

**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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FIFTH WITNESS STATEMENT OF  
MANAN SINGH

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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. 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.
3. I make this witness statement in connection with the Claimant's Application dated 13 February 2025 which seeks to add two further persons (namely **Mary Ensell** and **Harry Wade**) as Named Defendants to the Claim.
4. This witness statement is made pursuant to directions issued by the Court, received by the Claimant's solicitors on 18 March 2025, which state as follows: "*Please ask the Claimant's solicitors to provide (i) further to paragraph 6 of the witness statement of Manan Singh dated 13 February 2025, a witness statement as to proof of service of the application on the proposed two additional Defendants; and (ii) a draft order which (unlike the present draft) has Annexes which are not blank.*"

5. I exhibit to this witness statement a bundle of documents marked **MS5**. All references to that exhibit are in the format **MS5/page number**.
6. Accordingly, exhibited at **MS5/1 – 4** is the certificate of service, which has been duly filed with the Court as evidence of service of the application and supporting documents on the two proposed additional Defendants, Mary Ensell and Harry Wade. The documents were served by first-class post.
7. Further, exhibited at **MS5/5 – 6** are copies of the letters of service sent by first-class post to each of the proposed additional Defendants. These letters specify the documents enclosed with each service which were sent to each individual.
8. In light of the above, we respectfully invite the Court to grant the 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*

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Manan Singh

Dated this 18<sup>th</sup> day of March 2025