive relief against the Named Defendants. If the Claimant did not benefit from a Persons Unknown injunction that captures these newcomers, the Claimant would not be protected against the unlawful conduct.

## The need for interim relief: the Named Defendants

- 21. Mr Wargent, in his witness statement, has explained how and why the Claimant has named the Named Defendants to this Claim and Application, and the ongoing efforts to name further defendants. I will not repeat the same here.
- 22. The Claimant seeks interim injunctive relief against the Named Defendants, pursuant to CPR 25.1(1)(a) in the form set out in the Draft Order annexed to the Application Notice. Therefore, I shall address in brief the test for such injunctive interim relief, as set out in *American Cyanamid Co v Ethicon Ltd* [1975] AC 396 (HL), that being:
  - i. Is there a serious question to be tried; if yes
  - ii. Would damages be an adequate remedy for a party injured by the court's grant of, or its failure to grant, an injunction; and
  - iii. If not, where does the balance of convenience lie?
- 23. Counsel will of course make full submissions on the test, and how it is met in this Application, during the course of submissions.

24. I understand that Counsel will also deal with the test for precautionary relief, as found in *Vastint Leeds BV v Persons Unknown* [2019] 4 WLR 2, during the course of submissions (with reference to the relevant evidence). The relevant evidence to which Counsel will direct the court is contained primarily in Mr Wargent's witness statement, but also in part this witness statement. As the court will be aware, the *Vastint* test requires the following two questions to be asked and answered in the affirmative: (i) is there a strong probability that unless restrained by injunction the defendant will act in breach of the claimant's rights? and (ii) if the defendant did act in contravention of the claimant's rights would the resulting harm be so irreparable that, notwithstanding the grant of an immediate interim injunction (at the time of the actual infringement of the claimant's rights) to restrain further occurrence of the acts complained of, a remedy in damages would be inadequate?

#### Serious issue to be tried

- 25. I submit that there is a serious issue to be tried in these proceedings. It is clear from the evidence that has been submitted in support of the Claim and the Application that the Claim is nether frivolous or vexatious. The evidence provided by the Claimant makes a strong (and not merely a prima facie) case on the causes of action pursued.
- 26. Significant harm has already been suffered by reason of acts of unlawful protest that have occurred at the Claimant's Presteigne, Chelmsford, Wirral and Shipley Sites and specifically by reason of acts of trespass with significant aggravating features (including as recently as 2 October 2024). Further, protestors attended the Shipley Site as recently as 28 November 2024, and blocked access to the site by forming a human barrier at the entrance gate.
- 27. Furthermore, to the extent that the Claimant is seeking *quia timet* relief (i.e. for acts that it apprehends, as opposed to acts that it has already experienced), that relief is sought on the basis there has already been a significant increase in the frequency of acts of unlawful protest at the Claimant's sites, it is likely that protestors minded to engage in such action will have more time at their disposal over the Christmas holiday period, and the unfortunate continuing and deteriorating situation in the Middle East is likely to continue to fuel the cause of this protest movement. Further, the addresses of the six sites that the Claimant

seeks to protect are published and branded as 'targets' on the Palestine Action website, with the Claimant also referred to as a target in the 'Underground Manual' which instructs protestors in how to carry out direct action protest.

## Adequacy of damages

- 28. In the first instance, I submit that the granting of the interim relief sought would not cause the defendants to suffer any inconvenience or injustice for which they might be entitled to be compensated, as the interim relief sought seeks to restrain and prohibit only unlawful conduct. It follows that the defendants will not suffer any financial loss which would be required to be compensated by way of an award of damages.
- 29. In the event that the Court does not agree with me on the above, I submit that there is no loss, damage, injustice or prejudice that could not be compensated by way of an award of damages, if necessary; there is no irreversible or irremediable harm that would be suffered by the Defendants.
- 30. On the other hand, the Claimant would suffer prejudice and inconvenience should the grant of interim relief be refused, which prejudice and inconvenience cannot be adequately compensated by way of damages (or at least an award of damages in a sum that the Defendants are likely to be able to meet). In particular, as explained by Mr Wargent in his statement:
  - i. To date, the cumulative loss suffered by the Claimant by way of repair and cleanup costs following acts of trespass by protestors is currently in excess of £2.25 million (and is expected by the Claimant to rise as certain repairs are ongoing);
  - ii. There has been significant disruption to operations and productivity at sites by reason of sites being shut down because of trespassers being on site, and disruption to access at sites. For example, the business was unable to ship approximately US\$1m of sales by reason of the incident at the Presteigne Site in December 2022, and loss of revenue in excess of £300,000 was suffered by reason of the incident at the Shipley Site in April 2024. These are just two examples, with Mr Wargent giving others in his statement;

- iii. The Claimant continues to incur increasing costs of security at it sites, as well as the costs of repairing the damage caused by protestors in the course of acts of trespass. As set out by Mr Wargent in his witness statement, the cost of the additional security put in place at the Claimant's sites is in the sum of US\$2.7m for 2024 alone.
- iv. The Claimant's sites form a critical part of the UK defence supply chain. Disruption to production can weaken the UK's ability to protect its security and can place serving personnel at increased risk of shortages and equipment failure;
- v. Three of the Claimant's sites have Facility Security Clearance status, and hold assets that are classified as SECRET or above. If unauthorised persons, such as trespassing protestors, accessed these assets, that cannot be adequately compensated for by way of damages;
- vi. The continued targeting of the Claimant and its sites risks (unfair) reputational damage to the Claimant.
- 31. I respectfully urge the Court not to forget that the interim relief is sought, in large part, to restrain dangerous activities. The primary cause of action is trespass, and the acts of trespass that have already occurred included significant aggravating factors such as climbing on buildings, arson, the smashing of windows and skylights, and entering the buildings on sites. As Mr Wargent explains in his statement, many of the Claimant's sites house hazardous and sensitive materials and equipment. The protestors put themselves and others at physical risk by such actions; physical risk cannot be adequately compensated for by way of damages.
- 32. It is not just the Claimant who will suffer harm and loss as a result of the apprehended unlawful protest activity. Disruption to the highway outside of the Shipley Site could have a particular impact on surrounding businesses these sites and their neighbours are served by single (and effectively a dead-end) road, such that access to these sites could also be compromised by disruption on the highway. Further, if mass disruption was caused, such

that the access roads to either of these sites was completely blocked, that could have an adverse impact on the A6038 (at the Shipley Site).

- 33. It is also impossible for an undertaking in damages to be obtained from Persons Unknown. Further still, even where the Claimant has been able to identify the Defendants, there is no guarantee that they would be able to meet an award of damages or be able to give the necessary undertaking. In fact, I would suggest that it is incredibly unlikely that any Defendant could meet such an award or give such an undertaking, given the value of the losses apprehended by the Claimant.
- 34. Therefore, I submit that whilst no harm would be suffered by the Defendants, for which they might be entitled to be compensated, if they did in fact suffer any harm, damages would be an adequate remedy for the same. Conversely, the Claimant, if interim relief was refused, would suffer harm which could not be adequately be compensated by way of damages and, even if it could be so compensated, it is not clear whether the Defendants could even make good on the remedy.

#### Balance of convenience

- 35. The Claimant is not trying to prohibit or restrain peaceful and lawful protest. What the Claimant seeks to prohibit and restrain is protest activity that goes beyond what is peaceful and lawful.
- 36. I submit that the balance of convenience lays firmly in favour of granting the interim relief sought. In particular:
  - i. The relief sought does not interfere with the Defendants' right to protest peacefully and lawfully – they may still attend the Claimant's sites and protest, but must do so without trespassing and, in the case of the Shipley Site, without obstructing the highway or interfering with the Claimant's common law right to access the highway;
  - ii. The relief sought only seeks to restrain unlawful conduct (such as obstruction of the highway, trespass and interference with access rights);

- iii. Without the grant of the relief sought, the Claimant and its business will experience significant disruption and financial loss.
- 37. On the whole, I submit that the relief sought represents a fair balance between the rights of the Defendants (including their Article 10 and Article 11 rights, where applicable, which are qualified rights), and the rights of the Claimant. The relief sought by the Claimant seeks to provide boundaries within which the protestors may engage in meaningful protest, whilst safeguarding the Claimant's rights.

### Section 12 Human Rights Act 1998

- 38. The Court is reminded that it must consider section 12 of the Human Rights Act 1998, which provides that:
  - (1) This section applies if a court is considering whether to grant any relief which, if granted, might affect the exercise of the Convention right to freedom of expression.
  - (2) If the person against whom the application for relief is made ("the respondent") is neither present nor represented, no such relief is to be granted unless the court is satisfied—
  - (a) that the applicant has taken all practicable steps to notify the respondent; or
  - (b) that there are compelling reasons why the respondent should not be notified.
  - (3) No such relief is to be granted so as to restrain publication before trial unless the court is satisfied that the applicant is likely to establish that publication should not be allowed.
- 39. Counsel will make submissions on the relevance and application of section 12 at the hearing of the Application.

### Undertaking in damages

40. I am instructed that the Claimant can and does offer an undertaking in the sum of £50,000, and that the Claimant is able to meet this undertaking. I note from the accounts filed by the Claimant at Companies House that it recorded profits after tax for the year ended 31 December 2023 in excess of £29.7 million.

#### Necessary and proportionate

41. Finally, I submit that the interim relief sought strikes the right balance between the rights of the Defendants to protest, and the rights of the Claimant. The relief sought will allow the defendants to exercise their Article 10 and Article 11 rights and engage in meaningful protest, whilst also ensuring that the Claimant is able to go about its day-to-day business with only minimal disruption, and to be protected from avoidable damage to its property and financial risk and, in some cases, dangerous activity.

#### Persons Unknown: the Wolverhampton test

- 42. Counsel will of course in submissions deal with the *Wolverhampton* test and guidance in relation to the Claim and Application against Persons Unknown, and how the same is met in this case.
- 43. For the purposes of this witness statement, I highlight that the test to be applied when considering and grating relief against newcomer Persons Unknown is, in effect, a higher threshold than is applied under *American Cyanamid* (which does not apply in such cases). Namely, there must be a 'compelling justification' for the order sought (para 167).
- 44. Further, as required by the *Wolverhampton* guidance, the order sought at the return date will be temporally limited to five years, and will be subject to an annual review. I understand that this is the same Order than has been made in relation to Persons Unknown in many recent protestor injunctions. For example, I exhibit the Orders made in:
  - i. Arla Foods Limited & Anr v Persons Unknown & Ors [2024] EWHC 1952 (Ch)
     MS1/1 23;

- ii. Thurrock Council & Anr v Adams & Ors [2024] EWHC 2576 (KB) MS1/24 61;
- iii. London City Airport Limited & Anr v Persons Unknown [2024] EWHC 2557 (KB)MS1/62 77; and
- iv. Heathrow Airport Limited v Persons Unknown & Ors [2024] EWHC 2599 (KB) MS1/78 89.

### The prohibitions sought

- 45. The prohibitions in the draft Order have been crafted as they have to (i) match the causes of action that have been pleaded, (ii) respond to the specific unlawful acts of protest that have been experienced and which are apprehended and (iii) ensure that lawful acts of protest are not captured. Accordingly, it is submitted that the prohibitions sought are proportionate.
- 46. There have, in recent years, been several high-profile direct action protest campaigns (including, but not limited to, those conducted by groups such as Just Stop Oil and Animal Rising formerly known as Animal Rebellion). Those groups and protest movements have by now a well-known arsenal of direct action tactics, which include (but are not limited to):
  - i. Entering oil terminals, fuel refineries or dairy and dairy distribution sites (depending on the protest movement). Extensive acts of criminal damage have often been caused when protestors enter and occupy the sites and/or protestors often lock onto infrastructure at the sites (including in the roofs and at height);
  - Sitting or standing on roads to obstruct the same and/or obstructing access to specific sites;
  - iii. Protestors gluing themselves, or otherwise 'locking on', to roads, road furniture, private land and fencing, each other and vehicles (including HGVs which they have 'on-boarded') often with the intention to obstruct roads or accessways;
  - iv. Tunnelling under the highway.

- 47. To date, protestors operating under the banner of Palestine Action and other related groups have deployed some (but not all) of these tactics, and the prohibitions in the draft order have been crafted accordingly.
- 48. Prohibitions against the interference with the Claimant's common law right to access the highway and obstruction of the highway are sought in relation to the Wirral and Shipley Sites. As is explained in Mr Wargent's statement, acts of protest of this nature are becoming increasingly common at the Shipley Site; incidents have occurred on 30 October and 20 and 28 November 2024 in which access to the site was blocked, and the location and single access points to the site makes it especially vulnerable to such a blockade. Further, it is known that blocking access and obstruction of the highway is a key feature of direct action protest. If the Claimant sought only a prohibition against trespass and interference with the common law right to access the highway, it is entirely likely that the protest would just be moved from the gates of the site and further down the carriageway of the highway, such that it would have the same effect, and would not be caught by the injunction and prohibited.
- 49. In summary, it is submitted that the Claimant has taken a proportionate approach and sought only the prohibitions that are necessary at this time (that being trespass prohibitions at all six sites, and the additional common law right and public nuisance prohibitions for the Shipley Sites). If it transpires that further and additional relief is required, the Claimant understands that it would need to make a variation application to seek the same.

## **Alternative service**

50. Finally, the Claimant seeks alterative service orders for service of the Claim Form, Application for an Interim Injunction, the supporting documents relied on in this Claim, and this Order. The terms of the order sought is set out in the draft Order annexed to the Claim Form and Application Notice. I shall not repeat the same here, but refer the Court to the Draft Order.

51. I submit that the order sought is such that the measures can be reasonably expected to bring

the proceedings and injunction to the Defendants' attention (as per Cameron v Liverpool

Victoria Insurance Co Ltd [2019] UKSC 6). In particular:

i. It can be reasonably expected that placing clear and unequivocal signs on the

perimeter of the Claimant's Sites, which advise of the existence of the injunction

and provide the link and QR code by which the injunction and Claim documents

may be accessed, will ensure that anyone who attends the Claimant's Sites to protest

will become aware of the injunction and the proceedings. I exhibit at MS1/90 a

draft of the sign that the Claimant proposes to place on the access points to, and

around the perimeter of, its sites. The sign reads:

WARNING INJUNCTION

This area is subject to a High Court injunction which places restrictions on some

protest activities. You must not enter this site.

Breach of the injunction could lead to imprisonment.

For details, please see: [insert link and QR code]

By the time the Application for interim relief is heard, these signs will already be

in production to ensure that they can be distributed to the Claimant's sites and

erected to ensure that any injunction is served in good time before the Christmas

holiday period.

ii. The groups that have so far identified themselves as being interested in acts of

protest at the Claimant's Sites are Palestine Action, Bradford Friends of Palestine

and the Palestine Solidarity Campaign (specifically the Chelmsford Branch). It can

be reasonably expected that by sending the injunction and Claim documents to the

email addresses that the Claimant has been able to find for those groups, including

the applicable regional branches, the injunction and proceedings will come to the

attention of that group and its membership (who are the persons likely to engage in

acts of protest). To that end, the proposed email addresses are:

info@palestineaction.org;
media@palestinecampaign.org;
info@palestinecampaign.org;
pscchelmsford@gmail.com;
liverpoolfopal@gmail.com;
bfdfriendsofpalestine@yahoo.com;

actions@palestineaction.org;
branches@palestinecampaign.org;
palestinesolidaritybradford@gmail.com;
lincolnpalestine@gmail.com;
pscshrop@gmail.com;

- iii. It can be reasonably expected that a person who is intending to protest at the Claimant's sites would have an interest in the Claimant and its business and visit the Claimant's website. Therefore, placing a copy of the injunction and Claim documents on the website can be reasonably expected to bring the injunction and proceedings to the Defendants' attention. In practice, a link to a webpage that has been set up for the specific purpose of making the documents available will be provided on the Claimant's main website; finally
- iv. Where addresses for a Defendant (for which, see below) are known, it can be reasonably expected that delivering the injunction and Claim documents to those addresses will bring the injunction and the proceedings to the Defendant's attention.
- 52. In any event, the above clauses are to be read conjunctively and not disjunctively. The Claimant is aware that personal service of any injunction order would of course be preferable; the alternative service provision does not oust the possibility that personal service could still be effected if and when a protestor attends one of the Claimant's sites, and it is safe to effect service in that manner.
- 53. Finally, where a Defendant requests service by email, or where a solicitor is instructed, service by email or by service on the solicitor respectively can be reasonably expected to bring the injunction and proceedings to the defendant's attention.
- 54. As Mr Wargent has explained in his witness statement, the Claimant does not (at the time of finalising this statement) have addresses for any of the Named Defendants. However, to obtain addresses in order to be able to assist with service, disclosure applications pursuant to CPR 31.17 are being made, with the Respondents to those Applications being West

Yorkshire Police and Merseyside Police. It is hoped that the necessary data will be obtained in time for any return date hearing in this Application.

### Full and frank disclosure

- 55. Both I and the Claimant acknowledge that, following *Wolverhampton*, the relief against Persons Unknown is always without notice. Further, the interim relief is being sought against the Named Defendants on a short notice basis. Accordingly, a duty of full and frank disclosure arises.
- 56. With that in mind, I should emphasise the following:
  - i. None of those persons who have attended and blocked access to the Shipley Site on have been named as Defendants. No arrests were made by West Yorkshire Police, such that the identities of these persons are not known. The incidents were not documented on the Palestine Action website (the protest appears to have been organised by the Bradford Friends of Palestine group), nor were any photographs captured by the Claimant. In relation to 30 October 2024, there is a very short video on the Bradford Friends of Palestine Instagram page, to which Mr Wargent has referred in his witness statement, which shows the protestors outside the gate to the site. However, they all appear to be wearing either face coverings or hoods/hats (or both), or are facing away from the camera as it pans around, such that identification of these persons is impossible.

The quality of the Claimant's CCTV imaging also does not assist with identification. For example, a still CCTV image has been obtained of a female protestor, but she is wearing a black face covering and loose-fitting black clothing with no distinctive markings. Her only distinguishing feature is that she appears to have blonde hair. The Claimant has taken the view that the image is not of sufficient quality to enable the female to be given a cipher and added to the proceedings as a named defendant (with the image attached to the Claim Form). It would be impossible to tell if any other female who attended the Claimant's sites, and who happened to have blonde hair, was in fact the woman in the image;

- ii. The Claimant has named as defendants only those persons who have been arrested whilst protesting at the Claimant's site throughout 2024 (i.e. it has not named those who were arrested throughout 2022 and 2023). The Claimant has taken that approach as those arrested in 2022 and 2023 have not re-attended the Claimant's sites. The Claimant does not know anything of the current status of these persons (including whether they continue to engage in acts of direct action protest under the banner of Palestine Action or similar), and therefore does not at this time apprehend their return to the Claimant's sites. In contrast, those arrested during 2024 are clearly still active direct action protestors, with an interest in protesting against the Claimant's business, and a tendency to engage in unlawful acts of protest;
- iii. Four protestors were arrested at the Shipley Site on 15 May 2024. Only three of those persons have been named as Defendants. The fourth has been remanded into custody as they were involved in another Palestine Action protest at Barclays Bank (which has been the target of repeated protests that includes actions such as spray painting and the smashing of windows). As that person remains in custody, the Claimant does not reasonably apprehend that they will re-attend the Claimant's sites and engage in acts of unlawful protest at this time;
- iv. On 11 May 2024, an incident occurred at one of the Claimant's sites in Scotland in which four people attended the site. Some windows were broken and there was some spray painting. The incident has not been linked to the Palestine Action group. Further, as this incident occurred at a site in Scotland, relief would not be sought in relation to this site in this Claim.
- v. The Claimant is not yet able to fully consider its position in relation to the Wirral Site, it not having received necessary information from a third-party to enable it to do so. The Claimant intends to keep the relief sought in relation to the Wirral Site under review in advance of the return date.

#### **Conclusion**

57. It is clear that the threat of criminal prosecution alone is not sufficient to protect the Claimant's rights and guard against the acts of unlawful protest (especially aggravated

trespass) that have been suffered by the Claimant. Therefore, and for the reasons set out in

this witness statement, I respectfully ask the Court to:

i. Grant interim injunctive relief against the Named Defendants, with a return date set

for mid-January;

ii. Grant interim injunctive relief against Persons Unknown until the return date (at

which a five-year order with an annual review will be sought);

iii. Make the alternative service order sought.

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

Manan Singh

Dated this 13th day of December 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

CLAIM NO.

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

	<b>Defendants</b>
EXHIBIT MS1	

This is Exhibit MS1 referred to in the First Witness Statement of Manan Singh.



IN THE HIGH COURT OF JUSTICE BUSINESS AND PROPERTY COURTS OF ENGLAND AND WALES BUSINESS LIST (ChD)

## In the matter of an Injunction

BL-2022-001396

Before Jonathan Hilliard KC (sitting as a Deputy Judge of the High Court) 26 July 2024

BETWEEN:

- (1) ARLA FOODS LIMITED
- (2) ARLA FOODS HATFIELD LIMITED

**Claimants** 

-and-

- (1) PERSONS UNKNOWN WHO ARE, WITHOUT THE CONSENT OF THE CLAIMANTS, ENTERING OR REMAINING ON LAND AND IN BUILDINGS ON ANY OF THE SITES LISTED IN SCHEDULE 2 OF THE CLAIM FORM ("the Sites"), THOSE BEING:
- a. "THE AYLESBURY SITE" MEANING ARLA FOODS LIMITED'S SITE AT AYLESBURY DAIRY, SAMIAN WAY, ASTON CLINTON, AYLESBURY HP22 5EZ, AS MARKED IN RED ON THE PLANS AT ANNEXE 1 TO THE CLAIM FORM;
- b. "THE OAKTHORPE SITE" MEANING ARLA FOODS LIMITED'S SITE AT OAKTHORPE DAIRY, CHEQUERS WAY, PALMERS GREEN, LONDON N13 6BU, AS MARKED IN RED ON THE PLANS AT ANNEXE 2 TO THE CLAIM FORM;
  - c. "THE HATFIELD SITE" MEANING ARLA FOODS HATFIELD LIMITED'S SITE AT HATFIELD DISTRIBUTION WAREHOUSE, 4000 MOSQUITO WAY, HATFIELD BUSINESS PARK, HATFIELD, HERTFORDSHIRE AL10 9US, AS MARKED IN RED ON THE PLANS AT ANNEXE 3 TO THE CLAIM FORM; AND
- d. "THE STOURTON SITE" MEANING ARLA FOODS LIMITED'S DAIRY AT PONTEFRACT ROAD, LEEDS LS10 1AX AND NATIONAL DISTRIBUTION CENTRE AT LEODIS WAY, LEEDS LS10 1NN AS MARKED IN RED ON THE PLANS AT ANNEXE 4 TO THE CLAIM FORM
  - (2) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE OBSTRUCTING ANY VEHICLE ACCESSING FROM THE HIGHWAY THE SITES LISTED IN SCHEDULE 2 OF THE CLAIM FORM

- (3) PERSONS UNKNOWN WHO FOR THE PURPOSE OF PROTESTING ARE OBSTRUCTING ANY VEHICLE ACCESSING THE HIGHWAY FROM ANY OF THE SITES LISTED IN SCHEDULE 2 OF THE CLAIM FORM
- (4) PERSONS UNKNOWN WHO ARE FOR THE PURPOSE OF PROTESTING CAUSING THE BLOCKING, SLOWING DOWN, OBSTRUCTING, OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF, OR ALONG THE ROADS LISTED AT ANNEXE 1A, 2A, 3A, AND 4A TO THE CLAIM FORM
- (5) PERSONS UNKNOWN WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES ON TO ANY VEHICLE WHICH IS ACCESSING OR EXITING THE SITES LISTED IN SCHEDULE 2 OF THE CLAIM FORM
- (6) PERSONS UNKNOWN WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES ON TO, ANY VEHICLE WHICH IS TRAVELLING TO OR FROM ANY OF THE SITES LISTED IN SCHEDULE 2 OF THE CLAIM FORM)
  - (7) 34 OTHER NAMED DEFENDANTS LISTED AT SCHEDULE 1 OF THIS ORDER

			<b>Defendants</b>
	ODDED		-
	ORDER		_

#### **PENAL NOTICE**

IF YOU, THE ABOVE NAMED DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

**UPON** the hearing of the Claimants' Claim for final injunctive relief against the named Defendants, and a continuation of the injunction Order against Persons Unknown

**AND UPON** all of the named Defendants other that the Fortieth Defendant settling the proceedings by giving undertakings to the Court

**AND UPON** hearing Counsel for the Claimants, Caroline Bolton and Natalie Pratt, without any attendance by or on behalf of the remaining Fortieth Defendant or Persons Unknown

**AND UPON** the Court reading the application and the witness statements listed in Schedule A

**AND UPON** the Court having particular regard to the importance of the Defendants' Article 10 and Article 11 Convention rights to freedom of expression and freedom of lawful assembly

**AND UPON** the Court being satisfied that the order sought does not prohibit peaceful protest

**AND UPON** the Court considering its discretion to grant injunctive relief pursuant to s.37(1) Senior Courts Act 1981 and considering it just and convenient to do so

## IT IS ORDERED THAT:

#### **Definitions**

- 1. For the purpose of this Order:
  - 1.1 **"The Roads"** shall mean the Roads identified in Annexe 1A, 2A, 3A, 4A to this Order and to the Claim Form, as marked in purple on the maps at Annexes 1A, 2A, 3A, and 4A to this Order and to the Claim Form.
  - 1.2 "The Aylesbury Site" shall mean Arla Foods Limited's site at Aylesbury Dairy, Samian Way, Aston Clinton, Aylesbury HP22 5EZ, as marked in red on the plans at Annexe 1 to this Order and to the Claim Form ("the Aylesbury Site Plan").
  - 1.3 "The Oakthorpe Site" shall mean Arla Foods Limited's site at Oakthorpe Dairy, Chequers Way, Palmers Green, London N13 6BU, as marked in red on the plans at Annexe 2 to this Order and to the Claim Form ("the Oakthorpe Site Plan").
  - 1.4 "The Hatfield Site" shall mean Arla Foods Hatfield Limited's site at Hatfield Distribution Warehouse, 4000 Mosquito Way, Hatfield Business Park, Hatfield, Hertfordshire AL10 9US, as marked in red on the plans at Annexe 3 to this Order and to the Claim Form ("the Hatfield Site Plan").
  - 1.5 **"The Stourton Site"** shall mean Arla Foods Limited's Dairy at Pontefract Road, Leeds LS10 1AX and National Distribution Centre at Leodis Way, Leeds LS10 1NN as marked in red on the plans at Annexe 4 to this Order and to the Claim Form ("**the Stourton Site Plan**").

#### **INJUNCTION**

#### **Prohibitions**

- 2. Until and including 26 July 2029, the **First to Sixth Defendants (Persons Unknown)** and the **Fortieth Defendant** and each of them (whether by themselves or by instructing, encouraging or allowing any other person), are <u>forbidden</u> from:
  - 2.1 Entering into, entering onto, tunnelling under or remaining on the following Sites:
    - (i) The Aylesbury Site as marked in red on the attached Aylesbury Site Plan at Annexe 1;
    - (ii) The Oakthorpe Site as marked in red on the attached Oakthorpe Site Plan at Annexe 2;
    - (iii) The Hatfield Site as marked in red on the attached Hatfield Site Plan at Annexe 3;
    - (iv) **The Stourton Site** as marked in red on the attached **Stourton Site Plan** at Annexe 4.
  - 2.2 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to or from the highway at the following sites:
    - (i) The Aylesbury Site as marked in red on the attached Aylesbury Site Plan at Annexe 1;
    - (ii) The Oakthorpe Site as marked in red on the attached Oakthorpe Site Plan at Annexe 2;
    - (iii) The Hatfield Site as marked in red on the attached Hatfield Site Plan at Annexe 3; and
    - (iv) The Stourton Site as marked in red on the attached Stourton Site Plan at Annexe 4.
  - 2.3 Approaching, slowing down, or obstructing any vehicle on or moving along or accessing **the Roads** identified in Annexes 1A, 2A, 3A, 4A to this Order for the purpose of:
    - (i) disrupting vehicular access to or from The Aylesbury Site, The Oakthorpe Site, The Hatfield Site, and/or The Stourton Site; and
    - (ii) protesting.
  - 2.4 Entering, climbing onto, climbing into, or climbing under any vehicle travelling to or from **The Aylesbury Site**, **The Oakthorpe Site**, **The Hatfield Site**, and/or **The Stourton Site**:

- (i) for the purpose of protesting; and
- (ii) and without the permission of the registered keeper of the vehicle.
- 2.5 Affixing themselves ("locking on") to any vehicle on, entering or exiting **The Aylesbury Site**, **The Oakthorpe Site**, **The Hatfield Site**, and/or **The Stourton Site** where the "locking on" is for the purpose of protesting.
- 2.6 Affixing themselves ("locking on") or any other items to any of **the Roads** or any other person or object on, under or over **the Roads** for the purpose of:
  - (i) disrupting vehicular access to or from **The Aylesbury Site**, **The Oakthorpe Site**, **The Hatfield Site**, and/or **The Stourton Site**; and
  - (ii) protesting.
- 2.7 Erecting any structure on **the Roads** for the purpose of:
  - (i) disrupting vehicular access to or from Arla Foods Limited at The Aylesbury Site, The Oakthorpe Site, The Hatfield Site, and/or The Stourton Site; and
  - (ii) protesting.

#### **Alternative service**

- 3. Pursuant to CPR rules 6.15 and 6.27, the Claimants have permission, in addition to personal service, or in the alternative to personal service, to serve the **First to Sixth Defendants (Persons Unknown)** and the **Fortieth Defendant** with this Order and any further documents in the Claim by **all** of the following methods (with paragraph 3.1 to 3.5 to be treated conjunctively):
  - 3.1 **Websites:** placing a web link on the First Claimant's website and Facebook page at which a copy of the re-Amended Claim Form, Application(s) for an Interim Injunction, the supporting documents relied on in this Claim, and this Order can be accessed; and
  - 3.2 **Email:** sending a copy of this Order to Animal Rebellion and Extinction Rebellion at the following email addresses:

actions@animalrebellion.org; fundraising@animalrebellion.org; integration@animalrebellion.org; talks@animalrebellion.org; global@animalrebellion.org; localgroups@animalrebellion.org; media@animalrebellion.org; pressoffice@animalrebellion.org; finance@animalrebellion.org; governance@animalrebellion.org; techsupport@animalrebellion.org; press@extinctionrebellion.uk; AnimalRisingLegal@protonmail.com.

- and providing a web link at which they can access documents relied on in this Claim and this Order; and
- Post: where an address of a named Defendant is known to the Claimants, by posting a copy of this Order together with a covering letter through the letterbox of the named Defendant's address (or by leaving in a separate mailbox) with a notice affixed to the front door if necessary, drawing the recipient's attention to the fact that the package contains a court order. If the premises do not have a letterbox, or mailbox, or the package will not fit through the letterbox, a package may be left next to the front door and a notice containing this Order may be affixed to the front door marked with a notice drawing the recipient's attention to the fact that the package contains a court order and should be read urgently. The notices shall be given in the form set out in Schedule 2 to this Order; and
- 3.4 **Text messages:** sending a text message to any named Defendant for whom the Claimants have a mobile telephone number, notifying them that an injunction order has been granted against them and providing a web link at which the Defendant can access the re-Amended Claim Form, Application(s) for an Interim Injunction, the supporting documents relied on in this Claim, and this Order. The notice shall be given in the form set out in Schedule 2 to this Order; and
- 3.5 Placing signs and/or notices: on the perimeter of The Aylesbury Site, The Oakthorpe Site, The Hatfield Site, and The Stourton Site providing a web link and/or QR code at which the Amended Claim Form, Application(s) for an Interim Injunction, the supporting documents relied on in this Claim, and this Order can be found; OR
- 3.6 **Where requested:** the re-Amended Claim Form, Application(s) for an Interim Injunction, the supporting documents relied on in this Claim, and this Order may be served by email where the Defendant has requested that they be served by email and by sending the email to the address provided by the Defendant; **OR**
- 3.7 **Lawyers:** By serving any solicitor acting for a Defendant who has filed a notice of acting in these proceedings.
- 4. The **deemed date of service** of any documents referred to in paragraph 3 above shall be the day on which service of the document or documents is completed in accordance with paragraph 3 above.

#### **FURTHER DIRECTIONS**

## Liberty to apply

5. The First to Sixth Defendants or any person other than the named Defendants may each of them apply to the Court on 48 hours prior written notice (not to include weekends or public holidays) to both the Court and the Claimants to vary or discharge this Order (or so much of it as affects that person).

6. Any person applying to vary or discharge this order must provide their full name and address for service.

#### **Review of this Order**

7. The Order against the **First to Sixth Defendants (Persons Unknown)** shall be reviewed at a hearing no later than **24 July 2025** (or as near to that date as the court can reasonably accommodate), with a time estimate of one day, unless the Claimants indicate to the Court that they do not seek an extension of the Order, upon which the Order will expire as against Persons Unknown only. The Claimants must file and serve in accordance with paragraph 3 above any evidence upon which they intend to rely at the review hearing by 4pm on 10 July 2025. Any other person who would like to participate in the review hearing must also file and serve on the Claimants any evidence upon which they intend to rely at the review hearing by 4pm on 10 July 2025.

#### Costs

8. No Order as to costs.

#### **GUIDANCE NOTES**

#### Effect of this Order – the Defendants

1. A Defendant who is an individual and who is ordered not to do something must not do it him or herself or in any other way nor must he/she do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

#### **Interpretation of this Order**

- 2. In this Order references to 'the Defendant' means any or all of them (unless expressly stated otherwise).
- 3. A requirement to serve on 'Defendant' means on each of them. However, the Order is effective against any Defendant on whom it is served in accordance with this Order.
- 4. An Order requiring 'the Defendant' not to do anything applies to all Defendants.
- 5. This Order contains the following schedules and annexes
  - (i) Schedule A-Witness Statements;
  - (ii) Schedule 1-List of Named Defendants;
  - (iii) Schedule 2-Notices;
  - (iv) Annex 1 the plan of the Aylesbury Site;
  - (v) Annex 2 the plan of the Oakthorpe Site;
  - (vi) Annex 3 the plan of the Hatfield Site;
  - (vii) Annex 4 the plan of the Stourton Site;
  - (viii) Annexe 1A, 2A, 3A, and 4A-The List of "The Roads".

#### **Communications with the Court**

6. All communications with the Court about this Order should be sent to the Rolls Building at 7 Rolls Buildings, Fetter Lane, London, EC4A 1NL. The telephone number is 020 79476690. The Email address is <a href="mailto:ChanceryJudgesListing@justice.gov.uk">ChanceryJudgesListing@justice.gov.uk</a>. The offices are open between 10am and 4pm Monday to Friday.

#### **SCHEDULE A-WITNESS STATEMENTS**

- 1. The Court read the following witness statements filed on behalf of the Claimants:
  - i. Joanne Taylor;
  - ii. Melanie Savage (first and second witness statements);
  - iii. David Dons;
  - iv. Anne-Frances Ball;
  - v. Afshin Amirahmadi;
  - vi. Nicholas McQueen (first to eleventh witness statements, inclusive);
  - vii. Samantha Sage;
  - viii. James Damarell.

#### Service of this Order

This Order will be served by the Claimants on the Defendants. The Court has provided a sealed copy of this order to the Claimants' legal representative, Walker Morris at email <a href="mailto:nick.mcqueen@walkermorris.co.uk">nick.mcqueen@walkermorris.co.uk</a>

## SCHEDULE 1-NAMED DEFENDANTS

Defendant No.	
7	Xanthe Wells
8	Stephen Bone
9	Kim Wainwright
10	Bryan Mongelli
11	Nikola Muratova
12	Radim Sandr
13	Robert King-Houston
14	Vojtech Palencar
15	Jan Kratky
16	Anna Wilkinson
17	Lucia Bree Alexander
18	Rueben Lemer
19	Solene Rashleigh
20	Cristina Acosta
21	Sined Singhage
22	Vaclav Opatril
23	Cathy Eastburn
24	Marina Ballestra Candel
25	Hamish Gardner
26	Euphemia Smith
27	Dev Vyas
28	Vita Sleigh
29	Gabriella Ditton
30	Robert Smith
31	Emily Camp
32	Gemma Barnes
33	Marcus Decker
34	Robert Allan
35	Theresa Higginson
36	Rachel Steele
37	Alexander Bourke
38	Rosa Sharkey
39	Rik Jansen
40	Person identified in image 1 at Schedule 1A to the re-Amended Claim Form

#### **SCHEDULE 2-NOTICES**

On the package containing this Order:

"VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE DOWNLOAD IT FROM <a href="https://www.walkermorris.co.uk/arla-injunction/">https://www.walkermorris.co.uk/arla-injunction/</a> OR CALL 0113 283 2500"

to affix to the front door when the package has been posted through the letterbox or placed in a mailbox:

"VERY URGENT: A PACKAGE HAS BEEN LEFT THAT CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE DOWLOAD IT FROM <a href="https://www.walkermorris.co.uk/arla-injunction/">https://www.walkermorris.co.uk/arla-injunction/</a> OR CALL 0113 283 2500"

For service by text message:

"VERY URGENT: A HIGH COURT INJUNCTION ORDER HAS BEEN MADE AGAINST YOU, THE LINK PROVIDED IN THIS TEXT MESSAGE CONTAINS AN ORDER OF THE HIGH COURT AND THE SUPPORTING DOCUMENTS RELIED UPON BY THE CLAIMANTS. YOU SHOULD IMMEDIATELY SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE CALL 0113 283 2500"



# ANNEXE 1A ROADS AT THE AYLESBURY SITE

- SAMIAN WAY
   COLLEGE ROAD NORTH
   MODEL ROW



## ANNEXE 2 THE OAKTHORPE SITE



## ANNEXE 2A ROADS AT THE OAKTHORPE SITE

- 1. OSTLIFFE ROAD
- 2. CHEQUERS WAY
- 3. OWEN ROAD
- 4. MITCHELL ROAD

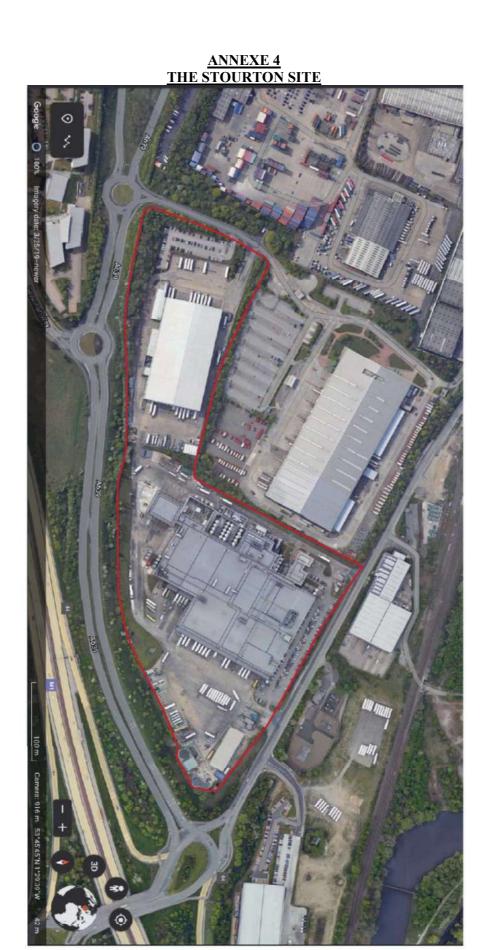




# ANNEXE 3A ROADS AT THE HATFIELD SITE

- 1. HATFIELD AVENUE
- 2. GYSPY MOTH AVENUE3. MOSQUITO WAY





# ANNEXE 4A ROADS AT THE STOURTON SITE

- 1. A639
- 2. PONTEFRACT ROAD3. LEODIS WAY



## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

<u>In the matter of an application for an injunction made pursuant to the Local Government</u> Act 1972, s222 and the Highways Act 1980, s130(5)

Before the Honourable Mr Justice Julian Knowles 12 July 2024

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL



-and-

### (1) MADELINE ADAMS

(2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

(223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM

(225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<u>Defendan</u>
ORDER	

#### PENAL NOTICE

IF YOU, PERSONS UNKNOWN, DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED

#### POWER OF ARREST

THIS ORDER CONTAINS A POWER OF ARREST ATTACHED AT SCHEDULE 2 OF THIS ORDER FOR BREACH OF PARAGRAPHS 2.1 TO 2.16 OF THIS ORDER PURSUANT TO SECTION 27 OF THE POLICE AND JUSTICE ACT 2006. ANY PERSON CAUGHT BREACHING PARAGRAPHS 2.1 TO 2.16 OF THIS ORDER MAY BE ARRESTED AND BROUGHT BEFORE THE COURT

**UPON** the review of the injunction Order granted by Foster J and dated 26 January 2023 insofar as it applies to Persons Unknown (only)

AND UPON hearing Caroline Bolton and Natalie Pratt of counsel and no person appearing for or on behalf of the Defendants

#### IT IS ORDERED THAT:

#### **Definitions**

- 1. For the purpose of this Order:
  - 1.1 "The Roads" shall mean the Roads identified in Annexe 1 to this Order and to the Claim Form as marked in red on the maps at Annexes 2 and 3 to this Order and to the Claim Form.
  - 1.2 "The Administrative Area of Thurrock" shall mean the administrative area as marked with the purple line on the map at Annexe 2 to this Order and to the Claim Form.
  - 1.3 "The Administrative Area of Essex" shall mean the administrative area as marked with the pink line on the map at Annexe 3 to this Order and to the Claim Form.
  - 1.4 "The Administrative areas of Thurrock and Essex" shall mean those areas in 1.2 and 1.3 above.
  - 1.5 "The Fuel Terminals" shall refer to the following four sites collectively:
    - 1.5.1 The Navigator Fuel Terminal, Oliver Road, West Thurrock RM20 3ED;
    - 1.5.2 The Esso Fuel Terminal, London Road, Purfleet RM19 1RS;
    - 1.5.3 Exolum Storage Ltd, off Askews Farm Lane, London Road, Grays RM17 5YZ; and
    - 1.5.4 Oikos Storage Limited, Haven Road, Hole Haven Wharf, Canvey Island, Essex SS8 0NR.

#### **INJUNCTION**

#### **Prohibitions**

- Until and including 12 July 2029, and subject to paragraph 6 below, the 223<sup>rd</sup> to 229<sup>th</sup>
   Defendants (Persons Unknown) (whether by themselves or by instructing, encouraging or allowing any other person) are <u>forbidden</u> from:
  - 2.1 Blocking, slowing down, endangering, obstructing or otherwise interfering with the flow of traffic onto or along or off **the Roads** for the purpose of protesting.
  - 2.2 Blocking, slowing down, endangering, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimants, for the purpose of protesting.
  - 2.3 Entering, climbing onto, climbing into, climbing under **any vehicle** travelling on to, off or along **the Roads** or accessing or exiting the Roads: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
  - 2.4 Entering, climbing onto, climbing into, climbing under any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
  - 2.5 **Affixing themselves** ("locking on") to any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads.
  - 2.6 Affixing themselves ("locking on") to any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants, where the "locking on" is for the purpose of protesting.
  - 2.7 Affixing themselves ("locking on") or any other items to any of the Roads or any other person or object on, under or over the Roads.
  - 2.8 Affixing themselves ("locking on") or any other items to any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants where the "locking on" is for the purpose of protesting.
  - 2.9 Erecting any structure on the Roads.
  - 2.10 **Tunnelling**, excavating, drilling or digging under or adjacent to the Roads.
  - 2.11 Occupying existing tunnels under the Roads for the purpose of protesting.
  - 2.12 Causing damage to the surface of or to any apparatus on or adjacent to the Roads or any vehicle on the Roads for the purpose of protesting.

- 2.13 Abandoning any vehicle or item on any Roads, adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants for the purpose of protesting.
- 2.14 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to **any petrol station** in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.15 Blocking, endangering, slowing down, obstructing or otherwise interfering with vehicular access to any **petrol station forecourt or access road**, in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.16 Blocking, endangering, slowing down, obstructing or otherwise interfering with the offloading by delivery tankers of fuel supplies and/or the refuelling of vehicles at any petrol station within the administrative areas of Thurrock and Essex.
- 2.17 **Causing, assisting** or encouraging any other person to do any act prohibited by paragraphs 2.1 to 2.16 above.
- 2.18 Continuing any acts prohibited by paragraphs 2.1 to 2.16 above.

#### Power of arrest

3. Pursuant to s.27 Police and Justice Act 2006, a power of arrest shall apply to paragraphs 2.1 to 2.16 above in the form attached at Schedule 2 of this Order.

#### Alternative service

- 4. Pursuant to CPR rules 6.15 and 6.27, the Claimants shall have permission to serve the 223<sup>rd</sup> to 229<sup>th</sup> Defendants (Persons Unknown) with this Order, the power of arrest and any further documents in the Claim by (4.1 4.3 to be treated conjunctively):
  - 4.1 **Websites:** placing a copy of the documents to be served on the Claimants' websites and Facebook pages; and
  - 4.2 **Email:** sending a copy of the documents to be served to Just Stop Oil, Youth Climate Swarm, Extinction Rebellion and Insulate Britain at the following email addresses: juststopoilpress@protonmail.com; youthclimateswarm@protonmail.com; press@extinctionrebellion.uk; insulatebritainpress@protonmail.com
    - and providing a web link at which they can access the documents to be served; and
  - 4.3 Placing signs: on A-Road entry points and exit points to the administrative area of Thurrock, and within 50 metres of The Fuel Terminals and on the A130 and B1014 between the entrance to Canvey Island and the roundabout known as the Waterside Road roundabout on Canvey Island, stating that there is a High Court

Injunction in place prohibiting protest on the highway and providing a web link and QR code at which the documents to be served can be found.

5. The **deemed date of service** of any documents referred to in paragraph 4 above shall be the day on which service of the document or documents is completed in accordance with paragraph 4 above.

#### Review of this Order

6. The Order against the 223<sup>rd</sup> to 229<sup>th</sup> Defendants (Persons Unknown) shall be reviewed at a hearing no later than 11 July 2025 (and as near to that date as the court can reasonably accommodate), with a time estimate of one day, unless the Claimants indicate to the Court that they do not seek an extension of the Order, upon which the Order will expire. The Claimants must file and serve in accordance with paragraph 4 above any evidence upon which they intend to rely at the review hearing by 4pm on 27 June 2025. Any other person who would like to participate in the review hearing must also file and serve on the Claimants any evidence upon which they intend to rely at the review hearing by 4pm on 27 June 2025.

## Liberty to apply

- 7. The Defendants or any other person affected by this order may apply to the Court at any time to vary or discharge it, but if they wish to do so they must inform the Claimants' solicitors at the same time as the application is filed at court (and in any event not less than 48 hours before the hearing of any such application, not to include weekends or public holidays).
- 8. Any person applying to vary or discharge this order must provide their full name and address for service.

#### Costs

9. No order as to costs.

#### **GUIDANCE NOTES**

#### Effect of this Order - the Defendants

1. A Defendant who is an individual and who is ordered not to do something must not do it him or herself or in any other way nor must he/she do it through others acting on his/her behalf or on his/her instructions or with his/her encouragement.

#### Interpretation of this Order

2. In this Order references to 'the Defendant' means any or all of them (unless expressly stated otherwise).

- 3. A requirement to serve on 'Defendant' means on each of them. However, the Order is effective against any Defendant on whom it is served in accordance with this Order.
- 4. An Order requiring 'the Defendant' not to do anything applies to all Defendants.
- 5. This Order contains the following schedules and annexes
  - (i) Schedule A-Witness Statements;
  - (ii) Schedule 1-List of Named Defendants;
  - (iii) Schedule 2-The Power of Arrest;
  - (iv) Annexe 1-The List of "The Roads" in Thurrock;
  - (v) Annexe 2-The map of the Administrative Area of Thurrock; and
  - (vi) Annexe 3-The map of the Administrative Area of Essex.

#### Communications with the Court

6. All communications with the Court about this Order should be sent to Room E03, The Royal Courts of Justice, Strand, London, WC2A 2LL. The telephone number is 020 3938957. The offices are open between 10am and 4pm Monday to Friday.

#### SCHEDULE A-WITNESS STATEMENTS

- 1. The Court read the following witness statements filed on behalf of the Claimants:
  - (a) The witness statement of Adewale Adesina 23.4.2022;
  - (b) The witness statement of Morgan Cronin 23.4.2022;
  - (c) The witness statement of Paul Crick 23.4.2022;
  - (d) The first witness statement of Adam Rulewski 24.4.2022;
  - (e) The second witness statement of Adam Rulewski dated 11.5.2022;
  - (f) The third witness statement of Adam Rulewski dated 16.5.2022;
  - (g) The fourth witness statement of Adam Rulewski dated 25.1.2023;
  - (h) The second witness statement of Adewale Adesina 20.3.2024;
  - (i) The witness statement of Stephen Jennings 23.3.2024;
  - (j) The third witness statement of Adewale Adesina 26.6.2024;
  - (k) The fifth witness statement of Adam Rulewski 11.7.2024.

## SCHEDULE 1-NAMED DEFENDANTS

- 1. Madeline Adams
- 2. Mary Adams
- 3. David Addy
- 4. Amber Alexandar
- 5. Mina-Mae Alexander
- 6. Eric Anderson
- 7. Christine Aslett
- 8. Nicholas Aslett
- 9. Lachlan Ayles
- 10. Stephanie Aylett
- 11. Pete Bailey
- 12. William Bajwa
- 13. Jeremy Banks
- 14. Colin Barrington
- 15. Kai Bartlett
- 16. Joshua Bates
- 17. Christopher Bennett
- 18. Gillian Bird
- 19. John Blanco
- 20. John Blewett
- 21. Poppy Bliss
- 22. Hilary Bond
- 23. Trevor Boulden
- 24. Geoffroy Bowman
- 25. Simon Bramwell
- 26. Joseph Bream
- 27. Scott Breen
- 28. Stephen Brett
- 29. Emily Brocklebank
- 30. Claire Brook
- 31. Emma Brooker
- 32. Michael Brown
- 33. Judith Bruce
- 34. Madeleine Budd
- 54. Wadeleille Buc
- 35. Tes Burns
- 36. Benjamin Buse
- 37. Catherine Cannon
- 38. Rebecca Cassar
- 39. Jessica Causby
- 40. Susan Chamberlayne
- 41. Sally Chapman
- 42. Vishal Chauhan
- 43. Katherine Chesterman
- 44. Phillipa Clarke
- 45. Oliver Clegg
- 46. Orla Coghlan
- 47. John Coghlan
- 48. Ruth Cook

- 49. Heather Cooper
- 50. Jasmine Corkhill Harris
- 51. Joy Susan Corrigan
- 52. Richard Crane
- 53. David Crawford
- 54. Rosemary Croft
- 55. Joseph Daldorph
- 56. Beverley Ann Daniel
- 57. Ben Delap
- 58. Gaie Delap
- 59. Gabriella Ditton
- 60. Igors Djomins
- 61. Laura Doehlei
- 62. Marguerite Doubleday
- 63. Ella Eason
- 64. Christine Essex
- 65. Janet Flynn
- 66. Michael Forton
- 67. Phoebe Frewer
- 68. Amy Friel
- 69. Robin Gardner
- 70. Cressida Gething
- 71. Alasdair Gibson
- 72. Hugo Glashier
- 73. Stephanie Golder
- 74. William Goldring
- 75. Xavier Gonzalez Trimmer
- 76. Alfie Goodland
- 77. Emma-Rose Goodwin
- 78. Sophie Greenland
- 79. Aaron Gunning
- 80. Louisa Hadden
- 81. Catherine Hallett
- 82. Finn Halsall
- 83. Jake Handling
- 84. Gareth Harper
- 85. Louise Harris
- 86. Patrick Hart
- 87. Yvonne Hayward
- 88. Selma Heimedinger
- 89. Jonathan Herbert
- 90. Noah Herfort
- 91. Suzanne Hetherington
- 92. Sarah Hirons
- 93. Rupert Horlick
- 94. Adrian Howlett
- 95. Eric Hoyland
- 96. Abigail Hubbucks
- 97. Hannah Hunt
- 98. Emma Ireland

- 99. Pavel Ivanov
- 100. Rik Jansen
- 101. Ruth Jarman
- 102. Stephen Jarvis
- 103. Russell Jarvis
- 104. John Johnson
- 105. Hannah Johnston
- 106. Timothy Jones
- 107. Pascale Kann
- 108. Hallum Kelly
- 109. Linda Latter
- 110. Charles Laurie
- 111. Peter Lay
- 112. Eben Lazarus
- 113. Isobel Lewis
- 114. Elanor Lewis-Holmes
- 115. Joseph Linheart
- 116. El Litten
- 117. Rebecca Lockyer
- 118. Felix Lozano
- 119. Barbara Lund
- 120. Jacqueline Macey
- 121. Catharine Maclean
- 122. Jacob Main
- 123. Elizabeth McCormack
- 124. Eilidh McFadden
- 125. Nathan McGovern
- 126. Louis McKechnie
- 127. Lilah McKim
- 128. Grace McMeekin
- 129. Adalaide Meaney
- 130. Anna Middleton
- 131. Hannah Miles
- 132. Benjamin Mitchell
- 133. Darcy Mitchell
- 134. Deborah Mitchell
- 135. Teddy Monroe
- 136. Fiona Moore
- 137. Stefania Morosi
- 138. Paul Morozzo
- 139. Virgenia Morris
- 140. Paul Morrison
- 141. Zak Mullen
- 142. Alexandra Mulvey
- 143. Reuben Mychaleckyj
- 144. Richard Newell-Price
- 145. Ben Newman
- 146. Alexander Newnham
- 147. Jessica Norgard
- 148. Rachel Norris

- 149. Rose Norris
- George Oakenfold
- 151. Nicholas Onley
- 152. Jakub Pabiniak
- 153. Ella-Rose Paez
- 154. Sophie Page-Hall
- 155. Susan Parfitt
- 156. Dillon Parsons
- 157. Rose Patterson
- 158. Ethan Paul
- 159. Rosalind Pears
- 160. Abigail Percy-Ratcliff
- 161. Ursula Pethick
- 162. Jacqueline Phillips
- 163. Mitchel Phillips-White
- 164. Robert Possnett
- 165. Matthew Powell
- 166. Emily Price
- 167. Robert Price
- 168. Amy Pritchard
- 169. Felix Reeves-Whymark
- 170. Anna Retallack
- 171. Anne Richards
- 172. Bethan Roberts
- 173. Jasmin Robertson
- 174. Sebastian Roblyn
- 175. Isabel Rock
- 176. Elizabeth Rosser
- 177. Christian Rowe
- 178. Finn Roweth
- 179. Adelheid Russenberger
- 180. Isla Sandford
- Daniel Sargison
- 182. James Sargison
- 183. Cat Scothorne
- James Sebley
- 185. Rosa Sharkey
- 186. Sophie Sharples
- 187. Susan Sidey
- 188. James Skeet
- 189. Hannah Skwarska
- Jacqueline Slade
- 191. Oliver Slaughter
- 192. David Smartknight
- 193. Heather Smith
- 194. Joshua Smyth
- 195. David Squire
- 196. Katherine Steer
- 197. Oliver Stevens
- 198. Madeleine Stewart

- 199. Ferdi Suleyman
- 200. Vivien Talbot
- 201. Ben Taylor
- 202. Jacqueline Teggin
- 203. Zachary Tenquist
- 204. David Thorneywork
- 205. Hannah Torrance-Bright
- 206. Lucy Trinder
- 207. Morgan Trowland
- 208. Jan Van Der Knapp
- 209. Rik Venhoutteghem
- 210. Sally Webber
- 211. Leonard Weber
- 212. Miranda Whelehan
- 213. Philip White
- 214. Edred Whittingham
- 215. Alexander Wilcox
- 216. Clare Wilson
- 217. Thomas Winter
- 218. Carol-Ann Wood
- 219. Lizia Woolf
- 220. Amorel Kennedy
- 221. Grace Lally
- 222. Morien Morgan
- 230. Alice Wharrie
- 231. Anne Hart
- 232. Anthony Whitehouse
- 233. Callum Goode
- 234. Caroline Cattermole
- [Not used]
- 236. Christopher Hardy
- 237. David Nixon
- 238. Isabel Walters
- 239. Jade Calland
- 240. Jane Touil
- 241. Joe Howlett
- 242. John Jordan
- 243. Jonathan Coleman
- 244. Judy Judkins
- 245. Karan Wildin
- 246. Kayleigh Matthews
- 247. Larch Maxey
- 248. Lindsay Hart
- 249. Margaret Reid
- 250. Mia Powell
- 251. Phoebe Plummer
- 252. Sam Parry Holland
- 253. Samuel Johnson
- 254. Sarah MacDonald
- 255. Seiriol Davies

256.	Simon Reding
257.	Stephen Gingell
258.	Suzie Webb
259.	Victoria Lindsell
260.	Wendy Cocks
261.	Diana Martin
262.	Tony Muir

## SCHEDULE 2 – POWER OF ARREST

N110A

## Power of arrest

Name of defendant (1) Madeline Adams (2)-(222) Other Named Defendants Defendant's address See attached continuation sheet

Name of court High Court of Justice King's Bench Division Claim No.

QB-2022-001317

Claimant's name (including ref.)

- (1) Thurrock Council
- (2) Essex County Council

Defendant's name (including ref.)

(223)-(229) Persons Unknown



Date order made | 1 | 2 |/ 0 | 7 |/ 2 | 0 | 2 | 4 |

Name of judge Mr Justice Julian Knowles

Order made under (insert statutory provision)

Local Government Act 1972, s222 and Highways Act 1980, s130(5)

This order includes a power of arrest under (insert statutory provision)

Police and Justice Act 2006, s27

The relevant paragraphs of the order to which a power of arrest has been attached are:

(set out those paragraphs of the order to which the power of arrest is attached, if necessary continue on a separate sheet)

Paragraphs 2.1 to 2.16 of the Order of Mr Justice Julian Knowles dated 12 July 2024 (see attached continuation sheet)

This power of arrest was ordered on 1 2 / 0 7 / 2 0 2 4

and expires on the | 1 | 1 | 0 | 7 | 2 | 0 | 2 | 9

#### **Note to Arresting Officer**

Where the defendant is arrested under the power given by section 155 of the Housing Act 1996, or section 27 of the Police and Justice Act 2006; or section 43 of the Policing and Crime Act 2009; or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014:-

- the defendant shall be brought before the judge within the period of 24 hours beginning at the time of their arrest;
- · a constable shall inform the person on whose application the injunction was granted, forthwith where the defendant is arrested under the power given by section 155 of the Housing Act 1996 or as soon as reasonably practicable where the defendant is arrested under the power given by section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014.

Nothing in section 155 of the Housing Act 1996 or section 27 of the Police and Justice Act 2006 or section 43 of the Policing and Crime Act 2009 or section 4 of the Anti-Social Behaviour, Crime and Policing Act 2014, shall authorise the detention of the respondent after the expiry of the period of 24 hours beginning at the time of their arrest.

In calculating any period of 24 hours, no account shall be taken of Christmas Day, Good Friday or any Sunday.

Name of Claimant

- (1) Thurrock Council
- (2) Essex Council

Claimant's address

Sharpe Pritchard LLP

Elm Yard

10-16 Elm Street

London

WC1X 0BJ

Claimant's phone number

020 7405 4600

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No. QB-2022-001317

In the matter of an application for an injunction made pursuant to the Local Government Act 1972, s222 and the Highways Act 1980, s130(5)

Before the Honourable Mr Justice Julian Knowles 12 July 2024

BETWEEN:

- (1) THURROCK COUNCIL
- (2) ESSEX COUNTY COUNCIL

Claimants

-and-

## (1) MADELINE ADAMS

- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)
- (226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

# FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

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(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

	<b>Defendants</b>
POWER OF ARREST: CONTINUATION SHEET	
TOWER OF ARREST: CONTINUATION SHEET	

#### **DEFENDANTS**

PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING,	223
CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN,	1.55 M 2.50 M 2.
OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE	
FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT	
ANNEXE 1 TO THE CLAIM FORM	
PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING,	224
AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE	
VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER,	
OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO	
ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS	
ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE	
CLAIM FORM	
PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING,	225
CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN,	

-		Ve -
	OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH	
	VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS	
	FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS	
	MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)	
1	PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING,	226
1	CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN,	
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	VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS	
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	BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE	
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	ANNEXE 2 TO THE CLAIM FORM)	
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	BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE	220
	OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE	
1	REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE	
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ŀ	PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT	229
	TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY	and had I
	UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR	
	TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY	
	AUTHORITY	
L	227 2227 233 2	

# THE RELEVANT PARAGRAPHS OF THE ORDER TO WHICH A POWER OF ARREST HAVE BEEN ATTACHED ARE:

Paragraphs 2.1 to 2.16 of the Order of Mr Justice Julian Knowles dated 12 July 2024:

- 2. The Defendants and each of them (whether by themselves or by instructing, encouraging or allowing any other person) are forbidden from:
  - 2.1 Blocking, slowing down, endangering, obstructing or otherwise interfering with the flow of traffic onto or along or off the Roads for the purpose of protesting.
  - 2.2 Blocking, slowing down, endangering, obstructing or otherwise interfering with access to or from the Roads, and on any adjacent roads, slip roads or roundabouts which are not vested in the Claimants, for the purpose of protesting.
  - 2.3 Entering, climbing onto, climbing into, climbing under any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
  - 2.4 Entering, climbing onto, climbing into, climbing under any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested

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- in the Claimants: (a) without the permission of the registered keeper of the vehicle; and (b) for the purpose of protesting.
- 2.5 Affixing themselves ("locking on") to any vehicle travelling on to, off or along the Roads or accessing or exiting the Roads.
- 2.6 Affixing themselves ("locking on") to any vehicle on any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants, where the "locking on" is for the purpose of protesting.
- 2.7 Affixing themselves ("locking on") or any other items to any of the Roads or any other person or object on, under or over the Roads.
- 2.8 Affixing themselves ("locking on") or any other items to any adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants where the "locking on" is for the purpose of protesting.
- 2.9 Erecting any structure on the Roads.
- 2.10 Tunnelling, excavating, drilling or digging under or adjacent to the Roads.
- 2.11 Occupying existing tunnels under the Roads for the purpose of protesting.
- 2.12 Causing damage to the surface of or to any apparatus on or adjacent to the Roads or any vehicle on the Roads for the purpose of protesting.
- 2.13 Abandoning any vehicle or item on any Roads, adjacent roads, slip roads or roundabouts to the Roads, whether or not those roads are vested in the Claimants for the purpose of protesting.
- 2.14 Blocking, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.15 Blocking, endangering, slowing down, obstructing or otherwise interfering with vehicular access to any petrol station forecourt or access road, in the administrative areas of Thurrock and Essex for the purpose of protesting.
- 2.16 Blocking, endangering, slowing down, obstructing or otherwise interfering with the offloading by delivery tankers of fuel supplies and/or the refuelling of vehicles at any petrol station within the administrative areas of Thurrock and Essex.

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ANNEXE 1

### **Thurrock Council Roads**

NORTH ROAD	B186
SANDY LANE	B1335
ROMFORD ROAD ROUNDABOUT	B1335
MILL ROAD	C Class
PURFLEET ROAD	C Class
WEST ROAD	C Class
ARISDALE AVENUE	C Class
DAIGLEN DRIVE	C Class
STIFFORD ROAD	B1335
LANCE CORPORAL NICKY MASON WAY	B1335
STIFFORD ROAD	B1335
ARTERIAL ROAD	A1306
THURROCK SERVICES ROAD	Unclassified
POND ROAD ROUNDABOUT	Unclassified

LONDON ROAD ROUNDABOUT	A1306
LONDON ROAD	A1306
ENTRY ON SLIP WELLINGTON INTERCHANGE TO A13 EASTBOUND	A13
EXIT OFF SLIP A13 TO WELLINGTON INTERCHANGE WESTBOUND	A13
PURFLEET BYPASS	B1335
LINK ROAD FROM A13 SOUTHBOUND TO A1306	A1090
CANTERBURY WAY SLIP ROAD ANTICLOCKWISE	A282
LINK ROAD FROM A1306 TO A13 NORTHBOUND	A282
CANTERBURY WAY SLIP ROAD CLOCKWISE	A282
STONEHOUSE CORNER ROUNDABOUT	A1090
ARTERIAL ROAD ROUNDABOUT	A1090
STONEHOUSE LANE	A1090
CYGNET VIEW	Unclassified
ARTERIAL ROAD ROUNDABOUT A1306	A1306
WEST THURROCK WAY RETAIL PARK ROUNDABOUT	B186
ARTERIAL ROAD	A1306
LAKE RISE	Unclassified
OLIVER CLOSE	A1090
ST CLEMENTS WAY ROUNDABOUT	A1090
ST CLEMENTS WAY	A1090
LONDON ROAD	A1090
WEST THURROCK WAY	A126
Access road Cost Co	Unclassified
JUNCTION 30 M25 TO BOROUGH BOUNDARY WESTBOUND	A13
BOROUGH BOUNDARY TO M25 JUNCTION 30 EASTBOUND	A13
ACCESS ROAD FROM BURGHLEY ROAD TO SUPERSTORE	Private Road
BURGHLEY ROAD ROUNDABOUT	B146
SEALLY ROAD	Unclassified
BURGHLEY ROAD	B146
PILGRIMS LANE ROUNDABOUT	A1306
ARTERIAL ROAD	A1306
ENTRY ON SLIP NORTH SLIFFORD ROUNDABOUT TO A13	
EASTBOUND	A13
ENTRY ON SLIP NORTH STIFFORD ROUNDABOUT TO A13	
WESTBOUND	A13
EXIT OFF SLIP A13 TO NORTH STIFFORD ROUNDABOUT	
WESTBOUND EVIT OFF SLIP A 12 TO NORTH STIFFORD BOLDING A DOLL'S	A13
EXIT OFF SLIP A13 TO NORTH STIFFORD ROUNDABOUT EASTBOUND	4.12
STIFFORD ROUNDABOUT	A13
TREACLE MINE ROUNDABOUT	A1012
LINK FROM A1012 ROUNDABOUT TO A1306 INTERCHANGE	A1012
HOGG LANE	A1012
ELIZABETH ROAD	A1012
HOGG LANE ROUNDABOUT	A1012
LONDON ROAD	A1012
	A126
HOGG LANE ROUNDABOUT EASTERN WAY	A1012
EASTERN WAY	A126

LAKESIDE INTERCHANGE TO NORTH STIFFORD ROUNDABOUT EASTBOUND	A13
NORTH STIFFORD ROUNDABOUT TO LAKESIDE INTERCHANGE WESTBOUND	A13
LAKESIDE INTERCHANGE TO M25 JUNCTION 30 WESTBOUND	A13
JUNCTION 30 M25 TO LAKESIDE INTERCHANGE EASTBOUND	A13
BRENTWOOD ROAD	A128
STANFORD ROAD	A1013
SOUTHEND ROAD	A1013
CEMENT BLOCK COTTAGES	Unclassified
DOCK ROAD	A126
ORSETT COCK ROUNDABOUT	A1013
ENTRY ON SLIP ORSETT COCK ROUNDABOUT TO A13 WESTBOUND	A13
EXIT OFF SLIP A13 EASTBOUND TO ORSETT COCK ROUNDABOUT	A13
EXIT OFF SLIP A13 WESTBOUND TO ORSETT COCK ROUNDABOUT	A13
DENEHOLES ROUNDABOUT	A1013
WOOD VIEW	B149
LODGE LANE	A1013
CHADWELL HILL	C Class
EXIT OFF SLIP A1089 TO A126 SOUTHBOUND	A1089
ENTRY ON SLIP A126 TO A1089 NORTHBOUND	A1089
MARSHFOOT ROAD ROUNDABOUT	A126
ST CHADS ROAD ROUNDABOUT	A126
GATEWAY ACADEMY ROUNDABOUT MARSHFOOT ROAD	A126
MARSHFOOT ROAD	A126
MARSHFOOT ROAD	A126
BROADWAY	A126
THURROCK PARK WAY	Unclassified
ACCESS ROADS FOR ASDA SUPPERSTORE	Unclassified
NORTH STIFFORD ROUNDABOUT TO A 1089 EASTBOUND	A13
A1089 TO NORTH STIFFORD ROUNDABOUT WESTBOUND	A13
A1089 TO ORSETT COCK ROUNDABOUT EASTBOUND	A13
ORSETT COCK ROUNDABOUT TO A1089 WESTBOUND	A13
DOCK APPROACH ROAD	A1089
DOCK APPROACH ROAD	A1089
DOCK APPROACH ROAD	A1089
THURROCK PARK WAY ROUNDABOUT	A1089
SLIP ROAD FROM DOCK APPROACH ROAD TO A13	A13
SLIP ROAD FROM DOCK APPROACH ROAD TO A13	A13
STANFORD ROAD	A1013
LONDON ROAD	C Class
ENTRY ON SLIP ORSETT COCK ROUNDABOUT TO A13 EASTBOUND	A13
Orsett Cock FS West Slip Roads	A13
Orsett Cock FS East Slip Roads	A13
STANFORD ROAD	A1013
STANFORD BYPASS INTERCHANGE	A1014
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 EASTBOUND	A13
EXIT OFF SLIP A13 EASTBOUND TO STANFORD INTERCHANGE	A13

EXIT OFF SLIP A13 WESTBOUND TO STANFORD INTERCHANGE	A13
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 WESTBOUND	A13
SOUTHEND ROAD	B1420
THE MANORWAY SOUTHEND ROAD LINK WESTBOUND	A1014
THE MANORWAY SOUTHEND ROAD LINK EASTBOUND	A1014
THE MANORWAY	A1014
CORRINGHAM ROAD A1014 ROUNDABOUT	A1014
ORSETT COCK ROUNDABOUT TO STANFORD INTERCHANGE	
EASTBOUND	A13
STANFORD INTERCHANGE TO ORSETT COCK ROUNDABOUT	
WESTBOUND	A13
STANFORD INTERCHANGE TO BOROUGH BOUNDARY AT FIVE	
BELLS EASTBOUND	A13
BOROUGH BOUNDARY AT FIVE BELLS TO STANFORD	
INTERCHANGE WESTBOUND	A13
BELLS CORNER PARADE SOUTHEND ROAD	A176
BELLS CORNER ROUNDABOUT	A176
SOUTHEND ROAD	B1420
LINK ROAD FROM B1420 AND BELLS CORNER ROUNDABOUT TO	
BOUNDARY	B1420
THE MANORWAY	A1014
GIFFORDS CROSS ROAD	C Class
FOBBING ROAD	C Class
CHURCH ROAD LAMPITS HILL	B1420
SOUTHEND ROAD	B1420
ENTRY ON SLIP FIVE BELLS ROUNDABOUT TO A13 WESTBOUND	B1420
FIVE BELLS ROUNDABOUT SOUTH	A13
FIVE BELLS ROUNDABOUT NORTH	A176
EXIT OFF SLIP A13 EASTBOUND TO FIVE BELLS ROUNDABOUT	A176
FIVE BELLS SLIP ROAD FROM SOUTHEND ROAD WESTBOUND	A13
FIVE BELLS SLIP ROAD FROM SOUTHEND ROAD WESTBOUND	A13
ASKEWS FARM LANE	Unclassified
WOULDHAM ROAD	Unclassified
LONDON ROAD	A126
ST CLEMENTS WAY ROUNDABOUT	A1090
BURNLEY ROAD	Unclassified
ST CLEMENTS WAY	A1090
STONEHOUSE CORNER ROUNDABOUT	A1090
SHIP LANE	C Class
ARTERIAL ROAD ROUNDABOUT	A1306
STONEHOUSE LANE	A1090
ARTERIAL ROAD	A1306
LONDON ROAD	A1090
LONDON ROAD	A1090
OLIVER ROAD	A1090
OLIVER CLOSE	A1090
STANFORD BYPASS INTERCHANGE	A1014

CORRINGHAM ROAD A1014 ROUNDABOUT	A1014
THE MANORWAY	A1014
THE MANORWAY	A1014
THE MANORWAY	A1014
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 WESTBOUND	A13
EXIT OFF SLIP A13 EASTBOUND TO STANFORD INTERCHANGE	A13
ENTRY ON SLIP STANFORD INTERCHANGE TO A13 EASTBOUND	A13
EXIT OFF SLIP A13 WESTBOUND TO STANFORD INTERCHANGE	A13
CANTERBURY WAY SLIP ROAD ANTICLOCKWISE	A282
CANTERBURY WAY SLIP ROAD CLOCKWISE	A282
LINK ROAD FROM A13 SOUTHBOUND TO A1306	A13
LINK ROAD FROM A1306 TO A13 NORTHBOUND	A13

## **Essex County Council Roads**

HAVEN ROAD, CANVEY ISLAND
ROSCOMMON WAY, CANVEY ISLAND
NORTHWICK ROAD, CANVEY ISLAND
A130 FROM SADDLERS FARM ROUNDABOUT TO JUNCTION WITH
HAVEN ROAD
SADLERS FARM ROUNDABOUT
SLIPROADS LEADING TO AND FROM A13 FROM SADLERS FARM
ROUNDABOUT
SLIPROADS LEADING TO AND FROM A130 FROM SADLERS FARM
ROUNDABOUT
B1014 CANVEY ROAD FROM WATERSIDE ROUNDABOUT TO
ROUNDABOUT ON HIGH STREET BENFLEET
CANVEY ISLAND PUBLIC FOOTPATH NUMBER 8
A130 AND B1014 BETWEEN THE ENTRANCE TO THE ISLAND AND
ROUNDABOUT KNOWN AS THE WATERSIDE ROAD ROUNDABOUT

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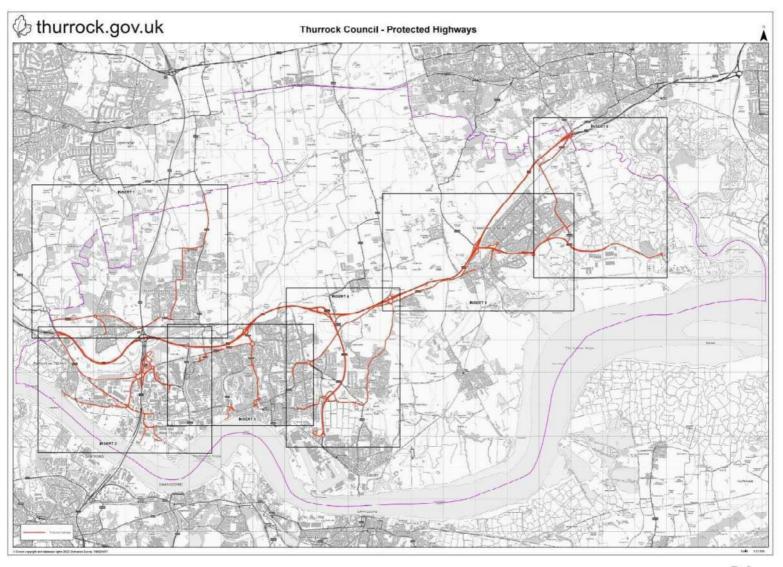
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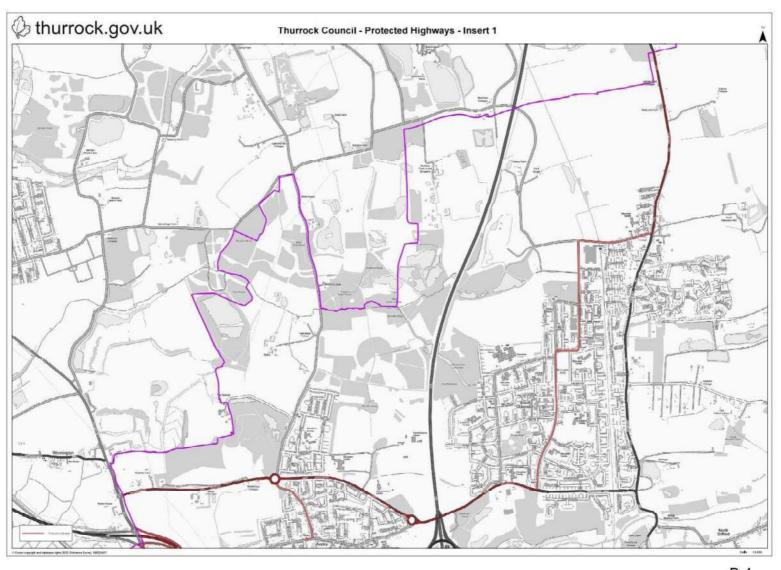
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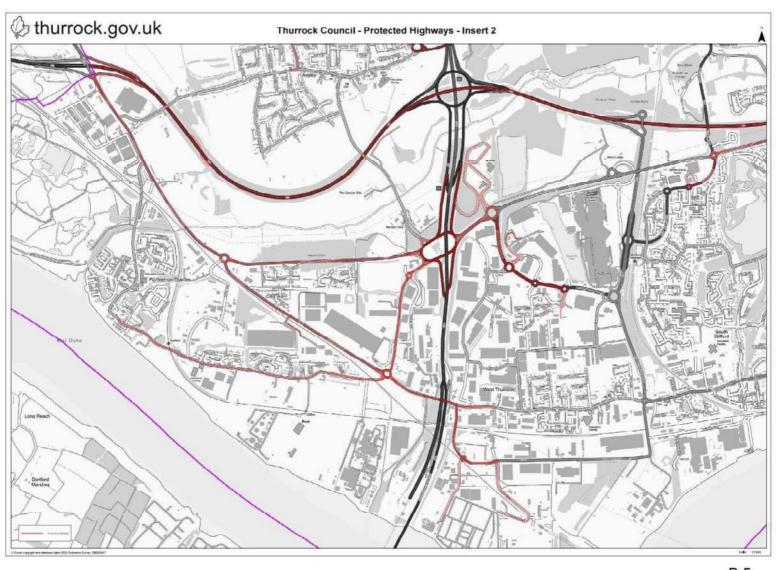
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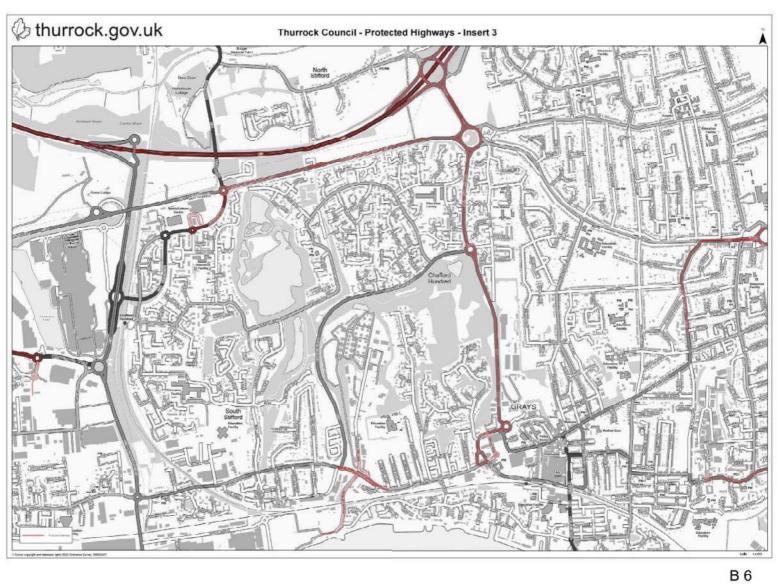
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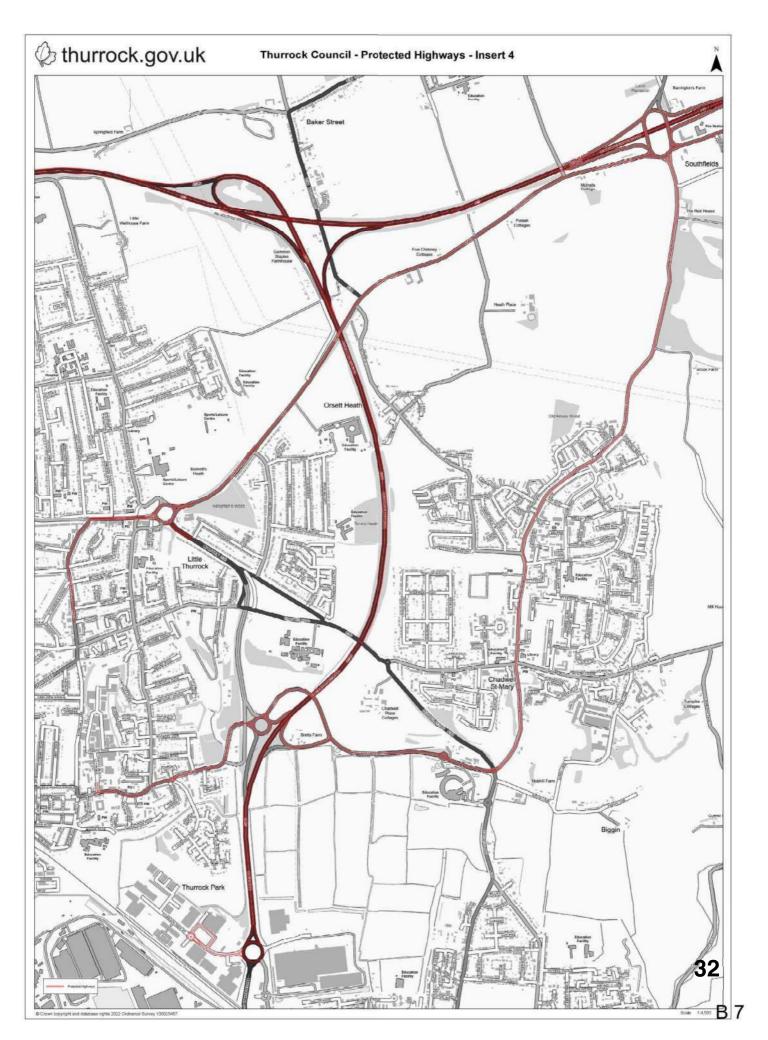
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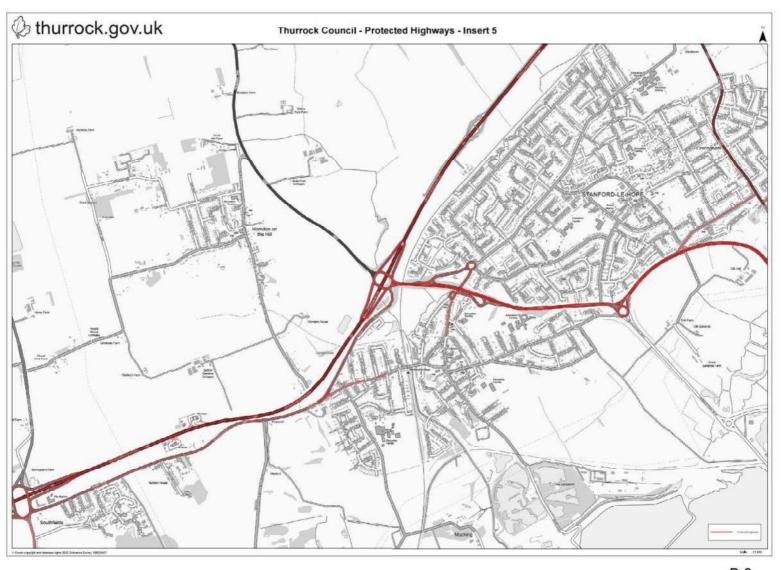


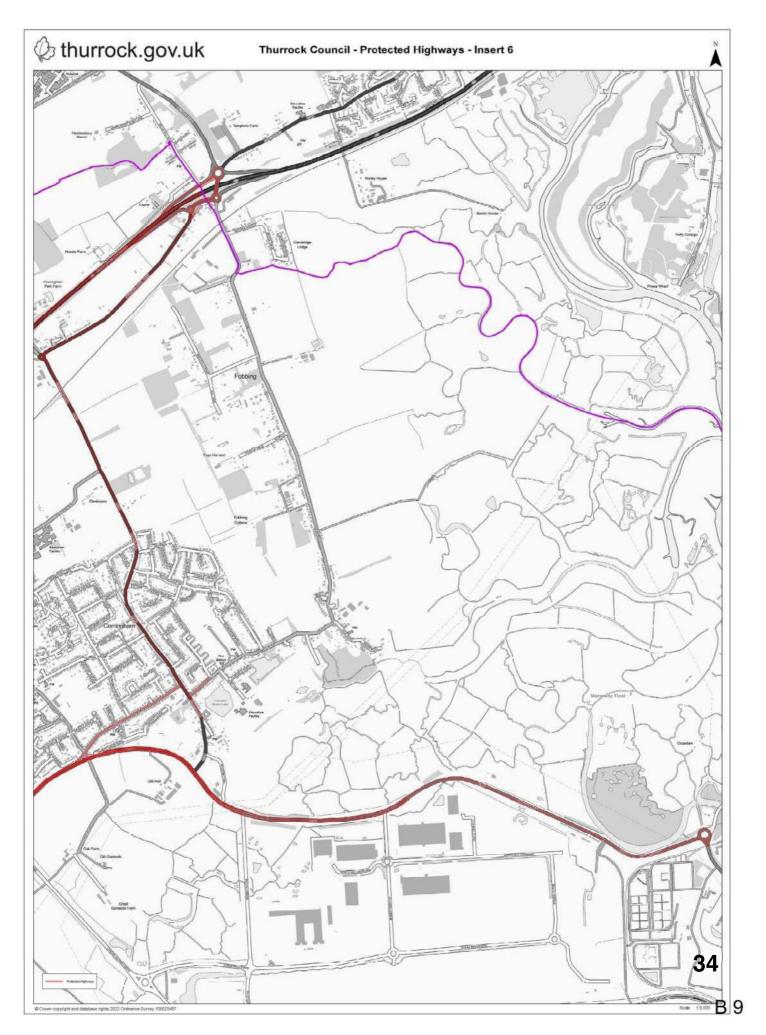












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- (2)-(222) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM
- (223) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH THE FREE FLOW OF TRAFFIC ON TO, OFF OR ALONG THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (224) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, AND WITHOUT THE PERMISSION OF THE REGISTERED KEEPER OF THE VEHICLE, ENTERING, CLIMBING ON, CLIMBING INTO, CLIMBING UNDER, OR IN ANY WAY AFFIXING THEMSELVES OR AFFIXING ANY ITEM TO ANY VEHICLE TRAVELLING ON TO, OFF, ALONG OR WHICH IS ACCESSING OR EXITING THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM
- (225) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO, INTO OR OFF ANY PETROL STATION OR ITS FORECOURT WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)
- (226) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, CAUSING THE BLOCKING, ENDANGERING, SLOWING DOWN, OBSTRUCTING, PREVENTING OR OTHERWISE INTERFERING WITH VEHICULAR ACCESS TO OR FROM ANY PETROL STATION OR ITS

FORECOURT WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(227) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF THURROCK (AS MARKED ON THE MAP AT ANNEXE 2 TO THE CLAIM FORM)

(228) PERSONS UNKNOWN, WHO ARE FOR THE PURPOSE OF PROTESTING, BLOCKING, PREVENTING OR OTHERWISE INTERFERING WITH THE OFFLOADING BY DELIVERY TANKERS OF FUEL SUPPLIES AND/OR THE REFUELLING OF VEHICLES AT ANY PETROL STATION WITHIN THE ADMINISTRATIVE AREA OF ESSEX (AS MARKED ON THE MAP AT ANNEXE 3 TO THE CLAIM FORM)

(229) PERSONS UNKNOWN WHO ARE TRESPASSING ON, UNDER OR ADJACENT TO THE ROADS LISTED AT ANNEXE 1 TO THE CLAIM FORM BY UNDERTAKING EXCAVATIONS, DIGGING, DRILLING AND/OR TUNNELLING WITHOUT THE PERMISSION OF THE RELEVANT HIGHWAY AUTHORITY

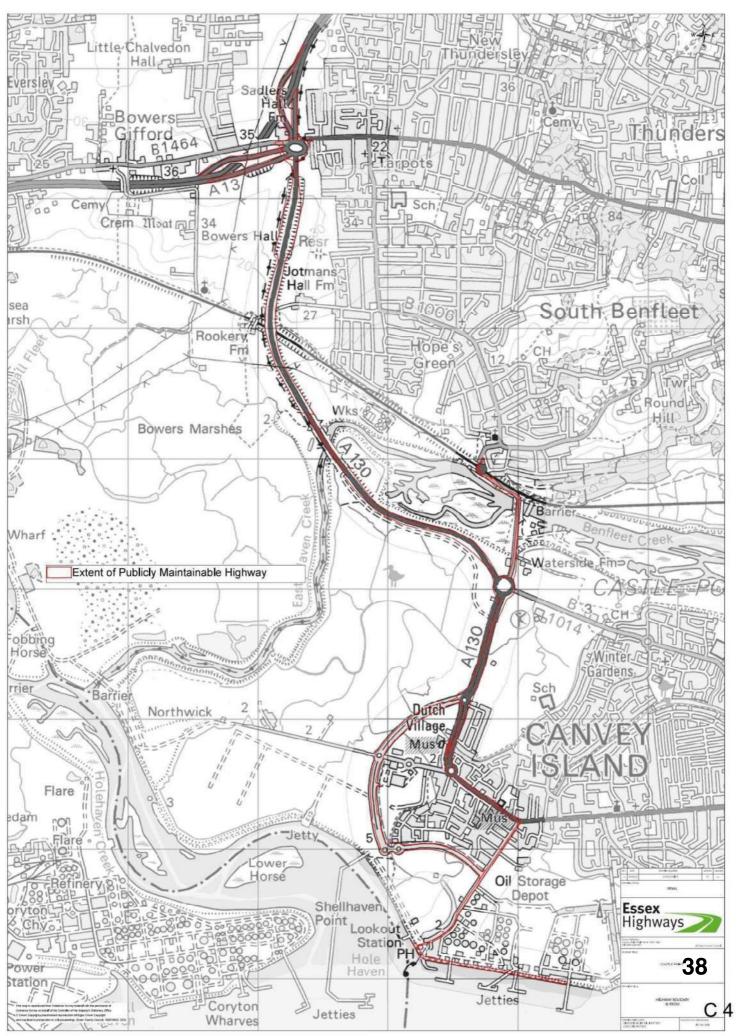
(230)-(262) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1 TO THE CLAIM FORM

		<u>Defendants</u>
AN	NEXE 3	



**37** 

C 3



# IN THE HIGH COURT OF JUSTICE KING BENCH DIVISION

CLAIM NO: KB-2024-001765

x 20 Jun 202

Before Mr Justice Julian Knowles On 20 June 2024

**BETWEEN:-**

(1) LONDON CITY AIRPORT LIMITED

(2) DOCKLANDS AVIATION GROUP LIMITED

PERSONS UNKNOWN WHO, IN CONNECTION WITH THE JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN, ENTER OCCUPY OR REMAIN (WITHOUT THE CLAIMANTS' CONSENT) UPON THAT AREA OF LAND KNOWN AS LONDON CITY AIRPORT (AS SHOWN FOR IDENTIFICATION EDGED RED ON THE ATTACHED PLAN 1) BUT EXCLUDING THOSE AREAS OF LAND AS FURTHER DEFINED IN THE CLAIM FORM

		<u>Defendant</u>
ORDI	ER	

#### **PENAL NOTICE**

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

#### IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

**UPON** the Claimants' claim by Claim Form, dated 12 June 2024

**AND UPON** hearing the Claimants' application for an interim injunction, dated 12 June 2024, and supporting evidence, without Persons Unknown being notified

**AND UPON** hearing Counsel for the Claimants

**AND UPON** the Claimants giving and the Court accepting the undertakings set out in Schedule 2 to this Order

**AND UPON** the "Land" being defined as that land known as London City Airport, as shown for identification edged red on the attached Plan 1 in Schedule 1, but <u>excluding</u>:

- a. Those buildings shaded blue on Plan 1;
- b. In those buildings shaded green on Plan 1, the areas edged blue on Plans 2-8;
- c. In those areas shaded purple, the land suspended over the ground and forming part of the Docklands Light Railway.
- d. In the areas shaded pink, the underground rail tunnel, the subway and that part of Docklands Light Railway located below ground level.

#### IT IS ORDERED THAT:

#### **INJUNCTION**

- 1. Until 20 June 2029 or final determination of the claim or further order in the meantime, whichever shall be the earlier, Persons Unknown must not, without the consent of the Claimants, enter, occupy or remain upon the Land.
- 2. In respect of paragraph 1, Persons Unknown must not: (a) do it himself/herself/themselves or in any other way; (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
- 3. The injunction contained at paragraph 1 of this Order shall be reviewed on each anniversary of this Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 1.5 hours. The Claimants are permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the review hearing.

#### **VARIATION**

- 4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimants' solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimants' solicitors at least 48 hours in advance of any hearing.
- 5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
- 6. The Claimants have liberty to apply to vary this Order.

#### **SERVICE AND NOTIFICATION**

- 7. Service of the claim form, the application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).
- 8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and Note of the Hearing on 20 June 2024 will be notified to Persons Unknown by the Claimants carrying out each of the following steps:
  - a. Uploading a copy onto the following website:
     <a href="https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction">https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction</a>
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made, and that the documents can be found at the website referred to above.
  - c. Either affixing a notice at those locations marked with an "X" on Plan 1 setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9(d) below.
- 9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to Persons Unknown by the Claimants carrying out each of the following steps:

- a. Uploading a copy of the Order onto the following website: <a href="https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction">https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction</a>
- b. Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
- c. Affixing a copy of the Order in A4 size in a clear plastic envelope at those locations marked with an "X" on Plan 1.
- d. Affixing warning notices of A2 size at those locations marked with an "X" on Plan 1.
- 10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to Persons Unknown of any further applications shall be effected by the Claimants carrying out each of the following steps:
  - a. Uploading a copy of the application onto the following website: <a href="https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction">https://www.londoncityairport.com/corporate/corporate-info/reports-and-publications/injunction</a>.
  - b. Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
  - c. Affixing a notice at those locations marked with an "X" on Plan 1 stating that the application has been made and where it can be accessed in hard copy and online.
- 11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to Persons Unknown may be effected by carrying out the steps set out in paragraph 10(a)-(b) only.
- 12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have taken place on the date on which all of the relevant steps have been carried out.
- 13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8(c), 9(c)-(d) and 10(c), effective notification will be deemed to have taken place when those documents are first affixed regardless of whether they are subsequently removed.

### **FURTHER DIRECTIONS**

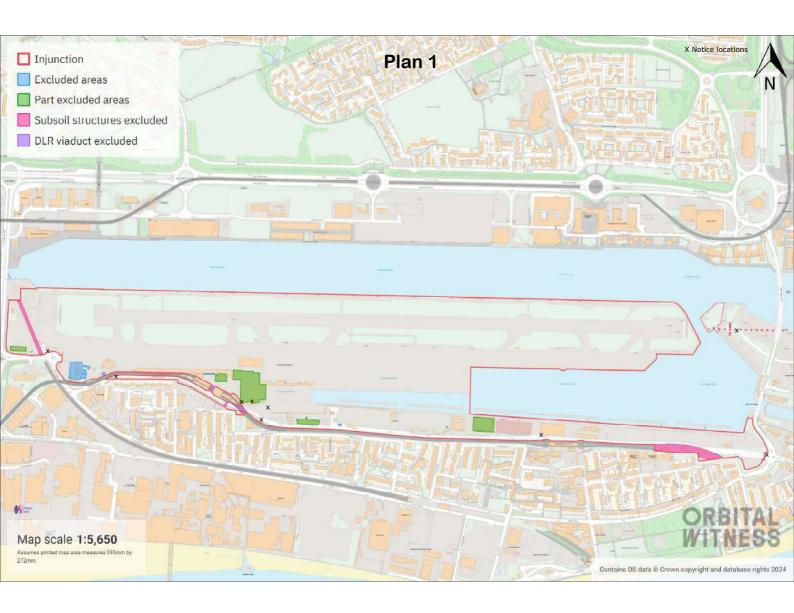
- 14. Liberty to apply.
- 15. Costs are reserved.

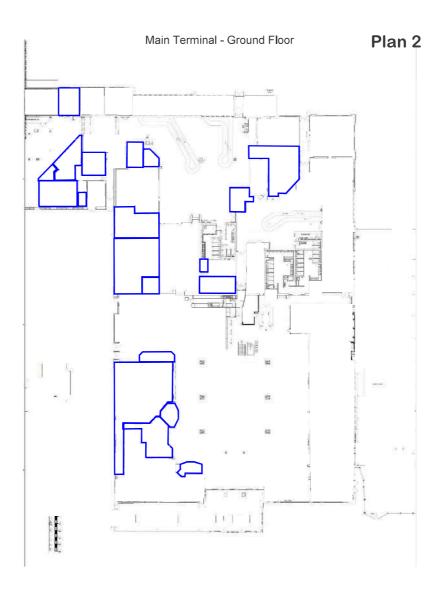
## **COMMUNICATIONS WITH THE CLAIMANT**

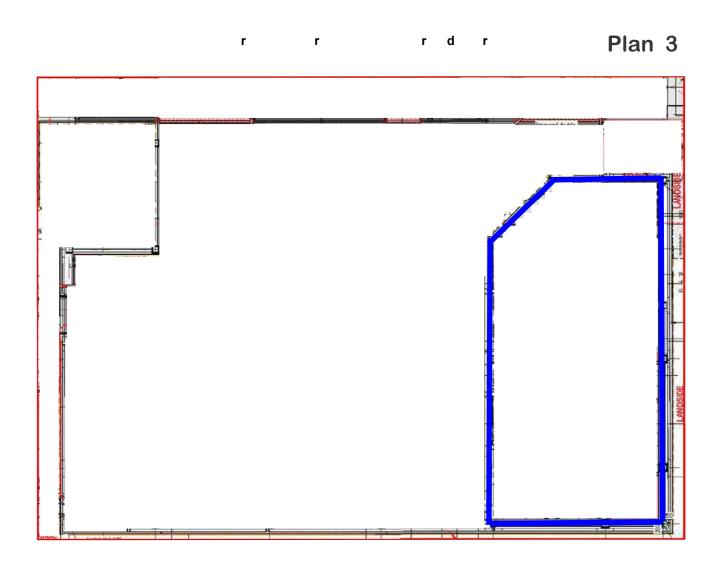
- 16. The Claimants' solicitors and their contact details are:
  - (1) Stuart Wortley Eversheds Sutherland (International) LLP <u>StuartWortley@eversheds-sutherland.com</u> 07712 881 393
  - (2) Nawaaz Allybokus Eversheds Sutherland (International) LLP NawaazAllybokus@eversheds-sutherland.com 07920 590 944

Dated: 20 June 2024

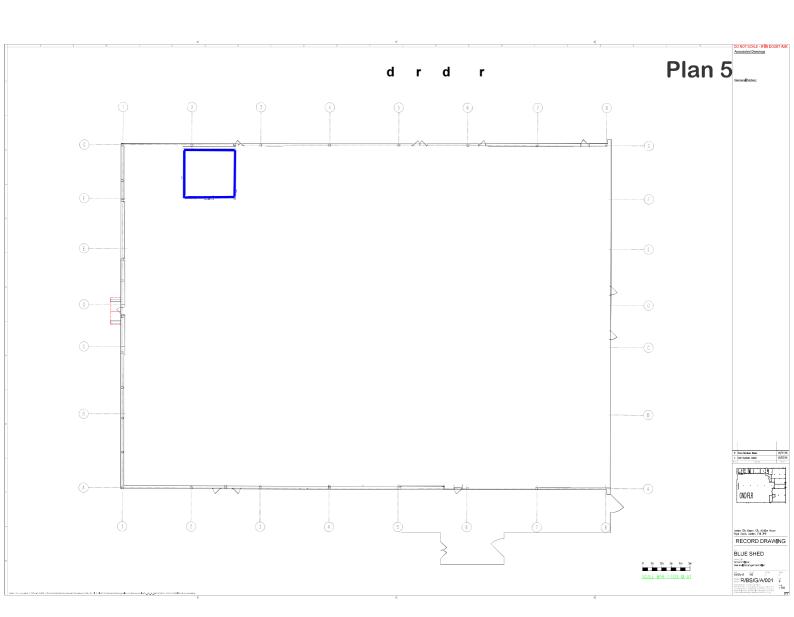
## **SCHEDULE 1 - PLANS**

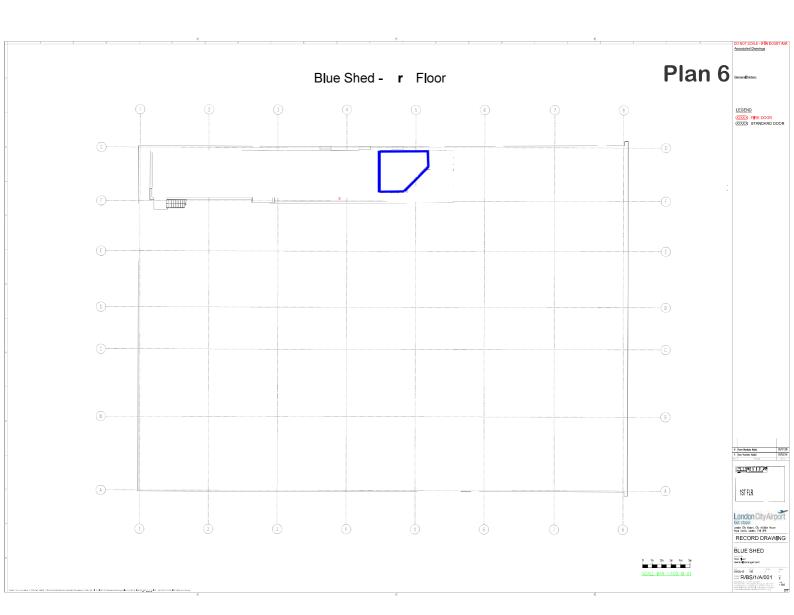


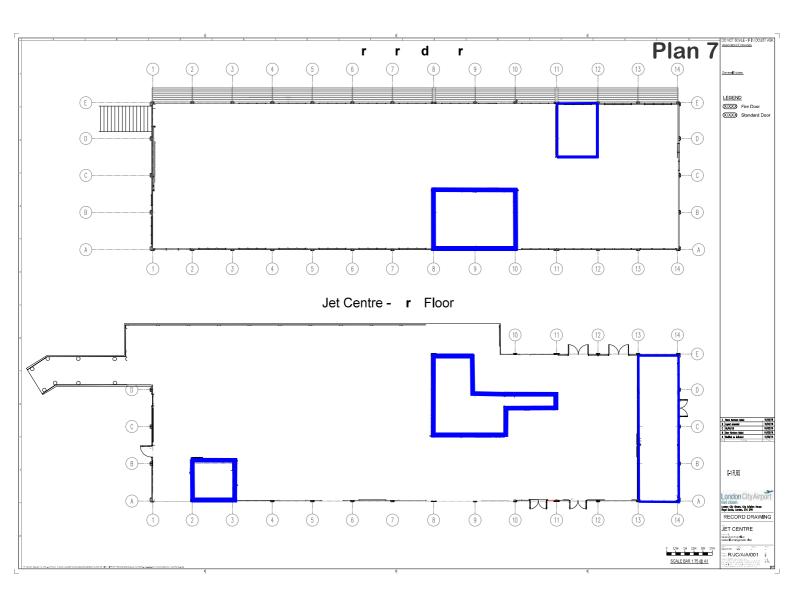


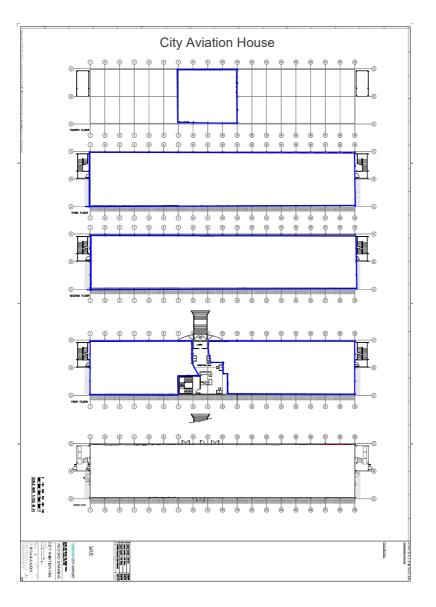


Terminal Immigration Facilities - r Floor Plan 4









Plan 🛘

#### **SCHEDULE 2 - UNDERTAKING GIVEN BY THE CLAIMANTS**

- (1) The Claimants will take steps to notify Persons Unknown of the claim form, application notice, evidence in support, the Note of the Hearing on 20 June 2024, and the Order as soon as practicable and no later than 5pm on Monday 24 June 2024.
- (2) The Claimants will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

## **SCHEDULE 3 - EMAIL ADDRESSES**

- juststopoil@protonmail.com
- juststopoilpress@protonmail.com
- info@juststopoil.org

## IN THE HIGH COURT OF JUSTICE

### **KINGS BENCH DIVISION**

**Before The Honourable Mr Justice Julian Knowles BETWEEN:** 

#### **HEATHROW AIRPORT LIMITED**

Claim No: KB-2024-002210

-and-

PERSONS UNKNOWN WHO (IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN) ENTER, OCCUPY OF REMAIN (WITHOUT THE CLAIMANT'S CONSENT) UPON 'LONDON HEATER WAS AIRPORT' AS IS SHOWN EDGED PURPLE ON THE ATTACHED FEAR FOR PARTICULARS OF CLAIM

	<b>Defendants</b>
ORDER	
PENAL NOTICE	

IF YOU THE WITHIN DEFENDANTS OR PERSONS UNKNOWN OR ANY OF YOU DISOBEY THIS ORDER OR INSTRUCT OR ENCOURAGE OTHERS TO BREACH THIS ORDER YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE YOUR ASSETS SEIZED.

ANY OTHER PERSON WHO KNOWS OF THIS ORDER AND DOES ANYTHING WHICH HELPS OR PERMITS THE DEFENDANTS OR PERSONS UNKNOWN TO BREACH THE TERMS OF THIS ORDER MAY ALSO BE HELD IN CONTEMPT OF COURT AND MAY BE IMPRISONED, FINED OR HAVE THEIR ASSETS SEIZED.

IMPORTANT NOTICE TO THE DEFENDANTS AND PERSONS UNKNOWN

This Order prohibits you from doing the acts set out in this Order. You should read it carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

**UPON** the Claimant having issued this Claim by a Claim Form dated 7 July 2024

**AND UPON** hearing the Claimant's application for an interim injunction by Application Notice dated 7 July 2024

**AND UPON READING** the Witness Statements of Akhil Markanday dated 6 July 2024 and Jonathan Daniel Coen dated 7 July 2024

AND UPON HEARING Leading Counsel and Junior Counsel for the Claimant

**AND UPON** the Claimant giving and the Court accepting the undertakings set out in Schedule 1 to this Order

#### IT IS ORDERED THAT:

#### **INJUNCTION**

- 1. Until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, the Defendants must not, without the consent of the Claimant, enter, occupy or remain on Heathrow Airport, Hounslow, Middlesex, as shown edged purple on the plan annexed to this Order at Schedule 2 ("Plan A").
- 2. In respect of paragraph 1, the Defendants must not (a) do it himself/herself/themselves in any other way (b) do it by means of another person acting on his/her/their behalf, or acting on his/her/their instructions.
- 3. The injunction set out at paragraph 1 of this Order shall be reviewed annually on each anniversary of the Order (or as close to this date as is convenient having regard to the Court's list) with a time estimate of 1 ½ hours. The Claimant is permitted to file and serve any evidence in support 14 days before the review hearing. Skeleton Arguments shall be filed at Court, with a bundle of authorities, not less than 2 days before the hearing.

#### **VARIATION**

- 4. Anyone served with or notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it as affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. If any evidence is to be relied upon in support of the application the substance of it must be communicated in writing to the Claimant's solicitors at least 48 hours in advance of any hearing.
- 5. Any person applying to vary or discharge this Order must provide their full name, address and address for service.
- 6. The Claimant has liberty to apply to vary this Order.

#### SERVICE AND NOTIFICATION

- 7. Service of the Claim Form, the Application for interim injunction and this Order is dispensed with, pursuant to CPR 6.16, 6.28 and 81.4(2)(c).
- 8. Pursuant to the guidance in *Wolverhampton CC v London Gypsies & Travellers* [2024] 2 WLR 45, the Claim Form, Application Notice, evidence in support and a Note of the Hearing on 9 July 2024 will be notified to the Defendants by the Claimant carrying out each of the following steps:
  - 8.1 Uploading a copy on to the following website: <a href="www.heathrow.com/injunction">www.heathrow.com/injunction</a>
  - 8.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that a claim has been brought and an application made and that the documents can be found at the website referred to above.
  - 8.3 Either affixing a notice at the locations shown marked with a red dot on the second plan attached to this Order at Schedule 4 ("Plan B") setting out where these documents can be found and obtained in hard copy or including this information in the warning notices referred to at paragraph 9.4 below.

- 9. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, this Order shall be notified to the Defendants by the Claimant carrying out each of the following steps:
  - 9.1 Uploading a copy of the Order on to the following website: <a href="https://www.heathrow.com/injunction">www.heathrow.com/injunction</a>
  - 9.2 Sending an email to the email addresses listed in Schedule 3 to this Order attaching a copy of this Order.
  - 9.3 Affixing a copy of the Order in A4 size in a clear plastic envelope at each of the locations shown with a red dot on Plan B.
  - 9.4 Affixing warning notices of A2 size at those locations marked with a red dot on Plan B, substantially in the form of the notice at Schedule 5.
- 10. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification to the Defendants of any further applications shall be effected by the Claimant carrying out each of the following steps:
  - 10.1 Uploading a copy of the application on to the following website: www.heathrow.com/injunction
  - 10.2 Sending an email to the email addresses listed in Schedule 3 to this Order stating that an application has been made and that the application documents can be found at the website referred to above.
  - 10.3 Affixing a notice at these locations marked with a red dot on Plan B stating that the application has been made and where it can be accessed in hard copy and online.
- 11. Pursuant to the guidance in *Wolverhampton CC v London Gypsies and Travellers* [2024] 2 WLR 45, notification of any further documents to the Defendants may be effected by carrying out the steps set out in paragraphs 10.1 and 10.2 only.

12. In respect of paragraphs 8 to 11 above, effective notification will be deemed to have

taken place on the date on which all the relevant steps have been carried out.

13. For the avoidance of doubt, in respect of the steps referred to at paragraphs 8.3, 9.3

and 10.3, effective notification will be deemed to have taken place when the

documents have all been first affixed regardless of whether they are subsequently

removed.

**FURTHER DIRECTIONS** 

14. Liberty to apply.

**COSTS** 

15. Costs reserved.

**COMMUNICATIONS WITH THE CLAIMANT** 

16. The Claimant's solicitors and their contact details are:

(1) Akhil Markanday

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,

London EC4R 0BR <u>akhil.markanday@bclplaw.com</u> / +44 20 3400 4344

(2) Phil Spencer

Bryan Cave Leighton Paisner, Governor's House, 5 Laurence Pountney Hill,

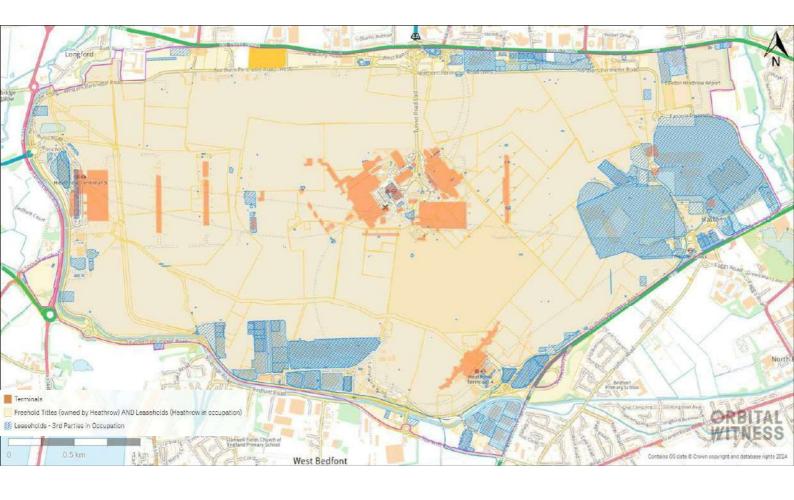
London EC4R 0BR <a href="mailto:phil.spencer@bclplaw.com">phil.spencer@bclplaw.com</a> / +44 20 3400 3119

**Dated: 9 July 2024** 

#### **SCHEDULE 1 – UNDERTAKINGS**

- 1. The Claimant will take steps to notify Defendants of the Claim Form, Application Notice, evidence in support, the Order and a Note of the Hearing on 9 July 2024 as soon as practicable and no later than 5pm on 15 July 2024.
- 2. The Claimant will comply with any order for compensation which the Court might make in the event that the Court later finds that the injunction in paragraph 1 of this Order has caused loss to a future Defendant and the Court finds that the future Defendant ought to be compensated for that loss.

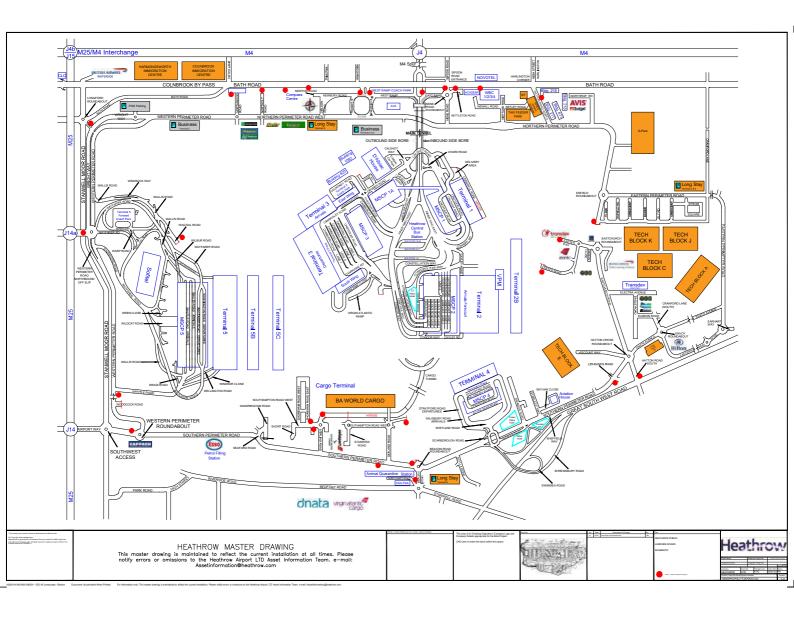
# SCHEDULE 2 – PLAN A



## **SCHEDULE 3 – EMAIL ADDRESSES**

- 1. juststopoil@protonmail.com
- 2. <u>juststopoilpress@protonmail.com</u>
- 3. <u>info@juststopoil.org</u>

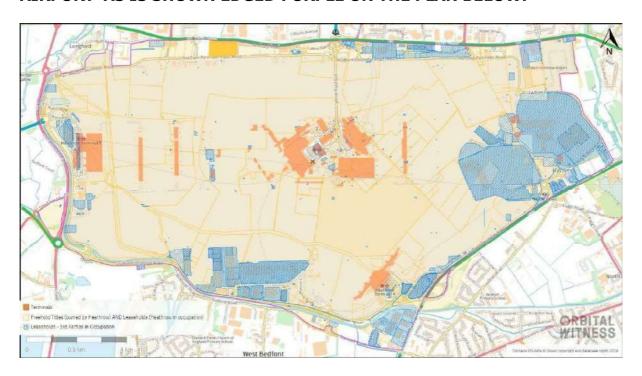
### **SCHEDULE 4 – PLAN B**



# SCHEDULE 5 – NOTICE WARNING – NOTICE OF COURT INJUNCTION

A HIGH COURT INJUNCTION granted in Claim No KB-2024-002210 granted on 9 July 2024 until 9 July 2029 or final determination of the Claim or further order in the meantime, whichever shall be the earlier, now exists in relation to Heathrow Airport. The injunction means you may NOT without the express consent of HEATHROW AIRPORT LIMITED:

IN CONNECTION WITH JUST STOP OIL OR OTHER ENVIRONMENTAL CAMPAIGN ENTER, OCCUPY OR REMAIN UPON 'LONDON HEATHROW AIRPORT' AS IS SHOWN EDGED PURPLE ON THE PLAN BELOW:



ANYONE BREACHING THE TERMS OF THIS COURT ORDER OR ASSISTING ANY OTHER PERSON IN BREACHING THE TERMS OF THIS ORDER MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE SENT TO PRISON, FINED, OR HAVE THEIR ASSETS SEIZED.

A copy of the legal proceedings (including the Order, Claim Form, Application Notice, evidence in support and a note of the hearing on 9 July 2024) can be viewed at <a href="www.heathrow.com/injunction">www.heathrow.com/injunction</a> or obtained from:

- (1) Compass Centre, Heathrow Airport, Nelson Road, Hounslow TW6 2GW, which is open between 9am-5pm Monday-Friday; or
- (2) Bryan Cave Leighton Paisner LLP, Governor's House, 5 Laurence Pountney Hill, London EC4R 0BR (Reference: AMRK/PSPE/20H0904.000140; Telephone: 020 3400 3119).

Anyone notified of this Order may apply to the Court at any time to vary or discharge this Order or so much of it affects that person but they must first give the Claimant's solicitors 72 hours' notice of such application. The address of the Court is the Royal Courts of Justice, Strand, London WC2A 2LL.

# WARNING INJUNCTION

THIS AREA IS SUBJECT TO A
HIGH COURT INJUNCTION
WHICH PLACES RESTRICTIONS ON
SOME PROTEST ACTIVITIES.
YOU MUST NOT ENTER THIS SITE.
BREACH OF THE INJUNCTION COULD
LEAD TO IMPRISONMENT.

FOR DETAILS, PLEASE SEE
WWW.TELEDYNE-INJUNCTION.CO.UK
OR FOLLOW THIS QR CODE



Nicholas James Wargent Claimant Second Statement Exhibit NJW-2 19 December 2024 CLAIM NO. KB-2024-004175

## IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

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

<u>Defendants</u>

#### SECOND WITNESS STATEMENT OF NICHOLAS JAMES WARGENT

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

Nicholas James Wargent

Dated this 19th day of December 2024

#### 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

<u>]</u>	<u>Defendants</u>
	_
EXHIBIT NJW-2	

This is Exhibit NJW-2 referred to in the Second Witness Statement of Nicholas James Wargent.



The Yorkshire Palestin...

December 15th, 10:30 pm (10h ago) (5)





THURSDAY 19.12.24. Join @bfdfriendsofpalestine for the big roadside poster parade against Teledyne Shipley. Meeting at 12pm at the corner of Acorn Park & Otley Road, BD17 7SW.



N244

## **Application notice**

For help in completing this form please read the notes for guidance form N244 Notes.

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when you fill in a form:

https://www.gov.uk/

government/organisations/hm-courts-and-

tribunals-service/about/personal-

information- charter

Name of court HIGH COURT OF JUSTICE, KING'S BENCH DIVISION	Claim no. KB-2024-004175
Fee account no. (if applicable)	Help with Fees - Ref. no. (if applicable)
PBA0087115	H W F
Warrant no. (if applicable)	
Claimant's name (including TELEDYNE UK LIMITED (TEL14/40)	ref.)
Defendant's name (includin See Schedule 1	mg re€) ★ an Dan 2004 ★
Date	20 Dec 2024 20 December 2024
	TO'S BENCH DIVIS

KB-2024-004175

What is your name or, if you are a legal representative, the name of your firm?
Keystone Law

2. Are you a

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1 1	ı, ı	allilalli	
-	•	aummanic	

□Defendant

 $\Box$ Other (please specify)

If you are a legal representative whom do you represent?

Claimant

3. What order are you asking the court to make and why?

The Claimant applies for an order under the Senior Courts Act 1981, s34 and CPR 31.17 (a draft of which is attached) that the Chief Constable of Merseyside Police (the **Respondent**):

- Discloses and permits the Claimant to inspect the documents in its control that are within the classes identified in the attached draft order; and
- Specifies any of those documents that are no longer in its control and what has happened to them and those for which it claims a right or duty to withhold inspection.

The Claimant believes that:

- The Respondent holds the documents of which disclosure is sought;
- Those documents are likely to support the case of the Claimant or adversely affect the case of one of the parties to the proceedings; and
- Disclosure of the documents is necessary in order to dispose fairly of the claim or to save costs.

The Respondent has confirmed (as per the attached witness statement and evidence) that she adopts a neutral position on this Application.

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4.	Have you attached a draft of the order you are applying for?	⊠Yes	□No
5.	How do you want to have this application dealt with?	□at a hearing	⊠without a hearing
6.	How long do you think the hearing will last? Is this time estimate agreed by all parties?	□at a remote hea  Hours  □  Yes	ring Minutes □No
7.	Give details of any fixed trial date or period	N/A	
8.	What level of Judge does your hearing need?	Judge	
9.	Who should be served with this application?	Respondent	
9a	Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.	Solicitor service	

10. What information will you be relying on, in support of your application?

⊠the attached witness statement

 $\Box$  the statement of case

⊠ the evidence set out in the box below

#### If necessary, please continue on a separate sheet.

- 1. On 13 December 2024 the Claimant issued a claim against the Defendants in Schedule 1 and Persons Unknown (as defined fully in the Claim Form) and an application seeking interim precautionary injunctive relief.
- 2. The injunction order sought includes prohibitions in relation to "Wirral Site", which means Teledyne UK Limited's site at Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA. Specifically, prohibitions on trespass are sought.

#### 5 July 2024 Incident

- 3. On 5 July 2024, three individuals unlawfully entered the Wirral Site and spray-painted the premises in red paint. These individuals also attempted to access the roof of the premises with a ladder but failed to do so. They were arrested by police officers acting for and on behalf of the Respondent and were subsequently released on bail.
- 4. The Claimant suffered loss, by way of repair bills and loss of production revenue, in the amount of approximately £7,500.00.

#### 2 October 2024 Incident

- 5. On 2 October 2024, three individuals gained access to the Wirral Site and climbed onto the roof of the premises. They caused damage to the roof, as well as to the production floor in the building underneath, including by the use of red paint. They were arrested by police officers acting for and on behalf of the Respondent and were subsequently released on bail.
- 6. The Claimant suffered loss, by way of repair bills and loss of production revenue, in the amount of approximately £162,000.00 (with a further £335,000 expected to be incurred in further repair costs).

#### Persons Known

- 7. The Claimant does not know the identities or contact details of those persons arrested in the above two incidents. It is the Claimant's position that the identities of those persons arrested are known to the Respondent.
- 8. The Claimant's position is that the persons arrested ought to be named and served in these injunction proceedings in order to be subject to the jurisdiction of the Court and any injunction order made. The Claimant therefore requests disclosure of relevant documents in order to identify (and assist with effecting service on) the individuals who have previously trespassed onto its property and been arrested by the Respondent.
- 9. Disclosure of the classes of documents requested will enable the Claimant to:
  - a. add those individuals that it alleges to have committed trespass in the past to the Claim as named individuals;
  - b. effect service of documents on those individuals in the proceedings; and
  - c. commence any further necessary proceedings against those individuals should they breach any inunction order in the future.
- 10. In conclusion, I believe that the Respondent holds the classes of documents requested in the Draft Order, that those documents will support the Claimant's case or adversely affect the case of the Defendants and will assist the court to dispose fairly of the action or save costs.
- 11. I believe that it is appropriate for the court to exercise its power under CPR 31.17 to make the Order requested for those reasons.
- 12. The Respondent has confirmed that she adopts a neutral position on the Application.

	Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?				
	Yes.	es. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.			
$\boxtimes$	No				

11.

## **Statement of Truth**

I understand that proceedings for contempt of court may be brought against a person 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 section 10 (and any continuation sheets) are true.
☑The applicant believes that the facts stated in section 10 (and any continuation sheets) are true. I am authorised by the applicant to sign this statement.
Signature
M Singh
□Applicant
□ Litigation friend (where applicant is a child or a Protected Party)
⊠Applicant's legal representative (as defined by CPR 2.3(1))
Date
Day Month Year
20 12 2024
Full name
MANAN SINGH
Name of applicant's legal representative's firm
KEYSTONE LAW
If signing on behalf of firm or company give position or office held
PARTNER

Applicant's address to which documents should be sent.

Building and street	
48	
Second line of address	
CHANCERY LANE	
Town or city	
HOLBORN	
County (optional)	
Destands.	
Postcode	
w  c  2  4  1  J  F	
f applicable	
Phone number	
020 3319 3700	
ax phone number	
OX number	
193 Chancery Lane	
Your Ref.	
TEL14/40	
Email	
Manan.Singh@keystonelaw.co.uk	
info.teledyne@keystonelaw.co.uk	

#### Schedule 1

- (1) JULIAN ALLEN GAO
  - (2) RUBY HAMILL
  - (3) DANIEL JONES
  - (4) NAJAM SHAH
- (5) RICKY SOUTHALL
- (6) AMAREEN AFZAL
- (7) SERENA FENTON
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    - 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).
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**Defendants** 

#### 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
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**Defendants** 

(12) THE CHIEF CONSTABLE OF WEST YORKSHIRE POLICE

Respondent

#### **Draft ORDER**

**UPON** reading the Application dated 16 December 2024 made by the Claimant pursuant to CPR 31.17 (the 'Application')

**AND UPON** reading the witness statement of Stephen William Simpson for and on behalf of the Respondent, in which it is confirmed that the Respondent remains neutral on the Application

[AND UPON the Court considering the Application on the papers and without a hearing or AND UPON the Court hearing Natalie Pratt of counsel and the Respondent not appearing or being represented]

#### IT IS ORDERED THAT:

#### **Definitions**

- 1. For the purpose of this Order:
  - 1.1 The "Shipley Site" shall mean Teledyne UK Limited's site at Airedale House, Acorn Park, Shipley BD17 7SW;
  - 1.2 The "**Road**" shall mean the road known as Acorn Park, Shipley.

#### Order

2. The Respondent shall disclose to and permit the Claimant inspection of the

#### following documents within its control:

- 2.1 the occurrence logs for the incidents that occurred at the Shipley Site on 26/12/23, 02/04/24 and 15/05/24, as set out in the Claimant's Application, which logs provide the name, addresses, email addresses and telephone numbers of any person arrested by one of the Respondent's officers in the course of, or as a result of, protest (including, but not limited to, acts of trespass) at the Shipley Site or on the Road; and
- documents which provide the names, addresses, emails addresses and telephone numbers of any person who was asked to leave the Shipley Site by one of the Respondent's officers during the course of the incidents that occurred at the Shipley Site on 26/12/23, 02/04/24 and 15/05/24, as set out in the Claimant's Application; and
- 2.3 photographic material and any evidentially relevant material, including witness statements and written/typed interview records, relating to any person arrested by one of the Respondent's officers during the course of the incidents that occurred at the Shipley Site (or on the Road) on 26/12/23, 02/04/24 and 15/05/24, as set out in the Claimant's Application; and
- 2.4 the incident logs that provide the name, addresses, email addresses and telephone numbers of any person arrested by one of the Respondent's officers in the course of, or as a result of, protest (including, but not limited to, acts of trespass and obstruction of the highway) at the Shipley Site or on the Road on any occasion throughout 2024 and until the date of disclosure, along with any photographic material and any evidentially relevant material relating to any person arrested.
- 2.5 details of any remaining conditions or restrictions from attending the Claimant's sites placed on any person so arrested and subsequently released on bail by the Respondent.
- 3. The Respondent, when providing disclosure of the documents described in paragraph 2, shall:
  - 3.1 specify documents over which it claims a right or duty to withhold inspection (if any);
  - 3.2 be entitled to redact any information on the grounds of public interest immunity or legal privilege;
  - 3.3 be entitled to redact any information on the grounds of sub judice.

    Once the sub judice reasons for redaction conclude, then the Claimant be at liberty to request an un-redacted version of the documents and the Respondent shall provide a copy for inspection.

- 4. The duty to disclose the matters specified in paragraph 2 above shall be ongoing and continue until 4pm on 28 February 2025, unless extended by further order.
- 5. The Claimant shall pay the Respondent's reasonable costs of and occasioned by this Application and the disclosure, to be assessed in default of agreement.

Dated this day of December 2024

#### Service of the order

The court has provided a sealed copy of this order to the serving party: Keystone Law at 48 Chancery Lane, London WC2A IJF (Ref: TEL14/40)

N244

## **Application notice**

For help in completing this form please read the notes for guidance form N244 Notes.

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tribunals-service/about/personal-

information- charter

Name of court	Claim no. KB-2024-004175
HIGH COURT OF JUSTICE, KING'S BENCH DIVISION	
Fee account no.	Help with Fees - Ref. no.
(if applicable)	(if applicable)
PBA0087115	H W F
Warrant no.	
(if applicable)	
Claimant's name (including TELEDYNE UK LIMITED (TEL14/40)	ref.)
<b>Defendant's name</b> (including	ng retain
See Schedule 1	* 16 Day 2024 *
Date	16 Dec 2024 16 December 2024
	TO S BENCH DIVIS

KB-2024-004175

١.	What is your name or, if you are a legal representative, the name of your firm?  Sub Event ID: 5
	Keystone Law

2. Are you a

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	annanc	

□ Defendant

□Other (please specify)

If you are a legal representative whom do you represent?

Claimant

3. What order are you asking the court to make and why?

The Claimant applies for an order under the Senior Courts Act 1981, s34 and CPR 31.17 (a draft of which is attached) that the Chief Constable of West Yorkshire Police (the **Respondent**):

- Discloses and permits the Claimant to inspect the documents in its control that are within the classes identified in the attached draft order; and
- Specifies any of those documents that are no longer in its control and what has happened to them and those for which it claims a right or duty to withhold inspection.

The Claimant believes that:

- The Respondent holds the documents of which disclosure is sought;
- Those documents are likely to support the case of the Claimant or adversely affect the case of one of the parties to the proceedings; and
- Disclosure of the documents is necessary in order to dispose fairly of the claim or to save costs.

The Respondent has confirmed by way of a witness statement (attached) that he adopts a neutral position on this Application. The Draft Order has been produced jointly with the Respondent.

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4.	Have you attached a draft of the order you are applying for?	⊠Yes	□No
5.	How do you want to have this application dealt with?	$\square$ at a hearing	⊠without a hearing
6.	How long do you think the hearing will last? Is this time estimate agreed by all parties?	□at a remote hea  Hours  □  Yes	mining Minutes □No
7.	Give details of any fixed trial date or period	N/A	
8.	What level of Judge does your hearing need?	Judge	
9.	Who should be served with this application?	Respondent	
9a	Please give the service address, (other than details of the claimant or defendant) of any party named in question 9.	Solicitor service	

10. What information will you be relying on, in support of your application?

□the statement of case

⊠the attached witness statement

#### If necessary, please continue on a separate sheet.

- 1. On 13 December 2024 the Claimant issued a claim against the Defendants in Schedule 1 and Persons Unknown (as defined fully in the Claim Form) and an application seeking interim precautionary injunctive relief.
- 2. The injunction order sought includes prohibitions in relation to:
  - a. The "Shipley Site", which means Teledyne UK Limited's site at Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW (specifically, prohibitions on trespass and interference with the Claimant's common law right to access the highway); and
  - b. The road known as Acorn Park, Shipley (specifically, prohibitions on obstruction of the highway).

#### 26 December 2023 Incident

- 3. On 26 December 2023 (Boxing Day), at approximately 4.30am, one individual gained access to the Shipley Site by climbing over the fence. They then approached the building and attempted to set fire to a goods entrance.
- 4. The individual was arrested by police officers acting for and on behalf of the Respondent and were subsequently released on bail.
- 5. The Claimant suffered loss, by way of repair bills and loss of production revenue, in the amount of approximately £35,000.

#### 2 April 2024 Incident

- 6. On 2 April 2024, at approximately 5.30am, a group of around 20 protestors attended the Shipley Site. Four of these protestors managed to climb on to the roof of the premises and proceeded to cause extensive damage to the roof tiles and brickwork, as well as the glass doors and windows these four protestors were arrested by police officers acting for and on behalf of the Respondent and were subsequently released on bail.
- 7. The Claimant suffered loss, by way of repair bills and loss of production revenue, in the amount of approximately £871,000.

#### 15 May 2024 Incident

- 8. On 15 May 2024, at approximately 4.30am, four individuals gained access to the roof at the Shipley Site and once again caused damage to the roof. They were arrested by police officers acting for and on behalf of the Respondent and were subsequently released on bail.
- 9. The Claimant suffered loss, by way of repair bills and loss of production revenue, in the amount of approximately £128,000.

#### Persons Known

- 10. The Claimant is aware of the identities of the persons arrested on 2 April and 15 May 2024, and has named them as the First to Seventh Defendants (inclusive) to injunction proceedings; the Claimant is however not aware of the contact details of those persons arrested in the above incidents. It is the Claimant's position that the identities and contact details of those persons arrested are known to the Respondent.
- 11. The Claimant's position is that the persons arrested ought to be named and served in these injunction proceedings in order to be subject to the jurisdiction of the Court and any injunction order made. The

Claimant therefore requests disclosure of relevant documents in order to confirm the identities of (and assist with effecting service on) the individuals who have previously trespassed onto its property and been arrested by the Respondent.

- 12. Disclosure of the classes of documents requested will enable the Claimant to:
  - a. add all those individuals that it alleges to have committed trespass in the past to the Claim as named individuals (and confirm the identities of those persons already added);
  - b. effect service of documents on those individuals in the proceedings; and
  - c. commence any further necessary proceedings against those individuals should they breach any injunction order in the future.
- 13. In conclusion, I believe that the Respondent holds the classes of documents requested in the Draft Order, that those documents will support the Claimant's case or adversely affect the case of the Defendants and will assist the court to dispose fairly of the action or save costs.
- 14. I believe that it is appropriate for the court to exercise its power under CPR 31.17 to make the Order requested for those reasons.
- 15. The Respondent has confirmed by way of the witness statement of Stephen William Simpson dated 16 December 2024 (attached to this Application Notice) that he adopts a neutral position on the Application. The Draft Order has been produced jointly with the Respondent.

Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?				
□ Ye	Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.			
⊠ N				

11.

## Statement of Truth

brought aga false staten	inst a persor nent in a doc	edings for contempt of court may be n who makes, or causes to be made, a cument verified by a statement of truth f in its truth.	
		acts stated in section 10 (and ets) are true.	
(and any	•	<b>leves</b> that the facts stated in section 10 in sheets) are true. I am authorised by the statement.	
Signature			
M Si	igh		
□Applic	ant		
☐ Litigation friend (where applicant is a child or a Protected Party)			
⊠Applic	ant's legal re	epresentative (as defined by CPR 2.3(1))	
Date			
Day	Month	Year	
16	12	2024	
Full name			
MANAN SINC	Н		
Name of apr	olicant's lega	ıl representative's firm	
KEYSTONE L			
If signing on	behalf of fir	m or company give position or office held	
PARTNER			

Applicant's address to which documents should be sent.

Building and street
48
Second line of address
CHANCERY LANE
Town or city
HOLBORN
County (optional)
Postcode
W  C  2  A  1  J  F
If applicable
Phone number
020 3319 3700
Fax phone number
DX number 193 Chancery Lane
Your Ref.
TEL14/40
Email
Manan.Singh@keystonelaw.co.uk info.teledyne@keystonelaw.co.uk

#### Schedule 1

- (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** 

#### 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

#### **Draft ORDER**

**UPON** reading the Application dated 20 December 2024 made by the Claimant pursuant to CPR 31.17 (the 'Application')

**AND UPON** reading the witness statement of Manan Singh for and on behalf of the Claimant, in which it is confirmed that the Respondent remains neutral on the Application

[AND UPON the Court considering the Application on the papers and without a hearing or AND UPON the Court hearing Natalie Pratt of counsel and the Respondent not appearing or being represented]

#### [BY CONSENT] IT IS ORDERED THAT:

#### **Definitions**

- 1. For the purpose of this Order:
  - 1.1 The "Wirral Site" shall mean Teledyne UK Limited's site at Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA.

#### **Order**

- 2. The Respondent shall disclose to and permit the Claimant inspection of the following documents within its control:
  - any record of the name, addresses, email addresses and telephone numbers of any person who has been arrested by one of their officers in the course of, or as a result of, protests (including, but not limited to, acts of trespass) at the Wirral Site, as defined in paragraph 1.1 above;

- all, officer bodycam footage, CCTV and drone footage from the Wirral Site, and officer MG11 witness statements (including any exhibit) relating to any person who has been arrested by one of their officers in the course of, or as a result of, protests (including, but not limited to, acts of trespass) at the Wirral Site, as defined in paragraph 1.1 above;
- 2.3 any record which provides names and addresses of any person asked to leave the Wirral Site by one of their officers in the course of, or as a result of, protests at the Wirral Site, as defined in paragraph 1.1 above; and
- any record which confirms whether any of the persons referred to in paragraphs 2.1 and 2.3 above are subject to bail conditions and, if so, the identity of that person and the relevant conditions to which their bail is subjected.
- 3. The Respondent shall specify when providing disclosure of the documents described in paragraph 2:
  - 3.1 which documents are no longer in its control and what has happened to those documents; and
  - 3.2 the documents over which it claims a right or duty to withhold inspection.
- 4. The duty to disclose the matters specified in paragraph 2 above shall be ongoing and continue until 4pm on 28 February 2025, unless extended by further order.
- 5. The Claimant shall pay the Respondent's reasonable costs of this Application, agreed in the sum of £500 plus VAT. The Claimant shall also pay the Respondent's reasonable costs of disclosure and permitting inspection, to be calculated in accordance with Appendix 3 of the Merseyside Police's internal disclosure policy document.

Dated this day of December 2024

#### Service of the order

The court has provided a sealed copy of this order to the serving party: Keystone Law at 48 Chancery Lane, London WC2A IJF (Ref: TEL14/40)

First statement of Mr Stephen W Simpson Made on behalf of the Respondent Dated the 16<sup>th</sup> day of December 2024 Exhibits: "SS1"

CLAIM NO. KB-2024-004175

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

#### BETWEEN:

#### TELEDYNE UK LIMITED

Claimant

- (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 WEST YORKSHIRE POLICE

Respondent

# STATEMENT OF STEPHEN WILLIAM SIMPSON ON BEHALF OF THE RESPONDENT

- I, Stephen Simpson, of West Yorkshire Police Headquarters, Laburnum Road, Wakefield, West Yorkshire, WF1 3QP will state as follows:
- 1. I am a Solicitor within Legal Services, West Yorkshire Police, I am authorised by the Respondent to make this statement on their behalf. I make this statement in response to the Applicant's application for an order for third party disclosure of documents.
- 2. The facts and matters referred to in this witness statement are within my knowledge, except where I have indicated otherwise.

# **Background**

3. The Respondent understands that the Claimant's sites have been subject to a number incidents where persons have stage protects and trespassed to these sites. The incidents are set out in the Claimant's application for Third Party Disclosure.

- 4. The Respondent has been required to respond to these incidents, attend the sites and arrest a number of persons for trespassing.
- 5. The Claimant seeks disclosure of information, specifically the personal information for the arrested persons in order to name them in legal proceedings and effect service of proceedings.
- 6. The Respondent has confirmed to the Claimant that a Court Order is required to provide the documentation requested. The Respondent requires the Court to determine whether the disclosure is necessary in order to protect the Respondent from potential claims for unlawful disclosure of personal information.
- 7. The Claimant has provided the Respondent with their draft application for Third Party.

# **Legal Procedure**

- 8. The Court has the power to make an order for disclosure against a non-party to proceedings pursuant to Section 34 of the Senior Courts Act 1981
- 9. Pursuant to the Civil Procedure Rules, the test for a non-party disclosure order is contained in Part 31 as follows:

#### 31.17

- (1) This rule applies where an application is made to the court under any Act for disclosure by a person who is not a party to the proceedings.
- (2) The application must be supported by evidence.
- (3) The court may make an order under this rule only where—
- (a) the documents of which disclosure is sought are likely to support the case of the applicant or adversely affect the case of one of the other parties to the proceedings; and
- (b) disclosure is necessary in order to dispose fairly of the claim or to save costs

- 10. The ordering of disclosure is to be regarded as the exception, rather than the rule, and not to be ordered routinely (Frankson v Home Office [2003] EWCA Civ 655). The Court is referred to Secretary of State for Transport v Pell Frischmann Consultants Ltd [2006] EWHC 2756 (TCC) and the matters to be considered for a non-party disclosure order, including:
  - (a) The need to strike a balance between the applicant's need for access to the documents and some other competing interest, such as public interest immunity.
  - (b) On occasion, the court may have to balance the applicant's need for particular documents against the respondent's legitimate interest in keeping them private. Privacy does not provide immunity from disclosure, but the court is entitled to consider whether it is necessary to infringe upon a person's privacy in order to enable a party to legal proceedings to prosecute their case.
  - (c) There may well be circumstances where the incursion into the non-party's privacy would be so great, and the benefits of disclosure so small, that the court would decline to order disclosure.
  - (d) The court must take great care not to impose too heavy a burden on non-parties.
  - (e) An applicant who satisfies the criteria in CPR 31.17(3) will not necessarily succeed. The final decision will depend on the court's assessment of the competing interests of the party and the non-party. The court must have regard not only to the interests of the party seeking disclosure but, also, the non-party's interest in protecting their privacy, confidentiality or other interests.
- 11. The Data Protection Act 2018 provides exceptions to providing disclosure of personal information/documents where the disclosure is necessary for the purposes

of legal proceedings. This is a qualified exception and not absolute. If it was found that the disclosure of the information was in excess of that which was necessary the Respondent would be liable for claims for breaches of The Data Protection Act 2018 and, as a public body, the Human Rights Act 1998.

12. It was made clear by Aldous LJ in *Totalise Plc v The Motley Fool Ltd and Another* [2001] EWHC 706 (QB) that it is for the Applicant to satisfy the Court that disclosure is necessary, and it is not for third parties to take a view which could be wrong.

# **Respondent's Position**

- 13. The Claimant states that they seek documents to correctly name the individuals in the legal proceedings to obtain an injunction against those persons. The information is also required in order to effect service of the proceedings.
- 14. The Respondent's position on the application for disclosure is that they remain neutral subject to the Court's determination that the disclosure is necessary.
- 15. The Respondent considers the issue of necessity a matter between the Claimant and the Court. The Respondent therefore respectfully request that their attendance at any hearing be excused.
- 16. The Respondent does not object to the application be dealt with on the papers without a hearing should the Court deem it appropriate.
- 17. The Respondent seeks their costs of the application and providing the subsequent disclosure in accordance with CPR 46.1. Such costs order has been agreed and is included with the Claimant's draft order.
- 18. I attach to this (marked "SS1") a copy of the draft order sought by the Claimant and confirm that the Respondent takes no issue, subject to the Court's determination that the disclosure is necessary.

I believe the facts stated in this 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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Signed	

S. Simpson

Dated 16 December 2024

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

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TELEDYNE UK LIMITED	
	Claimant
-and-	
-and-	
(1) THE CHIEF CONSTABLE OF WEST YORKSHIRE POLICE	
	Respondent
EXHIBIT SS1	

#### BETWEEN:

#### TELEDYNE UK LIMITED

Claimant

- (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 WEST YORKSHIRE POLICE

Respondent

# **Draft ORDER**

**UPON** reading the Application dated 16 December 2024 made by the Claimant pursuant to CPR 31.17 (the 'Application')

**AND UPON** reading the witness statement of Stephen William Simpson for and on behalf of the Respondent, in which it is confirmed that the Respondent remains neutral on the Application

[AND UPON the Court considering the Application on the papers and without a hearing or AND UPON the Court hearing Natalie Pratt of counsel and the Respondent not appearing or being represented]

### IT IS ORDERED THAT:

#### **Definitions**

- 1. For the purpose of this Order:
  - 1.1 The "Shipley Site" shall mean Teledyne UK Limited's site at Airedale House, Acorn Park, Shipley BD17 7SW;
  - 1.2 The "Road" shall mean the road known as Acorn Park, Shipley.

# Order

2. The Respondent shall disclose to and permit the Claimant inspection of the

# following documents within its control:

- 2.1 the occurrence logs for the incidents that occurred at the Shipley Site on 26/12/23, 02/04/24 and 15/05/24, as set out in the Claimant's Application, which logs provide the name, addresses, email addresses and telephone numbers of any person arrested by one of the Respondent's officers in the course of, or as a result of, protest (including, but not limited to, acts of trespass) at the Shipley Site or on the Road; and
- documents which provide the names, addresses, emails addresses and telephone numbers of any person who was asked to leave the Shipley Site by one of the Respondent's officers during the course of the incidents that occurred at the Shipley Site on 26/12/23, 02/04/24 and 15/05/24, as set out in the Claimant's Application; and
- 2.3 photographic material and any evidentially relevant material, including witness statements and written/typed interview records, relating to any person arrested by one of the Respondent's officers during the course of the incidents that occurred at the Shipley Site (or on the Road) on 26/12/23, 02/04/24 and 15/05/24, as set out in the Claimant's Application; and
- 2.4 the incident logs that provide the name, addresses, email addresses and telephone numbers of any person arrested by one of the Respondent's officers in the course of, or as a result of, protest (including, but not limited to, acts of trespass and obstruction of the highway) at the Shipley Site or on the Road on any occasion throughout 2024 and until the date of disclosure, along with any photographic material and any evidentially relevant material relating to any person arrested.
- 2.5 details of any remaining conditions or restrictions from attending the Claimant's sites placed on any person so arrested and subsequently released on bail by the Respondent.
- 3. The Respondent, when providing disclosure of the documents described in paragraph 2, shall:
  - 3.1 specify documents over which it claims a right or duty to withhold inspection (if any);
  - 3.2 be entitled to redact any information on the grounds of public interest immunity or legal privilege;
  - 3.3 be entitled to redact any information on the grounds of sub judice.

    Once the sub judice reasons for redaction conclude, then the Claimant be at liberty to request an un-redacted version of the documents and the Respondent shall provide a copy for inspection.

- 4. The duty to disclose the matters specified in paragraph 2 above shall be ongoing and continue until 4pm on 28 February 2025, unless extended by further order.
- 5. The Claimant shall pay the Respondent's reasonable costs of and occasioned by this Application and the disclosure, to be assessed in default of agreement.

Dated this day of December 2024

# Service of the order

The court has provided a sealed copy of this order to the serving party: Keystone Law at 48 Chancery Lane, London WC2A IJF (Ref: TEL14/40)

Manan Singh Claimant Second Statement Exhibit MS2 20 December 2024

# IN THE HIGH COURT OF JUSTICE

**CLAIM NO. KB-2024-004175** 

KING'S BENCH DIVISION

**BETWEEN:** 

# TELEDYNE UK LIMITED

**Claimant** 

- (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).

Manan Singh Claimant Second Statement Exhibit MS2 20 December 2024

- (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,

Manan Singh Claimant Second Statement Exhibit MS2

20 December 2024

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.

Manan Singh

M Singh

Dated this 20th day of December 2024

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# IN THE HIGH COURT OF JUSTICE

#### KING'S BENCH DIVISION

#### **BETWEEN:**

#### TELEDYNE UK LIMITED

**Claimant** 

- (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

# **EXHIBIT MS2**

# **Manan Singh**

From: Quick Adam

**Sent:** 20 December 2024 09:46

To: Manan Singh

Cc:

Subject: RE: Our client: Teledyne UK Limited

Mr. Singh

I can confirm that Merseyside Police have no objection to the draft order and therefore, are neutral on the application. I will not be able to prepare a WS today and so, I am happy for you to enclose this email.

Thanks

#### **Adam Quick**

Solicitor-Civil Lit & Employment Legal Services



Website: www.merseyside.police.uk









For more information about the use and disclosure of personal data, see our <u>privacy notice</u>



Certifi	cate of service	1	<b>lame of court</b> High Court of Jus Division	tice, King's Bench	Claim No. KB-2024-004175
On what d		-	lame of Claimant TELEDYNE UK L	.IMITED	
you serve	of service is 17/12	N	lame of Defendant See Schedule 1		
Please attach	nments did you serve? copies of the documents you ady filed with the court.	<ol> <li>Sealed application</li> <li>Draft Order</li> <li>Witness Statement</li> </ol>	·		
<b>On whom</b> (If appropriate e.g. partner, d	did you serve? e include their position lirector).	Stephen Simpson, So	licitor within Leg	Services, West Y	orkshire Police
•	ou serve the documents? ne appropriate box)				ffected, include fax or DX electronic identification
☐ deliver	class post or other service w y on the next business day		1	en.Simpson@west @westyorkshire.pol	yorkshire.police.uk; CC: lice.uk.
by pers	vering to or leaving at a pe sonally handing it to or leav time left, where docume orm) (please specify)	ving it with	Being the	claimant's solicitor's	Respondent Iitigation friend
by other	er means permitted by the specify)	court		residence	
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docum	er electronic means (.12:03 nent is other than a claim fo to: Stephen.Simpson@west	rm) (please specify)		siness of the partn n within the jurisdi	ership/company/ ction with a connection
	egal.Services@westyorkshir	• '	<b>✓</b> other (pleas	e specify)	
				address for Stepher al email address fo	n Simpson and the or West Yorkshire Police
I believe t	hat the facts stated in thi	s certificate are true.			
Full name	Manan Singh				
Signed	M Singh		Position or office held	Partner	
	(Claimant) (Defendant) ('s sol	icitor) ('s litigation friend)		(If signing on beha	lf of firm or company)
Date	1 7 / 1 2 / 2 0 2 4	1			

N215 Certificate of service (09.11) © Crown copyri 594

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

# Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

# Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

# Schedule 1

- (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 West Yorkshire Police

Respondent

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

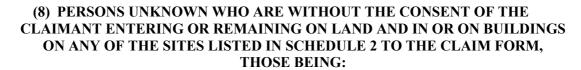
**CLAIM NO. KB-2024-004175** 

Before the Honourable Mr Justice Bourne 20 December 2024

BETWEEN:

### TELEDYNE UK LIMITED

- (1) JULIAN ALLEN GAO
  - (2) RUBY HAMILL
  - (3) DANIEL JONES
  - (4) NAJAM SHAH
- (5) RICKY SOUTHALL
- (6) AMAREEN AFZAL
- (7) SERENA FENTON



- 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 WEST YORKSHIRE POLICE

Respondent

# **ORDER**

**UPON** reading the Application dated 16 December 2024 made by the Claimant pursuant to CPR 31.17 (the 'Application')

**AND UPON** reading the witness statement of Stephen William Simpson for and on behalf of the Respondent, in which it is confirmed that the Respondent remains neutral on the Application

**AND UPON** the Court hearing Natalie Pratt of counsel and the Respondent not appearing or being represented

# IT IS ORDERED THAT:

#### **Definitions**

- 1. For the purpose of this Order:
  - 1.1 The "Shipley Site" shall mean Teledyne UK Limited's site at Airedale House, Acorn Park, Shipley BD17 7SW;
  - 1.2 The "Road" shall mean the road known as Acorn Park, Shipley.

# Order

2. The Respondent shall disclose to and permit the Claimant inspection of the

# following documents within its control:

- 2.1 the occurrence logs for the incidents that occurred at the Shipley Site on 26/12/23, 02/04/24, 15/05/24 and 19/12/24, which logs provide the name, addresses, email addresses and telephone numbers of any person arrested by one of the Respondent's officers in the course of, or as a result of, protest (including, but not limited to, acts of trespass) at the Shipley Site or on the Road; and
- documents which provide the names, addresses, email addresses and telephone numbers of any person who was asked to leave the Shipley Site by one of the Respondent's officers during the course of the incidents that occurred at the Shipley Site on 26/12/23, 02/04/24, 15/05/24 and 19/12/24; and
- 2.3 photographic material and any evidentially relevant material, including witness statements and written/typed interview records, relating to any person arrested by one of the Respondent's officers during the course of the incidents that occurred at the Shipley Site (or on the Road) on 26/12/23, 02/04/24, 15/05/24 and 19/12/24; and
- 2.4 the incident logs that provide the name, addresses, email addresses and telephone numbers of any person arrested by one of the Respondent's officers in the course of, or as a result of, protest (including, but not limited to, acts of trespass and obstruction of the highway) at the Shipley Site or on the Road on any occasion throughout 2024 and until the date of disclosure, along with any photographic material and any evidentially relevant material relating to any person arrested.
- 2.5 details of any remaining conditions or restrictions from attending the Claimant's sites placed on any person so arrested and subsequently released on bail by the Respondent.
- 3. The Respondent, when providing disclosure of the documents described in paragraph 2, shall:
  - 3.1 specify documents which are no longer in its control (if any);
  - 3.2 specify documents over which it claims a right or duty to withhold inspection (if any);
  - 3.3 be entitled to redact any information on the grounds of public interest immunity or legal privilege;
  - 3.4 be entitled to redact any information on the grounds of sub judice.

    Once the sub judice reasons for redaction conclude, then the Claimant will be at liberty to request an un-redacted version of the documents and the Respondent shall provide a copy for inspection.

- 4. The duty to disclose the matters specified in paragraph 2 above shall be ongoing and continue until 4pm on 28 February 2025, unless extended by further order.
- 5. The Claimant shall pay the Respondent's reasonable costs of and occasioned by this Application and the disclosure, to be assessed in default of agreement.

Dated this 20th day of December 2024

# Service of the order

The court has provided a sealed copy of this order to the serving party: Keystone Law at 48 Chancery Lane, London WC2A IJF (Ref: TEL14/40)

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

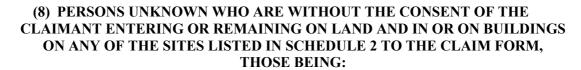
**CLAIM NO. KB-2024-004175** 

Before the Honourable Mr Justice Bourne 20 December 2024

BETWEEN:

### TELEDYNE UK LIMITED

- (1) JULIAN ALLEN GAO
  - (2) RUBY HAMILL
  - (3) DANIEL JONES
  - (4) NAJAM SHAH
- (5) RICKY SOUTHALL
- (6) AMAREEN AFZAL
- (7) SERENA FENTON



- 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)	2) THE CHIEF	' CONSTABLE OI	F MERSEYSIDE POLIC	$\mathbf{CE}$
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Respondent

**UPON** reading the Application dated 20 December 2024 made by the Claimant pursuant to CPR 31.17 (the 'Application')

**AND UPON** reading the witness statement of Manan Singh for and on behalf of the Claimant, in which it is confirmed that the Respondent remains neutral on the Application

AND UPON the Court considering the Application on the papers and without a hearing

# IT IS ORDERED THAT:

#### **Definitions**

- 1. For the purpose of this Order:
  - 1.1 The "Wirral Site" shall mean Teledyne UK Limited's site at Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA.

# Order

- 2. The Respondent shall disclose to and permit the Claimant inspection of the following documents within its control:
  - any record of the name, addresses, email addresses and telephone numbers of any person who has been arrested by one of their officers in the course of, or as a result of, protests (including, but not limited to,

- acts of trespass) at the Wirral Site, as defined in paragraph 1.1 above;
- all, officer bodycam footage, CCTV and drone footage from the Wirral Site, and officer MG11 witness statements (including any exhibit) relating to any person who has been arrested by one of their officers in the course of, or as a result of, protests (including, but not limited to, acts of trespass) at the Wirral Site, as defined in paragraph 1.1 above;
- 2.3 any record which provides names and addresses of any person asked to leave the Wirral Site by one of their officers in the course of, or as a result of, protests at the Wirral Site, as defined in paragraph 1.1 above; and
- any record which confirms whether any of the persons referred to in paragraphs 2.1 and 2.3 above are subject to bail conditions and, if so, the identity of that person and the relevant conditions to which their bail is subjected.
- 3. The Respondent shall specify when providing disclosure of the documents described in paragraph 2:
  - 3.1 which documents are no longer in its control and what has happened to those documents; and
  - 3.2 the documents over which it claims a right or duty to withhold inspection.
- 4. The duty to disclose the matters specified in paragraph 2 above shall be ongoing and continue until 4pm on 28 February 2025, unless extended by further order.
- 5. The Claimant shall pay the Respondent's reasonable costs of this Application, agreed in the sum of £500 plus VAT. The Claimant shall also pay the Respondent's reasonable costs of disclosure and permitting inspection, to be calculated in accordance with Appendix 3 of the Merseyside Police's internal disclosure policy document.

Dated this 20th day of December 2024

#### Service of the order

The court has provided a sealed copy of this order to the serving party: Keystone Law at 48 Chancery Lane, London WC2A IJF (Ref: TEL14/40)

# IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

**CLAIM NO. KB-2024-004175** 

**Mr Justice Johnson** 

**BETWEEN** 



#### TELEDYNE UK LIMITED

**Claimant** 

- (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

### **ORDER**

**UPON** reading the Application dated 20 December 2024 made by the Claimant pursuant to CPR 31.17 (the 'Application')

**AND UPON** reading the witness statement of Manan Singh for and on behalf of the Claimant, in which it is confirmed that the Respondent remains neutral on the Application

**AND UPON** the Court considering the Application on the papers and without a hearing

#### IT IS ORDERED THAT:

#### **Definitions**

- 1. For the purpose of this Order:
  - 1.1 The "Wirral Site" shall mean Teledyne UK Limited's site at Unit A, 6 Tebay Road, Bromborough, Birkenhead, Wirral CH62 3PA.

#### Order

- 2. The Respondent shall disclose to and permit the Claimant inspection of the following documents within its control:
  - any record of the name, addresses, email addresses and telephone numbers of any person who has been arrested by one of their officers in the course of, or as a result of, protests (including, but not limited to, acts of trespass) at the Wirral Site, as defined in paragraph 1.1 above;
  - all, officer bodycam footage, CCTV and drone footage from the Wirral Site, and officer MG11 witness statements (including any exhibit) relating to any person who has been arrested by one of their officers in the course of, or as a result of, protests (including, but not limited to, acts of trespass) at the Wirral Site, as defined in paragraph 1.1 above;
  - 2.3 any record which provides names and addresses of any person asked to leave the Wirral Site by one of their officers in the course of, or as a result of, protests at the Wirral Site, as defined in paragraph 1.1 above; and
  - any record which confirms whether any of the persons referred to in paragraphs 2.1 and 2.3 above are subject to bail conditions and, if so, the identity of that person and the relevant conditions to which their bail is subjected.
- 3. The Respondent shall specify when providing disclosure of the documents described in paragraph 2:
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  - 3.2 the documents over which it claims a right or duty to withhold inspection.
- 4. The duty to disclose the matters specified in paragraph 2 above shall be ongoing and continue until 4pm on 28 February 2025, unless extended by further order.
- 5. The Claimant shall pay the Respondent's reasonable costs of this Application, agreed in the sum of £500 plus VAT. The Claimant shall also pay the Respondent's reasonable costs of disclosure and permitting inspection, to be calculated in accordance with Appendix 3 of the Merseyside Police's internal disclosure policy document.
- 6. Any party may apply on notice to set aside or vary this order. Any such application must be made within 7 days of service of this order.

Dated this 20th day of December 2024

# Service of the order

The court has provided a sealed copy of this order to the serving party: Keystone Law at 48 Chancery Lane, London WC2A IJF (Ref: TEL14/40)

Certificate of service	Name of court High Court of Justice Kings Bench Division  Claim No.  KB-2024-004175
On what day did you serve? 2 0 / 1 2 / 2 0 2 4	Name of Claimant TELEDYNE UK LIMITED
The date of service is 2 0 / 1 2 / 2 0 2 4	Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and others
What documents did you serve?  Please attach copies of the documents you have not already filed with the court.	÷1
On whom did you serve? (If appropriate include their position e.g. partner, director).	amed in the Orders
How did you serve the documents?  (please tick the appropriate box)  by first class post or other service which provides fo delivery on the next business day	Give the address where service effected, include fax or DX number, e-mail address or other electronic identification
<ul> <li>by delivering to or leaving at a permitted place</li> <li>by personally handing it to or leaving it with</li> <li>(time left, where document is other than claim form) (please specify)</li> </ul>	Being the claimant's defendant's solicitor's litigation friend usual residence
by other means permitted by the court (please specify)	☐ last known residence ☐ place of business ☐ principal place of business
In accordance with para 3(i) of the Order of Bourne dated 20/12/2024.	e J
<ul> <li>by Document Exchange</li> <li>by fax machine (time sent, where docum is other than a claim form) (you may want to enclose of the transmission sheet)</li> </ul>	a copy principal office of the corporation
by other electronic means (time sent, wh document is other than a claim form) (please specify	principal office of the company  place of business of the partnership/company/  corporation within the jurisdiction with a connection to claim  other (please specify)
I believe that the facts stated in this certificate are Full name Nicholas Wargent	true.
Signed Mulilyant	Position or office held
(Claimant) (Defendant) ('s olicitor) ('s litigation  Date 1 3 / 0 1 / 2 0 2 5	(If signing on behalf of firm or company)

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

# Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

# Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service		
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day		
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day		
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day		
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted		
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent		
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day		

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

#### Schedule 1

# Copies of the Order and the relevant court documents relating to the Order can be obtained below:

- 1. Sealed Claim Form dated 13 December 2024
- 2. Sealed Application Notice dated 13 December 2024
- 3. Sealed Order dated 20 December 2024
- 4. Skeleton Argument

#### WITNESS STATEMENTS AND EXHIBITS

- 1. First Witness Statement of Nicholas Wargent dated 13 December 2024
- 2. Exhibit NJW1
- 3. First Witness Statement of Manan Singh dated 13 December 2024
- 4. Exhibit MS1
- 5. Witness Statement of Stephen Simpson and Exhibit dated 16 December 2024
- 6. Second Witness Statement of Nicholas Wargent dated 19 December 2024
- 7. Exhibit NJW2
- 8. Second Witness Statement of Manan Singh dated 20 December 2024
- 9. Exhibit MS2

#### **Third Party Disclosure Forms**

- 1. Application Notice Merseyside Police
- 2. Sealed Order Merseyside Police
- 3. Second Sealed Order Merseyside Police
- 4. Application Notice West Yorkshire Police
- 5. Sealed Order West Yorkshire Police

Certifi	cate of service		Name of court High Court of Jus Division	tice Kings Bench	Claim No. KB-2024-004175
On what d		/2024	Name of Claimant TELEDYNE UK L	LIMITED	
you serve	of service is 2 0 / 1 2			GAO, RUBY HAMII RICKY SOUTHALL	LL, DANIEL JONES,
			NAJAW SHAH, F	KICKY SOUTHALL	, and others
Please attach	ments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ched		
<b>On whom (</b> (If appropriate e.g. partner, d	did you serve? e include their position lirector).	Defendants named i	n the Orders		
	ou serve the documents? ne appropriate box)				ffected, include fax or DX electronic identification
	class post or other service w y on the next business day	hich provides for			
by deli	vering to or leaving at a pe	rmitted place			
[ (	sonally handing it to or lea time left, where docume orm) (please specify)	_	Being the	claimant's solicitor's	defendant's litigation friend
			usual reside	ence	
lavi atlav	ou un our un our site out leur the o		☐ last known	residence	
(pleases	er means permitted by the specify)	court	place of bu		
	ordance with para 3 (iv) of t 20/12/2024. (Wirral, Shipley			lace of business place of business	
☐ by Doo	cument Exchange			principal place of	
by fax	machine (time sen	t, where document		ffice of the partner ffice of the corpora	
	ansmission sheet)	iy wani to enclose a сору		ffice of the compa	
by other	er electronic means (nd ent is other than a claim fo	time sent, where orm) (please specify)	_ place of bu	isiness of the partr	nership/company/ iction with a connection
			other (pleas	e specify)	
					-
I believe t	hat the facts stated in thi	s certificate are true.			
Fullname	Nicholas Wargent				
Signed	Meele Way	ut	Position or office held	General Counsel	
	(Claimant) (Defendant) ('s so		1)	(If signing on beha	alf of firm or company)
Date	13/01/202	5			

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules (www.justice.gov.uk) and you should refer to the rules for information.

# Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

# Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service		
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day		
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day		
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day		
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted		
Other electronic method  If the email or other electronic transmission is sent on a business day on which it was sent			
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after the		

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

# Copies of the Order and the relevant court documents relating to the Order can be obtained below:

- 1. Sealed Claim Form dated 13 December 2024
- 2. Sealed Application Notice dated 13 December 2024
- 3. Sealed Order dated 20 December 2024
- 4. Skeleton Argument

#### WITNESS STATEMENTS AND EXHIBITS

- 1. First Witness Statement of Nicholas Wargent dated 13 December 2024
- 2. Exhibit NJW1
- 3. First Witness Statement of Manan Singh dated 13 December 2024
- 4. Exhibit MS1
- 5. Witness Statement of Stephen Simpson and Exhibit dated 16 December 2024
- 6. Second Witness Statement of Nicholas Wargent dated 19 December 2024
- 7. Exhibit NJW2
- 8. Second Witness Statement of Manan Singh dated 20 December 2024
- 9. Exhibit MS2

#### **Third Party Disclosure Forms**

- 1. Application Notice Merseyside Police
- 2. Sealed Order Merseyside Police
- 3. Second Sealed Order Merseyside Police
- 4. Application Notice West Yorkshire Police
- 5. Sealed Order West Yorkshire Police





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Plotted Scale - 1:1250. Paper Size – A4

Title Number: WYK387275



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Title Number: LL317736



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Plotted Scale − 1:1000. Paper Size − A4

Title Number: CYM839162



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Plotted Scale - 1:750. Paper Size - A4

Title Number: WA552132

Certificate of service		Name of court High Court of Jus Division	tice Kings Bench	Claim No. KB-2024-004175	
On what day did you serve?	2 3 / 1 2	2/2024	Name of Claimant TELEDYNE UK L Name of Defendant		
The date of service is 2 3 / 1 2 / 2 0 2 4				GAO, RUBY HAMI RICKY SOUTHALL	LL, DANIEL JONES, ,, and others
<b>What documents did</b> Please attach copies of the d have not already filed with ti	locuments you	See Schedule 1 A	Attached		
On whom did you ser (If appropriate include their e.g. partner, director).	On whom did you serve? (If appropriate include their position e.g. partner, director).				
How did you serve the (please tick the appropriate					ffected, include fax or DX electronic identification
by first class post or delivery on the nex		vhich provides for			
by personally hand (time left, claim form) (please:	where docum		Being the  usual resid last known		☐ defendant's☐ litigation friend
	ı para 3 (iv) of t	he Order of Bourne	☐ place of bu☐ principal p	isiness lace of business	
dated 20/12/2024.  by Document Exch		nd Newbury)	- 1 -	place of business principal place of	
	m form) (you m	nt, where document ay want to enclose a cop	py principal o	ffice of the partne ffice of the corpor ffice of the compa	ation
by other electronic means (time sent, where document is other than a claim form) (please specify)			place of bu	isiness of the parti n within the jurisd	nership/company/ iction with a connection
		:			
Full name Nicholas W		is certificate are tri	ie.		
Signed Lle	eleliky	ut	Position or office held	General Counsel	
(Claimant) (I	Defendant),('s so	licitor) ('s litigation frie	end)	(If signing on beha	alf of firm or company)

## Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

# Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

# Copies of the Order and the relevant court documents relating to the Order can be obtained below:

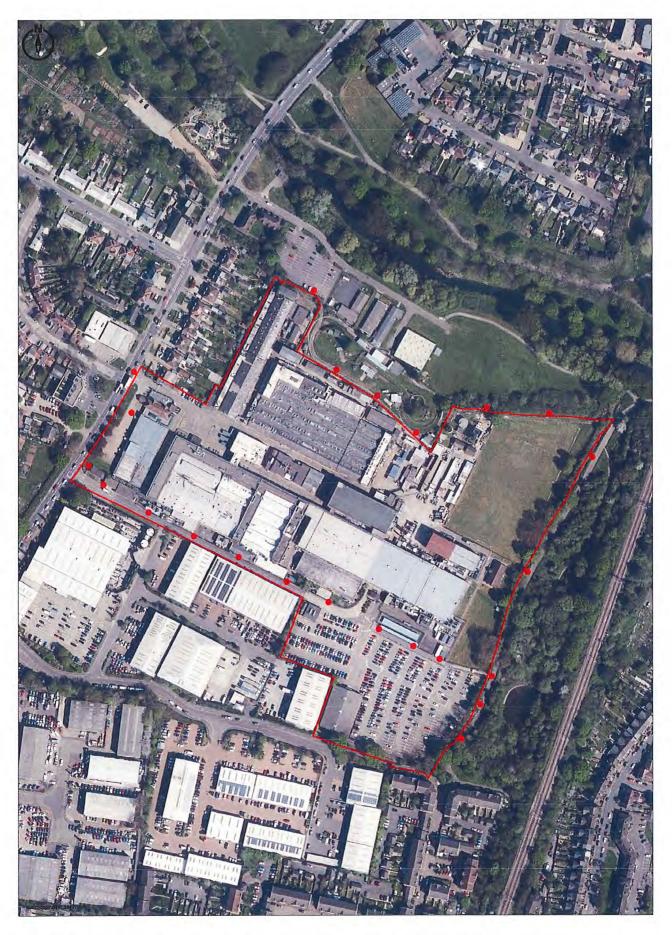
- 1. Sealed Claim Form dated 13 December 2024
- 2. Sealed Application Notice dated 13 December 2024
- 3. Sealed Order dated 20 December 2024
- 4. Skeleton Argument

#### WITNESS STATEMENTS AND EXHIBITS

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- 3. First Witness Statement of Manan Singh dated 13 December 2024
- 4. Exhibit MS1
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- 8. Second Witness Statement of Manan Singh dated 20 December 2024
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- 1. Application Notice Merseyside Police
- 2. Sealed Order Merseyside Police
- 3. Second Sealed Order Merseyside Police
- 4. Application Notice West Yorkshire Police
- 5. Sealed Order West Yorkshire Police



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Title Number: EX688035





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Title Number: BK365055

Certificate of service			Name of court High Court of Justice Kings Bench Division  Claim No. KB-2024-004175			
			Name of Claimant TELEDYNE UK I	LIMITED		
On what o		/2024	Name of Defendant			
The date	of service is 2 0 / 1 2	/ 2 0 2 4	JULIAN ALLEN	GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others	
Please attach	uments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached			
<b>On whom</b> (If appropriat e.g. partner, a	did you serve? The include their position The irector).	Defendants named	in the Orders			
•	ou serve the documents? ne appropriate box)				ffected, include fax or Da electronic identification	
	class post or other service w y on the next business day	hich provides for	info@palestine	action.org		
by deli	vering to or leaving at a pe	rmitted place				
(	sonally handing it to or leav time left, where docume orm) (please specify)	•	Being the	claimant's solicitor's	defendant's	
			usual resid			
by oth	er means permitted by the	court	☐ last known☐ place of bu			
By wa	y of email at 17:14 in accord der of Bourne J dated 20/12	•		lace of business place of business		
by Doo	cument Exchange		last known	principal place of	business	
by fax	machine (time sen	t, where document	principal office of the partnership			
	r than a claim form) (you ma ansmission sheet)	y want to enclose a copy				
by other electronic means (.17:14time sent, where document is other than a claim form) (please specify)			principal office of the company  place of business of the partnership/company/  corporation within the jurisdiction with a connection to claim			
			<b>✓</b> other (pleas	e specify)		
			Known Em	ail for Service		
I believe t	hat the facts stated in this	s certificate are true	•			
Full name	Manan Singh					
Signed	M Singh		Position or office held	Partner		
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation friend</del>	<del></del> <del>d)</del>	(If signing on beha	If of firm or company)	
Date	1 3 / 0 1 / 2 0 2 5	5				

# Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

# Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
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Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

- 1. Injunction Order dated 20 December 2024 prohibiting certain protest activities at six of Teledyne's sites (as listed therein);
- 2. Disclosure Order dated 20 December 2024 (West Yorkshire Police);
- 3. Disclosure Order dated 20 December 2024 (Merseyside Police); and
- 4. Disclosure Order dated 20 December 2024 (Merseyside Police).

Certificate of service			Name of court High Court of Justice Kings Bench Division  Claim No.  KB-2024-004175			
			Name of Claimant TELEDYNE UK I	LIMITED		
On what o		/ 2 0 2 4	Name of Defendant			
The date	of service is 2 0 / 1 2	/2 0 2 4		GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others	
Please attach	uments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached			
<b>On whom</b> (If appropriate, e.g. partner, c	did you serve? te include their position director).	Defendants named	in the Orders			
•	ou serve the documents?				ffected, include fax or D electronic identification	
	class post or other service w y on the next business day	hich provides for	actions@palest	tineaction.org		
by deli	ivering to or leaving at a pe	rmitted place				
(	sonally handing it to or leav time left, where docume form) (please specify)	_	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>	
			usual resid			
by oth (please:	er means permitted by the specify)	court	place of bu			
-	y of email at 17:15 in accord	•		lace of business place of business		
by Doo	cument Exchange		last known principal place of business			
by fax	machine (time sen	t, where document	principal office of the partnership			
is othe	er than a claim form) (you ma cansmission sheet)			ffice of the corpora		
by other electronic means (.17:15time sent, where document is other than a claim form) (please specify)			place of bu	ffice of the compar siness of the partn n within the jurisdi		
			<b>✓ other</b> (pleas	e specify)		
			Known Em	ail for Service		
I believe t	hat the facts stated in this	s certificate are true	•			
Full name	Manan Singh					
Signed	M Singh		Position or office held	Partner		
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation frien</del> d		(If signing on beha	If of firm or company)	
Date	1 3 / 0 1 / 2 0 2 5	5				

### Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

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- 4. Disclosure Order dated 20 December 2024 (Merseyside Police).

C - 1:C		Г			1
Certificate of service		Name of court High Court of Justice Kings Bench Division  Claim No.  KB-2024-004175			
			Name of Claimant TELEDYNE UK L	LIMITED	
On what o		/ 2 0 2 4			
•	of service is 2 0 / 1 2			GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others
Please attach	uments did you serve? In copies of the documents you ady filed with the court.	See Schedule 1 Atta	ched		
(If appropriat	n whom did you serve? appropriate include their position g. partner, director).  Defendants named in the Orders				
•	ou serve the documents?				fected, include fax or Dielectronic identification
	class post or other service w ry on the next business day	hich provides for	media@palesti	necampaign.org	
by deli	ivering to or leaving at a per	rmitted place			
by personally handing it to or leaving it with  (time left, where document is other than a claim form) (please specify)		_	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>
			usual resid	ence	
			last known	residence	
by oth (please	er means permitted by the a specify)	court	place of bu	siness	
-	y of email at 17:16 in accord der of Bourne J dated 20/12			lace of business place of business	
by Doo	cument Exchange		☐ last known principal place of business		
	machine (time sent		principal office of the partnership		
	er than a claim form) (you may ransmission sheet)	y want to enclose a copy	principal office of the corporation		
by other electronic means (.17:16time sent, where document is other than a claim form) (please specify)		time sent, where rm) (please specify)	place of bu	ffice of the compar siness of the partn n within the jurisdi	
			✓ other (pleas	e specify)	
			Known Em	ail for Service	
I believe t	that the facts stated in this	certificate are true.			
Full name	Manan Singh				
Signed	M Singh		Position or office held	Partner	
	(Claimant) <del>(Defendant</del> ) ('s soli	icitor) <del>('s litigation friend</del>	<del>)</del>	(If signing on behal	lf of firm or company)
Date	1 3 / 0 1 / 2 0 2 5	3			

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		F			1
Certifi	Certificate of service		Name of court High Court of Jus Division	tice Kings Bench	Claim No. KB-2024-004175
			Name of Claimant TELEDYNE UK L	IMITED	
On what o		/ 2 0 2 4	Name of Defendant		
The date	of service is 2 0 / 1 2		JULIAN ALLEN	GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others
Please attach	uments did you serve? In copies of the documents you ady filed with the court.	See Schedule 1 Atta	ched		
<b>On whom</b> (If appropriate.g. partner, c	<b>did you serve?</b> te include their position director).	Defendants named in	n the Orders		
•	ou serve the documents?				ffected, include fax or Di electronic identification
	class post or other service w ry on the next business day	hich provides for	branches@pale	estinecampaign.org	
by deli	ivering to or leaving at a per	mitted place			
by personally handing it to or leaving it with  (time left, where document is other than a claim form) (please specify)		•	Being the	claimant's solicitor's	defendant's
			usual resid	ence	
			last known	residence	
by oth (please	er means permitted by the a specify)	court	place of bu		
'	y of email at 17:17 in accord der of Bourne J dated 20/12	•		lace of business place of business	
☐ by Doo	cument Exchange		☐ last known principal place of business		
	machine (time sent		principal office of the partnership		
	e <mark>r than a claim form)</mark> (you mag ransmission sheet)	y want to enclose a copy	_ ` `	ffice of the corpora	
by other electronic means (.17:17time sent, where document is other than a claim form) (please specify)		time sent, where rm) (please specify)	place of bu	ffice of the compar siness of the partn n within the jurisdi	
			other (pleas	e specify)	
			Known Em	ail for Service	
I believe t	that the facts stated in this	certificate are true.			
Full name	Manan Singh				
Signed	M Singh		Position or office held	Partner	
	(Claimant) <del>(Defendant</del> ) ('s soli	citor) <del>('s litigation friend</del>	<del>)</del>	(If signing on behal	f of firm or company)
Date	1 3 / 0 1 / 2 0 2 5				

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c		Г			T
Certifi	Certificate of service		Name of court High Court of Jus Division	tice Kings Bench	Claim No. KB-2024-004175
			Name of Claimant TELEDYNE UK L	IMITED	
On what o		/ 2 0 2 4			
•	of service is 2 0 / 1 2			GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others
Please attach	uments did you serve? In copies of the documents you ady filed with the court.	See Schedule 1 Atta	ched		
(If appropriat	n whom did you serve?  appropriate include their position g, partner, director).  Defendants named in the Orders				
•	ou serve the documents?				ffected, include fax or Di electronic identification
	class post or other service w ry on the next business day	hich provides for	info@palestine	campaign.org	
by del	ivering to or leaving at a per	mitted place			
by personally handing it to or leaving it with  (time left, where document is other than a claim form) (please specify)		•	Being the	claimant's solicitor's	defendant's
			usual resid	ence	
			last known	residence	
by oth (please	er means permitted by the a specify)	court	place of bu	siness	
-	y of email at 17:18 in accord der of Bourne J dated 20/12	•		lace of business place of business	
☐ by Do	cument Exchange		☐ last known principal place of business		
	machine (time sent		principal office of the partnership		
	er than a claim form) (you may ransmission sheet)	y want to enclose a copy	_ ` `	ffice of the corpora	
by other electronic means (.17:18time sent, where document is other than a claim form) (please specify)		time sent, where rm) (please specify)	place of bu	ffice of the compar siness of the partn n within the jurisdi	
			<b>✓</b> other (pleas	e specify)	
			Known Em	ail for Service	
I believe t	that the facts stated in this	certificate are true.			
Full name	Manan Singh				
Signed	M Singh		Position or office held	Partner	
	(Claimant) <del>(Defendant</del> ) ('s soli	citor) <del>('s litigation friend</del>	<del>)</del>	(If signing on beha	If of firm or company)
Date	1 3 / 0 1 / 2 0 2 5				

## Calculation of deemed day of service of a claim

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Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
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Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

- 1. Injunction Order dated 20 December 2024 prohibiting certain protest activities at six of Teledyne's sites (as listed therein);
- 2. Disclosure Order dated 20 December 2024 (West Yorkshire Police);
- 3. Disclosure Order dated 20 December 2024 (Merseyside Police); and
- 4. Disclosure Order dated 20 December 2024 (Merseyside Police).

					T		
Certificate of service			Name of court High Court of Justice Kings Bench Division Claim No. KB-2024-004175				
			Name of Claimant TELEDYNE UK L	IMITED			
On what o		/ 2 0 2 4	Name of Defendant				
The date of service is 2 0 / 1 2 / 2 0 2 4			JULIAN ALLEN	GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others		
Please attach	uments did you serve? In copies of the documents you ady filed with the court.	See Schedule 1 Atta	ched				
(If appropriat	On whom did you serve? If appropriate include their position .g. partner, director).  Defendants named in			in the Orders			
•	ou serve the documents? the appropriate box)				ffected, include fax or Di electronic identification		
	class post or other service w ry on the next business day	hich provides for	palestinesolida	ritybradford@gmail.	com		
by del	ivering to or leaving at a per	mitted place					
(	sonally handing it to or leav time left, where docume form) (please specify)	•	Being the	claimant's solicitor's	defendant's		
			usual resid	ence			
1 .1			last known	residence			
by oth (please	er means permitted by the a specify)	court	place of bu				
-	y of email at 17:19 in accord der of Bourne J dated 20/12	•	principal place of business  last known place of business				
☐ by Do	cument Exchange		☐ last known principal place of business				
	machine (time sent		principal office of the partnership				
	er than a claim form) (you may ransmission sheet)	y want to enclose a copy	principal office of the corporation principal office of the company				
by other electronic means (.17::19time sent, where document is other than a claim form) (please specify)			place of bu	siness of the partn			
			✓ other (pleas	e specify)			
			Known Em	ail for Service			
I believe t	that the facts stated in this	certificate are true.					
Full name	Manan Singh						
Signed	M Singh		Position or office held	Partner			
	(Claimant) <del>(Defendant</del> ) ('s soli	citor) <del>('s litigation friend</del>	<del>)</del>	(If signing on beha	If of firm or company)		
Date	1 3 / 0 1 / 2 0 2 5						

### Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

# Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service		
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day		
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day		
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- 3. Disclosure Order dated 20 December 2024 (Merseyside Police); and
- 4. Disclosure Order dated 20 December 2024 (Merseyside Police).

Certificate of service			Name of court High Court of Justice Kings Bench Division  Claim No.  KB-2024-004175				
			Name of Claimant TELEDYNE UK L	LIMITED			
On what o		/2024	Name of Defendant				
The date of service is 2 0 / 1 2 / 2 0 2 4				GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others		
Please attach	uments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached				
(If appropriat	On whom did you serve? (If appropriate include their position e.g. partner, director).  Defendants named i			in the Orders			
•	ou serve the documents? ne appropriate box)				ffected, include fax or Da electronic identification		
	class post or other service w y on the next business day	hich provides for	pscchelmsford(	@gmail.com			
by deli	vering to or leaving at a pe	rmitted place					
(	sonally handing it to or leav time left, where docume form) (please specify)	•	Being the	claimant's solicitor's	defendant's		
			usual resid				
	er means permitted by the	court	last known				
(please s	· · · · · · · · · · · · · · · · · · ·		_ '	lace of business			
-	y of email at 17:19 in accord der of Bourne J dated 20/12	•	last known	place of business			
by Doo	cument Exchange		last known	principal place of	business		
	machine (time sen		principal office of the partnership				
	e <mark>r than a claim form)</mark> (you ma ansmission sheet)	y want to enclose a copy	principal office of the corporation principal office of the company				
by other electronic means (.17:19time sent, where document is other than a claim form) (please specify)			place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim				
			✓ other (pleas	e specify)			
			Known Em	ail for Service			
I believe t	hat the facts stated in this	s certificate are true	•				
Full name	Manan Singh						
Signed	M Singh		Position or office held	Partner			
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation frien</del> d	l <del>sl)</del>	(If signing on beha	If of firm or company)		
Date	1 3 / 0 1 / 2 0 2 5	5					

### Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

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- 3. Disclosure Order dated 20 December 2024 (Merseyside Police); and
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Certificate of service			Name of court Claim No.			
			High Court of Jus Division	tice Kings Bench	KB-2024-004175	
			Name of Claimant TELEDYNE UK L	IMITED		
On what o		/2024	Name of Defendant			
The date of service is 2 0 / 1 2 / 2 0 2 4			Name of Defendant  JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES,  NAJAM SHAH, RICKY SOUTHALL, and others			
Please attach	uments did you serve? In copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached			
(If appropriat	On whom did you serve? (If appropriate include their position e.g. partner, director).  Defendants named i					
•	ou serve the documents? he appropriate box)				ffected, include fax or D) electronic identification	
	class post or other service w ry on the next business day	hich provides for	lincolnpalestine	e@gmail.com		
☐ by deli	ivering to or leaving at a pe	rmitted place				
(	sonally handing it to or leav time left, where docume form) (please specify)	_	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>	
			usual resid			
	er means permitted by the	court	☐ last known☐ place of bu			
(please s	y of email at 17:20 in accord	ance with para 3 of	principal p	lace of business		
the Or	der of Bourne J dated 20/12	/2024.	last known	place of business		
☐ by Doo	cument Exchange			principal place of		
	machine (time sen		principal office of the partnership principal office of the corporation			
	e <mark>r than a claim form)</mark> (you ma <sub>g</sub> cansmission sheet)	y want to enclose a copy		-		
by other electronic means (.17:20time sent, where document is other than a claim form) (please specify)			principal office of the company  place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim			
			<b>✓</b> other (pleas	e specify)		
			Known Em	ail for Service		
l believe t	that the facts stated in this	s certificate are true.	,			
Full name	Manan Singh					
Signed	7.45. /		Position or	Partner		
5	M Singh		office held	raiuiei		
	(Claimant) (Defendant) ('s sol		<del>d)</del>	(If signing on beha	lf of firm or company)	
Date	1 3 / 0 1 / 2 0 2 5	5				

#### Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

# Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

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- 2. Disclosure Order dated 20 December 2024 (West Yorkshire Police);
- 3. Disclosure Order dated 20 December 2024 (Merseyside Police); and
- 4. Disclosure Order dated 20 December 2024 (Merseyside Police).

					T		
Certificate of service			Name of court High Court of Justice Kings Bench Division Claim No.  KB-2024-00417				
			Name of Claimant TELEDYNE UK L	IMITED			
On what o		/2024	Name of Defendant				
The date of service is 2 0 / 1 2 / 2 0 2 4				GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others		
Please attach	uments did you serve? In copies of the documents you ady filed with the court.	See Schedule 1 Atta	ched				
(If appropriat	On whom did you serve? If appropriate include their position a.g. partner, director).			in the Orders			
•	ou serve the documents? he appropriate box)				ffected, include fax or Di electronic identification		
	class post or other service w ry on the next business day	hich provides for	liverpoolfopal@	gmail.com			
by del	ivering to or leaving at a per	mitted place					
by personally handing it to or leaving it with  (time left, where document is other than a claim form) (please specify)		Being the	claimant's solicitor's	defendant's			
			usual resid	ence			
1 .1			last known	residence			
by oth (please	er means permitted by the a specify)	court	place of bu				
By way of email at 17:20 in accordance with para 3 of the Order of Bourne J dated 20/12/2024.			principal place of business  last known place of business				
☐ by Do	cument Exchange		last known principal place of business				
	machine (time sent		principal office of the partnership				
	er than a claim form) (you may ransmission sheet)	y want to enclose a copy	principal office of the corporation principal office of the company				
by other electronic means (.17:20time sent, where document is other than a claim form) (please specify)			place of bu	siness of the partn			
			✓ other (pleas	e specify)			
			Known Em	ail for Service			
I believe t	that the facts stated in this	certificate are true.					
Full name	Manan Singh						
Signed	M Singh		Position or office held	Partner			
	(Claimant) <del>(Defendant</del> ) ('s soli	citor) <del>('s litigation friend</del>	<del>)</del>	(If signing on beha	If of firm or company)		
Date	1 3 / 0 1 / 2 0 2 5						

#### Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

### Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
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- 4. Disclosure Order dated 20 December 2024 (Merseyside Police).

Certificate of service		Name of court High Court of Justice Kings Bench Division  Claim No.  KB-2024-004175			
			Name of Claimant TELEDYNE UK L	LIMITED	l
On what day did you serve? 2 0 / 1 2 / 2 0 2 4			Name of Defendant		
The date	The date of service is 2 0 / 1 2 / 2 0 2 4			GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others
Please attach	uments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached		
<b>On whom</b> (If appropriat e.g. partner, a	did you serve? The include their position The irector).	Defendants named	in the Orders		
•	ou serve the documents? ne appropriate box)				ffected, include fax or Da electronic identification
	class post or other service w y on the next business day	hich provides for	pscshrop@gma	ail.com	
by deli	vering to or leaving at a pe	rmitted place			
(	sonally handing it to or leav time left, where docume form) (please specify)	•	Being the	claimant's solicitor's	defendant's litigation friend
			usual resid		
by oth	er means permitted by the specify)	court	last known place of bu		
-	y of email at 17:21 in accord	•		lace of business place of business	
by Doo	cument Exchange		ast known	principal place of	business
by fax	machine (time sen	t, where document	principal office of the partnership		
is othe	r than a claim form) (you ma ansmission sheet)				
by oth docum	er electronic means (.17:21 nent is other than a claim fo	time sent, where rm) (please specify)	place of bu	ffice of the compar siness of the partn n within the jurisdi	
			other (pleas	e specify)	
			Known Em	ail for Service	
I believe t	hat the facts stated in this	s certificate are true	•		
Full name	Manan Singh				
Signed	M Singh		Position or office held	Partner	
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation frien</del>	 <del>d)</del>	(If signing on beha	If of firm or company)
Date	1 3 / 0 1 / 2 0 2 5	5			

## Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

### Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
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- 4. Disclosure Order dated 20 December 2024 (Merseyside Police).

Certificate of service		Name of court High Court of Justice Kings Bench  KB-2024-004175			
			Division  Name of Claimant  TELEDYNE UK L	IMITED	
On what o		/ 2 0 2 4	TELEDTINE OK I		
The date of service is 2 0 / 1 2 / 2 0 2 4				GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others
Please attach	uments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached		
<b>On whom</b> (If appropriat e.g. partner, a	did you serve? e include their position lirector).	Defendants named	in the Orders		
•	ou serve the documents?				ffected, include fax or Di electronic identification
	class post or other service w y on the next business day	hich provides for	bfdfriendsofpale	estine@yahoo.com	
by deli	vering to or leaving at a pe	rmitted place			
(	sonally handing it to or leav time left, where docume form) (please specify)	•	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>
			usual resid		
by oth (please	er means permitted by the specify)	court	last known place of bu		
-	y of email at 17:22 in accord der of Bourne J dated 20/12	•		lace of business place of business	
by Doc	cument Exchange		ast known	principal place of	business
by fax	machine (time sen	t, where document	principal office of the partnership		
is othe	e <mark>r than a claim form)</mark> (you ma ansmission sheet)				
by oth docum	er electronic means (.17:22 nent is other than a claim fo	time sent, where rm) (please specify)	place of bu	ffice of the compar siness of the partn n within the jurisdi	•
			other (pleas	e specify)	
			Known Em	ail for Service	
I believe t	hat the facts stated in this	s certificate are true	•		
Full name	Manan Singh				
Signed	M Singh		Position or office held	Partner	
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation frien</del>	 <del>d)</del>	(If signing on beha	If of firm or company)
Date	1 3 / 0 1 / 2 0 2 5	5			

## Calculation of deemed day of service of a claim

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Certifi	cate of service		Name of court High Court of Justice Kings Bench  KR. 2024-004175			
			Division	lice Kings Bench	KB-2024-004175	
			Name of Claimant TELEDYNE UK L	IMITED		
On what o		/ 2 0 2 5	Name of Defendant			
The date	The date of service is 1 3 / 0 1 / 2 0 2 5			GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others	
Please attach	uments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached			
<b>On whom</b> (If appropriat e.g. partner, a	did you serve? The include their position director).	Defendants named	in the Orders			
•	ou serve the documents?				ffected, include fax or Di electronic identification	
	class post or other service w y on the next business day	hich provides for	media@palesti	necampaign.org		
by deli	ivering to or leaving at a pe	rmitted place				
(	sonally handing it to or leav time left, where docume form) (please specify)	_	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>	
			usual resid	ence		
	er means permitted by the	court	last known			
(please s	specify)		place of bu	lace of business		
-	y of email at 11.01 in accord der of Bourne J dated 20/12	•		place of business		
by Doc	cument Exchange		ast known	principal place of	business	
	machine (time sen		principal office of the partnership			
	e <mark>r than a claim form)</mark> (you ma ansmission sheet)	y want to enclose a copy	principal office of the corporation			
by other electronic means (.11.01time sent, where document is other than a claim form) (please specify)		principal office of the company  place of business of the partnership/company/  corporation within the jurisdiction with a connection to claim				
			other (pleas	e specify)		
			Known Em	ail for Service		
I believe t	hat the facts stated in this	s certificate are true	•			
Full name	Manan Singh					
Signed	M Singh		Position or office held	Partner		
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation frien</del> d	<del></del> ' <del>d)</del>	(If signing on beha	f of firm or company)	
Date	1 3 / 0 1 / 2 0 2 5	5				

## Calculation of deemed day of service of a claim

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Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

- 1. Interim Injunction Order granted by Bourne J
- 2. Sealed Claim Form
- 3. Application Notice for Injunction and Alternative Service
- 4. Draft Injunction Order
- 5. First Witness Statement of Nicholas James Wargent
- 6. Exhibit NJW-1
- 7. First Witness Statement of Manan Singh
- 8. Exhibit MS1
- 9. Second Witness Statement of Nicholas James Wargent
- 10. Exhibit NJW-2

Certifi	Certificate of service		Name of court High Court of Justice Kings Bench  KB-2024-004175			
			Division  Name of Claimant  TELEDYNE UK L	IMITED		
On what o		/ 2 0 2 5				
The date of service is 1 3 / 0 1 / 2 0 2 5				GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others	
Please attach	uments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached			
<b>On whom</b> (If appropriat e.g. partner, c	did you serve? The include their position director).	Defendants named	in the Orders			
•	ou serve the documents? ne appropriate box)				fected, include fax or Da electronic identification	
	class post or other service w y on the next business day	hich provides for	info@palestine	action.org		
☐ by deli	ivering to or leaving at a pe	rmitted place				
(	sonally handing it to or leav time left, where docume form) (please specify)	_	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>	
			usual resid			
by oth (please:	er means permitted by the specify)	court	last known			
-	y of email at 11:01 in accord	•		lace of business place of business		
by Doo	cument Exchange		last known	principal place of	business	
by fax	machine (time sen	t, where document	principal office of the partnership			
is othe	e <mark>r than a claim form)</mark> (you ma ansmission sheet)					
by oth docum	er electronic means (.11.01 nent is other than a claim fo	time sent, where rm) (please specify)	place of bu	ffice of the compar Isiness of the partn In within the jurisdi	•	
			<b>✓</b> other (pleas	e specify)		
			Known Em	ail for Service		
I believe t	hat the facts stated in this	s certificate are true	•			
Full name	Manan Singh					
Signed	M Singh		Position or office held	Partner		
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation friend</del>	∖ <del>d)</del>	(If signing on behal	If of firm or company)	
Date	1 3 / 0 1 / 2 0 2 5	5				

#### Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

### Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
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- 1. Interim Injunction Order granted by Bourne J
- 2. Sealed Claim Form
- 3. Application Notice for Injunction and Alternative Service
- 4. Draft Injunction Order
- 5. First Witness Statement of Nicholas James Wargent
- 6. Exhibit NJW-1
- 7. First Witness Statement of Manan Singh
- 8. Exhibit MS1
- 9. Second Witness Statement of Nicholas James Wargent
- 10. Exhibit NJW-2

Certifi	cate of service		Name of court Claim No.				
			High Court of Jus Division	tice Kings Bench	KB-2024-004175		
			Name of Claimant TELEDYNE UK L	IMITED			
On what o		/ 2 0 2 5	TELEDINE ON I				
•	of service is 1 3 / 0 1	/ 2 0 2 5	Name of Defendant JULIAN ALLEN (	GAO, RUBY HAMIL	L, DANIEL JONES,		
me date o	or service is 1 3 / 0 1	J/ Z   0   Z   3	NAJAM SHAH, F	RICKY SOUTHALL,	and others		
Please attach	uments did you serve? I copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached				
<b>On whom</b> (If appropriate.g. partner, c	<b>did you serve?</b> te include their position director).	Defendants named	in the Orders				
•	ou serve the documents?				ffected, include fax or Di electronic identification		
	class post or other service w y on the next business day	hich provides for	info@palestine	ecampaign.org			
by deli	ivering to or leaving at a pe	rmitted place					
(	sonally handing it to or leav time left, where docume form) (please specify)	_	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>		
			usual resid	ence			
— by oth	er means permitted by the	court	last known	residence			
(please		court	☐ place of bu				
-	y of email at 11:02 in accord der of Bourne J dated 20/12	•		lace of business place of business			
by Doo	cument Exchange		last known	principal place of	business		
	machine (time sen		principal office of the partnership				
	e <mark>r than a claim form)</mark> (you ma ansmission sheet)	y want to enciose a copy		ffice of the corpora ffice of the compar			
✓ by oth docum	er electronic means (.11.02 nent is other than a claim fo	time sent, where rm) (please specify)	place of bu	siness of the partn	•		
			other (pleas	e specify)			
			Known Em	ail for Service			
I believe t	hat the facts stated in this	s certificate are true	•				
Full name	Manan Singh						
Signed	M Singh		Position or office held	Partner			
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation frien</del> d	 <del>d)</del>	(If signing on beha	f of firm or company)		
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Certificate of service		Name of court High Court of Justice Kings Bench  KB-2024-00417			
			Division  Name of Claimant	IMITED	1.0 2021 001110
On what o		/ 2 0 2 5	TELEDYNE UK I	-IMITED	
•	The date of service is 1 3 / 0 1 / 2 0 2 5			GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others
Please attach	uments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached		
<b>On whom</b> (If appropriate.g. partner, c	did you serve? The include their position The director).	Defendants named	in the Orders		
•	ou serve the documents?				ffected, include fax or Di electronic identification
	class post or other service w y on the next business day	hich provides for	pscchelmsford(	@gmail.com	
by deli	ivering to or leaving at a pe	rmitted place			
(	sonally handing it to or leav time left, where docume form) (please specify)	_	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>
			usual resid		
by oth (please:	er means permitted by the specify)	court	last known		
-	y of email at 11:03 in accord der of Bourne J dated 20/12	· ·		lace of business place of business	
by Dod	cument Exchange	,	ast known	principal place of	business
·	machine (time sen	t where document	principal office of the partnership		
is othe	er than a claim form) (you ma ansmission sheet)		principal office of the corporation principal office of the company		
✓ by oth docum	er electronic means (.11.03 nent is other than a claim fo	time sent, where rm) (please specify)	place of bu	Isiness of the partn	•
			other (pleas	e specify)	
			Known Em	ail for Service	
I believe t	hat the facts stated in this	s certificate are true	•		
Full name	Manan Singh				
Signed	M Singh		Position or office held	Partner	
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation friend</del>	<del></del> <del>d)</del>	(If signing on behal	If of firm or company)
Date	1 3 / 0 1 / 2 0 2 5	5			

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Certifi	Certificate of service		Name of court High Court of Justice Kings Bench  KB-2024-004175		
			Name of Claimant TELEDYNE UK L	IMITED	
On what o		/ 2 0 2 5	Name of Defendant		
•	The date of service is 1 3 / 0 1 / 2 0 2 5			GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others
Please attach	uments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached		
<b>On whom</b> (If appropriate, e.g. partner, c	did you serve? The include their position director).	Defendants named	in the Orders		
•	ou serve the documents? ne appropriate box)				ffected, include fax or Di electronic identification
	class post or other service w y on the next business day	hich provides for	pscshrop@gma	ail.com	
by deli	ivering to or leaving at a pe	rmitted place			
(	sonally handing it to or leav time left, where docume form) (please specify)	_	Being the	claimant's solicitor's	defendant's litigation friend
			usual resid		
by oth	er means permitted by the	court	last known place of bu		
By wa	y of email at 11.04 in accord der of Bourne J dated 20/12	•		lace of business place of business	
by Dod	cument Exchange		ast known	principal place of	business
by fax	machine (time sen	t, where document	principal office of the partnership		
is othe	er than a claim form) (you ma ansmission sheet)			ffice of the corpora	
by oth docum	er electronic means (.11.04 nent is other than a claim fo	time sent, where rm) (please specify)	place of bu	ffice of the compar siness of the partn n within the jurisdi	
			other (pleas	e specify)	
			Known Em	ail for Service	
I believe t	hat the facts stated in this	s certificate are true	•		
Full name	Manan Singh				
Signed	M Singh		Position or office held	Partner	
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation frien</del>	<del></del>   <del>d)</del>	(If signing on beha	If of firm or company)
Date	1 3 / 0 1 / 2 0 2 5	5			

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Certifi	cate of service		Name of court Claim No.				
			High Court of Jus Division	tice Kings Bench	KB-2024-004175		
			Name of Claimant TELEDYNE UK L	IMITED			
On what o		/ 2 0 2 5	TELEDTINE ON L				
•		/ 2 0 2 5	Name of Defendant JULIAN ALLEN (	GAO, RUBY HAMIL	L, DANIEL JONES,		
ine date o	of service is   1   3  / 0   1	/ 2 0 2 3	NAJAM SHAH, F	RICKY SOUTHALL,	and others		
Please attach	uments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached				
<b>On whom</b> (If appropriat e.g. partner, a	did you serve? The include their position The director).	Defendants named	in the Orders				
•	ou serve the documents?				ffected, include fax or Di electronic identification		
	class post or other service w y on the next business day	hich provides for	lincolnpalestine	e@gmail.com			
by deli	ivering to or leaving at a pe	rmitted place					
(	sonally handing it to or leav time left, where docume form) (please specify)	_	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>		
			usual resid	ence			
ha4h	ou up o o up o up o up o itt o d lb the o		last known	residence			
(please s	er means permitted by the specify)	court	place of bu				
-	y of email at 11:05 in accord der of Bourne J dated 20/12	•		lace of business place of business			
☐ by Doo	cument Exchange			principal place of			
	machine (time sen		principal office of the partnership principal office of the corporation				
	e <mark>r than a claim form)</mark> (you ma ansmission sheet)	y want to enclose a copy		ffice of the compar			
✓ by oth docum	er electronic means (.11.05 nent is other than a claim fo	time sent, where rm) (please specify)	place of bu	siness of the partn			
			other (pleas	e specify)			
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Full name	Manan Singh						
Signed	M Singh		Position or office held	Partner			
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation frien</del>	<del></del>   <del>d)</del>	(If signing on beha	If of firm or company)		
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Certifi	Certificate of service		Name of court High Court of Justice Kings Bench  KB-2024-004175			
			Division	Lice Kings Bench	KB-2024-004175	
			Name of Claimant TELEDYNE UK L	IMITED		
On what day did you serve?		Name of Defendant				
The date	The date of service is 1 3 / 0 1 / 2 0 2 5			GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others	
Please attach	uments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached			
<b>On whom</b> (If appropriate.g. partner, c	did you serve? The include their position The director).	Defendants named	in the Orders			
•	ou serve the documents?				ffected, include fax or Di electronic identification	
	class post or other service w y on the next business day	hich provides for	liverpoolfopal@	gmail.com		
by deli	ivering to or leaving at a pe	rmitted place				
(	sonally handing it to or leav time left, where docume form) (please specify)	_	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>	
			usual resid			
by oth (please	er means permitted by the	court	☐ last known☐ place of bu			
By wa	y of email at 11:06 in accord der of Bourne J dated 20/12	•		lace of business place of business		
by Doo	cument Exchange		last known	principal place of	business	
	machine (time sen		principal office of the partnership			
	e <mark>r than a claim form)</mark> (you ma ansmission sheet)	y want to enclose a copy		ffice of the corpora ffice of the compar		
✓ by oth docum	er electronic means (.11.06 nent is other than a claim fo	time sent, where rm) (please specify)	place of bu	siness of the partn	•	
			<b>✓ other</b> (pleas	e specify)		
			Known Em	ail for Service		
I believe t	hat the facts stated in this	s certificate are true	•			
Full name	Manan Singh					
Signed	M Singh		Position or office held	Partner		
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation frien</del>	<del>d)</del>	(If signing on beha	lf of firm or company)	
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			High Court of Jus Division	tice Kings Bench	KB-2024-004175		
			Name of Claimant TELEDYNE UK L	IMITED	,		
On what o		/ 2 0 2 5	TELEBTINE ON I				
	of service is 1 3 / 0 1	/ 2 0 2 5	Name of Defendant JULIAN ALLEN (	GAO, RUBY HAMIL	L, DANIEL JONES,		
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by deli	ivering to or leaving at a pe	rmitted place					
(	sonally handing it to or leav time left, where docume form) (please specify)	-	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>		
			usual resid	ence			
by oth	er means permitted by the	court	last known	residence			
(please		court	place of bu				
'	y of email at 11:07 in accord der of Bourne J dated 20/12	'		lace of business place of business			
☐ by Doo	cument Exchange		last known	principal place of l	business		
	machine (time sen		principal office of the partnership				
	e <mark>r than a claim form)</mark> (you ma <sub>j</sub> ansmission sheet)	y want to enclose a copy		ffice of the corpora ffice of the compar			
✓ by oth docum	er electronic means (.11.07. nent is other than a claim fo	time sent, where rm) (please specify)	place of bu	siness of the partn	•		
			<b>✓</b> other (pleas	e specify)			
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I believe t	hat the facts stated in this	certificate are true	•				
Full name	Manan Singh						
Signed	M Singh		Position or office held	Partner			
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Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

- 1. Interim Injunction Order granted by Bourne J
- 2. Sealed Claim Form
- 3. Application Notice for Injunction and Alternative Service
- 4. Draft Injunction Order
- 5. First Witness Statement of Nicholas James Wargent
- 6. Exhibit NJW-1
- 7. First Witness Statement of Manan Singh
- 8. Exhibit MS1
- 9. Second Witness Statement of Nicholas James Wargent
- 10. Exhibit NJW-2

Certifi	Certificate of service		Name of court High Court of Justice Kings Bench  KB-2024-004175			
			Division  Name of Claimant		100 2024 004170	
On what o		/ 2 0 2 5	TELEDYNE UK I	LIMITED		
•	you serve?  The date of service is 1 3 / 0 1 / 2 0 2 5			GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others	
Please attach	uments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached			
<b>On whom</b> (If appropriat e.g. partner, c	did you serve? te include their position director).	Defendants named	in the Orders			
•	ou serve the documents?				ffected, include fax or Di electronic identification	
	class post or other service w y on the next business day	hich provides for	branches@pale	estinecampaign.org		
by deli	ivering to or leaving at a pe	rmitted place				
(	sonally handing it to or leav time left, where docume form) (please specify)	_	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>	
			usual resid			
by oth (please:	er means permitted by the specify)	court	last known place of bu			
-	y of email at 11:08 in accord der of Bourne J dated 20/12	•		lace of business place of business		
by Doo	cument Exchange		last known	principal place of l	business	
by fax	machine (time sen	t, where document	principal office of the partnership			
is othe	e <mark>r than a claim form)</mark> (you ma <sub>g</sub> ansmission sheet)			ffice of the corpora		
by oth docum	er electronic means (.11.08 nent is other than a claim fo	time sent, where rm) (please specify)	place of bu	ffice of the compar siness of the partn n within the jurisdi	•	
			<b>✓</b> other (pleas	e specify)		
			Known Em	ail for Service		
I believe t	hat the facts stated in this	s certificate are true	•			
Full name	Manan Singh					
Signed	M Singh		Position or office held	Partner		
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation friend</del>	∖ <del>d)</del>	(If signing on behal	If of firm or company)	
Date	1 3 / 0 1 / 2 0 2 5	5				

#### Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

#### Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
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- 8. Exhibit MS1
- 9. Second Witness Statement of Nicholas James Wargent
- 10. Exhibit NJW-2

Certifi	Certificate of service		Name of court High Court of Justice Kings Bench KB-2024-0041		
			Division  Name of Claimant		ND-2024-004173
On what o		/ 2 0 2 5	TELEDYNE UK I	-IMITED	
•	you serve?  The date of service is 1 3/0 1/2 0 2 5			GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others
Please attach	uments did you serve? o copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached		
<b>On whom</b> (If appropriat e.g. partner, c	did you serve? te include their position director).	Defendants named	in the Orders		
•	ou serve the documents? he appropriate box)				ffected, include fax or Di electronic identification
	class post or other service w ry on the next business day	hich provides for	actions@palest	tineaction.org	
by deli	ivering to or leaving at a pe	rmitted place			
(	sonally handing it to or leav time left, where docume form) (please specify)	•	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>
			usual resid		
by oth (please:	er means permitted by the specify)	court	place of bu		
-	y of email at 11:09 in accord	•		lace of business place of business	
by Dod	cument Exchange		last known	principal place of	business
by fax	machine (time sen	t. where document	principal o	ffice of the partner	ship
is othe	e <mark>r than a claim form)</mark> (you ma ansmission sheet)			ffice of the corpora ffice of the compar	
by oth docum	er electronic means (.11.09) nent is other than a claim fo	time sent, where rm) (please specify)	place of bu	Isiness of the partn	•
			<b>✓</b> other (pleas	e specify)	
			Known Em	ail for Service	
I believe t	that the facts stated in this	s certificate are true	•		
Full name	Manan Singh				
Signed	M Singh		Position or office held	Partner	
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation friend</del>	 <del>a)</del>	(If signing on beha	f of firm or company)
Date	1 3 / 0 1 / 2 0 2 5	5			

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- 9. Second Witness Statement of Nicholas James Wargent
- 10. Exhibit NJW-2

Certificate of service		Name of court High Court of Jus	tice Kings Bench	Claim No. KB-2024-004175	
			Division  Name of Claimant  TELEDYNE UK L	LIMITED	
On what o		/2025	Name of Defendant		
The date	of service is 1 3 / 0 1	/2025	JULIAN ALLEN	GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others
Please attach	uments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached		
<b>On whom</b> (If appropriate.g. partner, c	om did you serve? priate include their position ner, director).  Defendants named in the Orders				
•	ou serve the documents? ne appropriate box)				fected, include fax or Da electronic identification
	class post or other service w y on the next business day	hich provides for	bfdfriendsofpale	estine@yahoo.com	
by deli	ivering to or leaving at a pe	rmitted place			
(	sonally handing it to or leav time left, where docume form) (please specify)	_	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>
			usual resid		
by oth	er means permitted by the specify)	court	last known place of bu		
By wa	y of email at 11:10 in accord der of Bourne J dated 20/12	· ·		lace of business place of business	
by Dod	cument Exchange		last known	principal place of l	business
·	machine (time sen	t where document	principal office of the partnership		
is othe	er than a claim form) (you ma ansmission sheet)		principal office of the corporation		
by other electronic means (.11.10time sent, where document is other than a claim form) (please specify)		place of bu	ffice of the compar siness of the partn n within the jurisdi	•	
			<b>✓</b> other (pleas	e specify)	
			Known Em	ail for Service	
I believe t	hat the facts stated in this	s certificate are true	•		
Full name	Manan Singh				
Signed	M Singh		Position or office held	Partner	
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation friend</del>	 <del>a)</del>	(If signing on behal	f of firm or company)
Date	1 3 / 0 1 / 2 0 2 5	5			

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Certificate of service			Name of court		Claim No.
		High Court of Jus Division	tice Kings Bench	KB-2024-004175	
			Name of Claimant TELEDYNE UK I	IMITED	
On what o		/2025	Name of Defendant		
The date	of service is 1 6 / 0 1	/ 2 0 2 5	JULIAN ALLEN	GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others
Please attach	uments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached		
<b>On whom</b> (If appropriate.g. partner, c	<b>did you serve?</b> te include their position director).	See Schedule 2 Atta	ached		
•	ou serve the documents?				ffected, include fax or D) electronic identification
✓ by first deliver	class post or other service w y on the next business day	hich provides for	See Schedule 2	2 Attached	
by deli	ivering to or leaving at a pe	rmitted place			
(	sonally handing it to or leav time left, where docume form) (please specify)	•	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>
			✓ usual resid		
	er means permitted by the	court	✓ last known  □ place of bu		
(please :	· · · · · · · · · · · · · · · · · · ·			lace of business	
In accordance with para 3 of the Order of Bourne J dated 20/12/2024.		last known place of business			
by Doo	cument Exchange		last known	principal place of	business
	machine (time sen				
	e <mark>r than a claim form)</mark> (you ma ansmission sheet)	y want to enclose a copy			
by other electronic means (time sent, where document is other than a claim form) (please specify)		principal office of the company place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim			
			other (pleas	e specify)	
I believe t	hat the facts stated in this	s certificate are true.	•		
Full name	Manan Singh				
Signed	M Singh		Position or office held	Partner	
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation frienc</del>	l <del>al)</del>	(If signing on beha	If of firm or company)
Date	1 6 / 0 1 / 2 0 2 5	5			

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# **Applications and Documents**

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- Application Notice seeking to add further Named Defendants
- Draft Amended Claim Form
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- Sealed Claim Form
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- Draft Injunction Order
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- Exhibit NJW-1
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- Exhibit MS1
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- Exhibit NJW-2

#### **Application Notices and Orders pursuant to Part 31.17**

- Part 31.17 Application Notice (Merseyside)
- Draft Order
- Part 31.17 Application Notice (West Yorkshire)
- Draft Order
- Witness Statement of Stephen Simpson and Exhibit
- Second Witness Statement of Manan Singh
- Exhibit MS2
- Certificate of Service

### **Disclosure Orders**

- Disclosure Order (West Yorkshire Police)
- Disclosure Order (Merseyside Police)
- Disclosure Order (Merseyside Police)

- D1 JULIAN ALLEN GAO of 11 Ellesmere Place, Walton-on-Thames, Surrey KT12 5AE
- D2 RUBY HAMILL of 14A Emu Road, Wandsworth, London SW8 3PR
- D3 DANIEL JONES of 2 Rossett Road, Crosby, Sefton L23 3AW
- D4 NAJAM SHAH of 24 Cliffe Gardens, Shipley, Bradford BD18 3DB
- D5 RICKY SOUTHALL of 3 Clarendon Street, Wakefield, West Yorkshire WF1 3RQ
- D6 AMAREEN AFZAL of 11 North Hill Road, Flat F, Headingley, Leeds, West Yorkshire LS6 2EN
- D7 SERENA FENTON of 19 Foxcroft Green, Headingley, Leeds, West Yorkshire LS6 3NR

Certificate of service		Name of court		Claim No.	
			High Court of Jus Division	tice Kings Bench	KB-2024-004175
			Name of Claimant TELEDYNE UK I	IMITED	
On what o		/ 2 0 2 5			
The date	of service is 2 0 / 0 1	/2025		GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others
Please attach	uments did you serve? copies of the documents you ady filed with the court.	See Schedule 1 Atta	ached		
<b>On whom</b> (If appropriat e.g. partner, a	did you serve? The include their position Thiring director).	See Schedule 2 Atta	ached		
•	ou serve the documents?				ffected, include fax or D) electronic identification
∀ by first deliver	class post or other service w y on the next business day	hich provides for	See Schedule 2	2 Attached	
by deli	ivering to or leaving at a pe	rmitted place			
(	sonally handing it to or leav time left, where docume form) (please specify)	•	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>
			✓ usual resid		
	er means permitted by the	court	✓ last known  □ place of bu		
(please s	specify)			lace of business	
				place of business	
by Doo	cument Exchange		last known	principal place of	business
	machine (time sen				
	e <mark>r than a claim form)</mark> (you ma ansmission sheet)	y want to enclose a copy			
by other electronic means (time sent, where document is other than a claim form) (please specify)		principal office of the company place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim			
			other (pleas	e specify)	
I believe t	hat the facts stated in this	s certificate are true.			
Full name	Manan Singh				
Signed	M Singh		Position or office held	Partner	
	(Claimant) <del>(Defendant</del> ) ('s sol	icitor) <del>('s litigation friend</del>	l <del>al)</del>	(If signing on beha	If of firm or company)
Date	1 6 / 0 1 / 2 0 2 5	5			

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- Certificate of Service

### **Disclosure Orders**

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- Disclosure Order (Merseyside Police)
- Disclosure Order (Merseyside Police)

D12 CHERYL LEANAGHAN of 33 Faulkner Square, Flat 2, Liverpool, Merseyside L8 7NZ

D13 MAIS ROBINSON of The Trees, 83-89 Amhurst Park, Flat 24, Hackney, London N16 5DP

D14 AUTUMN TAYLOR-WARD of 88 Allington Street, Liverpool, Merseyside L17 7AF

D15 ANABELLA BARRINGER of 8 Furance Hill, Flat 4, Sheffield S3 7AF

D16 LARA DOWNES of 49 Gipsy Hill, Flat 3, London SE19 1QH

D17 GABRIELLE MIDDLETON of 21 Athelstan Road, Margate, Kent CT9 2BD

D18 LUKE CARTER of 34 Broad Road, Lower Willingdon, East Sussex BN20 9QU

Cartifi	cate of service	Γ	Name of court		Claim No.
Certificate of Service		High Court of Justice Kings Bench Division  KB-2024-004175			
			Name of Claimant TELEDYNE UK L	IMITED	
On what o		/ 2 0 2 5			
•	of service is 1 6 / 0 1			GAO, RUBY HAMIL RICKY SOUTHALL,	L, DANIEL JONES, and others
Please attach	uments did you serve? o copies of the documents you ady filed with the court.	See Schedule 1 Attac	ched		
	<b>did you serve?</b> te include their position director).	Defendant 8 - Defend	dant 11		
•	ou serve the documents? he appropriate box)				fected, include fax or Dielectronic identification
	class post or other service w ry on the next business day	hich provides for	See Schedule 2	2	
by del	ivering to or leaving at a per	mitted place			
by personally handing it to or leaving it with  (time left, where document is other than a claim form) (please specify)		•	Being the	claimant's solicitor's	<ul><li>defendant's</li><li>litigation friend</li></ul>
			usual reside	ence	
by oth	er means permitted by the	court	last known		
(please			place of bu		
Email times at Schedule 2 and website, in accordance with para 3 of the Order of Bourne J dated 20/12/2024.			principal place of business  last known place of business		
by Document Exchange			last known principal place of business		
by fax	machine (time sent	t, where document	principal office of the partnership		
is othe	er than a claim form) (you may cansmission sheet)		principal office of the corporation		
by other electronic means (.Sch.2time sent, where document is other than a claim form) (please specify)		place of bu	ffice of the compar siness of the partn n within the jurisdi		
			<b>✓ other</b> (pleas	e specify)	
			Known Em	ail for Service	
I believe t	that the facts stated in this	certificate are true.	1		
Full name	Manan Singh				
Signed	M Singh		Position or office held	Partner	
	(Claimant) <del>(Defendant</del> ) ('s soli	citor) <del>('s litigation friend)</del>	<del>)</del>	(If signing on behal	lf of firm or company)
Date	1 6 / 0 1 / 2 0 2 5				

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- 5. Exhibit NJW-3

- 1. media@palestinecampaign.org Email sent at: 09:51
- 2. info@palestineaction.org Email sent at: 09:50
- 3. info@palestinecampaign.org Email sent at: 09:50
- 4. pscchelmsford@gmail.com Email sent at: 09:51
- 5. pscshrop@gmail.com Email sent at: 09:51
- 6. lincolnpalestine@gmail.com Email sent at: 09:51
- 7. liverpoolfopal@gmail.com Email sent at: 09:52
- 8. palestinesolidaritybradford@gmail.com Email sent at: 09:52
- 9. branches@palestinecampaign.org Email sent at: 09:53
- 10. actions@palestineaction.org Email sent at: 09:53
- 11. bfdfriendsofpalestine@yahoo.com Email sent at: 09:54