

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

CLAIM NO. KB-2024-004175

B E T W E E N :

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

**THIRD 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 advance of the return date listed for 24 January 2025 to update the Court on matters that have arisen since the Claimant filed and served the third witness statement of Nicholas Wargent (dated 15 January 2025) in accordance with the Order of Bourne J dated 20 December 2024. Whilst the directions do not make provision for this further witness statement, I make this statement with the intention of assisting the Court on an issue that may be material to the continuation of the Interim Injunction, and therefore respectfully ask that the Claimant be permitted to rely on this short statement.

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.
4. I exhibit to this witness statement a bundle of documents marked **MS3**. All references to that exhibit are in the format **MS3/page number**.

The Gaza conflict ceasefire

5. On 15 January 2025, national and international media reported that a ceasefire deal had been agreed between Hamas and Israel, which would bring an end to the current conflict in the Gaza region and result in the return of hostages. I understand from that news coverage that the ceasefire deal came into effect on 19 January 2025. I exhibit at **MS3/1 - 3** a copy of an online BBC News article that briefly explains the timeline of the ceasefire, which can also be accessed here (and which I accessed on 23 January 2025 when preparing this statement): <https://www.bbc.co.uk/news/articles/cvg4ryde7q5o>.

Impact of the ceasefire on protest activity

6. The news of the ceasefire does not appear to have dampened the resolve of activists in this country to engage in acts of direct-action protest. As evidence of this, I refer in particular to:
 - i. A post on the Palestine Action's Instagram dated "1 week ago" (which I understand to mean 16 January 2025). The post appears to have been created by an author titled "vocalpolitics", but appears on the Palestine Action Instagram feed. In that video, a lone male is making a statement to the camera, with a video overlay of various images, in which he urges viewers to "*escalate resistance in every form possible from boycotts to direct action the pressure must grow... this is not a moment for celebration, it's a moment for action, direct-action*". The video can be viewed here: <https://www.instagram.com/reel/DE5r-a0sCy-/?igsh=MWFya3l6MXAwcHpuaA%3D%3D>. The caption that accompanies the

video reads *“The end of the US-Israeli genocide in #Gaza does not mark the end of the battle against their crimes. Now is the time to escalate direct action against Israel and its interests, while keeping focus on the ultimate goal: ending the Israeli occupation across all of Palestine”*. I exhibit a screen shot of the post at **MS3/4**. I accessed the post on 23 January 2025 when preparing this witness statement.

- ii. Since the announcement and coming into force of the ceasefire, Palestine Action has continued its programme of direct-action. On 22 January 2025, two activists from Palestine Action ‘occupied’ the Aviva Centre in Bristol. I understand from a news article on the Palestine Action website (<https://palestineaction.org/aviva-bristol/>), which I exhibit at **MS3/5 – 6** and which I accessed on 23 January 2025 when preparing this statement, as well as other posts made on the Palestine Action Instagram feed, that two activists associated with the group attended the building; one climbed on the building, whilst another sprayed painted it in the familiar red paint. The building appears to have been target as Aviva provide the employer’s liability insurance to UAV Engines Ltd, which operates the factory in Staffordshire that was targeted by Palestine Action activists on Christmas Day (as set out in Mr Wargent’s third witness statement). I note that the news article states *“[d]espite a ceasefire being implemented in Gaza, the Israeli military begun “Operation Iron Wall” in Jenin, West Bank. In the last 24 hours, they’ve killed 9 Palestinians and injured 70 in the region”*. The article also quotes a spokesperson for Palestine Action as saying *“Palestine Action will continue to take direct action against companies such as Aviva as long as they facilitate the destruction of Palestine and massacres of the indigenous population of the land”*.
- iii. A further example of Palestine Action continuing its programme of direct-action is documented on the Palestine Action Instagram feed. In a post dated “4 days ago”, which I take to mean 19 January 2025, a picture of what appears to be a glass-fronted building can be seen. That building has been splashed with a red substance, and a person appears to be cleaning it from the glass. The accompanying caption reads *“BREAKING: Palestine Action target the London offices of CDW, tech suppliers for Israel’s biggest weapons firm. Action won’t stop until the Zionist war machine is defeated and Palestine is liberated.”* I exhibit a copy of the post at **MS3/7**, which I accessed on 23 January 2023 when preparing this statement.

- iv. Mr Wargent, in his third witness statement, explained that the Palestine Solidarity Campaign had advertised a march in Chelmsford, to be held on 8 February 2025. For completeness, I observe that further details of that march and its route have been released on the Instagram page of the Chelmsford Branch of the Palestine Solidarity Campaign. The march is still going ahead, and still appears to be planned as a peaceful protest. The Claimant continues to take no issue with this planned protest.
7. Consequently, the news of the ceasefire does not alleviate the Claimant's concern and apprehension of future and imminent acts of direct-action protest at its sites that are the subject of the Interim Injunction.

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.

Man Singh

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Manan Singh
Dated this 23rd day of January 2025