

**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 AS LISTED 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) – (20) OTHER NAMED DEFENDANTS AS LISTED AT SCHEDULE 1  
TO THE CLAIM FORM**

**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. 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 pursuant to paragraph 9 of the Order of Tipples J dated 24 January 2025, and paragraph 9 of the Order of Murray J dated 21 March 2025, both of which require Teledyne UK to file and serve any further evidence upon which it will rely at the final hearing of the Claim against the Named Defendants and at the review of the Order against Persons Unknown by 29 May 2025.
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 **MS5**. All references to that exhibit are in the format **MS5/page number**.

## **10 March 2025**

5. Mr Wargent, in his fourth witness statement, makes reference to an incident that occurred at my firm's offices located at 48 Chancery Lane, London on 10 March 2025. I shall here give further details of that incident.
6. In the early hours of Monday 10 March 2025, my firm's offices were targeted and vandalised as a result of its role in this Claim.
7. My firm's offices have a ground floor reception area that fronts onto Chancery Lane, which is accessed by a single-width glass door. There is also a large floor to ceiling window next to the door (on the right-hand side, if approaching from the street). The reception area is manned during working hours. Outside of working hours, access to the building can only be obtained by key card access, such that it is not possible for someone without pre-authorisation access to enter the building.
8. I understand from my firm's Office and Administration Manager that at approximately 2:19am four unidentified persons attended my firm's offices on what appeared to be hire bicycles (such as a Lime Bike or similar). These people were wearing hoods, baseball caps, bike helmets and face masks, and it has not been possible to identify them from the CCTV images obtained. These people were not able to access the building given the security arrangement that I have described above.
9. The four persons then proceeded to smash a hole in the large window next to the door, also causing the glass to shatter and crack. I understand that the review of the CCTV footage shows that the nozzle of a re-purposed fire extinguisher was then inserted to the hole, and red paint was sprayed all over the inside of the reception area. The outside of the building, including windows, window frames and brickwork were also sprayed with red paint from a fire extinguisher. On the pavement outside the building, the words "DROP TELEDYNE" were stencilled in red paint.
10. The four persons then made off on the same bicycles that they arrived on. I understand that the attack took only some 41 seconds.

11. I exhibit at **MS5/1-6** six photographs of the damage caused in the attack.
12. I exhibit at **MS5/7-10** a selection of still CCTV images showing the attack in progress. Unfortunately, as it was dark, the footage is of a reduced quality. The still image at **MS5/10** shows that the out of hours security guard was present in the reception area when the attack started; I understand that she left the reception area quickly, as the paint was being sprayed inside the building. The incident was likely to have been very distressing for her.
13. I note that the use of red paint and re-purposed fire extinguishers, as well as face coverings, is consistent with the usual *modus operandi* of supporters of Palestine Action, and is consistent with the type of actions encouraged in the so-called Underground Manual, with which the Court has been provided.
14. On 10 March 2025, a post appeared on the Palestine Action Instagram account. I exhibit that post at **MS5/11-14**. The post contained five photographs of my firm's offices, taken in the hours of darkness (presumably by one or more of the four unidentified persons), which showed the damage that had been caused by the incident. The text accompanying the post read:
- An anonymous submission shows action taken against the London office of Keystone Law, commercial lawyers for American weapons companies arming Israel*
15. The post suggests that the attack was not co-ordinated by Palestine Action itself, but it is notable that the perpetrators followed the guidance in the so-called Underground Manual and carried out such an action and submitted the photographs to Palestine Action for publication.
16. The persons responsible for the attack remain unidentified.

**10/11 May 2025**

17. Mr Wargent, in his fourth witness statement, also makes reference to an incident that occurred at a coffee shop close to my firm's offices (that being Black Sheep Coffee, 26 Southampton Buildings). I shall here give further details of that incident.

18. On Monday 12 May 2025, I was informed by colleagues at my firm's offices that sometime over the weekend of 10/11 May, posters were affixed to the outside of the abovementioned coffee shop. It is not known when they were affixed, or who affixed them, but enquiries are being made with both the police and the coffee shop in this regard. I understand from an internet search that the coffee shop is closed on Saturdays and Sundays, as is common in that part of town.

19. I exhibit at **MS5/15-16** photographs of the posters that have been provided to me by colleagues at my firm's offices. I did not see the posters myself, as I was not working at the office on Monday 12 May 2025.

20. As can be seen from the exhibit, the poster carries an artistic interpretation of my photograph, which appears to be based on the photograph of myself that appears on my firm's website. The poster also carries my name and job role.

21. The poster also reads:

*WANTED*

*FOR COMPLICITY IN WAR CRIMES & GENOCIDE*

*IF SEEN PLEASE REPORT TO THE ICJ*

*KEYSTONE LAW PROVIDE LEGAL SERVICES FOR TELEDYNE WEAPONS*

22. The poster is signed in the bottom right-hand corner with the Palestine Action logo.

## **15 May 2025**

23. Mr Wargent, in his fourth witness statement, also makes reference to an incident that occurred at King's College London. I shall here give further details of that incident.
24. On Thursday 15 May 2025, I received an email from a student at Kings College London informing me that, when leaving the library the day before, they had seen what they described as "*a rather intimidatory poster about you*". A photograph of the poster was enclosed with the email, and it is the same poster described above that was attached to the coffee shop.

## **The poster campaign**

25. On a personal level, it is bemusing to see my face and name on a poster accusing me of being complicit in war crimes and genocide. To the extent I need to deny such accusations, I can confirm that I am not complicit in war crimes and genocide and to wantonly accuse a legal professional of such matters purely as a reaction to them performing their legal role is, if nothing else, an appalling trivialisation of the suffering of those that experience such acts (people that groups like Palestine Action claim to be acting in the name of).
26. On a professional level, I find it deplorable and outrageous that any legal (or indeed other) professional should be subject to threats and attempted intimidation for simply doing their job – my only "*crime*" has been to represent a client of my firm in this matter and to obtain an injunction aimed at preventing trespass, criminal damage and access to their private property.
27. The deep irony of being accused of crimes by anonymous individuals who have in the past celebrated criminal damage and disruption to lawfully operating businesses and educational institutions in this jurisdiction (and who continue to encourage others to commit such crimes while themselves hiding in the shadows) is not lost on me.
28. While robust political debate and peaceful protests are vital elements of democratic society, the individual targeting and harassment of legal professionals simply for

performing their lawful duties crosses a dangerous line and should not be allowed to happen. It undermines the rule of law and the principle of access to justice.

### **West Yorkshire Police**

29. I should just explain one additional point in relation to the CPR 31.17 disclosure Order obtained against West Yorkshire Police on 20 December 2024.

30. As the Court will be aware, West Yorkshire Police were neutral on that Application but I, on behalf of the Claimant, had engaged with the Police in house legal team to agree the terms of the Order to assist with the passage of the Application. West Yorkshire Police requested that the Order contain a clause by which they were able to redact information on the grounds of sub judice. That clause became clause 3.4 of the Order.

31. When making that request, West Yorkshire Police did not indicate that they considered that all information on the 2024 incidents at the Shipley Site (upon which the Claimant relies in these proceedings), save for the names and addresses of the arrestees, would fall within that category. In the event, West Yorkshire Police withheld all information, save for the names addresses of the First to Seventh Defendants (and latterly the Nineteenth and Twentieth Defendants) from inspection, and relied on clause 3.4 when doing so.

32. I explain the above as I am conscious that Mr Wargent has been able to present material obtained by way of the CPR 31.17 disclosure from Merseyside Police, but no additional material from the CPR 31.17 disclosure from West Yorkshire Police is being presented, and that might appear at first glance to be unusual.

### **D19 Mary Ensell**

33. Lastly, I should just update the court that after Mr Wargent's fourth witness statement was settled, a notice of acting was received from Robert Lizar solicitors in relation to D19 Mary Ensell. As with D20 Harry Wade, it is not at this time clear to me whether the solicitors are acting for D19 Mary Ensell in the injunction proceedings, contempt application or both, and they have not confirmed the same.

**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*

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Manan Singh

Dated this 27 day of May 2025