

**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) – (7) OTHER NAMED DEFENDANTS**

**(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**

**Defendants**

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**EXHIBIT MS5**

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This is Exhibit MS5 referred to in the Fifth Witness Statement of Manan Singh.

Certificate of service

Name of court High Court of Justice Kings Bench Division	Claim No. KB-2024-004175
Name of Claimant TELEDYNE UK LIMITED	
Name of Defendant JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES, NAJAM SHAH, RICKY SOUTHALL, and Others	

On what day did you serve?	13/02/2025
The date of service is	17/02/2025

What documents did you serve?  
*Please attach copies of the documents you have not already filed with the court.*

See Schedule 1 Attached

On whom did you serve?  
*(If appropriate include their position e.g. partner, director).*

See Schedule 2 Attached

How did you serve the documents?  
*(please tick the appropriate box)*


<input checked="" type="checkbox"/> by first class post or other service which provides for delivery on the next business day
<input type="checkbox"/> by delivering to or leaving at a permitted place
<input type="checkbox"/> by personally handing it to or leaving it with (.....time left, where document is other than a claim form) <i>(please specify)</i>
<input type="checkbox"/> by other means permitted by the court <i>(please specify)</i>
<input type="checkbox"/> by Document Exchange
<input type="checkbox"/> by fax machine (.....time sent, where document is other than a claim form) <i>(you may want to enclose a copy of the transmission sheet)</i>
<input type="checkbox"/> by other electronic means (.....time sent, where document is other than a claim form) <i>(please specify)</i>

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

See Schedule 2 Attached

Being the	<input type="checkbox"/> claimant's	<input checked="" type="checkbox"/> defendant's
	<input type="checkbox"/> solicitor's	<input type="checkbox"/> litigation friend
<input checked="" type="checkbox"/> usual residence		
<input checked="" type="checkbox"/> last known residence		
<input type="checkbox"/> place of business		
<input type="checkbox"/> principal place of business		
<input type="checkbox"/> last known place of business		
<input type="checkbox"/> last known principal place of business		
<input type="checkbox"/> principal office of the partnership		
<input type="checkbox"/> principal office of the corporation		
<input type="checkbox"/> principal office of the company		
<input type="checkbox"/> place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim		
<input type="checkbox"/> other <i>(please specify)</i>		

I believe that the facts stated in this certificate are true.

Full name	Manan Singh		
Signed		Position or office held	Partner
	(Claimant) (Defendant) ('s solicitor) ('s litigation friend)		(If signing on behalf of firm or company)
Date	17/02/2025		

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://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)**

<b>Method of service</b>	<b>Deemed day of service</b>
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. Sealed Order of Tipples J dated 24 January 2025
2. Application Notice
3. Draft Order
4. Fourth Witness Statement of Manan Singh
5. Exhibit MS4
6. Draft Re-Amended Claim Form
7. Response Pack

**Schedule 2**

**D19** MARY ENSELL of 24 Aylton Road, Huyton, Merseyside, L36 2LU

**D20** HARRY WADE of Beaumont, 178 Leverington Road, Wisbech, Cambridgeshire, PE13 1RU

Mary Ensell  
24 Aylton Road  
Huyton  
Merseyside  
L36 2LU

Our ref: TEL14/40  
020 3319 3700  
[info.teledyne@keystonelaw.co.uk](mailto:info.teledyne@keystonelaw.co.uk)

13 February 2025

**BY FIRST CLASS POSTAGE**

Dear Sirs,

**TELEDYNE UK LIMITED v JULIAN ALLEN GAO, RUBY HAMILL, DANIEL JONES,  
NAJAM SHAH, RICKY SOUTHALL, and Others**  
**Claim No. KB-2024-004175**

We act for the Claimant, Teledyne UK Limited in the abovementioned High Court Proceedings.

Please find enclosed by way of service on you, our client's application to add you to these proceedings following your breach of the interim injunction order of Tipples J. This comprises of the following documents:

1. Sealed Order of Tipples J dated 24 January 2025
2. Application Notice
3. Draft Order
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7. Response Pack

Please note the final hearing of this Claim is listed to be heard on 25 July 2025 at the Royal Courts of Justice, Strand, London.

We advise that you seek legal advice.

Yours faithfully,



**Keystone Law**  
**Encs.**

Harry Wade  
Beaumont  
178 Leverington Road  
Wisbech  
Cambridgeshire  
PE13 1RU

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020 3319 3700  
[info.teledyne@keystonelaw.co.uk](mailto:info.teledyne@keystonelaw.co.uk)

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