

**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

**FOURTH 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 Application to add two further persons (namely **Mary Ensell** and **Harry Wade**) as Named Defendants to the Claim, and to also extend the scope of the interim injunction Order granted by Mrs Justice Tipples on 24 January 2025 (the '**Interim Injunction**') to cover these additional persons, pending the final hearing of the Claim (or settlement by way of undertakings). I set out in more detail at paragraph 7 below the order that is sought.
3. Given how recently the Interim Injunction has been considered (that being on 24 January 2024 at a 1 day return date listing before Mrs Justice Tipples), and in the circumstances of this Application (which I explain below), I respectfully ask the Court to consider this Application on the papers. If the Court does not think that to be appropriate, a 60 minute

listing is suggested; however, as will become clear below, it is desirable that an Order is made as soon as possible, so that the directions that are set for the existing Named Defendants can be extended to apply to Ms Ensell and Mr Wade, without upsetting the listing of the final hearing (or, in the alternative, truncating any directions for Ms Ensell and Mr Wade).

4. 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 email correspondence with officers and employees of the Claimant, and the Claimant's external legal representatives.
5. I exhibit to this witness statement a bundle of documents marked **MS4**. All references to that exhibit are in the format **MS4/page number**.
6. This Application will be served by first-class post on Ms Ensell and Mr Wade (the Claimant has obtained addresses for both).

Order sought

7. The Claimant seeks an Order:
 - i. adding **Mary Ensell** as the **Nineteenth Defendant** to the Claim (pursuant to CPR 19.4);
 - ii. adding **Harry Wade** as the **Twentieth Defendant** to the Claim (pursuant to CPR 19.4);
 - iii. extending the scope of the prohibitions of the Interim Injunction to include Ms Ensell and Mr Wade;
 - iv. extending the scope of the alternative service Order and directions in the Interim Injunction to include Ms Ensell and Mr Wade.

8. A copy of the Interim Injunction is exhibited at **MS4/1 – 19**.
9. The Draft Order that accompanies this Application replicates the provisions and directions of the Interim Injunction (in so far as they apply to Named Defendants), and simply extends these to Ms Ensell and Mr Wade, whilst also making provision for the necessary further amendments to the Amended Claim Form. I respectfully submit that this is the most sensible approach; the directions that have been set by Mrs Justice Tipples run to a final hearing on 25 July 2025 (if no settlement by way of undertakings is reached). To subject Ms Ensell and Mr Wade to alternative directions would risk upsetting the final listing, which has been deliberately set to bring the Claim against the Named Defendants to a swift conclusion, and the Order against Persons Unknown on for a timely review.

Background

10. By way of a Part 8 Claim Form dated and issued on 13 December 2024, the Claimant sought injunctive relief against seven Named Defendants and four defined categories of Persons Unknown. The causes of action relied upon are trespass, interference with the Claimant's common law right to access the highway and public nuisance caused by obstruction of the highway.
11. The relief from trespass is sought in relation to six of the Claimant's sites throughout the country, including the 'Shipley Site', as defined in the Claim (that being Teledyne UK Limited, Airedale House, Acorn Park, Shipley BD17 7SW). The relief in relation to the other two causes of action is sought in relation to the Shipley Site only.
12. The injunctive relief sought can be categorised as a so-called 'protest injunction' in that it is intended to restrict and prohibit some acts of direct-action protest at the six relevant sites. However, at its core, the relief sought is really just an injunction restraining acts of trespass, with some additional protections sought in relation to the Shipley Site, given recent acts of alleged unlawful direct-action protest that have occurred there.
13. As has been explained in detail in the evidence in this Claim and at both the without notice and return date hearings, the nature of the Claimant's business (and specifically its export

of products under licence to Israel) has caused the Claimant to become a target for pro-Palestinian protests. Those protests have typically taken the form of acts of aggravated trespass, with significant property damage having been caused. Often, the acts of aggravated trespass were committed by protestors associated with the direct-action group known as ‘Palestine Action’.

14. The protests increased in frequency throughout 2024, and notably so in the last quarter. Alongside the acts of aggravated trespass, additional incidents began to occur at the Shipley Site by which protestors would obstruct access and egress at the Site, such that the Site was effectively blockaded. On occasion, these blockade incidents have lasted for several hours.
15. Alongside the Part 8 Claim Form, the Claimant issued an Application Notice seeking without notice interim relief (short informal notice of the hearing was given to Palestine Action and various other protest groups by way of email – but the Application was still technically without notice). The Claimant apprehend further and imminent acts of protest over the Christmas period by reason of the increasing frequency of such incidents, the continued instability in the Middle East, and the imminent holiday period (with some previous acts of protest having coincided with holiday periods).
16. A half-day listing of the Application was initially listed for 19 December 2024. Unfortunately, the Judge was required to recuse himself at the hearing by reason of a conflict of interest. Whilst the hearing was taking place, an aggravated act of direct-action protest was taking place at the Shipley Site. The person responsible for that act (Luke Carter), has since been added to the Claim and Interim Injunction as the Eighteenth Defendant.
17. A further half-day listing was secured for the morning of 20 December 2024. At that hearing, Mr Justice Bourne granted the relief sought. I exhibit a copy of that Order at **MS4/20 – 36**. A return date was set for 24 January 2025, with a one-day time estimate.
18. The return date was listed before Mrs Justice Tipples. On Friday 24 January 2025, Mrs Justice Tipples continued the interim relief and alternative service order granted by Mr Justice Bourne (without amendment), permitted the addition of seven further Named Defendants and extended the scope of the interim relief to cover those persons (that being

the Twelfth to Eighteenth Defendants, inclusive), and set directions to the final hearing. As the Claim includes categories of Persons Unknown, a listing date (rather than a window) was fixed for the disposal of the Claim against the Named Defendants and the review of the Order against Persons Unknown.

19. The sealed Interim Injunction was received from the Court on Monday 27 January 2025, and served by the Claimant in accordance with the provisions of the alternative service order on the same day.

Mary Ensell and Harry Wade

20. On 28 January 2025, Ms Ensell and Mr Wade undertook acts of direct-action protest that breached the terms of the Interim Injunction. I shall further explain the actions of Ms Ensell and Mr Wade below. The Claimant is now in the process of gathering the necessary evidence to support possible proceedings to enforce the Interim Injunction. I am cautious about prejudicing any enforcement action, so at this time say only that the Claimant's view is that Ms Ensell and Mr Wade are likely to be in breach of paragraphs 2(i), 2(ii), 2(iii) and 2(vi) of the Injunction Order, and possibly also paragraph 2(v).

21. As Ms Ensell and Mr Wade have been identified, and as their actions fall squarely within the conduct that is prohibited by the Interim Injunction, the Claimant now seeks to add them as Named Defendants to the Claim and interim relief (in accordance with the various guidance from the Court of Appeal and Supreme Court that requires the same).

28 January 2025

22. I have compiled the following summary of events from information passed to me by the Site Manager and other employees at the Shipley Site; all of the photographs referred to were also sent to me by those persons, unless I state otherwise.
23. At around 05:00 on Tuesday 28 January 2025, a Vauxhall Vivaro van (which is a Transit-style van) was deliberately driven at speed into the yellow retractable bollards that protect the front gate to the Shipley Site. The force of the impact damaged two bollards, and the van came to rest on top of one (partially collapsed) bollard. I exhibit at **MS4/37** a

photograph that shows the van having crashed into the bollards, and at **MS4/38** a photograph of the collapsed bollard underneath the van. The van was blocking all vehicular access to the Shipley Site, and an unknown liquid (which was not thought to be harmful) was leaking from the van.

24. CCTV footage from the Shipley Site shows one person leaving the van from the driver's seat after it has crashed; they then leave the scene in a support vehicle (a hatchback style car). That person has not been identified; my firm has made several enquiries with West Yorkshire Police, as I believe that the current CPR 31.17 Order (exhibited at **MS4/39 – 42**) entitles the Claimant to be informed of the identity of that person if West Yorkshire Police were aware of the same but, so far, no response has been received. Two people appear to leave the hatchback car before it drives away; it is now known that these people were Ms Ensell and Mr Wade. Ms Ensell and Mr Wade then proceeded to 'lock-on' to the van. I have viewed the CCTV footage myself but, in the interest of proportionality, do not exhibit the same to this witness statement; I believe and hope that the photographic evidence should be sufficient for the purposes of this Application.

25. The 'lock-on' was quite elaborate, and pre-meditated, and the van was specially modified to facilitate it. The van was reinforced with concrete, and an opening was made in the side of the van into the concrete block. Ms Ensell and Mr Wade inserted their arms into the openings, and somehow affixed themselves. I exhibit at **MS4/43** a photograph that shows the inside of the van, with the concrete reinforcement, and at **MS4/44** a photograph of the tube-like opening in the side of the van (these photographs are taken after Ms Ensell and Mr Wade had been released from the lock-on, so there is damage visible to the lock-on device and van).

26. I exhibit at **MS4/45** a photograph of Ms Ensell locked-on to the van; her arm is in the tube-like opening into the van. I exhibit at **MS4/46** photograph of Mr Wade locked-on to the van; his arm is in the tube-like opening into the van.

27. I am informed by staff at the Shipley Site that Ms Ensell and Mr Wade were released from the lock-on at approximately 12:30 (that being some 7.5 hours after the incident started), and that the police used heavy-duty power tools to cut through the van and concrete (the damage to the van being visible in the exhibited photographs). I now understand from the

initial disclosure from West Yorkshire Police (made pursuant to the CR 31.17 Order) that Ms Ensell and Mr Wade in fact self-released from the lock-on, before they were released by the police.

28. Throughout the period of the lock-on and until the van was removed from the bollard, vehicular access to the Shipley Site was blocked, and all staff had to enter and leave on foot. I exhibit at **MS4/47** a photograph of Ms Ensell being led away from the van by police officers; her right wrist appears to be bound by a chain, which appears to be the remnants of the locking-on device. I exhibit at **MS4/48** a photograph of Mr Wade being led away from the van by police officers; his left wrist appears to be bound by a chain, which appears to be the remnants of the locking-on device.
29. The Site Manager at the Shipley Site informs me that when police officers searched the van, a large tin of cooking oil was recovered. I understand from Nicholas Wargent (a director of the Claimant, who has made witness statements in these proceedings) that on previous occasions when protestors have broken into the Claimant's sites, they have covered surfaces with an oil like substance to hinder the efforts of police who are trying to reach and retrieve them.
30. Ms Ensell and Mr Wade were arrested by West Yorkshire Police, but I do not have any further detail in that regard at this time.
31. I am informed by the Site Manager at the Shipley Site that the impact of this incident included: damage to two bollards (which were replaced overnight on 28 January at a cost of £3,402.16), disruption to deliveries at the Site, disruption and distress caused to staff at the Site (including to a member of staff who is disabled, and who had to be assisted with walking to the Site), and also disruption to neighbouring businesses by reason of the significant response and presence of the police and ambulance services. Further, staff were distressed at having to walk past the protestors – they are fearful of being identified by members of the protest groups, as in the past when the name of a staff member has become known, they have then received target abuse.
32. Lastly, I am informed by staff at the Shipley Site that a small peaceful protest formed on Acorn Park during the course of the lock-on incident (that being the road on which the

Shipley Site is located). This protest was peaceful and did not breach the terms of the Interim Injunction; no complaint is made in relation to this protest or these protestors.

33. Ms Ensell and Mr Wade's identities were not known to the Claimant at the time of the incident. Their identities (and addresses) became known to the Claimant on 29 January 2025, when West Yorkshire Police disclosed the same pursuant to the CPR 31.17 Order.

Palestine Action

34. Ms Ensell and Mr Wade appear to have been acting under the banner of the Palestine Action protest group (which is one of the two main groups that are of concern to the Claimant, as explained in detail in the evidence in the Claim). I exhibit at **MS/49 – 50** a copy of the news item on the Palestine Action website, that describes the incident on 28 January 2025. In the photograph that accompanies the news item, five police officers who are wearing protective clothing can be seen looking inside the van.

35. Further, I exhibit at **MS4/51 – 60** a copy of a post made to the Palestine Action Instagram page on 28 January 2025 (this is a pinned post that appears at the top of the group's Instagram page), which includes several photos. I note that as well as showing Ms Ensell and Mr Wade, those photos show the size of the disc cutter that the police were required to use when trying to free Ms Ensell and Mr Wade, as well as the large tin of cooking oil that was recovered.

36. Whilst in the interests of proportionality I do not exhibit the following, I note that the Palestine Action Instagram page also contains a pinned post which is a video, and which shows the van being driven at speed into the bollards. The video then proceeds to show a piece to camera by Mr Wade as he is locked-on to the van. The video can be viewed here: https://www.instagram.com/share/BAJ_0XLKwP.

Timing of this Application

37. The Claimant had hoped to make this Application sooner, but has been waiting on West Yorkshire Police to respond to my firm's enquiries as to the likely identity of the driver of the van on 28 January 2025. As that information has not yet been forthcoming, the Claimant

has elected to make this Application rather than delay further, so that Ms Ensell and Mr Wade can be given the same directions and timetable as all other Named Defendants. In the circumstances, I submit that the Claimant has made the Application with sufficient promptness, such that it can be dealt with on the papers (as the Interim Injunction, and the proportionality of the relief therein (where applicable) has been considered very recently).

38. If it becomes necessary to do so, a further Application may need to be made in relation to the van driver. It is likely that, to fit them within the same timetable of directions, it will not be possible to give them the same long window to acknowledge service that is enjoyed by the other Named Defendants.

Conclusion

39. By reason of their actions on 28 January 2025, and subsequent identification, the Claimant seeks to add Ms Ensell and Mr Wade as Named Defendants to the Claim, and to the scope of the Interim Injunction. Ms Ensell and Mr Wade are clearly minded to engage in acts of unlawful direct-action protest against the Claimant under the banner of Palestine Action, and the Claimant apprehends, on the basis of their past behaviour, that absent injunctive relief, Ms Ensell and Mr Wade will commit further acts of unlawful direct-action protest at the Claimant's 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.

Manan Singh

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Manan Singh

Dated this 13 day of February 2025